



Portland General Electric Company

Bart D. Withers Vice President

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REGION V

March 31, 1983

Trojan Nuclear Plant  
License NPF-1  
Docket 50-344

Mr. R. H. Engelken, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region V  
1450 Maria Lane, Suite 210  
Walnut Creek CA 94596

Dear Mr. Engelken:

TROJAN NUCLEAR PLANT  
NRC Inspection

Your letter of March 3, 1983 forwarded NRC Inspection Report 83-05 and a Notice of Violation. The Notice of Violation concerned Technical Specification 6.2.5.8.b, "Audits". In accordance with 10 CFR 2.201, our response to that Notice of Violation is attached.

Sincerely,

Bart D. Withers  
Vice President  
Nuclear

Attachment

c: Mr. Lynn Frank, Director  
State of Oregon  
Department of Energy

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VIOLATION

Technical Specification, Section 6.0, "Administrative Controls", Paragraph 6.2.5.8.b., "Audits", states in part:

"Audits of facility activities shall be performed under the cognizance of the NOB. These audits shall encompass . . . (b) the performance, training and qualifications of the entire facility staff at least once per 12 months.

Contrary to this requirement, audits of the Radiological Protection Group, Chemistry Group, and Radioactive Waste Management Group for the years 1981 and 1982 did not include a verification of the performance and qualifications of the facility staff assigned in the groups that were audited."

This is a Severity Level IV violation (Supplement 1).

Response

It has been determined from a review of past Nuclear Projects Quality Assurance audits that the areas of qualifications, training, and performance have been verified on a selected basis. Specific audit checklist questions were written for the Chemistry Department audit performed April 20-23, 1982 to evaluate new employee training, performance, and qualification records within the Chemistry Group. Performance and training verification audit checklist questions were included in other Chemistry and Radiation Protection audits performed in August 1981 and September 1982. Since training, performance, and qualification areas were only audited on a spot check basis, efforts have been made to ensure additional coverage. The following corrective actions have been taken:

1. A surveillance was performed on March 15-16, 1983 by the Nuclear Projects Quality Assurance Department to evaluate the training, performance, and qualifications of all new employees hired into the Plant Chemistry, Waste Management, and Radiation Protection groups since March 1980. A subsequent Chemistry Department audit performed March 21-25, 1983 completed the task for that group. The records were reviewed against requirements of ANSI N18.1-1971. All of the employee records checked met the ANSI requirements.
2. The 1983 onsite audit schedule has been revised listing training, qualifications and performance under each appropriate activity item as a reminder to the auditors of Technical Specification 6.5.2.8.b requirements.
3. The importance of understanding the exact details of the Technical Specification requirements has again been called to the attention of all Nuclear Projects Quality Assurance Department Engineers.

In addition, the Quality Assurance Engineering Branch Manager-Operations has been directed to review checklist questions prepared by audit team leaders to ensure audit coverage of the Technical Specification, Paragraph 6.5.2.8.b.