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PORTLAND GENERAL ELECTRIC COMPANY

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WILLIAM J. LINDBLAD
PRESIDENT

November 14, 1986

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Mr. John B. Martin
Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek CA 94596-5368

Dear Mr. Martin:

Response to Notice of Violation and
Proposed Imposition of Civil Penalty

Your letter of October 15, 1986 transmitted a Notice of Violation and Proposed Imposition of Civil Penalty based upon NRC Inspection Report Nos. 50-344/86-10, 50-344/86-24, and 50-344/86-32. Attached to this letter is our response to that Notice of Violation and Proposed Imposition of Civil Penalty, and a voucher in the amount of \$50,000 for payment of the Proposed Civil Penalty.

Sincerely,

CP Jensen for

Attachment

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

Mr. Steven A. Varga
Director, PWR-A
Project Directorate No. 3

Subscribed and sworn to before me this 14th day of November 1986.

Carole A. Hodgson
Notary Public of Oregon

My Commission Expires:

August 9, 1987



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PGE RESPONSE TO NOTICE OF VIOLATION AND
PROPOSED IMPOSITION OF CIVIL PENALTY

I. Violation Assessed as Civil Penalty

Technical Specification Limiting Condition for Operation (LCO) 3.5.2 requires in Modes 1, 2, and 3 that two independent emergency core cooling system (ECCS) subsystems be operable with each subsystem comprised in part of a residual heat removal (RHR) pump and an operable flow path.

Technical Specification LCO 3.0.3 requires that when a Limiting Condition for Operation and/or associated action requirements cannot be satisfied, the reactor be placed in at least hot standby within one hour.

The operability for the RHR system flow path for a Loss-of-Coolant Accident is represented in the Trojan Updated Final Safety Analysis Report (FSAR), Section 6.3 which shows that RHR flow will be injected into all four cold legs of the Reactor Coolant System.

Contrary to the above, on March 31, 1986 while in Mode 1 for one hour and 10 minutes, portions of two ECCS subsystems (the RHR system) were inoperable when Valve MO-8809A was closed. With Valve MO-8809A closed, the flow path for both trains of RHR cold leg injection was such that RHR flow to only two of the four Reactor Coolant System cold legs would have been achieved.

This is a Severity Level III violation (Supplement I).
(Civil penalty - \$50,000)

PGE Response

PGE acknowledges that on March 31, 1986, while in Mode 1, with Valve MO-8809A closed, portions of two ECCS subsystems were inoperable for 10 minutes longer than that permitted by Technical Specification LCO 3.0.3. The reason for the violation has been determined to be the unavailability of accurate and detailed design basis documents. As such, the specific requirements to maintain Valves MO-8809A and B open while in Modes 1, 2, and 3 were not being implemented by the appropriate Plant Operating Procedures. Corrective actions that have been taken include revising Plant Operating Manual Procedures to specify appropriate cautions and warnings to ensure that Valves MO-8809A and B remain open while operating in Modes 1, 2, and 3. Other ECCS subsystems were reviewed to see if there are other valves that could be inadvertently mispositioned and likewise affect the operability of their ECCS subsystems similar to Valves MO-8809A and B. This review has been completed and no other

valves were determined to be subject to the same mispositioning as Valves MO-8809A and B. However, additional precautions have been added to Plant Operating Procedures to ensure that all ECCS subsystems are maintained operable in Modes 1, 2, and 3.

A design basis document effort was initiated for 12 safety-related systems at Trojan, one of which is the RHR system. Formal completion of the design basis document program was expected to occur by December 31, 1986. Subsequently, it appears that some systems will not be completed until the end of April 1987. The RHR system design basis document is scheduled to be completed by February 28, 1987.

Full compliance with the Trojan Technical Specifications was achieved on March 31, 1986 when Valve MO-8809A was reopened. Full compliance was ensured by April 30, 1986, when the appropriate procedures were revised to add precautions.

II. Violation Not Assessed a Civil Penalty

10 CFR 50, Appendix B, Criterion V, as implemented by the Trojan Nuclear Quality Assurance Program, Section 5.0, requires in part that activities affecting quality be prescribed by and accomplished in accordance with documented procedures.

Maintenance Procedure MP-5-1, Pressurizer Safety Valve Inservice Test, Attachment I.B.5, Steps 6.h and 6.k, and Maintenance Request 86-2120, Work Instructions, Step 7, required a quality control inspector to witness the bolt torquing of the inlet flange of Pressurizer Safety Valve PSV-8010A in accordance with Quality Control Procedure QCP-3, Verification/Witnessing Inspections. QCP-3, Section II, defines witnessing as, "An independent confirmation, by means of actual physical observation, that a condition or process complies with specified requirements".

Contrary to the above, on May 13, 1986, a quality control (QC) inspector failed to properly follow Procedures MP-5-1 and QCP-3 for the installation of the inlet flange of Valve PSV-8010A. The QC inspector failed to witness the bolt torquing process, including requirements for stretch and reference marks on the nuts and flange, and signed the inspection record to document that the inspection had been completed.

This is a Severity Level III violation (Supplement I).

PGE Response

PGE acknowledges and admits this violation of the Nuclear Quality Assurance Program and implementing procedures. The reasons for the violation have been determined to be inadequate indoctrination

training and field supervision of contracted QC personnel. Contributing causes were inadequate pre-job planning, improper implementation of QC and maintenance procedures and inaccurate documentation of inspections due to carelessness and/or negligence on the part of the contracted QC inspector. Corrective steps that were taken involve the following:

- A. Reinspection of cleanliness and bolt torques on PSV-8010A.
- B. All work inspected by this contracted QC inspector was either reinspected or evaluated to have been performed satisfactorily by some other means (eg, testing). All of the items reinspected were found to be acceptable.
- C. The contracted QC inspector was terminated on May 15, 1986, two days after his failure to follow procedures.
- D. A new Quality Control Procedure, QCP-25, was developed and implemented to provide for the "Indoctrination and Training of Contracted and Temporary Quality Control Personnel".

Corrective steps to be taken to avoid further violations of this type include the following:

- A. Surveillances of contractor QC personnel will be performed in sufficient depth and early in the outages beginning with the 1987 audit/surveillance schedule and 1987 refueling outage to provide a high confidence level that contractors are performing as expected.
- B. The number of permanent PGE QC inspectors assigned to "lead" or supervisory positions will be increased to ensure contracted QC inspectors are periodically monitored for effectiveness and procedural compliance.
- C. QC contractor representatives designated as "lead-men" will commence work at Trojan four weeks prior to the refueling outage for extensive training and indoctrination. The additional contracted QC personnel will commence work one week prior to the outage in order to complete their training and indoctrination required by QCP-25.

Although these items will not be implemented until 1987, full compliance with the Nuclear Quality Assurance Program and implementing procedures has been determined to be achieved.