



Portland General Electric Company

Bart D. Withers Vice President

January 21, 1985

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Director of Nuclear Reactor Regulation  
ATTN: Mr. James R. Miller, Chief  
Operating Reactors Branch No. 3  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington DC 20555

Dear Mr. Miller:

NRC Request for Revision of License Change Application 111

Your letter of December 4, 1984 requested that PGE revise its submittal of License Change Application 111 to address apparent deficiencies identified by the NRC. These deficiencies are related to the NRC's model Technical Specifications (MTS) on overtime limits and turbine stop valve closure.

With respect to the Technical Specification on overtime limits, PGE excluded two sentences from the MTS version. These sentences are: "The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week, while the Plant is operating", and "Controls shall be included in the procedure such that individual overtime shall be reviewed monthly by the (Plant Superintendent) or his designee to assure that excessive hours have not been assigned."

The objective of the first omitted sentence appears to be the establishment of a baseline from which overtime is calculated. We would propose an alternatively worded sentence to accomplish the same purpose as follows: "The baseline for determining overtime use will be a 40-hour work week when the Plant is operating." The basis for this difference is the fact that certain positions at Trojan do not work a normal 8-hour day, 40-hour week. However, a 40-hour work week is used to determine overtime.

PGE has omitted the second MTS sentence because it did not appear in the revised Commission Policy Statement which was published in the Federal Register on June 1, 1982 (47 FR 23836). PGE reviews individual time sheets monthly which reflect the amount of overtime each employee works and intends to continue this practice. We oppose putting this practice in the Technical Specifications because it would cause a "quality assurance record" label to be applied to personnel time sheets. If such a provision must be included, we would propose wording as follows: "The Plant General Manager or his designee shall be responsible for conducting a monthly review to ensure that overtime practices are in compliance with the established limits. This requirement does not impose any additional retention requirements on personnel time sheets."

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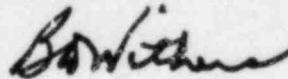
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With respect to the turbine stop valve closure item, the MTS suggests an 18-month calibration of the limit switch position for each valve to ensure the closed limit switch is actuated with the valve  $\geq 1$  percent open, which is the designated setpoint in Technical Specification Table 2.2-1. Including a channel calibration would create compliance problems inasmuch as there is no standard against which to calibrate the limit switch. Although adjustments can be made to the limit switch, the connecting rods, and actuating lever, these adjustments would not constitute a channel calibration as defined in the Trojan Technical Specifications. Furthermore, any misalignment or need for adjustment would be found as a result of the functional test that is currently required. These limit switches have been troublefree, no failures have occurred since the functional testing was initiated.

The intent of the setpoint, and therefore the calibration, is apparently to ensure the limit switch actuates before the valve reaches the closed position. The limit switch only needs to actuate upon valve closure and not necessarily before it reaches the fully closed position. Verification of this is accomplished by the Channel Functional Test which is currently being performed in accordance with existing Technical Specifications. Because of the fast acting nature of these valves (close in  $\leq 3$  sec), the point at which the limit switch actuates does not need to be precisely determined through a channel calibration. This position is based on the fact that reactor trip on turbine trip is not assumed to occur in the Plant's accident analyses, and that the timing of the initiation of the reactor trip is not critical for accomplishing the stated purpose of preventing undesirable transients and enhancing the overall reliability of the Reactor Protection System. For these reasons, it is not necessary to include a channel calibration requirement in the Technical Specifications.

Sincerely,



Bart D. Withers  
Vice President  
Nuclear

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

Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission  
Attention: G. Zwetzig