

Portland General Electric Company  
Trojan Nuclear Plant  
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WRR-036-91  
January 31, 1991

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington DC 20555

Gentlemen:

Trojan Technical Specification (TTS) 3.3.3.9, "Accident Monitoring Instrumentation", requires each Containment narrow range sump level channel to be operable in Modes 1, 2, and 3. An alternate method of monitoring, and a telephone notification within 24 hours with written confirmation by the next working day, are required if the Containment narrow range sump level channel is inoperable for more than 72 hours. Narrow range Level Channel LT-4208A1, for the south Containment sump, was determined to be inoperable at 1050 on January 15, 1991, due to erratic readings. The channel was declared inoperable, and the Action Statement for TTS 3.3.3.9 was entered.

Alternate monitoring of Containment sump level was implemented at 1055 on January 15, 1991 using a level channel which indicates sump level in approximately 8-inch increments (Level Channel LS-4179). This alternate method consists of six switch-actuated lights which provide indication at six discrete levels in the Containment sump and is being used per Plant procedure (Periodic Operating Test 24-5). The Containment wide range level channel for the south Containment sump overlaps the span for the narrow range Level Channel LT-4208A1. This provides additional alternative monitoring capability.

Troubleshooting did not identify a cause of the erratic readings but indicated that the erratic readings are most likely due to a transmitter problem. Further investigation would require a Containment entry and work in a high radiation area.

On January 17, 1991 at approximately 1500 hours, it was concluded that the Containment narrow range sump level channel could not be restored to operable status within the 72 hour time limit of TTS 3.3.3.9. In accordance with the Action Statement for TTS 3.3.3.9, telephone notification was provided to the NRC (made at 1035 hours on January 18, 1991) with written confirmation provided on January 18, 1991. The alternate method already in use for monitoring Containment sump level in accordance with TTS 3.3.3.9 was continued.

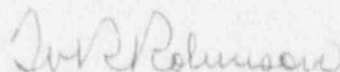
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Level Channel LT-4208A1 will be restored to service during the 1991 Refueling Outage (starts at the end of March). Due to past inoperability or out-of-calibration conditions found during surveillances, an evaluation will be performed by June 15, 1991 to determine if the design of the Containment sump level instrument channels should be modified. This evaluation will include a root cause analysis to identify the failure mechanism for the instrument channel. If the design evaluation indicates that a change is required, immediate action will be implemented to procure the necessary environmentally qualified Containment sump level instrument channel components and to install them in the next available outage of sufficient duration.

Sincerely,



W. R. Robinson  
General Manager  
Trojan Nuclear Plant

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith  
State of Oregon  
Department of Energy

Mr. R. C. Barr  
USNRC Resident Inspector  
Trojan Nuclear Plant