



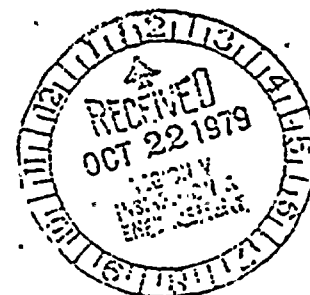
To: Andy Kober, Region V

Department of Energy

LABOR & INDUSTRIES BUILDING, ROOM 117, SALEM, OREGON 97310 PHONE 378-4040

October 13, 1979

Robert H. Engelken
Director, Region V
Nuclear Regulatory Commission
1990 N California Boulevard
Walnut Creek, CA 94596



Dear Mr. Engelken:

During its 1979 Session, the Oregon Legislative Assembly enacted and the Governor signed Senate Bill 641 which requires the Oregon Department of Energy (ODOE) to maintain an inspector at the Trojan Nuclear Plant at least 40 hours per week. A copy of this bill is attached. ODOE expects to fill this position within the next two months.

The purpose of this letter is to obtain NRC comments and agreements on the following aspects of the ODOE Inspector program as they affect NRC:

1. Training of the inspector;
2. Duties and responsibilities of the inspector;
3. Working relationships of the inspector with NRC.

ODOE believes this program is within the scope of the proposed memorandum of Understanding between NRC and the State of Oregon. ODOE proposals on each of these aspects are discussed separately below.

Training

ODOE proposes the following training schedule for the inspector:

1. Two weeks at ODOE in Salem for familiarization with ODOE people, procedures, and policies; Trojan and PGE organizational structure; and general Trojan systems and procedures.
2. Four weeks of self-study at Trojan to learn the details of Trojan systems. After this, the inspector will assume his inspection duties.

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3. Attend the following NRC training courses:

<u>Title</u>	<u>Dates</u>
Fundamentals of Inspection (O-101)	February 25-29, 1980
PWR Technology (R-404P)	March 11 - April 3, 1980
PWR Advanced Technology (R-504P)	April 15-25, 1980
PWR Simulator (R-604P)	June 2-8, 1980
BWR/PWR Radwaste (H-302)	July 28 - August 1, 1980

4. On an annual basis, attend any NRC-sponsored refresher courses for its resident inspectors and the PWR Simulator Refresher course (R-705P).

NRC permission is requested to send the inspector to the NRC courses. In addition, since the law requires 40 hours per week coverage, the ODOE nuclear engineer will be required to relieve the inspector during periods of sickness or vacation. In order to ensure he is qualified to fill in, NRC permission is requested to send the ODOE nuclear engineer to the following NRC courses:

<u>Course</u>	<u>Dates</u>
PWR Technology (R-204P)	February 4-15, 1980
PWR Simulator Preparation (R-101P)	February 27-29, 1980
PWR Simulator (R-603P)	March 3-7, 1980

NRC is also requested to provide ODOE with two complete copies of its Inspection and Enforcement Manual for use by the Nuclear Engineer and the Inspector. This will provide ODOE with a better understanding of how NRC does its job and will thus improve cooperation between NRC and ODOE.

Duties and Responsibilities

The ODOE inspector has no authority to direct PGE employees to take any action. Under Oregon law, this is the exclusive jurisdiction of the Director or in his absence, the Governor. The inspector will make his recommendations to the Director through and the Administrator of Siting and Regulation. The inspector's duties include the following:

1. Auditing reactor plant maintenance, engineering, quality assurance, security, emergency planning, and operation for compliance with federal and state safety standards. Specific aspects to be audited include the control of reactivity, radiological protection and control, water chemistry control, system repair and preventative maintenance, in-service inspections and periodic testing, and compliance with plant security programs.



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2. Assessing the significance of incidents at the plant and determining whether the corrective action taken is prompt and complete by reviewing engineering system design, sequence of events, and trouble-shooting. This will include discussion of the incident with the plant management and off-site engineering managers. The inspector will recommend to the ODOE Director if plant modifications or curtailment of plant operations are needed to assure the public health and safety pursuant with Oregon Revised Statutes 469.540 and 469.550.
3. Reviewing changes in plant operating and maintenance procedures and system modifications for conformance with state and federal requirements, compatibility with system design, and effect on safe plant operations.
4. Researching plant conditions or practices to support ODOE engineering evaluation of the safe operation of the plant including identification of as-built conditions, determination of historical performance of equipment, and review of operating practices.

Working Relationships

The following are proposed inspector working relationships with NRC:

1. The inspector will not attempt to duplicate the regulatory activities of the NRC; but rather the inspector will supplement the NRC regulatory activities in order to provide broader assurance that Trojan is not endangering the environment and the health, safety, and welfare of the public.
2. The inspector will cooperate with the assigned NRC resident inspectors.
3. The inspector may observe and participate in all NRC audits, reviews, inspections, investigations, exit interviews, drills, and meetings at Trojan. Conversely, the NRC resident inspector may observe or participate in all ODOE audits, reviews, inspections, investigations, exit interviews, drills, and meetings at Trojan.
4. The inspector will attend to the maximum extent practical all NRC exit interviews. NRC will advise the inspector of the date, time, and location of all exit interviews.



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Robert H. Engelken
October 18, 1979
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Your comments are requested by November 1, 1979. Thank you for your cooperation.

Sincerely,

Lynn Frank
Director

LF/BD:cs
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Attachment: Senate Bill 641

cc: Joe L. Williams, PGE
Robert G. Ryan, NRC, State Programs
Andrew W. Robart, NRC, Region V
Sheldon A. Schwartz, NRC, State Programs
Charles M. Trammell, NRC, Operating Reactors Branch #1
Paul C. Yundt, Trojan
Charles Goodwin, Jr., PGE
Michael H. Malmros, NRC, Trojan

