



Portland General Electric Company

James E. Cross Vice President, Nuclear

February 6, 1991  
Trojan Nuclear Plant  
Docket 50-344  
License NF-1

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

Dear Sirs:

Revised Response to Generic Letter 89-04,  
"Guidance on Developing Acceptable Inservice Testing Program"

Portland General Electric Company's (PGE's) letter dated October 3, 1989, "Response to Generic Letter 89-04, Guidance on Developing Acceptable Inservice Testing Program", committed to provide a supplemental response with resolution to Position 9 of the Generic Letter. PGE's letter dated November 17, 1989, "Revised Inservice Testing (IST) Program for Pumps and Valves Second Ten-Year Interval", Attachment 1 provided that supplemental response.

The supplemental response committed to provide instrumentation that would allow quarterly testing on the centrifugal charging pumps (CCPs) and the boric acid transfer pumps (BATPs) on instrumented minimum-flow lines by January 31, 1991. Request for Design Change (RDC) 90-003 was initiated to permanently install that instrumentation. The installation is currently planned for the 1992 Refueling Outage.

To meet the January 31, 1991 commitment, PGE purchased a portable ultrasonic flow instrument and procedures were revised that would allow the quarterly testing until the permanent instrumentation is installed. Vendor supplied specifications indicated that the instrument would meet the accuracy requirements of American Society of Mechanical Engineers (ASME) Section XI. However, calibration of the ultrasonic flow instrument by an independent lab revealed that the instrument would not meet the accuracy stated by the vendor for testing the CCP minimum-flow lines. This information was provided to PGE on January 25, 1991.

In addition, the instrument range of the ultrasonic flow instrument does not meet the 1983 ASME Section XI code requirements. However, digital (ultrasonic) instrumentation is addressed in later editions of the ASME Section XI code. This affects minimum-flow testing of both the CCPs and the BATPs.

Procedures are in place to record the flow data for the CCPs and BATPs minimum-flow lines using the ultrasonic flow instrument. This data will be for information only and to monitor for changes in system performance.

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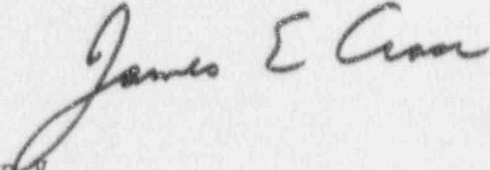
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Due to the inability of the portable ultrasonic flow instrument to meet range and accuracy requirements for the CCPs, Roby Bevan, the Nuclear Regulatory Commission (NRC) Project Manager for Trojan, was informed on January 30, 1991 of the issues related to using the ultrasonic flow instrument and the problem with meeting the January 31, 1991 implementation date.

A conference call with the NRC will be scheduled during February, 1991 to discuss possible interim solutions until the permanent flow instruments are installed. An interim resolution for the quarterly testing may include ASME Section XI code relief requests. PGE will respond to the NRC by February 28, 1991 with our proposed corrective action.

Sincerely,



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  
NRC Resident Inspector  
Trojan Nuclear Plant