PORTLAND GENERAL ELECTRIC COMPANY EUGENE WATER & ELECTRIC BOARD AND PACIFIC POWER & LIGHT COMPANY

TROJAN NUCLEAR PLANT

Operating License NPF-1 Docket 50-344 License Change Application 44

This License Change Application is submitted in support of Licensee's request to revise specific surveillance requirements in the Trojan Technical Specifications (Appendix A to Operating License NPF-1) regarding the Auxiliary Feedwater Pumps, Control Room Emergency Ventilation System, and Containment Isolation Valves.

PORTLAND GENERAL ELECTRIC COMPANY

By C. Jooleum, An C. Goodwin, Jg.

Assistant Vice President Thermal Plant Operation and Maintenance

Subscribed and sworn to before me this 13th day of March 1978.

Carole a. Dodgdon Notary Public of Gregon

My Commission Expires: August 9 1979

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- Standard Technical Specification 4.7.1.2.1.a. of Page 3/4 7-5: The minimum steam pressure at which the steam-driven auxiliary feedwater pump can be adequately tested should be raised from 200 psig to 275 psig and the discharge pressure on recirculation should be increased from 1470 psig to 1580 psig.
- 2. Standard Technical Specification 4.7.6.1.a. of Page 3/4 7-18: Control Room Emergency Ventilation System, the paragraph should specify the preheater as ON during surveillance testing. The intent of the specification is to regulate the relative humidity of air passing through the charcoal filter bed and this is met with preheat coils on.
- Standard Technical Specification 3.6.3.1 of Page 3/4 6-22: Containment Isolation Valves, the following valves should be footnoted to indicate that they may be exempted from being closed:

MO-2069A and MO-2069B - SIS recirculation sump - open in all modes.

Proposed replacement pages for the above changes are provided as Attachment A to this LCA.

#### REASON FOR CHANGE

1. The minimum allowable auxiliary feedwater pump discharge pressure specified in Technical Specification 4.7.1.2.1.a. is actually the design discharge pressure at design flow and design operating conditions. The discharge pressure expected when operating on recirculation flow is in excess of 1700 psig. Since the pumps are to be tested on recirculation flow, the minimum allowable discharge pressure should be >93 percent (per ASME Section XI) of nominal design discharge pressure on recirculation which is spproximately 1580 psig.

Experience in operational testing of the steam-driven auxiliary feedwater pump has shown that steam pressures <275 psig are insufficient to develop a discharge pressure that is indicative of pump capability, operability, or performance. Furthermore, although the pump is operable at steam pressures <800 psig, it is difficult to correlate actual pump performance with that expected by turbine-pump curves. Therefore, since it is desirable to test the steam-driven auxiliary feedwater pump at steam pressures >800 psig and not always possible to accomplish, it is proposed to test it in two phases if the plant is in the process of starting-up and the 31-day test interval has elapsed. This will allow an overall operability check of the pump and turbine driver at low steam pressures (>275 psig) and a performance evaluation test as soon as possible after reaching 800 psig steam pressure.

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## REASON FOR CHANGE (Concluded)

- 2. The purpose of Technical Specification 4.7.6.1.a. is to demonstrate the operability of the Control Room Emergency Ventilation System. This system has both preheaters, for regulating the relative humidity of the air prior to passing through the charcoal adsorbers, and after heaters, for maintaining proper temperature in the control room. The after heaters are only necessary for habitability; the preheaters are necessary to prevent exhaustion of the charcoal adsorbers due to excessive moisture in the air. Proper operability of the Control Room Emergency Ventilation System then is dependent only upon proper operation of the preheaters regardless of the operation of the after heaters. The wording of this specification (4.7.6.1.a.) is not clear which heaters are to be energized for the 10-hr test. This change will clarify that point.
- 3. Amendment 20 to the Trojan FSAR specified that valves MO-2069A and MO-2069B, Containment Sump SIS Recirculation Trains A and B, respectively, must be open in all modes of operation. By adding the described footnote to Table 3.6-1, the Technical Specifications are clarified to incorporate this requirement.

# SAFETY EVALUATION

These proposed changes have been determined to not constitute an unreviewed safety question nor change or alter the consequences or probability of an accident previously considered. Furthermore, it has been determined that no new accidents are created.

The change proposed by Item 1 involves improved means to demonstrate the operability of the auxiliary feedwater pumps. It clarifies the steam pressures at which the steam-driven auxiliary pump is physically able to be tested with meaningful results.

Changes proposed by Items 2 and 3 involve clarification of specific concerns relative to the respective systems. There is no change to the intent of either Technical Specification.

### SCHEDULE CONSIDERATIONS

Since these changes are of an editorial nature, it is expected that they could be acted upon in a reasonable amount of time or by August 1, 1978.