



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 188 TO FACILITY OPERATING LICENSE NO. NPF-1

PORTLAND GENERAL ELECTRIC COMPANY

THE CITY OF EUGENE, OREGON

PACIFIC POWER AND LIGHT COMPANY

TROJAN NUCLEAR PLANT

DOCKET NO. 50-344

1.0 INTRODUCTION

By letter dated September 25, 1992, and supplemented October 14, 1992, Portland General Electric Company, et al. (PGE or licensee) submitted a request for changes to the Facility Operating License No. NPF-1 for Trojan Nuclear Plant. The proposed changes would delete License Condition 2.C.(11), "Fuel Assemblies," from Facility Operating License No. NPF-1. This is an administrative change since the license condition is no longer necessary at Trojan Nuclear Plant, and is the result of a commitment made by the licensee in a letter dated March 2, 1990. This request is related to Generic Letter 90-02, Supplement 1, "Alternative Requirements for Fuel Assemblies in the Design Features Section of Technical Specifications," which was issued on July 31, 1992.

2.0 EVALUATION

The use of stainless steel rods in fuel assemblies was necessary to avoid water-jetting through gaps in the baffle plates surrounding the reactor core due to the pressure difference across the plates. Water impingement caused fuel rod damage in peripheral fuel assemblies. However, this contradicted Technical Specification (TS) 5.3.1, "Fuel Assemblies." License Condition 2.C.(11) provided a waiver from the requirements of Technical Specifications 5.3.1, "Fuel Assemblies," which allowed use of stainless steel rods and extra grid straps in fuel assemblies. This paragraph has been continuously modified to extend the waiver for subsequent cycles (i.e., Amendments 45, 60, 75, and 82).

With a modification to the reactor core internals to reverse the bypass flow direction between the core barrel and the baffle plates, the pressure differential was reduced across the baffle plates, and thus allowed use of unmodified fuel assemblies. Amendment 91 to the license condition was issued to prohibit fresh fuel assemblies containing stainless steel rods and extra grid straps.

However, in a letter dated March 2, 1990, the licensee interpreted this license condition as not applying to fuel reconstitution. TS Amendment 153 allowed a limited substitution of fuel rods with filler rods consisting of Zircaloy-4 or stainless steel, or by vacancies, provided that it was justified by a cycle-specific reload safety analysis. The licensee maintained that the license condition prevented the use of stainless steel rods in fresh fuel assemblies for the purpose of coping with the baffle water-jetting problems, but did not limit the use of stainless steel rods for other reasons such as fuel reconstitution. The licensee committed to delete the contradictory license condition.

Since the modification eliminated the issue concerning baffle water-jetting damaging peripheral fuel assemblies, the need for License Condition 2.C.(11) is no longer relevant, and should be removed in order to avoid any contradiction between the License Condition 2.C.(11) and TS 5.3.1. In regard to the cycle-specific reload safety analysis and fuel reconstitution issues, PGE committed in its October 14, 1992, letter to implement the features of Generic Letter 90-02, Supplement 1, although PGE chose the option not to change the Trojan Technical Specifications. Specifically, any fuel reconstitution performed for the Trojan Nuclear Plant will be performed in accordance with an NRC-approved methodology as defined in Generic Letter 90-02, Supplement 1. This should preclude any future difficulties which may arise concerning the use of stainless steel rods in fuel assemblies.

Therefore, based upon the information provided in the licensee's submittal dated September 25, 1992, and supplemented October 14, 1992, and the information provided above, the staff approves the deletion of License Condition 2.C.(11) from Facility Operating License NPF-1.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Oregon State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (57 FR 48824). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Lawrence E. Kokajko

Date: December 4, 1992

November 30, 1992

Docket No. 50-344

Mr. James E. Cross  
Vice President  
and Chief Nuclear Officer  
Portland General Electric Company  
121 S.W. Salmon Street  
Portland, Oregon 97204

Dear Mr. Cross:

SUBJECT: ISSUANCE OF AMENDMENT FOR TROJAN NUCLEAR PLANT (TAC NO. M84651)

The Commission has issued the enclosed Amendment No. 188 to Facility Operating License No. NPF-1 for Trojan Nuclear Plant. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated September 25, 1992, and supplemented October 14, 1992 designated by you as LCA-216.

The amendment deletes License Condition 2.C.(11), "Fuel Assemblies," from Facility Operating License NPF-1. This is an administrative change since the license condition is no longer necessary at Trojan Nuclear Plant.

A copy of the related Safety Evaluation is also enclosed. A notice of issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

Original signed by:  
Lawrence E. Kokajko, Senior Project Manager  
Project Directorate V  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.188 to NPF-1
2. Safety Evaluation

cc w/enclosures:  
See next page

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