



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

JAN 29 1991

Docket No. 50-344

Portland General Electric Company
121 S. W. Salmon Street
Portland, Oregon 97204

Attention: Mr. James E. Cross
Vice President, Nuclear

Gentlemen:

Subject: NRC INSPECTION OF TROJAN NUCLEAR POWER PLANT

This refers to the special inspection conducted by K. Johnston, M. Miller, and B. Olson of this office on November 26-30, 1990, of activities authorized by NRC License No. NPF-1. The inspectors also examined additional information, supplied by your staff, through January 8, 1991. Our findings were discussed with members of your staff on November 30, 1990, and by telephone conference call on January 8, 1991.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by inspectors.

The team inspection was conducted to examine the scope and effectiveness of corrective actions taken by your staff in response to the October 1988, Maintenance Team Inspection (Inspection Report 50-344/88-30) and to arrive at an assessment of the status of Trojan's maintenance program in those areas previously characterized as weak.

In summary, the team found that you had made significant efforts to improve the maintenance program and that many of these efforts had yielded positive results. Notable efforts included the maintenance excellence program, the implementation of the work control center, and the development of a stronger quality assurance organization.

Despite these efforts, the team identified weaknesses in some significant areas, including areas which had previously been identified as weak in the 1988 Maintenance Team Inspection. The weaknesses are characterized as follows:

Implementation of the Plant Design Basis Requirements Through the Maintenance Process: The team found several examples where you had failed to establish adequate controls to assure that work maintained the design basis. The examples included:

1. Some design quality classification lists were not available to job planners, and those lists that were available had apparent inconsistencies and inaccuracies.

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2. Numerous issues related to the maintenance of heat tracing and heating systems had been identified by the NRC and your staff; however, comprehensive action had not been taken to resolve the overall concern.
3. Although instrumentation calibration data sheets, which implement design requirements, had not been adequately controlled until October 1990, corrective actions to address their control did not include the need to establish their accuracy.

With respect to each of these problem areas, it was noted that a less than adequate involvement of plant and design engineering in the maintenance process appeared to be a significant contributor to the incomplete problem resolution.

Adequacy and Implementation of Procedures: The team had several concerns with the adequacy and implementation of maintenance procedures and instructions. These concerns resulted in a more severe rating of the maintenance procedures category than was determined during the 1988 Maintenance Team Inspection.

1. It was apparent that no guidance had been provided to maintenance planners and craft as to the minimum level of detail required for procedures and instructions for safety related work.
2. As a result of the above, in some instances, procedures and instructions were not explicit. As a result, craftsmen developed, without formal review, the steps necessary to complete work.
3. The Plant Manager's policy to limit solid waste generation by limiting the amount of materials brought into the radiation controls area was misinterpreted to include "unnecessary" portions of maintenance work packages; for example, work packages were excluded from entry.
4. The team observed one example where a procedure was not followed and other instances where ambiguous procedures were extensively interpreted by the workmen, indicating a need for continuing management attention to procedural compliance.

Work Prioritization: The team found that there had been little change in the implementation of establishing priorities for corrective maintenance activities and work associated with Non-Conformance Reports, even though this was an area rated as "poor" in the 1988 Maintenance Team Inspection.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Sincerely,


Dennis F. Kirsch, Chief
Reactor Safety Branch

Enclosure:

1. Inspection Report No. 50-344/90-34

cc w/enclosure:

Scott Bauer, Branch Manager
W. Robinson, Plant General Manager
T. D. Walt, General Manager
L. A. Girard, Vice President and General Counsel
D. Stewart-Smith, ODOE

bcc w/enclosure:

Project Inspector
Resident Inspector
docket file
G. Cook
B. Faulkenberry
J. Martin
W. Russell, NRR
T. Foley, NRR

bcc w/o enclosure:

J. Zollicoffer
M. Smith
N. Western

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MMiller *MM*
1/25/91

Bolson *BS*
1/28/91

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KJohnston
1/25/91

PMorrill
1/28/91

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RHuey
1/29/91

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YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

DKirsch *K*
1/29/91

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YES / NO

SEND TO PDR
YES / NO