



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V
1990 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

October 14, 1980

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 Regional Evaluation of Licensee Performance - Trojan

This refers to the meeting held at Portland General Electric Company offices in Portland, Oregon, on October 10, 1980, between Mr. R. H. Engelken and members of the Region V staff with Messrs. W. J. Lindblad, and others of your staff. The purpose of this meeting was to discuss the results of NRC's regional evaluation of licensee performance for those activities authorized by NRC License No. NPF-1. A copy of this evaluation and supporting data are enclosed.

Results of this, the first of NRC's planned Systematic Appraisal of Licensee Performance (SALP) evaluations conducted with regard to the Trojan plant, reveal areas which, although not of serious concern at this time, we plan to increase the frequency and/or scope of our future inspection activities. We feel these areas, identified in the enclosed evaluation, represent areas where you should direct particular management attention as well.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and its enclosures will be placed in the NRC's Public Document Rooms.

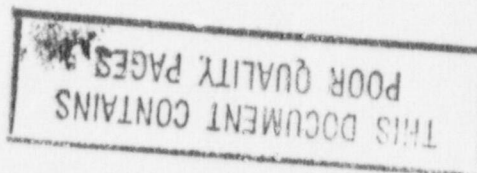
Should you have questions regarding the enclosed evaluation and supporting data, we will be glad to discuss them with you.

Sincerely,

J. L. Crews, Chief
Reactor Operations and
Nuclear Support Branch

Enclosure:
Regional Evaluation of Trojan
September 1979 through August 1980,
dtd 9/25/80

cc: W. J. Lindblad, PGE
C. P. Yundt, PGE
J. W. Durham, Esq., PGE



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NUCLEAR REGULATORY COMMISSION
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1390 N. CALIFORNIA BOULEVARD
SUITE 202, WALNUT CREEK PLAZA
WALNUT CREEK, CALIFORNIA 94596

September 25, 1980

MEMORANDUM FOR: J. L. Crews, Chief, Reactor Operations and Nuclear Support
Branch, IE:RV

FROM: Regional Performance Evaluation Board - Trojan

SUBJECT: REGIONAL EVALUATION OF TROJAN - SEPTEMBER 1979 THROUGH
AUGUST 1980

The Regional Performance Evaluation Board, consisting of representatives from Reactor Operations, Construction, Radiation Protection, Safeguards, and NRR, met on September 9, 1980, and performed an evaluation of Trojan activities for the period of September 1, 1979, through August 31, 1980. The Board's review encompassed the following:

1. Licensee performance in each of the 17 functional areas identified in Appendix A of MC 2955.
2. Enforcement actions for the period of September 1, 1979, through August 31, 1980.
3. Licensee event reports submitted during the period of September 1, 1979, through August 31, 1980.

The Board recommends, based upon the results of the review, that increased or special inspection activity be performed in the functional areas of (1) management control and (2) design changes and modifications.

One aspect of management control which has raised the concern of the Board stems from the sequence of Licensee Event Report Nos. 80-08, 80-09, 80-10 and 80-11 each of which was attributed to personnel error and occurred during a major refueling-maintenance outage. The Board noted that the Oregon Department of Energy has also expressed a concern in this area, as discussed in a letter to the licensee dated July 25, 1980. It appears that improved management coordination of plant activities with the requirements of the facility license during major plant outages could preclude incidents such as those described in the Licensee Event Reports. Increased inspection attention to this facet of management control during future major plant outages is recommended for the resident inspectors and cognizant Region V inspectors.

Another aspect of management control for which the Board recommends increased inspection activity is related to the completeness of the licensee's review process in meeting the requirements of 10 CFR 50.59. Apparent weaknesses in this area were identified in the recently completed Health Physics Appraisal of Trojan activities. The existence and adequacy of written safety evaluations for modifications to be made to facility structures, systems or components described in the facility's Final Safety Analysis Report should be examined more closely during future inspections by Region V personnel.

The design and modification activities at the Trojan Nuclear Plant continue at an accelerated pace due to the control building/masonry block wall modifications, fire protection improvements and TMI-2 related plant modifications. The bulk of the major modification work is scheduled for accomplishment during the next several months and increased inspection activity by the resident inspectors and cognizant Region V inspectors will be required to assure that modifications are completed in accordance with regulatory requirements and licensee commitments.

One other occurrence during the recent refueling outage which highlighted weaknesses in both the management control and design control areas was the installation of a reactor protection system modification prior to receipt of the required technical specifications change. This action was in conflict with the requirements of 10 CFR 50.59, although the premature installation was identified, reported, and corrected by the licensee prior to plant startup.

Based on planned changes in the environmental technical specifications which will eliminate non-radiological requirements, the scope of inspection in this area should be correspondingly reduced. In addition, inspections against radiological environmental technical specifications have identified no problems or items of noncompliance.

The licensee has made several changes to preclude the security problems which resulted in civil penalty action in February 1980. The change to a new site security contractor, increased licensee security staffing, improved procedures, and completion of facility security modifications have improved the physical security program of the Trojan Nuclear Plant. The Board recommends that the inspection frequency and scope in the security area remain unchanged.

The remaining functional areas identified in the attachments were discussed by the Board. No significant comments or problems were identified and the Board recommends no change to the existing inspection frequency in these areas. The Evaluation Forms from IE Manual Chapter 2955 have been completed by the Board, for Trojan, and are being submitted as Attachment A. Summaries of noncompliance items and licensee reports which were prepared for the review are also enclosed as Attachment B.

Regional Performance Evaluation
Board - Trojan

September 25, 1980

D. M. Sternberg

D. M. Sternberg, Chief
Reactor Projects Section 1

R. F. Fish

for R. F. Fish
Radiation Specialist

P. P. Narbut

P. P. Narbut
Reactor Inspector

W. P. Mortensen

W. P. Mortensen
Physical Protection Inspector

M. H. Malmros

for M. H. Malmros
Senior Resident Inspector

C. M. Trammell

for C. M. Trammell
Project Manager, NRR

P. H. Johnson

P. H. Johnson
Reactor Inspector

Enclosures:
As Stated

cc: R. H. Engelken, RV

REGION VLICENSEE PERFORMANCE EVALUATION (OPERATIONS)

Facility: Portland General Electric Company

Licensee: Trojan Nuclear Plant

Unit Identification:

<u>Docket No.</u>	<u>License No./Date of Issuance</u>	<u>Unit No.</u>
50-344	NPF-1/November 21, 1975	1

Reactor Information:	<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
NSSS	Westinghouse		
MWt	3411		

Appraisal Period: September 1, 1979 through August 31, 1980

Appraisal Completion Date: September 9, 1980

Review Board Members:

- D. M. Sternberg, Projects Section Chief, Chairman
- M. H. Malmros, Senior Resident Inspector
- C. M. Trammell, NRR Project Manager
- P. H. Johnson, Reactor Inspector
- P. P. Narbut, Reactor Inspector
- R. F. Fish, Radiation Specialist
- W. P. Mortensen, Physical Security Inspector

A. Number and Nature of Noncompliance Items

Noncompliance category:	<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
Violations	1		
Infractions	12		
Deficiencies	5		
Areas of Noncompliance: (List Areas as Required)	<u>Unit 1 (Points)</u>	<u>Unit 2 (Points)</u>	<u>Unit 3 (Points)</u>
Plant Operations	10		
Surveillance & Preop Testing	32		
Training	2		
Radiation Protection	44		
Environmental Protection	2		
Security & Safeguards	130		
Design Changes & Modifications	10		
Total Points	<u>230</u>	<u> </u>	<u> </u>

B. Number and Nature of Licensee Event Reports

Type of Events:	<u>Unit 1</u>	<u>Unit 2</u>	<u>Unit 3</u>
Personnel errors	9		
Defective procedures	2		
Causally-linked events	0		
Other	12		
Licensee Event Reports Reviewed (Report Nos.)			
LER's 79-13 through 79-16			
LER's 80-01 through 80-16			
Environmental Occurrences on 10/18/79 and 7/8/80			
Inadvertent safety injection on 9/6/79			

C. Escalated Enforcement Actions

Civil Penalties

February 15, 1980: Unauthorized access to vital area (\$5,000)

Orders

None

Immediate Action Letters

September 11, 1980: Physical Security Plan and Related Actions
October 22, 1979: Steam Generator Tube Leakage/Safety Related
Pipe Supports
December 21, 1979: Masonry Block Walls
April 17, 1980: Masonry Block Walls

D. Management Conferences Held During Past Twelve Months

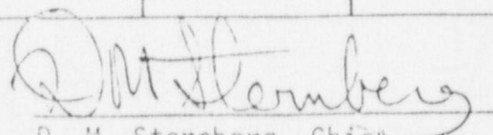
September 11, 1979: Management meeting in Region V office to discuss
noncompliance items identified during inspection conducted
on July 25-29, 1979.

E. Justification of Evaluations of Functional Areas Categorized as Requiring
an Increase in Inspection Frequency/Scope (See evaluation sheets)

See Memorandum from Regional Performance Evaluation Board - Trojan -
to J. L. Crews, dated September 25, 1980.

Inspection
Frequency and/or Scope

FUNCTIONAL AREA	Increase	No. Change	Decrease
1. Management Control	X		
2. Plant Operations		X	
3. Refueling Operations & Activities		X	
4. Maintenance		X	
5. Surveillance & Preoperational Testing		X	
6. Training		X	
7. Radiation Protection		X	
8. Environmental Protection			X
9. Emergency Planning		X	
10. Fire Protection		X	
11. Security & Safeguards		X	
12. Design Changes & Modifications	X		
13. Reporting		X	
14. QA Audits		X	
15. Committee Activities		X	
16. Quality Control		X	
17. Procurement		X	


 D. M. Sternberg, Chief
 Reactor Project Section 1
 9/25/80
 Date

DISTRIBUTION OF CAUSES OF LICENSEE REPORTS
Reports Dated September 1, 1979 to August 31, 1980

FUNCTIONAL AREA	Personnel	Procedure	Equipment	Design/ Construction
Management Control				
Plant Operations	7	2	6	1
Refueling Operations & Activities				
Maintenance				
Surveillance & Preoperational Testing				
Training				
Radiation Protection				
Environmental Protection	2			
Emergency Planning				
Fire Protection				
Security & Safeguards				
Design Change & Modifications				
Reporting				
QA Audits				
Committee Activities				
Quality Control				5
Procurement				
TOTAL	9	2	6	6

TYPES OF LICENSEE REPORTS
9/1/79 to 8/31/80

PLANT OPERATIONS

Personnel

- (80-01) "B" train DBA sequencer failed to start two loads.
- (80-04) Low flow rate on control room emergency vent system.
- (80-08) Containment integrity not maintained during SG/MSIV maintenance.
- (80-09) Spent fuel pool lowered below minimum level.
- (80-10) Low RCS boron concentration (while washing SG tube sheets).
- (80-11) Both diesel-generators out of service.
- (80-16) Boric acid storage tank level/concentration outside limits.

Procedure

- (9/6/79) Inadvertent safety injection (while trouble-shooting FHC)
- (80-15) Failure of turbine-driven aux feed pump to start.

Equipment

- (79-14) Cracks in containment purge exhaust ducting.
- (79-16) Crack in CCP mini-flow recirculation line.
- (80-02) Broken cooling water hose on diesel aux feed pump.
- (80-03) Pressurizer pressure transmitter setpoint drift.
- (80-06) Damaged fuel pins (adjacent to core baffle).
- (80-13) Type B and C penetration cumulative leakage in excess of limits.

Design/Construction

- (80-05) Failure of MSIV's to close during surveillance test.

ENVIRONMENTAL

Personnel

- (10/18/79) High plant effluent pH
- (7/8/80) High plant service water effluent pH/chlorine

QUALITY CONTROL

Design/Construction

- (79-13) Nonfunctional seismic restraint on containment spray suction piping.
- (79-15) Masonry block wall problems.
- (80-07) Aux building south wall not properly connected at top.
- (80-12) Missing seismic restraints on aux feed pump steam drain line.
- (80-14) Incorrectly installed seismic restraint on control room "A" emergency vent cooling coil.

DISTRIBUTION OF TYPES OF NONCOMPLIANCE ITEMS
 Inspections Conducted September 1, 1979, to August 31, 1980

FUNCTIONAL AREA	Violation	Infraction	Deficiency
Management Control			
Plant Operations		1	
Refueling Operations & Activities			
Maintenance			
Surveillance & Preoperational Testing		3	1
Training			1
Radiation Protection		4	2
Environmental Protection			1
Emergency Planning			
Fire Protection			
Security & Safeguards	1	3*	
Design Changes & Modifications		1	
Reporting			
QA Audits			
Committee Activities			
Quality Control			
Procurement			
TOTAL	1	11*	5

*Two additional items cited in the notification of proposed civil penalty were withdrawn after additional information was provided by the licensee.

SUMMARY OF TROJAN INSPECTIONS AND ENFORCEMENT ACTIONS

September 1, 1979 Through August 31, 1980

<u>Report No.</u>	<u>Dates</u>	<u>Inspectors</u>	<u>Findings</u>
79-16	9/11/79	Mortensen Schuster	Enforcement Conference
79-17	9/79	Malmros	Clear
79-18	11/7-9/79	Shackleton Schuster	Investigation (Drug Arrests)
79-19	10/79	Malmros Johnston	Clear
79-20	11/25-12/2/79	Mortensen et al	Vio: Unauthorized Access to Vital Area *Inf: Former Contractor Employee Still Badged & on Access List *Inf: Failure of Guard to Require Pocket Identification
79-21	10/25-11/7/79	Fish	Inf: No Air Samples While Workers in SGs
79-22	11/6-8/79	P. Johnson Horn	Inf: No Corrective Action on Unacceptable Surveillance Test Result
79-23	11/79	Malmros	Inf: Use of Uncalibrated Test Guage to Calibrate In-plant Instruments
79-24	12/79	Malmros Johnston	Clear
79-25	11/26-12/4/79	Morrill Kirsch Shackleton	Clear (Review of Block Wall Problem)
80-01	1/80	Malmros	Inf: Unattended and Unlocked Vehicle in Protected Area

*Withdrawn by RV after further information provided by licensee.

<u>Report No.</u>	<u>Dates</u>	<u>Inspectors</u>	<u>Findings</u>
80-02	1/21-23/80	P. Johnson Carlson	Def: Documentation of Operator Reactivity Manipulations. Dev(2): Review of Operator Requalification Program
80-03	2/15/80	Schuster	> Clear (Meeting, Licensee and NRR)
80-04	2/80	Malmros Johnston	Clear
80-05	3/17-4/21/80	Mortensen et al	Inf: Failure to Lock Communications Room Door
80-06	3/80	Malmros Johnston	Clear
80-07	4/14-18/80	Fish	Def: Plant Effluent pH Def: Labeling of Waste Containers
80-08	4/8-18/80	Haist Elin Narbut Wagner	Clear (Several Unresolved Items)
80-09	4/21-24/80	Horn Bagaqlio	Clear
80-10	4/80	Malmros Johnston	Clear
80-11	5/80	Malmros Johnston	Inf: Use of Unreviewed Electrical Test Procedure Def: No Certifications for Individuals Performing Tests
80-12	5/14-16/80	P. Johnson	Clear
80-13	6/10-11/80	Morrill	Clear (Block Wall Problem)

<u>Report No.</u>	<u>Dates</u>	<u>Inspectors</u>	<u>Findings</u>
80-14	6/80	Malmros Johnston	Clear
80-15	7/14-18/80	Schaefer	Inf: Inadequate Compensatory Measures (for Unapproved Perimeter Alarm System)
80-16	4/6-18/80	North Yuhas 2 Consultants	(H.P. Appraisal) Inf: Unapproved Fluid System Jumper (10 CFR 50.59) Inf: Failure to Instruct Workers per 10 CFR 19.12
80-17	6/19/80	Fong	(Waste Shipment Inspection, Richland) Inf: Leaking Container Def: 2 Unmarked Containers
80-18	7/21-25/80	Foster (PAB)	Clear
80-19	7/21-25/80	P. Johnson Carlson	Clear
80-20	7/80	Malmros Johnston	Inf: Failure to Follow Procedure (Resulting in Inadvertent Deboration)
80-21	8/80	Malmros Johnston	Clear