

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY
THE CITY OF EUGENE, OREGON
PACIFIC POWER & LIGHT COMPANY

(Trojan Nuclear Plant)

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Docket No. 50-344

ORDER CONFIRMING LICENSEE COMMITMENTS
ON POST-TMI RELATED ISSUES

I.

Portland General Electric Company, et al. (the licensee or PGE) is the holder of Facility Operating License No. NPF-1 which authorizes the operation of the Trojan Nuclear Plant (the facility) at steady-state power levels not in excess of 3411 megawatts thermal. The facility is a pressurized water reactor (PWR) located at the licensee's site in Columbia County, Oregon.

II.

Following the accident at Three Mile Island No. 2 (TMI-2) on March 28, 1979, the Nuclear Regulatory Commission (NRC) staff developed a number of proposed requirements to be implemented on operating reactors and on plants under construction. These requirements include Operational Safety, Siting and Design, and Emergency Preparedness and are intended to provide substantial

additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion,
- (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and
- (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

The licensee responded to the Generic Letters cited above by letters dated April 28, June 11, August 3 and 16, September 10 and 28, October 27, and December 17, 1982. In these submittals, the licensee confirmed that most of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

Generic Letters 82-05 and 82-10 applied to thirteen and ten items, respectively. Of the ten items listed in Generic Letter 82-10 requiring a response, six items are not included in this Order. Item I.A.1.3.2 is part of a separate rulemaking; Items I.C.1 and III.A.1.2 (2 items), and III.A.2.2 will be handled separately following Commission actions that would proceed as a result of its consideration of Commission Paper SECY 82-111, as amended; for Items II.K.3.30 and II.K.3.31 (one item), the staff review of generic models under II.K.3.30 has not been completed, and II.K.3.31 is not required until one year after staff approval of the generic models.

Eleven of the seventeen items addressed in this Order are considered by the licensee to be complete or to require no modifications. The NRC staff's evaluation of the licensee's delays for the remaining six items is provided below.

II.B.2 Plant Shielding

As reported by the licensee in its letter of April 28, 1982, all hardware modifications necessary to complete this item were completed before January 1, 1982. However, the emergency procedures are being

rewritten in response to Item I.C.1 of NUREG-0737. The licensee is in the process of reviewing the changes made to the emergency procedures to determine their impact, if any, on the assumptions of the shielding analyses. This review will determine if any procedure revisions are necessary to be consistent with the shielding analyses. Any modifications to procedures will be completed by April 16, 1983, at which time Item II.B.2 will be complete in all respects.

II.B.3 Post-Accident Sampling

This item will be delayed by the licensee and will be completed by July 1, 1983. The delay is due to late delivery of equipment from the vendor.

In order to expedite design and manufacturing of the sampling system, the licensee has provided engineering assistance at the vendor's facility to help resolve detailed design. The licensee also states that it took over design and fabrication responsibilities for certain portions of equipment in order to expedite completion of the major components by the vendor. In addition, PGE has requested assistance from Bechtel Power Corporation to expedite completion of the engineering by the vendor.

In the interim, PGE will maintain implementation of the post-accident sampling procedure outlined in Item 2.1.8.a of PGE letter of April 15, 1980. This interim action was approved in the NRC Safety Evaluation of the licensee's TMI Short-term Lessons Learned actions on April 23, 1980.

II.F.1(1) Install Noble Gas Effluent Monitors and II.F.1(2) Provide Effluent Monitoring of Iodine

The licensee has been experiencing startup problems with the main steamline radiation monitors. Two monitors with failed power supplies have been repaired by the equipment vendors and have been successfully calibrated onsite. However, the power supplies for the remaining two monitors have recently failed and will also be sent back to the vendor for repair. In light of these problems, PGE believes it prudent to allow a period of time for observation and testing of these monitors to ascertain their reliability before declaring them operational. As a result, the scheduled operational date for these monitors has been changed to July 1, 1983.

The remaining noble gas monitors under II.F.1.(1) and the iodine and particulate monitors under II.F.1(2) are being manufactured by a different equipment vendor. The delivery date for this equipment has been subject to numerous delays. The August 1982 delivery date was not met by the equipment vendor. The latest forecast for delivery is the first part of 1983. The licensee has little confidence that this date will be met, based on the number of missed commitments in the past by this vendor and based on the fact that part of the equipment is still in the design phase.

The licensee states that it will continue efforts to expedite delivery, but unless dramatic improvements are evident soon, it will be forced to cancel the contract.

The licensee points out that a significant portion of the system is uniquely designed for Trojan, with portions of the noble gas monitoring system required by II.F.1(1) being combined with part of the iodine and particulate monitoring system required by II.F.1(2). These unique design considerations have precluded the use of generic systems such as those used at many other plants. This has had an impact on the schedule for Trojan and could have a future impact on the completion date if the contract is cancelled or if problems are discovered during startup testing. As a result, the licensee advises that the schedule is being changed to six months after successful receipt inspection of the equipment at Trojan, but not later than December 31, 1983.

In the interim, the licensee states it will maintain implementation of the grab sample procedures described in PGE's letter of January 2, 1980, and accepted in NRC's Safety Evaluation of April 23, 1980, as meeting the TMI Lessons Learned Category "A" requirements.

II.D.1.2 Relief and Safety Valve Test Program

The licensee now plans to address the analysis of relief and safety valve qualification and qualification of downstream piping in one report. The licensee states that due to the interaction of the valves and piping, their qualification cannot be addressed separately. PGE is currently working with its consultants to complete the analysis, but has revised the date for submittal of the valve and piping qualification reports to the startup of Cycle 6 (approximately July 1983).

III.D.3.4 Control Room Habitability

The NRC Safety Evaluation of February 17, 1982 found this item acceptable for Trojan, subject to installation of sulfur dioxide and ammonia detectors in the Control Room Ventilation System on or before January 1, 1983. The licensee states, in its December 17, 1982 letter that some additional time is needed for system startup testing and to develop emergency procedures for dealing with sulfur dioxide and ammonia releases.

We find, based on the above evaluation, that 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the several delays; and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and should, therefore, be confirmed by Order.

IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described as complete in the attachments to this Order. Incomplete items shall be completed by no later than the dates shown in the attachments (as described in the licensee's submittals noted in Section III herein) and maintained thereafter.

V.

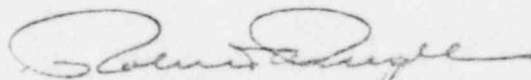
The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order.

This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Purple, Deputy Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland
this 14th day of March,
1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

TROJAN NUCLEAR PLANT

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Attachment 1

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions	4/16/83
II.B.3	Post-Accident Sampling	1/1/82	Install upgrade post-accident sampling capability	7/1/83
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program	Complete
II.E.1.2	Aux. Feedwater Initiation & Flow Indication	7/1/81	Modify instrumentation to level of safety grade	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5-lower containment pressure setpoint to level compatible w/normal operation	Complete
		7/1/81	Part 7-isolate purge & vent valves on radiation signal	Complete
II.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors	Main steamline monitors: 7/1/83. Balance: 12/31/83.
		1/1/82	(2) Provide capability for effluent monitoring of iodine	12/31/83
		1/1/82	(3) Install in-containment radiation-level monitors	Complete

TROJAN NUCLEAR PLANT (continued)

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Attachment 1

1/1/82	(4)Provide continuous indication of containment pressure	Complete
1/1/82	(5)Provide continuous indication of containment water level	Complete
1/1/82	(6)Provide continuous indication of hydrogen concentration in containment	Complete

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Generic Ltr. No. 82-12, dtd. June 15, 1982	Complete
I.A.1.3.2	**Minimum Shift Crew	To be superseded by Proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units.	To be addressed when Final Rule is issued.
I.C.1	**Revised Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
II.D.1.2	RV and SV Test Programs	7/1/82	Submit plant-specific report on relief and safety valve program	Cycle 6 Startup (approx. 7/83)
II.D.1.3	Block Valve Test Program	7/1/82	Submit report of results of test program	Complete
II.K.3.30&31	**SBLOCA Analysis	1 yr. after staff approval of model.	Submit plant specific analyses	To be determined following staff approval of model
III.A.1.2	**Staffing Levels for Emergency Situations	Superseded by SECY 82-111	Reference Secy 82-111, Requirements for Emergency Response Capability	To be Determined
III.A.1.2	**Upgrade Emergency Support Facilities	" " "	" " "	" "
III.A.2.2	**Meteorological Data	" " "	" " "	" "
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study.	3/31/83

**Not Part of Confirmatory Order