

September 21, 2004

Mr. Stephen M. Quennoz, Vice President  
Power Supply/Generation  
Portland General Electric Company  
Trojan Nuclear Plant  
71760 Columbia River Highway  
Rainier, Oregon 97048

SUBJECT: CLOSURE OF CLEARANCE OF MATERIALS ISSUE AT THE TROJAN  
NUCLEAR PLANT

Dear Mr. Quennoz:

In April 2003, the U.S. Nuclear Regulatory Commission (NRC) conducted an inspection at the Portland General Electric Company (PGE) Trojan Nuclear Plant (Trojan). At that time, PGE had initiated final status surveys of the Turbine Building and equipment. PGE used a release criterion of 21,000 dpm/100cm<sup>2</sup> based on the default NRC screening derived concentration guideline limits adjusted for the radionuclide mix and fractions expected from primary to secondary system leaks. The inspectors noted that in planning the FSS design for the Turbine Building, PGE treated certain components as "install systems," using the provisions of draft Regulatory Guide DG-4006 (Section B) and NUREG-1757 (Vol. 2, Sect. G-1.1). Since the inspection, the staff has been evaluating whether PGE's decommissioning approach is consistent with the License Termination Rule (LTR) and current clearance policy. The Clearance Steering Committee and Working Group evaluated the issue, and NRC senior management, including the Commission, were made aware of the issue. Specifically, NRC evaluated whether:

1. The PGE's interpretation of NRC guidance on "installed equipment" is within the context or basis of the LTR and Subpart E to Part 20; and
- b. The dose due to the potential release of systems and components after license termination is consistent with NRC guidance which present a prospective criterion of a "few mrem" for the control of solid materials.

The staff's evaluation concluded that PGE's decommissioning approach, as described in the approved License Termination Plan, is consistent with the basis for the LTR, and consistent with current NRC guidance regarding the control of solid materials. Therefore, NRC considers this issue closed.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have any questions concerning this evaluation, please contact me at (301) 415-6607.

Sincerely,

**/RA/**

John T. Buckley, Project Manager  
Decommissioning Directorate  
Division of Waste Management  
and Environmental Protection  
Office of Nuclear Material Safety  
and Safeguards

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

S. Quennoz

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