UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 194 TO FACILITY OPERATING LICENSE NO. NPF-1

PORTLAND GENERAL ELECTRIC COMPANY

THE CITY OF EUGENE, OREGON

TROJAN NUCLEAR PLANT

DOCKET NO. 50-344

1.0 INTRODUCTION

By letter dated July 31, 1993, as supplemented by letters dated March 8, 1994 and February 8, 1995, Portland General Electric Company (PGE or the licensee) submitted a request for changes to the Facility Operating License NFP-1 for the Trojan Nuclear Plant (Trojan). The March 8, 1994 letter updated the July 31, 1993 letter by deleting references to sections that had been relocated out of the Technical Specifications by amendments granted since June 1993. It also provided supplemental information concerning the deletion and/or relocation of certain existing Trojan Technical Specifications requested by the NRC staff. It also clarified the long-term organization at the site. Due to the numerous changes included in the additional information, the NRC staff chose to issue a second no significant consideration determination. The licensee provided the February 8, 1995 letter at the request of the NRC to provide a comparison of the proposed Trojan Permanently Defueled Technical Specifications versus the recommendations for technical specifications improvements contained in the Dresden Unit 1 Lessons Learned Evaluation Team report, issued by the NRC on October 21, 1994. The February 8, 1995 letter did not change the proposed no significant hazards consideration determination. The changes requested by the licensee would replace the Appendix A Technical Specifications for Trojan in its entirety with a new set of specifications called the Appendix A Permanently Defueled Technical Specifications (PDTS).

2.0 BACKGROUND

Trojan received an Operating License on November 21, 1975. On January 4, 1993, the Directors of PGE voted to accept the recommendation by the PGE management to permanently cease power operations at Trojan. The facility had been shut down since November 9, 1992, when a leak in the "B" steam generator was detected. PGE completed defueling of the reactor on January 27, 1993. On March 24, 1993, the NRC staff issued a Confirmatory Order to confirm a PGE commitment not to place fuel back into the reactor building without written approval by the NRC. On May 5, 1993, the staff issued a license amendment that modified Facility Operating License No. NPF-1 to a possession only license. The possession only license allows the licensee to possess and maintain but not operate the facility. Trojan is permanently defueled and cannot be operated or have fuel placed in the reactor under the terms of its license.

On November 17, 1994, the licensee obtained approval from the Oregon Department of Energy to begin the proposed large component removal (LCR) program. NRC approval was not needed. The licensee is currently pursuing the LCR program and expects to complete the removal and shipping of the four steam generators and pressurizer by the end of calendar year 1995. On January 25, 1995, the licensee submitted the Trojan Decommissioning plan for NRC review. The licensee is planning to begin reactor vessel internal removal once the State of Oregon and NRC approval of the Decommissioning Plan is obtained. The licensee is planning to use the DECON decommissioning alternative (in which the equipment, structures, and portions of the facility containing radioactive contaminants are removed or decontaminated to a level that permits the property to be released for unrestricted use) beginning in 1998 with completion by 2002. Trojan spent fuel, currently in the spent fuel pool, will be transferred to an onsite dry storage facility planned for completion in 1998.

In early spring 1994, Dresden Unit 1 experienced a service water leak into the containment with the potential for freezing and failure of the fuel transfer tube integrity. This event sequence could have led to a subsequent partial draining of the Dresden Unit 1 spent fuel pool. The NRC formed a Special Inspection Team to evaluate the generic implications of this event at other shutdown facilities. The results of the special inspections were documented in inspection reports for each facility inspected. Additionally, the NRC prepared a report entitled "Dresden 1 Lessons Learned Evaluation Report" dated October 21, 1994. The report made a number of recommendations pertaining to technical specifications for permanently shutdown facilities. The licensee has reviewed the October 21, 1994 document and has responded in a letter dated February 8, 1995, to the recommendations on permanently defueled technical specifications with respect to the Trojan PDTS. The licensee stated in the February 8, 1995 letter that the Trojan PDTS are consistent with the recommendations made in the October 21, 1994 "Dresden Lessons Learned Evaluation Report."

3. DISCUSSION AND EVALUATION

PGE, in its license amendment request of July 31, 1993, as supplemented by letters dated March 8, 1994 and February 8, 1995, has proposed extensive modifications to the current technical specifications. The current technical specifications are appropriate for an operating facility. The licensee proposes in the PDTS to delete many of the requirements contained in the current technical specifications since they are no longer applicable to the facility in its current configuration. Other requirements have been modified. Additionally, the licensee has developed the PDTS for Trojan using the improved standard technical specifications, NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," as the basis for the PDTS scope and format. The improved standard technical specifications were developed to meet the goals and criteria set forth in the interim Commission Policy Statement for Nuclear Power Reactors, dated February 6, 1987.

The NRC issued its Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (58 FR 39132) on July 22, 1993. The

Final Policy Statement established four criteria to define the scope of equipment and parameters included in the improved technical specifications. These criteria were developed for operating reactors and focused on instrumentation to detect degradation of the reactor coolant system pressure boundary and on equipment or process variables that affect the integrity of fission product barriers during design bases accidents or transients. The licensee modified the four criteria consistent with the permanently defueled condition of the Trojan facility. The modified criteria are discussed below.

Criterion 1 of the Final Policy Statement states that the technical specifications should include installed instrumentation used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. Since the maintenance of the reactor coolant pressure boundary is no longer required in a nonoperating permanently defueled facility this criterion is no longer applicable to the Trojan facility. The licensee modified the criterion to apply to instrumentation used to detect, and indicate in the control room, a significant abnormal degradation in the integrity of the spent fuel pool.

Criterion 2 of the Final Policy Statement states that the technical specifications should include process variables, design features, or operating restrictions, that are an initial condition of a design basis accident (DBA) or transient analysis that either assume the failure of or present a challenge to the integrity of a fission product barrier. This criterion remains applicable to a permanently defueled facility with the exception of the reference to transient analyses. This phrase was deleted in the criterion used to develop the PDTS. The scope of the DBAs applicable to a permanently defueled facility is also markedly reduced from those postulated for an operating plant. Section 15 of the SAR describes the DBA scenarios that were applicable to the Trojan Nuclear Plant during power operations. However, with the permanent shutdown of Trojan, and the conversion of the operating license to a possession only license, most of the accident scenarios postulated in the SAR are no longer possible. The remaining SAR Section 15 DBA scenarios that PGE still consider applicable to Trojan in nonoperating and permanently defueled condition are SAR subsection 15.7.3, "Postulated Radioactive Release Due to Liquid Tank Failure," SAR Subsection 15.7.4, "Design Basis Fuel Handling Accident," SAR Subsection 15.7.5, "Spent Fuel Cask Drop Accident."

Criterion 3 of the Final Policy Statement states that the technical specifications should include structures, systems, or components that are the primary success path and which function or actuate to mitigate a Design Basis Accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This criterion also remains applicable to a permanently defueled facility with the exception of the reference to transients. The reference to transients was deleted from the criterion used to develop the PDTS. Also the qualifying phrase "...that is part of the primary success path and which functions or actuates to mitigate a

Design Basis Accident..." was deleted in favor of a more general statement that includes structures, systems, or components that function to prevent or mitigate the specified DBAs. The DBAs considered are described in the above discussion of Criterion 2.

Criterion 4 of the Final Policy Statement states that the technical specifications should include structures, systems, or components which operating experience or probabilistic safety assessment has shown to be significant to public health or safety. This criterion also remains applicable to a permanently defueled facility.

The modified criteria developed by the licensee and used to evaluate each of the current Trojan Appendix A Technical Specifications as to whether or not the specification should be included or modified for the PDTS, are as follows:

1. Installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the spent fuel pool integrity.

2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident (DBA) that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

3. A structure, system, or component that functions to prevent or mitigate a design basis accident that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

4. A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Due to the extensive revisions to both the format and content of the current technical specifications, the licensee determined that a complete reissue of the Appendix A Technical Specifications was required. The staff has reviewed the proposed changes and has determined that they are acceptable for the non-operating, defueled condition of the facility.

The following is a section-by-section discussion of the proposed changes to the Trojan Appendix A Technical Specifications. Each section of the existing technical specifications is listed by section number and title and the proposed changes described.

1.0 Introduction

This section of the Trojan Appendix A Technical Specifications contains the specific definitions of terms and words used throughout the rest of the Trojan Technical Specifications. The licensee proposes to delete certain definitions related to power operation and tables related to power operation (Table 1.1, Operational Modes) and frequency notation (Table 1.2, Frequency Notation). The licensee proposes to add a new definition related to the permanently shutdown status of Trojan. Additionally, the licensee has proposed to change

the format of Section 1 consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants."

The licensee proposes to delete the following definitions from the current Trojan Technical Specifications Section 1, Definitions: Thermal Power, Rated Thermal Power, Operational Mode or Mode, Operable - Operability, Reportable Event, Containment Integrity, Channel Calibration, Channel Check, Channel Functional Test, Core Alteration, Shutdown Margin, Identified Leakage, Unidentified Leakage, Pressure Boundary Leakage, Controlled Leakage, Quadrant Power Tilt Ratio, Dose Equivalent I-131, Staggered Test Basis, Frequency Notation, Reactor Trip System Response Time, Engineered Safety Feature Response Time, Axial Flux Difference, Physics Tests, E- Average Disintegration Energy, Source Check, Solidification, Offsite Dose Calculation Manual, Gaseous Radwaste Treatment System, Ventilation Exhaust Treatment System, Purge-Purging, Liquid Radwaste Treatment System, Core Operating Limits Report, and Member(s) of the Public. The licensee proposes to delete these definitions since the defined words pertain to activities associated with an operating facility and are no longer used in the proposed PDTS.

The definition of "Action" has been retained in Section 1.1 of the PDTS although the definition has been changed consistent with the revised definition in the improved standard technical specifications. A new definition "Certified Fuel Handler" has been added since License Amendment No. 191, issued May 6, 1993, deleted the requirement for licensed operators at the facility replacing them with certified fuel handlers. The inclusion of a definition for certified fuel handlers updates Section 1.1 of the current technical specifications consistent with License Amendment No. 191. The licensee has proposed to delete two terms contained in the current technical specifications, "Process Control Program" and "Offsite Dose Calculation Manual." The PDTS defines these terms in Sections 5.7.2.2 and 5.7.2.3, respectively. The licensee has also proposed to delete the definitions for "site boundary" and "unrestricted area." Both of these terms pertain to, and are defined in, the Offsite Dose Calculation Manual. Eliminating these four definitions from Section 1 reduces the redundancy in the PDTS.

Section 1 of the proposed PDTS also includes expanded information and examples related to the use of logical connectors (Section 1.2), the interpretation of completion times (Section 1.3), and the interpretation of surveillance frequencies (Section 1.4). This expanded information is consistent with the improved standard technical specifications, and has been simplified consistent with the reduced scope and complexity of the proposed PDTS. The staff finds this change to Section 1 acceptable.

2.0 Safety Limits and Limiting Safety System Settings

Section 2.0 of the current technical specifications contains "safety limits" and "limiting system settings." The licensee proposes eliminating all safety limits and limiting safety system settings for Trojan. In accordance with 10 CFR 50.36(c)(1), safety limits are limits on parameters necessary to protect the physical barriers that guard against the uncontrolled release of radioactivity from a nuclear reactor. The current technical specifications

contain two safety limits. Subsection 2.1.1 and Figure 2.1.1 sets limitations on the combination of reactor thermal power, reactor coolant system pressure, and reactor coolant temperature. These limits prevent damage to the fuel cladding during reactor operation that could result in the release of fission products to the reactor coolant system. Subsection 2.1.2 places a limitation on the pressure in the reactor coolant system. This limitation prevents potential damage to the reactor coolant system pressure boundary that could result in the release of fission products in the reactor coolant system to the containment atmosphere.

The limiting safety system settings are contained in Subsection 2.2.1. This specification establishes limits on the setpoints of the reactor protection system. The reactor protection system monitors various parameters associated with reactor operation and initiates a shutdown of the reactor if the settings are exceeded during normal operation or an anticipated operational occurrence. Examples of the parameters included within the scope of the reactor protection system include reactor trips based on neutron flux, reactor coolant system temperature, pressurizer pressure, pressurizer water level, reactor coolant system flow rate, steam generator level, steam and feedwater flow, reactor coolant pump undervoltage or underfrequency, and various turbine trips.

The Trojan facility is permanently shut down and the fuel has been removed from the reactor vessel and placed in the spent fuel storage pool. The facility operating license has been modified to a possession only license that prohibits operation. Since Trojan will no longer operate, Technical Specification 2.1.1, including Figure 2.1.1 and Technical Specification 2.1.2, which specifies safety limits, are no longer applicable and are deleted. Since the facility will no longer operate, the reactor protection system is no longer necessary; therefore Technical Specification 2.2.1, which provides limiting safety system setpoints, is no longer needed and is deleted. The staff finds this change acceptable.

3.0/4.0 Limiting Conditions for Operation and Surveillance Requirements

In accordance with 10 CFR 50.36(c)(2), limiting conditions for operation (LCOs) specify the lowest functional capability or performance levels of equipment required for safe operation of the facility. The LCOs typically place restrictions on the availability of safety equipment needed to prevent or mitigate a postulated design basis accident or on process variables necessary to preserve the initial conditions assumed in analyses of postulated design basis events. The associated surveillance requirements help to ensure that the specified equipment and parameters are maintained within the limits specified in the LCOs.

As stated above only a limited set of postulated design basis accidents remains applicable to the Trojan facility in its permanently defueled state. As a result, most of the LCOs and accompanying surveillance requirements contained in the current technical specifications were determined to be inappropriate for retention in the proposed PDTS.

Section 3/4.0, Applicability, has been modified to adopt the definitions of "applicability" for "limiting conditions for operation" and "surveillance requirement" contained in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Additionally, several subsections have been deleted. Subsections 3.0.3, Exceeding LCO Actions; 3.0.4, Changes in Modes or Conditions; and 3.0.5, Power Sources refer to actions the licensee would take if an LCO is exceeded. These actions refer to operational modes (e.g., Hot Standby, Hot Shutdown, or Cold Shutdown) of the Trojan facility. Since the facility is nonoperable and permanently defueled, these modes are no longer relevant to the facility. Therefore, Subsections 3.0.3, 3.0.4, and 3.0.5 can be deleted from the current technical specifications.

Subsections 4.0.4, Entry into Operational Modes or Conditions, restricts entry into operational modes or conditions when surveillance requirements have not been met. Again, since the facility is nonoperable and permanently defueled restricting modes are no longer necessary, this subsection can be deleted.

Subsection 4.0.5, ASME Code Class 1, 2, and 3 Components, covers the inservice inspection and testing of components, as required by 10 CFR 50.55a(g). By letter dated March 15, 1993, PGE stated that 10 CFR 50.55a(g) is no longer applicable since the facility is no longer operated as a nuclear power reactor as specified in the regulations. Therefore this technical specification is no longer required, and can be deleted. The staff finds the proposed changes to Section 3/4.0 acceptable.

Section 3/4.1 contains LCOs and surveillance requirements related to the control of reactivity in the reactor. The licensee proposes deleting this section. Since the reactor at the Trojan facility is nonoperating and permanently defueled, these specifications are no longer applicable. The staff finds this proposed change acceptable.

Section 3/4.2 contain LCOs and surveillance requirements that restrict the spatial distribution of nuclear and thermal power generation within the reactor core. The licensee proposes deleting this section. Since the reactor at the Trojan facility is nonoperating and permanently defueled, these specifications are no longer applicable. The staff finds this proposed change acceptable.

Section 3/4.3 contain LCOs and surveillance requirements related to a wide variety of instrumentation systems associated with power generation. The licensee proposes deleting this section. Since the reactor at the Trojan facility is nonoperating and permanently defueled, these specifications are no longer applicable. The staff finds this proposed change acceptable.

Section 3/4.4 contain LCOs and surveillance requirements associated with the protection of the reactor coolant pressure boundary and operation of the pressurizer and rector coolant system pumps. The licensee proposes deleting this section. Since the reactor at the Trojan facility is nonoperating and permanently defueled, the functions of the reactor coolant system are no longer required to prevent or mitigate the consequences of a postulated accident. The staff finds this proposed change acceptable.

Section 3/4.5 contain LCOs and associated surveillance requirements pertaining to the operation of various emergency core cooling systems. The licensee proposes deleting this section. Since the reactor at the Trojan facility is nonoperating and permanently defueled, the functions of the emergency core cooling systems no longer required to prevent or mitigate the consequences of a postulated accident. The staff finds this proposed change acceptable.

Section 3/4.6 contain LCOs and associated surveillance requirements to ensure the integrity of the primary containment. The licensee proposes to delete this section. The primary containment serves to limit the release of radioactive material to the environment in the event of postulated accidents that release radioactive materials from the reactor coolant system. Since the reactor at the Trojan facility is nonoperating and permanently defueled, there are no remaining design basis accidents which result in the release of significant radioactive materials to the containment. Therefore, containment integrity is no longer required to prevent or mitigate the consequences of a postulated accident. The licensee will operate the Reactor Building Purge System or an alternative system capable of limiting the spread of contamination when conducting activities inside containment with the likelihood of significant airborne contamination. The staff finds this proposed change acceptable.

Section 3/4.7 contain LCOs and associated surveillance requirements pertaining to a number of plant systems. The specifications in each subsection are discussed below:

Subsections 3/4.7.1 and 3/4.7.2 contain LCOs and surveillance requirements associated with the turbine cycle and steam generators. The licensee proposes to delete these subsections. These systems function to remove heat from the reactor coolant system. Since the reactor has been shut down and permanently defueled, these systems no longer serve any necessary function. The staff finds this proposed change acceptable.

Subsections 3/4.7.3, 3/4.7.4, and 3/4.7.5 contain LCOs and surveillance requirements associated with the component cooling water system, the service water system, and the ultimate heat sink. The licensee proposes to delete these subsections. These systems are intended to ensure that sufficient cooling capacity is available for continued operation of safety related equipment during normal reactor operation or accident conditions. These requirements also ensure that sufficient cooling capacity exists to provide for a normal cooldown of the facility or to mitigate the effects of a postulated accident involving the reactor. Since the reactor has been shut down and permanently defueled, the active safety-related equipment served by these cooling systems is no longer required to prevent or mitigate any postulated design basis accident.

The service water system serves as both a source of makeup water for the spent fuel pool and as a source of cooling to the spent fuel pool through the component cooling water system. A loss of the service water system would result in a gradual rise in the temperature and evaporation rate of the water in the spent fuel pool. The temperature of the water would continue to rise

until the water would begin to boil. The combination of a lack of forced cooling and a loss of makeup water due to a failure of the service water system would result in the gradual loss of water due to boiling and would, over time, lower the level of the water in the pool. The licensee has calculated that boiling would begin after 49 hours and it would take an additional 250 hours for the water level to drop to 10 feet above the spent fuel at which time the shielding effect of the water over the fuel would be seriously degraded. It would take an additional 120 hours for the water level to drop low enough to uncover the fuel. Therefore, the licensee would have approximately 300 hours (12.5 days) before the loss of makeup water would adversely affect the radiological conditions in the Fuel Building. This extended period provides ample time for actions to effect repairs to the cooling system or to establish alternative sources of makeup water to the spent fuel pool. The service water system provides one source of makeup to the spent fuel pool following a prolonged loss of forced cooling. Additional sources of water for normal and off-normal conditions include demineralized primary makeup water systems and the fire protection system. Supplemental water makeup sources described in TNP Procedure ONI 4-4 "Spent Fuel Pool System Trouble" include the station potable water system and tankage from the Rainier Fire Department. Since an extended time is available before this event presents any challenge to the integrity of a fission product barrier and several other sources of makeup are available, the service water system is not considered to be required to function to prevent or mitigate this event. Less than 8 gallons per minute are calculated to be required to offset evaporation losses. The staff finds this proposed change acceptable.

Subsection 3/4.7.6 contains LCOs and surveillance requirements associated with maintenance of the control room ventilation system. The licensee proposes to delete this subsection. The control room ventilation system ensures that the control room temperature does not exceed the duty rating of equipment and instrumentation cooled by this system and ensures that the control room will remain habitable for personnel during and following credible accidents involving the release of radioactive materials or toxic gases. As noted above the only remaining design basis event requiring operator action is the prolonged loss of cooling and makeup water to the spent fuel pool. Since the analysis of this postulated event demonstrates that approximately 300 hours (12.5 days) are available to restore cooling to the spent fuel pool or to reestablish makeup flow, short term actions initiated from the control room are not necessary to protect the fission product barrier. The staff finds this proposal acceptable.

Subsection 3/4.7.7 contains an LCO and surveillance requirements associated with licensee sealed sources containing radioactive material. The current technical specification requires that all sealed sources containing radioactive material either in excess of those quantities of byproduct material listed in 10 CFR 30.71 or $\geq$0.1 microcuries of any other material, including alpha emitters, be tested for leakage and/or contamination every 6 months. If the survey demonstrates an excess of $\geq$0.005 microcuries of removable surface contamination, the source will be immediately withdrawn from use. The licensee in its letter of February 8, 1995, agrees to continue to

test sealed sources as described above for contamination every 6 months and proposes to relocate this requirement to the Trojan Defueled Safety Analysis Report. The requirements for leakage monitoring will be contained in appropriate plant procedures. Relocation of this LCO and surveillance requirement is consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The staff finds the proposed relocation of the requirement acceptable.

Subsection 3/4.7.10 contains LCOs and surveillance requirements associated with snubbers. The licensee proposes to delete this subsection. Snubbers were required at the Trojan plant to ensure the structural integrity of the reactor coolant system and other safety-related systems following a seismic or other dynamic load. The reactor coolant system and other safety-related systems affected by this specification are no longer required for the safe storage of the irradiated fuel. Since systems with snubbers are no longer relied upon in the permanently defueled condition, the staff finds this proposal acceptable.

Subsection 3/4.7.11 contains an LCO and surveillance requirements associated with the through-wall bolts used to tie reinforced concrete and steel plate to the Control Building west and east walls. The licensee proposes to transfer and renumber this subsection to 5.7.2.9 and revise the LCO and surveillance requirement consistent with the program format of Section 5.7 of the proposed PDTS. The staff finds this proposed change acceptable.

Subsection 3/4.8 contains LCOs and surveillance requirements associated with AC and DC power sources and distribution systems. The licensee proposes to delete this subsection. The LCOs are intended to ensure that sufficient power is available to supply safety-related equipment required for the safe shutdown of the facility, the mitigation of accident conditions, and the monitoring of the facility status. The proposed PDTS do not contain LCOs for active safety systems. The limited set of LCOs contained in the PDTS consists of limitations on selected parameters associated with the storage of irradiated fuel in the spent fuel pool (i.e., water level, boron concentration, and pool coolant temperature). These parameters are not subject to rapid change and do not require continuous monitoring. Since active safety systems are not required in the PDTS, the specifications covering electrical power to support such systems have not been retained in the proposed PDTS. The staff finds this proposal acceptable.

Subsection 3/4.9.1 contains LCOs and surveillance requirements associated with the soluble boron concentration in the reactor coolant system and refueling canal. The licensee proposes to delete this subsection. The limits ensure that the reactor remains subcritical during core alterations and that a uniform boron concentration is maintained in the water volume connected to the reactor vessel. Since the reactor has been shut down and permanently defueled, these requirements no longer serve any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.2 contains an LCO and surveillance requirements related to the source range neutron flux monitors. The licensee proposes to delete this subsection. This instrumentation is used to detect changes in the reactivity of the reactor core. Since the reactor has been shut down and permanently

defueled, these systems no longer serve any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.3 contains an LCO and surveillance requirement that specifies a minimum decay time prior to the movement of irradiated fuel assemblies in the reactor pressure vessel. The licensee proposes to delete this subsection. Since the reactor has been shut down and permanently defueled, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.4 contains LCOs and surveillance requirements related to the containment building penetrations. The requirements specify conditions that must be met prior to reactor core alterations or movement of irradiated fuel inside of containment. The licensee proposes to delete this subsection. Since the reactor has been shut down and permanently defueled, and the licensee is prohibited from moving fuel back into the reactor building, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.5 contains an LCO and surveillance requirement than requires communications between refueling station personnel inside containment and the control room. The purpose of this requirement is to ensure that the refueling station personnel are informed of significant changes in the facility status or core reactivity conditions during core alterations. The licensee proposes deleting this subsection. Since the reactor has been shut down and permanently defueled, and the licensee is prohibited from moving fuel back into the reactor building, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.6 contains LCOs and surveillance requirements related to the operation of the manipulator crane during the movement of fuel or control rods in the reactor core. The specification ensures that the core internals and pressure vessel are protected from excessive lifting force. The licensee proposes to delete this subsection. Since the reactor has been shut down and permanently defueled, and the licensee is prohibited from moving fuel back into the reactor building, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.7 contains an LCO and surveillance requirement that limits the loads that may be carried over irradiated fuel assemblies in the spent fuel pool. The licensee proposes to renumber this subsection to 3.1.4 and reformat the LCO and surveillance requirement consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The staff finds this proposed change acceptable.

Subsection 3/4.9.8 contains LCOs and surveillance requirements related to the operation of the residual heat removal system that provides cooling to the fuel in the reactor vessel during refueling modes. The licensee proposes to delete these subsections. Since the reactor has been shut down and

permanently defueled, and the licensee is prohibited from moving fuel back into the reactor building, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.9 contains an LCO and surveillance requirement related to the containment ventilation isolation system. This system ensures that the containment ventilation system penetrations are isolated in the event of a release of radioactive materials in the containment. The licensee proposes to delete this subsection. The reactor has been permanently defueled and all the irradiated fuel has been removed from the containment. There are no remaining significant sources of radioactive contamination that potentially could be released inside the containment. Therefore, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.10 contains an LCO and surveillance requirement related to maintaining a minimum water level in the refueling canal during fuel movement inside the reactor pressure vessel. The licensee proposes to delete this subsection. The specified water level ensures that sufficient water depth is available to remove 99 percent of the iodine assumed to be released from a fuel assembly as a result of a fuel handling accident. The principal isotope of concern is I-131. Since the reactor ceased operation on November 9, 1992, and no new I-131 has been created since reactor shutdown, the I-131 inventory present at the time the reactor shutdown has undergone approximately 60 half-lives and is no longer of any concern. Also, since the reactor has been permanently defueled, and all the fuel has been removed from the containment, there is no longer a potential for a fuel handling event in the reactor or containment. Therefore, this requirement no longer serves any necessary function. The staff finds this proposed change acceptable.

Subsection 3/4.9.11 contains an LCO and surveillance requirement that limits the minimum water level in the spent fuel pool. The licensee proposes to renumber this subsection to 3.1.1 and reformat the LCO and surveillance requirement consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The staff finds this proposed change acceptable.

Subsection 3/4.9.12 contains LOCs and surveillance requirements related to the spent fuel pool exhaust system. This system provides filtration of the air above the spent fuel pool for radioactive material released from an irradiated fuel assembly as a result of a postulated fuel handling accident. The licensee proposes to delete this subsection. The radioactive decay in the first 6 months following facility shutdown has reduced the potentially airborne fission product inventory in the irradiated fuel assemblies to a level that no longer requires operation of this system. Analyses of a postulated fuel handling accident predict that radiation doses beyond the site exclusion area boundary to be a small fraction of the regulatory limit without the operation of this system. Therefore, operation of the spent fuel pool exhaust system is no longer required to prevent or mitigate the consequences of a design basis accident and can be deleted. The staff find this proposal acceptable.

Subsection 3/4.9.13 contains an LCO and surveillance requirement related to the operation of the containment purge exhaust system. These requirements ensure that the offsite doses resulting from a postulated fuel handling accident inside the containment are within the bounds of the accident analyses. The licensee proposes deleting this requirement. Since the reactor has been permanently defueled, and all the irradiated fuel has been removed from the containment and placed in the spent fuel pool, a fuel handling accident in the containment building is not a possibility. Therefore, the staff finds this proposed change acceptable.

Section 3/4.10 contains LCOs and surveillance requirements that provide for exceptions from various LCOs contained in current Trojan Appendix A Technical Specifications Section, 3.1, Reactivity Control Systems, Section 3.2, Power Distribution Limits, and Section 3.4, Reactor Coolant System, during physics testing. These tests are conducted to verify the design parameters of the nuclear reactor core after each refueling. The licensee proposes deleting Section 3/4.10. The licensee has also proposed deleting Sections 3/4.1, 3/4.2, and 3/4.4. The staff discussion, finding the licensee proposal to delete these sections acceptable, is found on page 7 above. Since the only purpose of Section 3/4.10 is to allow for exceptions to Sections 3/4.1, 3/4.2, and 3.4.4, and these sections have been deleted, then Section 3/4.10 is no longer needed and can be deleted. The staff finds this proposal acceptable.

Section 3/4.11.1.4 contains an LCO and surveillance requirement that limits the quantity of radioactive material contained in the temporary radwaste storage tanks. The licensee proposes moving this requirement to Section 5.7, Procedures, Programs, and Manuals, of the PDTS. Subsection 5.7.2.6, Storage Tank Radioactivity Monitoring Program, contains the same limitation on the quantity of radioactive material that can be in storage contained in the current LCO. This format change is consistent with NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." The staff finds this proposed change acceptable.

Section 3/4.11.2.6 contains LCOs and surveillance requirements associated with a limitation on the concentration of oxygen in gas being discharged by the waste gas compressors to ensure that the concentration of potentially explosive gas mixtures contained in the waste gas treatment system is maintained below the flammability limits for a hydrogen and oxygen mixture. The licensee proposes to delete this section. The waste gas holdup tanks are designed to hold waste gases generated during operation of the facility until relatively short half-life radionuclides decay to within regulatory limits for discharge. Trojan is no longer operating and is permanently defueled. The waste gas decay tanks have been vented to the atmosphere. There is no possibility that handling of waste gases will result in offsite exposure to the public in excess of U.S. Environmental Protection Agency Evacuation Protective Action Guidelines. Venting of the tanks to the atmosphere precludes the possibility of the buildup of potentially explosive concentrations of hydrogen and oxygen. The staff finds this proposed change acceptable.

The licensee proposes adding Section 3.1.2, Spent Fuel Pool Boron Concentration, to the Trojan PDTS. This would be a new LCO and surveillance requirement that would place a limit on the minimum soluble boron concentration in the spent fuel pool. Analyses performed to evaluate the effect of a postulated drop of an irradiated fuel assembly on the spent fuel racks assumed the presence of 2000 ppm soluble boron in the spent fuel pool.

The presence of soluble boron was also assumed in the evaluations of other abnormal events. The negative reactivity effect of the boron compensates for any increase in reactivity caused by postulated accidents. The new LCO and surveillance requirement limits the boron concentration to no less than 2000 ppm to preserve the initial conditions assumed in the accident analyses. The staff finds this proposal acceptable.

The licensee proposes adding Section 3.1.3, Spent Fuel Pool Temperature, to the Trojan PDTS. This would be a new LCO and surveillance requirement that would limit the maximum spent fuel pool coolant temperature. Without forced cooling the irradiated fuel in the spent fuel pool will gradually heat up the water in the spent fuel pool eventually reaching the boiling temperature of water. The inventory of water in the pool would begin to decrease due to boiling. Therefore, the 140° F value is appropriate as an LCO for the spent fuel pool by ensuring that actions are taken to maintain the initial conditions assumed in the analyses. The new LCO requires that immediate action be taken to initiate restoration of pool temperature to within limits and to verify that a source of makeup water is available. The staff finds this proposal acceptable.

5.0 Design Features

Section 5.0 of the Trojan Appendix A Technical Specifications describes design features of the facility. In accordance with 10 CFR 50.36(c)(4), this section describes features of the facility such as materials of construction or geometric arrangement that, if altered, would significantly affect safety and are not covered in other sections of the technical specifications. Consistent with the format of NUREG-1431 this section is renumbered 4.0. The staff finds this change acceptable.

Section 5.1 provides a description of the Trojan site. The licensee proposes deleting the delineation of the "low population zone," a reference to flood control provisions and renumbering the section to 4.1.

Subsection 5.1.2 delineates the "low population zone." "Low population zone" is defined in 10 CFR 100.3(b) as the area immediately surrounding the exclusion area which contains residents, the total number and density of which are such that there is a reasonable probability that appropriate protective measures could be taken in their behalf in the event of a serious accident. On September 30, 1993, the NRC staff approved the Trojan Permanently Defueled Emergency Plan (PDEP). Due to the reduced risk of offsite consequences, as a result of the shutdown and permanently defueled condition of the facility, the

"low population zone" is no longer referenced in the Trojan PDEP. Therefore, the licensee proposes deleting this term from the PDTS. The staff finds this proposed change acceptable.

The current Appendix A Technical Specifications Subsection 5.1.3 reference the flood control provisions contained in Section 2.4.2.2 of the Final Safety Analysis Report (FSAR) for the Trojan Facility. The licensee proposes to delete this subsection. The flood protection features described in FSAR Section 2.4.2.2 were intended to protect various pieces of equipment needed for safe shutdown of the reactor. The Trojan facility is permanently shut down and defueled. Therefore, these features are no longer necessary to protect equipment previously needed for safe shutdown of the reactor. Additionally, none of the equipment is necessary to ensure the safe storage of the irradiated fuel in the spent fuel pool. The staff finds this proposed change acceptable.

The licensee also proposes renumbering Subsection 5.1, "The Site," to 4.1, "Site." The staff finds this format change acceptable.

Sections 5.2 through 5.5 describe design features of the containment, reactor, reactor coolant system, and engineered safety features. The licenses proposes to delete these sections. These structures and systems serve to prevent or mitigate the consequences of postulated accidents involving the release of fission products in the containment. Since the Trojan facility is permanently shut down and defueled, there is no longer the potential for accidents involving the release of fission products in containment. Therefore, the licensee has requested that these sections be deleted from the PDTS. The staff finds these proposed changes acceptable.

Section 5.6 describes the design features of the facility related to the storage of new and irradiated fuel. The licensee proposes to delete Subsection 5.6.1.1 pertaining to the storage of new fuel since no new fuel will be stored at the facility. The licensee proposes retaining Subsection 5.6.1.2 pertaining to the storage of irradiated fuel. The subsection is renumbered to 4.2 in the PDTS to confirm to the new format. Subsections 5.6.2 and 5.6.3, dealing with spent fuel pool drainage and capacity respectively, have been renumbered to 4.2.2 and 4.2.3 in the PDTS. The staff finds these proposed changes acceptable.

Section 5.7 describes the design features of the facility related to the capability of the facility to withstand a seismic event. The licensee proposes to delete this section. The seismic concerns relate to safe shutdown of the reactor and maintenance of the spent fuel pool integrity. Safe shutdown of the facility is no longer a concern since the facility is permanently shut down. The staff considered the integrity of the spent fuel pool in relation to a seismic event in an exemption from portions of 10 CFR 50.54(q) and certain sections of 10 CFR 50.47 granted by the staff in a letter to Portland General Electric dated September 30, 1993. The staff found that the Trojan spent fuel pool will maintain, with an adequate margin, its

structural integrity even for an earthquake with a resulting ground acceleration value of 0.5g. The 0.5g value was found to be appropriate for Trojan and could be used to evaluate plant vulnerabilities significantly beyond the design basis. Therefore the staff finds this proposal acceptable.

Section 5.8 describes the location of the meteorological towers. The licensee proposes to delete this section. The meteorological towers provided information for use in estimating the potential consequences of radiological releases resulting from postulated accidents. In a letter to Portland General Electric Company, dated September 30, 1993, the staff approved the licensee's Permanently Defueled Emergency Plan (PDEP) for the Trojan facility. The PFEP provides for a significantly reduced level of emergency planning for the Trojan facility commensurate with the significant reduction in potential offsite consequences associated as a result of the permanently shutdown and defueled status of the facility. The potential offsite doses due to the remaining applicable accident scenarios have been shown to result in potential radiation doses at the site boundary that are below the U.S. Environmental Protection Agency Evacuation Protective Action Guidelines. Therefore, the meteorological instrumentation is no longer needed to predict offsite dose consequences of an accident at the Trojan facility. The licensee has deleted this section from the PDTS and the location of the meteorological towers are no longer depicted on Figure 5.1-1.

Section 5.9 describes the cyclic or transient limits imposed on various plant systems. The licensee proposes to delete this section. These limits ensure that the systems or components included within the scope of the specifications are operated within their design basis. Components included within the scope of the specification include the reactor coolant system and the secondary system. These systems are no longer in operation since Trojan is permanently shut down and defueled. Neither of these systems affect the safe storage of irradiated fuel. The staff finds this proposal acceptable.

6.0 Administrative Controls

Section 6.0 of the Trojan Appendix A Technical Specifications describes the administrative controls of the facility. In accordance with 10 CFR 50.36(c)(5), this section describes the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner. Consistent with the format of NUREG-1531 this section is renumbered 5.0. The staff finds this change in numbering acceptable.

Sections 6.1 and 6.2 of the current Appendix A Technical Specifications define the individual with overall responsibility for operation of the Trojan facility and other general organizational requirements. The content of these sections has been retained in the PDTS Sections 5.1 and 5.2. Titles of positions have been updated to reflect the proposed unit organization. The PDTS sections are patterned after the format and wording of the improved standard technical specifications in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants." Provisions for designating the line of succession for the operational command and control function has been

incorporated into the technical specification. The provisions of the current technical specifications that were recently incorporated by license Amendment Nos. 191 and 192 to License No. NPR-1 pertaining to certified fuel handlers and fire protection requirements have been retained. The staff finds these proposed changes acceptable.

Section 6.3 specifies the requirements for qualifications of the facility staff. The licensee proposes changing the section numbering to Section 5.3. The staff finds this format change acceptable and consistent with the improved standard technical specifications.

Section 6.4 specifies the requirements for training and replacement training of certified fuel handlers. The requirement for training certified fuel handlers has been retained without modification in the proposed PDTS. The licensee proposes changing the section numbering to Section 5.4. The staff finds this format change acceptable and consistent with the improved standard technical specification.

Section 6.5 specifies the review and audit functions performed by the Plant Review Board (PRB) and the Trojan Nuclear Operations Board (TNOB). The licensee has proposed transferring the review and audit functions of the PRB and the TNOB to an Independent Safety Reviewer and a single site oversight review committee referred to in the proposed PDTS as the Independent Review and Audit Committee (IRAC). The proposed PDTS Section 5.5.1 describes the composition, qualifications, and responsibilities of the Independent Safety Reviewers. Proposed Section 5.5.2 describes the composition, meeting, frequency, experience and technical competence, functions, and review responsibilities of the IRAC. The IRAC safety review function is modified to an after-the fact independent review of a number of certain specific items such as: safety evaluations for procedures and changes to procedures accomplished under the provisions of 10 CFR 50.59, changes to structures systems or components important to the safe storage of irradiated fuel, proposed changes to the technical specifications, and the performance of the corrective action system. This is comparable to the TNOB after-the-fact safety review performed under the current technical specifications. The licensee states that the termination of reactor operations and the issuance of a possession only license has resulted in a reduction in the scope and complexity of activities at the facility. This reduction in activities makes the continued existence of two review committees unnecessary. The responsibilities of the independent safety reviewers and the IRAC encompass the functions previously performed by the PRB and the TNOB and will provide an equivalent level of safety oversight and audit as the existing two organizations. The staff finds this proposal acceptable.

Section 6.6 specifies required actions under 60 CFR 50.73, by the licensee, if a reportable event occurs at the Trojan facility. The licensee proposes deleting this section. Consistent with the content of the improved standard technical specifications, these provisions are not included in the PDTS. The requirements for reporting reportable events are specified in 10 CFR 50.73 and restating these requirements in the technical specifications is redundant. The staff finds this proposed change acceptable.

Section 6.7 specifies the actions to be taken by the licensee if any of the safety limits specified in Section 2 of the current technical specifications are violated. The licensee proposes deleting this section. As stated in the discussion of Section 2 above the facility operating license has been modified to a possession only license that prohibits operation; therefore, safety limits for reactor operation are no longer needed. In the discussion of Section 2 above, the staff found the elimination of safety limits for reactor operation for the Trojan plant acceptable. Therefore, the staff finds that the deletion of Section 6.7, which specifies the actions to be taken, should these safety limits be exceeded, is acceptable.

Section 6.8 specifies requirements for procedures and programs. This section has been retained in the PDTS as proposed PDTS Section 5.7, with a slight modification of format consistent with the improved standard technical specifications. Review and approval of changes of the various procedures and programs has been updated to reflect the substitution of the IRAC and the ISRs for the PRB and the TNOB (see explanation in the Section 6.5 above). The staff finds these changes acceptable, and consistent with the improved standard technical specifications.

Subsection 6.8.1 covers the scope of required procedures. This subsection has been retained as Subsection 5.7.1 of the PDTS and modified consistent with the wording in the improved standard technical specifications. Wording in current technical specification Subsection 6.8.1a has been modified to include an updated reference and limit applicability to procedures applicable to the safe storage of irradiated fuel. Discussion of refueling operations in current Subsection 6.8.1b has been deleted since refueling will not occur. Current Subsection 6.8.1c, conferring procedures for surveillance and test activities of safety-related equipment, has also been deleted consistent with the scope of procedures included in the improved standard technical specifications. Additionally, it is redundant to Subsection 6.8.1a. The staff finds these proposed changes acceptable.

Subsections 6.8.2 and 6.8.3 cover permanent and temporary changes to procedures. The provisions of these sections have been retained as proposed PDTS 5.7.1.2 and 5.7.1.3. PDTS 5.7.1.2 has an added provision that changes to procedures be subject to independent review. PDTS 5.7.1.3 covers temporary changes to procedures. The number of members of the facility management staff required to approve temporary changes to procedures has been reduced from two in the current technical specifications to one in the PDTS. This is consistent with the reduced scope and complexity of procedures required to support the facility in its permanently shutdown and defueled condition. Section 6.8.3.c addressing licensee organizations other than the Trojan facility staff has been deleted since this distinction is no longer necessary with the significantly reduced size of the organization. The staff finds these proposed changes acceptable.

Subsection 6.8.4 addresses programs which are required to be maintained and implemented. This subsection has been retained and renumbered in the PDTS as Subsection 5.7.2. Existing programs in Subsection 6.8.4 not applicable to a permanently defueled facility have not been retained (e.g. Primary Coolant

Sources Outside Containment, In-Plant Radiation Monitoring for Iodine, Secondary Water Chemistry, and Post-Accident Sampling). Applicable programs that have been retained and renumbered include the Radiation Control Program, Process Control Program, Offsite Dose Calculation Manual, Radioactive Effluent Controls Program, Radiological Environmental Monitoring Program, Storage Tank Radioactivity Monitoring, Program, and the Fire Protection Program.

Two additional programs have been added by the licensee, the Spent Fuel Pool Water Chemistry Program, and the Spent Fuel Pool Cooling and Makeup Monitoring Program. The Spent Fuel Pool Water Chemistry Program (see Table 4.3-1 of the Defueled Safety Analysis Report) requires periodic sampling of the water in the spent fuel pool for 12 parameters including, but not limited to, gross gamma, gross beta, tritium, pH, boron, conductivity, and chlorides. PDTS 5.7.2.8 requires the licensee to notify the NRC staff prior to eliminating or changing any of the acceptance criteria for monitored parameters for the Spent Fuel Pool Water Chemistry Program. The second new program, the Spent Fuel Pool Cooling and Makeup Monitoring Program, requires that the primary method for spent fuel pool cooling and for makeup capability is monitored and maintained to assure that the equipment is capable of fulfilling its intended function of controlling spent fuel pool temperature and level. The licensee is required by PDTS 5.7.2.10 to notify the NRC prior to implementation of changes that reduce the overall effectiveness of the program. The programs identified above that have been deleted, retained, or added are appropriate for a permanently shutdown and defueled facility. The staff finds these proposed changes acceptable.

Section 6.9 contains requirements for submitting various reports. This section has been retained, with appropriate modification and renumbered in the PDTS as Section 5.8. The licensee proposes deleting several reports listed in the current technical specifications that are no longer appropriate for a permanently shutdown and defueled facility. These are the steam generator tube inservice inspections required by Subsection 6.9.1.5.b; documentation of challenges to the pressurizer power operated relief valves or safety valves required by Subsection 6.9.1.5.c; the results of specific activity analysis of the primary coolant required by Subsection 6.9.1.5.d; startup reports required by Subsections 6.9.1.1, 6.9.1.2, and 6.9.1.3; the monthly operating reports required by Subsection 6.9.1.6; and the core operating limits report required by Subsection 6.9.1.7. Subsection 6.9.1.5.2, Annual Radicactive Effluent Release Report was renumbered 5.8.1.3 and updated to reflect changes in the reporting requirements as specified in 10 CFR 50.36a. Subsection 6.9.2 covering special reports has also been deleted, with the exception of Section 6.9.2.j., since the referenced LCOs of surveillance sections have not been retained in the PDTS. The requirement for a special report contained in Section 6.9.2.j., Control Building Modification Connection Bolts, has been relocated to the program description required by proposed PDTS Section 5.7.2.9, Control Building Structural Monitoring. The staff finds these proposed changes to Section 6.9.2 acceptable.

Section 6.10 contains requirements for the retention of various types of records. This specification has been modified and renumbered as PDTS 5.9. Consistent with the improved standard technical specifications, the retention period for licensee event reports, radioactive shipments and changes to

specified procedures has been changed from five years to three years. Several record types have not been retained in the proposed PDTS since they are no longer applicable to the facility in its permanently shutdown and defueled condition. These include records of transient or operational cycles (Subsection 6.10.2.f), records of inservice inspections (Subsection 6.10.2.h), records covering environmental qualification of electrical equipment (Subsection 6.10.2.1), and records related to hydraulic and mechanical snubbers (Subsection 6.10.2.n). Records of review committee meetings (Subsection 6.10.2.k) has also been deleted from this section consistent with the format of the improved standard technical specifications. However, PDTS 5.9.3.h and 5.9.3.i require the continued retention of records related to the review and audits conducted by the review committee. The records of the review committee meetings are also covered in PDTS Subsection 5.5.2. Several of the requirements have been reworded to clarify that the scope of the required records is limited to those activities affecting the safe storage of irradiated fuel. The staff finds these proposed changes acceptable.

Section 6.11 specifies the requirement for a radiation protection program. This specification is retained without modification in the renumbered PDTS 5.7.2.1 and is consistent with the improved standard technical specifications contained in NUREG-1431. The staff finds this proposed change acceptable.

Section 6.12 specifies requirements for the control of high radiation areas. The licensee proposes to include the provisions of this current technical specification in PDTS 5.10. Additional provisions contained in the improved standard technical specifications have also been included in the PDTS Section 5.10. The scope and content of PDTS Section 5.10 are consistent with the improved standard technical specifications contained in NUREG-1431. The staff finds these proposed changes acceptable.

Section 6.13 specifies requirements related to the environmental qualification of safety-related electrical equipment. The licensee proposes to delete this section. The environmental qualification requirements for safety-related electrical equipment require that equipment be shown capable of functioning in the harsh environments resulting from a loss of coolant accident or a rupture of a high-energy line. Since the reactor at Trojan has been permanently shut down and defueled, the postulated accidents that could produce the harsh environments are no longer possible. Also this current requirement duplicates the requirements of 10 CFR 50.49. The improved standard technical specifications of NUREG-1431 do not include the requirement for a specification on environmental qualification of safety-related electrical equipment since it would be redundant with the regulations. The staff finds this proposed change acceptable.

Section 6.14 specifies requirements for a Process Control Program (PCP) covering the solidification of wet radioactive waste. The licensee proposes that this section be renumbered and the requirements incorporated into Subsection 5.7.2.2 of the PDTS. The wording of the section has been modified consistent with the wording found in the improved standard technical specifications contained in NUREG-1431. The staff finds this proposed change acceptable.

Section 6.15 specifies requirements for an Offsite Dose Calculation Manual (ODCM) covering the methodology used in the calculation of offsite dose resulting from radioactive effluents. The licensee proposes that this subsection be renumbered and the requirements incorporated into Subsection 5.7.2.3 of the PDTS. The wording of the section has been modified consistent with the wording found in the improved standard technical specifications contained in NUREG-1431. The staff finds this proposed change acceptable.

Based on the above evaluation, we find that the changes proposed by the licensee to the Appendix A Technical Specifications for Trojan Nuclear Plant, s described in Portland General Electric Company License Change Application 234, dated July 31, 1993, as supplemented by letters dated March 8, 1994 and February 8, 1995, acceptable and consistent with the improved standard technical specifications contained in NUREG-1431, Standard Technical Specifications, Westinghouse Plants.

4. STATE CONSULTATION

In accordance with Commission regulations, the appropriate member of the Oregon Department of Energy was notified of the proposed issuance of this amendment. The State official had no comment.

5. ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The amendment also relates to changes in recordkeeping, reporting, and administrative procedures and requirements. The NRC staff has determined that the amendment involves no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (59 FR 2869 dated January 19, 1994, and 59 FR 17604 dated April 13, 1994). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6. CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Michael T. Masnik

Date: March 31, 1995