



Portland General Electric Company

James E. Cross  
Vice President and Chief Nuclear Officer

December 11, 1992

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington DC 20555

Dear Sirs:

Request for Scheduler Exemption from  
10 CFR 50 Appendix E (IV)(F)(2)

Portland General Electric Company (PGE) is requesting a one time scheduler exemption from the requirements of Title 10 to the Code of Federal Regulations, Part 50, Appendix E, Section (IV)(F)(2), requiring each licensee at each site to annually exercise its emergency plan. This exemption will allow PGE to defer conducting its annual emergency plan exercise currently scheduled for December 15, 1992 until the first quarter of 1993. The basis for this exemption is submitted in the attachment to this letter.

Sincerely,

T. D. Walt for  
J. E. Cross

Attachment

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith  
State of Oregon  
Department of Energy

Mr. R. C. Barr  
NRC Resident Inspector  
Trojan Nuclear Plant

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## **Request for Scheduler Exemption from 10 CFR 50 Appendix E(IV)(F)(2)**

### **Description of Exemption Request**

Title 10 of the Code of Federal Regulations, Part 50, Appendix E, Paragraph IV, Section F, Item 2 states, "Each licensee at each site shall annually exercise its emergency plan." The Trojan Radiological Emergency Response Plan (RERP) 1992 Annual Exercise is currently scheduled for December 15, 1992. Portland General Electric (PGE) requests a one time scheduler exemption from this annual exercise requirement. PGE has made efforts to comply with this regulation, but as a result of activities ongoing at the site due to an unplanned outage that commenced November 9, 1992, compliance with this regulation would incur undue burden on PGE in terms of additional staff workload and outage costs.

### **Basis for Exemption Request**

The provisions of 10 CFR 50.12 allow specific exemptions from the requirements of 10 CFR 50 provided the exemptions are authorized by law, are consistent with the common defense and security, are accompanied by special circumstances, and do not present an undue risk to the public health and safety. PGE concludes that the activities sought to be conducted under this exemption request are clearly authorized by law, are consistent with the common defense and security, and do not present an undue risk to the public health and safety. PGE believes special circumstances exist with regard to the performance of the annual exercise during the 1992 calendar year as described below.

*10 CFR 50.12 (a)(2)(iii) states, "Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated;..."*

The Trojan Nuclear Plant (TNP) experienced a steam generator tube leak that resulted in a plant shutdown November 9, 1992. Though the repair of the leaking steam generator tube is complete, eddy current inspection of the TNP steam generators is ongoing, and plant startup is not expected to occur until after January 1, 1993.

During this outage, a number of plant personnel, also having emergency plan responsibilities, are heavily involved with activities required to return the plant to power operation as soon as possible. A number of these personnel are key supervisory and management personnel. To conduct the annual emergency plan exercise on its scheduled

date of December 15, 1992, could reduce personnel coverage of plant activities during a time when workload demand is heavy. Additionally, work within the Radiologically Controlled Area (RCA) would have to be substantially reduced for the duration of the exercise because Radiation Protection (RP) personnel would not be available to cover both outage and exercise activities. If the exercise were to be conducted as scheduled, the result could be a substantial slow down in the progress of outage activities resulting in an extension of the current forced outage. The resultant outage extension would place an unduly heavy burden on PGE.

The current exercise schedule would require senior management, critical outage supervisory and craft personnel to attend player and controller briefings on the day preceding the exercise, to participate in the exercise itself most of the day shift on December 15, 1992, and critiques on the day following the exercise, thus decreasing their availability during the outage.

In addition to the potential impact on plant personnel and the outage duration, Trojan senior management considers it prudent to conduct emergency plan exercises at times other than while the plant is involved in complicated plant evolutions. The current forced outage for steam generator eddy current inspection, that requires the reactor coolant system to be operated in a reduced inventory condition, typifies just such a condition. The deferring of this exercise until the first quarter of 1993 would help maximize plant safety.

As well as being prudent from a safety standpoint, the combination of added workload on the remaining plant staff, and the economic impact from the potential outage extension, make the performance of the 1992 annual exercise on its scheduled date of December 15, 1992, undesirable.

**10 CFR 50.12 (a)(2)(v) states, "*The exemption would provide only temporary relief from the applicable regulation and the licensee or applicant has made good faith efforts to comply with the regulation;...*"**

The 1992 annual exercise was initially scheduled for November 17, 1992, (PGE to NRC letter, August 12, 1992). PGE had completed necessary preparations for this exercise. However, as a result of the above steam generator tube leak, the initial scheduled date of November 17, 1992, was deferred until December 15, 1992, (PGE to NRC letter, November 20, 1992). PGE undertook the necessary preparatory actions to conduct the annual exercise on this date, in an effort to comply with 10 CFR 50, Appendix E, Section (IV)(F)(2). However, as a result of the continued forced outage, the annual exercise cannot be practicably performed on this date. PGE is requesting temporary relief from the annual requirement, deferring the conduction of this exercise until the first quarter of 1993. The precise date selected for this exercise will depend on the duration of the current forced outage.

### Conclusion

Portland General Electric has made a good faith attempt to conduct the annual emergency plan exercise in accordance with 10 CFR 50 Appendix E requirements. However, as a result of the steam generator tube leak that occurred in November 1992, the ensuing forced outage has created a situation in which undue hardship would be borne by PGE to conduct this exercise as scheduled. It is on this basis that this exemption request is being submitted.

### Potential Environmental Impact

Pursuant to the requirements of 10 CFR 50.12, PGE is requesting a one time schedular exemption from the requirements of 10 CFR 50, Appendix E, (IV)(F)(2) for the Trojan Nuclear Plant. This exemption will allow the deferral of the Trojan Radiological Emergency Response Plan 1992 Annual Exercise from its currently scheduled date of December 15, 1992, until the first quarter of 1993.

The proposed exemption does not involve any measurable environmental impacts, as the plant configuration and operation are not changed. In addition, the likelihood of a radiological accident is not affected as a result of the requested exemption.

The proposed change does not affect non-radiological plant effluents. Therefore, there are no significant non-radiological environmental impacts associated with the requested exemption request.

As the proposed exemption is schedular only, and does not involve any change to the emergency organization and plan that are in place at Trojan, the requested exemption does not involve a significant environmental impact.