



RSB

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

1450 MARIA LANE, SUITE 210
WALNUT CREEK, CALIFORNIA 94596

AUG 31 1983

Docket No. 50-344

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

Attention: Mr. Bart D. Withers
Vice President, Nuclear

Gentlemen:

Subject: NRC Inspection of Trojan Nuclear Plant

This refers to the special inspection conducted by Messrs. K. Scown, M. Malmros, J. Stang, T. Chan, and L. Whitney of the NRC and E. MacDougall and H. Thomas of Brookhaven National Laboratory representing the NRC, on June 20-24, 1983, of activities authorized by NRC License No. NPF-1, and to the discussion of our findings held by Mr. M. Malmros with Mr. D. Broehl and other members of your staff at the conclusion of the inspection. This also refers to discussions held between your staff and Mr. J. Crews and Mr. A. Johnson of the NRC on July 26-28, 1983.

The inspection was an examination of Sections III.G, J, O and L of Appendix R to 10 CFR 50. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

In November 1980, the NRC published a final rule on fire protection programs as 10 CFR 50.48 and Appendix R to 10 CFR 50. This rule became effective on February 17, 1981. By letter dated February 20, 1981 (Generic Letter 81-12), the Director of Licensing, Office of Nuclear Reactor Regulation informed you that the new rule required the Trojan plant to meet the requirements of Sections III.G., III.J and III.O of Appendix R to 10 CFR 50 regardless of any previous approvals by the NRC for alternate design features for those items. Additionally, the letter stated that, "This would require each licensee to reassess all those areas of the plant... 'where cables or equipment, including associated circuits, that could prevent operation or cause maloperation due to hot shorts, open circuits or shorts to ground or (sic) redundant trains of systems necessary to achieve and maintain hot shutdown conditions are located within the same fire area outside of primary containment...' to determine whether the requirements of III.G.2 of Appendix R are satisfied."

AUG 31 1983

The attached report indicates that you have not complied with the above stated requirements in several areas. In order to assess the causes for your failure to comply with these requirements, Messrs. Crews and Johnson of this office conducted a special assessment of your engineering reassessment for compliance with Appendix R requirements, its documentation and the associated supervisory reviews. They found: (1) lead responsibility for assuring compliance with the NRC requirements was not clearly defined within your organization; (2) your reassessment was not substantive in addressing the applicable requirements of Appendix R and was in part based on informal discussions with your consultant who orally assured you that plant conditions satisfied the NRC requirements with certain exceptions that were already under review by the NRC; (3) documentation of the engineering reassessment and reviews to support written communications sent to the NRC subsequent to the new rule was essentially nonexistent; and (4) supervisory reviews were administrative in nature and did not provide a check of the technical adequacy and accuracy of the reassessment results or its documentation. These findings give us cause for concern as to how engineering work is being done, documented and checked at PGE. We urge that you evaluate this concern and assess where other engineering reviews have been handled similarly and inform us of the results of your review.

In view of the seriousness of the foregoing, appropriate enforcement action for the violations of regulatory requirements is under consideration and will be the subject of separate correspondence.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

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

Sincerely,
Original Signed by
John B. Martin

John B. Martin
Regional Administrator

Enclosure:
Inspection Report
No. 50-344/83-18

cc w/o enclosure B
C. P. Yundt, PGE
J. W. Durham, Esq., PGE

bcc: RSB/Document Control Desk (RIDS)
JBM, State of Oregon, Resident Inspector

RV K
K. Scown:dh
8/31/83

K
R. Dodds
8/31/83

A
A. Johnson
8/31/83

J. Crews
8/31/83

B
J. Martin
/31/83