



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

August 29, 1988

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

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

Dear Sir:

Reply to a Notice of Violation

Your letter of July 28, 1988 transmitted a Notice of Violation associated with Nuclear Regulatory Commission Inspection Report 50-344/88-27. Attached is our response to that Notice of Violation.

Sincerely,

Attachment

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

Mr. Bill Dixon  
State of Oregon  
Department of Energy

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

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REPLY TO A NOTICE OF VIOLATION

Violation

Part 50.59(b)(1) to Title 10 of the Code of Federal Regulations, [10 CFR 50.59(b)(1)] states, in part, that "The licensee shall maintain records of changes in the facility . . . made pursuant to this section, to the extent that these changes constitute changes in the facility as described in the safety analysis report . . . These records must include a written safety evaluation . . .".

Section 2.1.1.3 of the licensee's Final Safety Analysis Report (FSAR) states, in part, that the restricted area as defined in 10 CFR 20, is shown in Figure 2.1-5. Figure 2.1-5 depicts the restricted area as being within the immediate site protected area boundary.

10 CFR 20.3(a)(14) "Restricted Area" is defined, in part, as any area access to which is controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

Section 11.4.2.5 of the licensee's FSAR states, in part, that the onsite storage facilities for packaged radioactive wastes is within the protected area boundary.

Contrary to the above, as of June 30, 1988, the licensee had not performed a written safety evaluation for radioactive materials being stored outside of the protected area during the period of April 1987 through June 30, 1988.

This is a Severity Level IV Violation (Supplement I).

Response

Portland General Electric Company (PGE) acknowledges the violation.

1. Reason for Violation:

The reason for the violation was procedural inadequacy. Section II.E.4 of the Radiation Protection Manual (RPM) allows storage of radioactive/contaminated material ". . . in areas approved by the Radiation Protection Supervisor." This section of the RPM does not reference Section 11.4.2.5 of the FSAR which specifically describes storage areas. In addition, the RPM does not require the Radiation Protection Supervisor to perform a safety evaluation when approving a new storage area.

2. Corrective Action Taken and Results Achieved:

- a. The radioactive material has been either shipped offsite or moved to a new storage location immediately adjacent to the protected area boundary. This area is within a locked fence, providing improved access control, and is large enough to handle the trailers on which the radioactive material is being stored. (The trailers were not moved to the storage area inside the protected area due to space limitations.)
- b. A safety evaluation has been performed for alternate storage locations, including the fenced area where the trailers were moved. The evaluation concluded that no unreviewed safety or environmental questions were involved and that personnel are adequately protected from exposure to radiation and radioactive materials.

3. Corrective Action to Avoid Further Violations:

Section II.E.4 of the RPM is being revised to include additional guidance for designating radioactive/contaminated material storage areas. The revision will include specific direction to perform a safety evaluation and is scheduled for completion by October 31, 1988.

4. Date When Full Compliance Will be Achieved:

Full compliance has been achieved, since the radioactive materials are now being stored in a location for which a safety evaluation has been performed.