APR 3 0 1985 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: Thank you for your letter dated April 3, 1985, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated March 5, 1985. Your corrective actions will be verified during a future inspection. Your cooperation with us is appreciated. Sincerely, 151 D. F. Kirsch, Acting Director Division of Reactor Safety and Projects cc: W. S. Orser, PGE J. W. Durham, Esq. W. Dixon, DOE bcc: RSB/Document Control Desk (RIDS) Mr. J. Martin Resident Inspector RV D RDodds: dh 4/29/85 4/25/85 (E0/1)

Bart D. Withers - Vice President

April 3, 1985

Trojan Nuclear Plant Docket 50-344 License NPF-1

Mr. D. F. Kirsch, Acting Director Division of Reactor Safety and Projects U.S. Nuclear Regulatory Commission, Region V 1450 Maria Lane, Suite 210 Walnut Creek CA 94596

Dear Sir:

TROJAN NUCLEAR PLANT Response to Notice of Violation

Your letter of March 5, 1985 transmitted a Notice of Violation. This violation was identified as a result of an inspection conducted by your office during January 7 - February 15, 1985, as described in Inspection Report 50-344/85-04, which was also transmitted by your letter.

Attachment 1 is our response to the Notice of Violation, pursuant to the provisions of 10 CFR 2.201.

Sincerely,

Bart D. Withers Vice President Nuclear

Attachment

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

> Mr. Lynn Frank, Director State of Oregon Department of Energy

8504 223 @ 3 men Street Popu Oregon 97204

Trojan Nuclear Plant Docket 50-344 License NPF-1 Mr. D. F. Kirsch April 3, 1985

Attachment 1 Page 1 of 1

NOTICE OF VIOLATION

As a result of the inspection conducted during the period of January 7 - February 15, 1985, and in accordance with the NRC Enforcement Policy, 10 CFR Part 2, Appendix C, the following violation was identified.

Section 4.3.1.1.3 of the Technical Specifications requires that the reactor trip system response time of each reactor trip function be demonstrated to be within its limit at least once per 18 months. Technical Specification Table 3.3-2 lists the reactor coolant pump undervoltage and underfrequency trips as reactor trip functions with response time limits.

Contrary to the above requirement, the total channel response time for the reactor coolant pump undervoltage and underfrequency reactor trips had not been demonstrated every 18 months in that the response time of the auxiliary relays associated with these trips were not included in the testing program.

This is a Severity Level IV Violation.

RESPONSE TO NOTICE OF VIOLATION

The periodic 12.47KV bus undervoltage/underfrequency reactor trip circuit response time tests, PICT-22-12 and PICT-22-13 have been revised to include the auxiliary relays previously not included. In addition to the appropriate procedure revisions, the actual time response of the auxiliary relays was verified. The times measured were then included with times previously recorded and the results indicate that all required response times were well within Technical Specification limits.

A review of other required time response requirements was conducted to insure compliance with applicable Technical Specifications. Our review indicates that all other requirements are being met.

All corrective actions have been completed and all data is within allowable Technical Specification limits.