

APPENDIX A

NOTICE

VIOLATION

Portland General Electric Company  
Trojan Nuclear Plant

Docket No. 50-344  
License No. NPF-1

During NRC inspections conducted from February 12 through March 25, 1989 and from June 18 through July 29, 1989, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1989), the violations are listed below:

- A. 10 CFR Part 50, Appendix B, Criterion XVI, provides in part that "measures shall be established to assure that conditions adverse to quality such as ... nonconformances are promptly identified and corrected."

Nuclear Quality Assurance Program, PGE-8010, section 16.2.1., states in part, that "Any PGE employee has the authority and responsibility to report a nonconforming activity (NCAR) to their manager or supervisor who will assure that the nonconforming activity is or has been documented on an NCAR unless it has been previously documented."

Contrary to the above, on July 14, 1989, while conducting steam generator crevice flushing per OI-T-61, "Steam Generator Crevice Flushing," Revision 0, dated July 11, 1989, licensee employees identified boiling in the RHR/CCW heat exchangers but did not promptly document the boiling as a nonconforming activity (NCAR).

This is a Severity Level IV violation (Supplement I)

- B. 10 CFR Part 50, Appendix B, Criterion V, states in part that "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."
1. Contrary to the above, maintenance instruction (MR) 89-1538 did not provide appropriate work instructions specifying that the calibration of the first stage impulse pressure lead-lag module, LY-505-E, could only be calibrated while shutdown. Because the procedure was used with the reactor at 100% power on March 4, 1989 a steam generator water level transient occurred.

This is a Severity Level IV violation.

2. Contrary to the above, Temporary Operating Instruction OI-T-61, "Steam Generator Crevice Flushing," Revision 0, dated July 11, 1989, was not appropriate for the circumstances in that the procedure required closing the component cooling water (CCW) supply valves to the residual heat removal heat exchanger with 315 degrees F. reactor coolant flowing through the heat exchanger, which resulted in the shell side of the RHR/CCW heat exchanger exceeding its design analyzed temperature by approximately 105 degrees F. on July 14, 1989.

This is a Severity Level IV violation.

3. Administrative Order (AO) 4-2, "Use of Procedures" defines the requirements for the use of plant procedures contained in the Plant Operating Manual (POM).

Section 4.2.3.a. of the POM requires in part that personnel are not to blindly follow procedures. Rather, if the POM or lower tier procedures cannot or should not be performed as written, procedures are to be revised or deviated in accordance with AO 4-4 or appropriate Lower Tier Administrative Procedures.

Contrary to the above, on July 14, 1989, while conducting crevice flushing of steam generators per procedure OI-T-61, "Steam Generator Crevice Flushing," Revision 0, dated July 11, 1989, OI-T-61 could not be performed as written, but was performed differently than written in that MO-3210 A/B were alternately opened and closed where the procedure specified the valves be closed, even though the procedure for conducting the evolution was not revised or deviated.

This is a Severity Level IV violation (Supplement I)

4. Administrative Order 3-9, "Maintenance Requests", establishes the controls for initiating, planning, performing and documenting work performed in response to Maintenance Requests (MRs).

Section 4.9.1 of this order states that "Changes in MR work instructions, made after approval by the Cognizant Work Group Supervisor, shall be submitted for supervisor approval prior to implementation"

Contrary to the above, on April 28, 1989, the work instructions of Maintenance Request 89-1770 did not include instructions for pulling wires from containment penetration BZ03; even though MR 89-1770 had been approved by the Cognizant Work Group, wires were pulled out of the penetration module without changing the work instructions or obtaining appropriate supervisor approval to conduct the wire pulling.

This is a Severity Level IV violation.

5. Administrative Order (AO) AO 5-5, "Request For Evaluation," establishes the process for requesting, documenting and tracking a Request For Evaluation (RFE).

Section 3.4.1 of AO-5-5 states in part that

"The assigned evaluator shall review the situation described in Part 1 of the RFE and the assigned RFE priority. If the evaluator determines it is not possible to completely resolve the RFE within the date implied by the assigned priority, the evaluator shall:

- a. Perform an evaluation in sufficient detail to determine what actions need to be taken to resolve the RFE and complete an Initial RFE Response..."

Contrary to the above procedure, the below are examples of RFE's which were not responded to within the date specified by the priority:

<u>RFE Number</u>	<u>Priority</u>	<u>Date Logged</u>	<u>Evaluation Date</u>	<u>Days Late</u>
6825	30 Day	6/12/89	7/28/89	16 Days
6787	7 Day	6/5/89	6/21/89	9 Days
6722	7 Day	5/19/89	/ /	No Evidence Performed
6699	7 Day	5/17/89	6/29/89	37 Days
6581	7 Day	4/27/89	5/16/89	12 Days

This is a Severity Level IV Violation.

6. Administrative Order (AO) 10-1, "Plant Housekeeping," defines the responsibilities for maintaining the plant in a clean and orderly condition.

Section B. AO 10-1 states in part that

"Each employee will perform the following at the termination of each assignment or at the end of the day if the assignment is not yet completed: 1) Wipe up minor oil spills; pick up rags, papers, and other foreign material. All solvent waste, oily rags and other flammable liquids shall be kept in fire resistant covered containers and are to be emptied at reasonable intervals as the work progresses and upon completion of the work."

Contrary to the above, at the end on the work days specified below, the following conditions existed:



- a) On June 18, 1989, oily rags and tubing were on the Diesel Driven AFW pump.
- b) On June 28, 1989, oily rags were on both Main Feedwater Pumps and insulation was lying near the pumps. Also, approximately 2.5 gallons of oil in an open bucket was next to the south MFW Pump and a half coffee can of linseed oil was next to the north MFW Pump.

This is a severity level IV violation.

Pursuant to the provisions of 10 CFR 2.201, Portland General Electric Company is hereby required to submit a written statement of explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region V, and a copy to the NRC Senior Resident Inspector, Trojan, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation if admitted, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown.

FOR THE NUCLEAR REGULATORY COMMISSION

*A. E. Chaffee*

A. E. Chaffee, Deputy Director  
Division of Reactor Safety  
and Projects

Dated at Walnut Creek, California  
this 12 day of September 1989