



Portland General Electric Company

Bart D. Withers Vice President

March 25, 1983

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Dear Sir:

Environmental Qualification Exemption Request

The purpose of this letter is to request an exemption from certain environmental qualification requirements of 10 CFR 50.49. It is requested that an extension be granted, from the deadline specified in Paragraph (g), to a date no later than November 30, 1985 for the scope of equipment covered in Paragraph (b)(3) of 10 CFR 50.49.

The Final Rule on environmental qualification of electric equipment was promulgated as 10 CFR 50.49 and became effective on February 22, 1983. Paragraph (g) of the Final Rule requires licensees to "... establish a goal of final environmental qualification of the electric equipment within the scope of this section by the end of the second refueling outage after March 31, 1982 or by March 31, 1985, whichever is earlier". This paragraph also specifies that "[T]he Director of the Office of Nuclear Reactor Regulation may grant requests for extensions of this deadline to a date no later than November 30, 1985 for specific pieces of equipment if these requests are filed on a timely basis and demonstrate good cause for the extension, such as procurement lead time, test complications, and installment problems".

For the Trojan Nuclear Plant, the goal for final environmental qualification would be July 1983, based on an April 19 commencement of the 1982 refueling outage and the current projected date for completion of the 1983 refueling outage. We anticipate this goal will be met for all equipment except possibly for that covered by Paragraph (b)(3) as "certain post-accident monitoring equipment". While the supplementary section to the rule specifies post-accident monitoring equipment to be Category 1 and 2 equipment in Revision 2 of Regulatory Guide 1.97, Paragraph (b)(3) does not specifically require compliance with Regulatory Guide 1.97. In any case, PGE's detailed review of conformance with this Regulatory Guide was only recently initiated in response to Supplement 1 to NUREG-0737. This review is not expected to be completed until the first quarter of 1984. It cannot be determined until then what criteria in the Guide are applicable to the Trojan Plant design and to what extent equipment modifications may be necessary to conform with applicable criteria, including environmental qualification. Procurement lead times, as well as potential unforeseen test complications and installation problems, will

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Director of Nuclear Reactor Regulation

March 25, 1983

Page 2

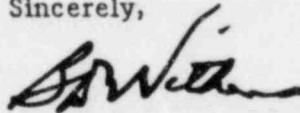
extend this schedule considerably. For these reasons, sufficient cause exists to warrant granting the maximum extension allowed by Paragraph (g). Moreover, implementation of Regulatory Guide 1.97 must be coordinated and integrated with other emergency response capability requirements in accordance with Supplement 1 to NUREG-0737. Maximum schedule flexibility is therefore imperative to effectively integrate these other regulatory initiatives.

Paragraph (g) of the Final Rule also requires licensees, by May 20, 1983, to "... identify the electric equipment important to safety within the scope of this section already qualified and submit a schedule for either the qualification to the provisions of this section or for the replacement of the remaining electric equipment important to safety within the scope of this section". PGE intends to comply with this provision of Paragraph (g). Because our plans and schedules for phased implementation and integration of all emergency response activities will be submitted by April 15 in response to Supplement 1 to NUREG-0737, the schedule for qualification or replacement provided with the May 20th submittal will establish a more definitive basis for the extension requested by this letter. However, it is not anticipated that the goal for final environmental qualification of equipment defined in Paragraph (b)(3) can be established any sooner than the maximum permitted deadline of November 30, 1985.

As a final note, further requests for schedule extensions from the provisions of 10 CFR 50.49(g) may be necessary for other equipment as a result of NRC staff review of PGE's current environmental qualification efforts. It is not possible at this time to predict when the NRC staff, in conjunction with Franklin Research Center, will conclude their current review, or to what extent their conclusions regarding qualification will differ from PGE's conclusions. In light of Paragraph (h) of 10 CFR 50.49, we will consider any such difference as a "significant equipment qualification problem that may require an extension of the completion date provided in accordance with Paragraph (g)", and will request a schedule extension accordingly.

A timely response to this exemption request is necessary in order to effectively carry out completion of our qualification efforts, and integration with emergency response capability requirements.

Sincerely,



Bart D. Withers
Vice President
Nuclear

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