



Portland General Electric Company

James E. Cross Vice President, Nuclear

Trojan Nuclear Plant
Docket 50-344
License NPF-1
December 15 1991

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington DC 20555

Dear Sir:

Portland General Electric Company (PGE)
Steam Generator Tube Integrity Safety Analysis
Report for Tube Support Plate Intersections

Attached is PGE Report titled, "PGE Steam Generator Tube Integrity Safety Analysis Report for Tube Support Plate Intersections", (hereinafter, "the PGE Report"). The Nuclear Regulatory Commission (NRC) has been kept aware of many ongoing activities at the Trojan Nuclear Plant (TNP) regarding steam generator tube repair methodology and tube inspection results. In this regard, the PGE Report serves to provide additional detail regarding PGE activities that have occurred during the 1991 Refueling Outage.

Regulatory Guide 1.121, "Bases for Plugging Degraded PWR Steam Generator Tubes" has been used as the foundation on which the Trojan Repair Basis was developed. The PGE Report describes the extensive tube inspection, examination, analysis, and repair program completed during the 1991 Outage, and provides the technical basis for PGE's conclusions that the steam generator tubes which will be in service during Cycle 14 meet the tube integrity criteria of NRC Regulatory Guide 1.121. Therefore, the completion of tube repairs consistent with the Trojan Repair Basis will ensure operability of the Trojan steam generators.

PGE has taken conservative and prudent actions during this refueling outage to ensure that the structural integrity of TNP steam generator tubes is maintained. As a result, PGE now has assurance that the TNP steam generators will be operable prior to restart. PGE requests NRC Staff review of this report and appropriate action, as necessary, prior to the scheduled date for TNP restart.

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PGE has also submitted a proposed change to the TTS to: (i) more clearly define the appropriate Trojan Repair Basis for outer diameter stress corrosion cracking/intergranular attack at the tube support plate intersection applicable for Cycle 14, and (ii) implement a reduction in allowable primary-to-secondary leak rate limits from 500 gallons per day (gpd) to 130 gpd per steam generator, not to exceed 400 gpd total leakage from all steam generators.

The PGE Report also satisfies several reporting requirements in Trojan Technical Specification (TTS) 4.4.5.5.a and in NRC Regulatory Guide 1.83, "Inservice Inspection of Pressurized Water Reactor Steam Generator Tubes".

Appendix 3 of the enclosed report is a proprietary version of Westinghouse Commercial Atomic Power (WCAP) 13129 "Trojan Nuclear Plant Steam Generator Tube Repair Criteria for Indications at the Tube Support Plate". Due to the time constraints placed on Westinghouse by PG&E, a non-proprietary version of this WCAP is not yet available. PGE is however submitting this Appendix under the provisions of 10 CFR 2.790 and will obtain and submit a non-proprietary version of the WCAP within the next two weeks. Accordingly, we request that the enclosed Appendix 3 (WCAP 13129) be withheld from public disclosure.

Sincerely,



T. D. Walt
for J. E. Cross

Attachments

c: Mr. John B. Marcin
Regional Administrator, Region V
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith (by separate cover)
State of Oregon
Department of Energy

Mr. R. C. Barr
NRC Resident Inspector
Trojan Nuclear Plant



Portland General Electric Company

James E. Cross Vice President, Nuclear

Trojan Nuclear Plant
Docket 50-364
License NPF-1
December 15, 1991

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Trojan Nuclear Plant

STEAM GENERATOR TUBE INTEGRITY
SAFETY ANALYSIS REPORT FOR
TUBE SUPPORT PLATE INTERSECTIONS

PORTLAND GENERAL ELECTRIC COMPANY