

NOTICE OF VIOLATION

Portland General Electric Company
Trojan Plant

Docket 50-344
License NPF-1

During an inspection conducted January 7-11, 1991, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1990), the violations are listed below:

A. 10 CFR 50.71, "Maintenance of records, making of reports," states in part:

(e) Each person licensed to operate a nuclear power reactor pursuant to the provisions of 50.21 or 50.22 of this part shall update periodically . . . the final safety analysis report (FSAR) originally submitted as part of the application for the operating license, to assure that the information included in the FSAR contains the latest material developed. This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the licensee or prepared by the licensee pursuant to Commission requirement since the submission of the original FSAR or, as appropriate, the last updated FSAR. The updated FSAR shall be revised to include the effects of: all changes made in the facility or procedures as described in the FSAR . . .

(4) Subsequent revisions shall be filed no less frequently than annually and shall reflect all changes up to a maximum of 6 months prior to the date of filing.

Contrary to the above requirement, on November 14, 1990, Portland General Electric Company submitted a periodic update to the FSAR which did not include the effects of all changes to the solid radioactive waste system components and procedures as described in the FSAR that were made prior to May 14, 1990.

This is a Severity Level IV violation (Supplement VII).

B. 10 CFR 20.203, "Caution signs, labels, signals and controls," states in part:

(f) Containers.

(1) Except as provided in paragraph (f)(3) of this section, each container of licensed material shall bear a durable, clearly visible label identifying the radioactive contents.

(3) Notwithstanding the provisions of paragraph (f)(1) of this section labeling is not required:

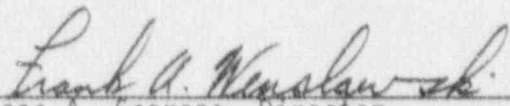
- (i) For containers that do not contain licensed materials in quantities greater than the applicable quantities listed in Appendix C of this part.

Contrary to the above requirement, from September 1987 to January 9, 1991, the licensee stored outside the protected area three dumpsters not labeled as containing radioactive material, each of which contained licensed material with quantities of Cesium-137 and Cesium-134 greater than those quantities of Cesium-137 and Cesium-134 listed in Appendix C of 10 CFR 20.

This is a Severity Level IV violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Portland General Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555, with a copy to the Regional Administrator, Region V, and a copy to the the NRC Resident Inspector, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Dated at Walnut Creek, California
this 7 day of February 1991



Frank A. Wenzlawski
Ross A. Scarano, Director
Division of Radiation Safety and
Safeguards