

PORTLAND GENERAL ELECTRIC COMPANY  
EUGENE WATER & ELECTRIC BOARD  
AND  
PACIFIC POWER & LIGHT COMPANY  
  
TROJAN NUCLEAR PLANT

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Operating License NPF-1  
Docket 50-344  
License Change Application 122

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This License Change Application requests modification of Operating License NPF-1 to reflect a change to the fire pump diesel engine Surveillance Requirement, correction of the Reactor Coolant System volume, and a more clearly identified Low Population Zone.

PORTLAND GENERAL ELECTRIC COMPANY

By

*B. D. Withers*

Bart D. Withers  
Vice President  
Nuclear

Subscribed and sworn to before me this 14th day of June 1985.

*Carole A. Roddy*  
Notary Public of Oregon

My Commission Expires:

*August 9, 1987*



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LICENSE CHANGE APPLICATION 122

The following changes to Appendix A of Facility Operating License NPF-1 are requested (proposed replacement pages are provided as Attachment 1).

Page 3/4 7-25 - Technical Specification 4.7.8.1.2.c is revised to delete the requirement to perform a fire pump diesel engine inspection only during shutdown modes.

Page B 3/4 1-1 - Technical Specification (Bases) 3/4.1.1.3 is changed to read . . . "an equivalent Reactor Coolant System volume of 12,900 cubic feet" . . . This change maintains consistency within the Technical Specifications.

Page 5-3 - Figure 5.1-2 is replaced with a new figure which more accurately (and clearly) identifies the Low Population Zone for the Trojan Nuclear Plant. No change is required to Technical Specification 5.1.2 (Page 5-1).

Page 5-5 - Technical Specification 5.4.2 is changed to indicate that the Reactor Coolant System (RCS) volume (hot) is 12,900  $\pm$  100 cu ft.

REASON FOR CHANGES

Technical Specification Surveillance Requirements for the fire pump diesel engine require a diesel inspection at least once per 18 months, during shutdown, in accordance with procedures prepared in conjunction with its manufacturer's recommendations for the class of service. Limiting this inspection to shutdown periods only is unduly restrictive and results in inefficient use of labor and material resources. Deletion of "during shutdown" would allow this inspection to be performed during operation.

Trojan Technical Specification 5.4.2 states that the total water and steam volume of the RCS is 13,104  $\pm$  100 cu ft at a nominal  $T_{avg}$  of 584.7°F (ie, 100 percent power  $T_{avg}$ ). This value appears to be inconsistent with Table 5.1-1 of the Updated FSAR, which identifies the RCS volume as 12,540 cu ft. At another Updated FSAR location, Table 15.8-1, RCS volume is given as 12,550 cu ft. The FSAR numbers are cold volumes; ie, before applying the actual volumes of the Trojan calculation as 12,903 cu ft (hot), and 12,527 cu ft (cold). The FSAR will be corrected as part of Amendment 3 in July 1985.

Figure 5.1-2 of the Trojan Technical Specifications appears to indicate a Low Population Zone of 5-mile radius, which is inconsistent with the Trojan Radiological Emergency Plan (PGE-1008) and with the Updated FSAR.

#### SAFETY/ENVIRONMENTAL EVALUATION

Fire protection requirements do not differ significantly between operational and shutdown modes. The length of time in which the diesel engine is taken out of service for this inspection would be less than that permitted by Technical Specifications for other equipment (eg, 72 hours). Also, whenever the diesel engine is out of service for inspection, backup capability is provided by the redundant motor-driven fire pump.

Since the bases of Technical Specification 3/4.7.8 does not address fire pump diesel engine surveillance, a reduction of the margin of safety, as defined in the basis of the Technical Specifications, does not occur.

This license change also results in corrections to Technical Specification 5.4.2 and Technical Specification Bases 3/4.1.1.3, and a new Figure 5.1-2 that more clearly depicts the 2-1/2-mile Low Population Zone. These changes are administrative in nature and do not involve an unreviewed safety question. The RCS volume used in the Trojan safety analysis is not affected, nor is the minimum allowable RCS flow rate during boron dilution operations (Technical Specification 3.1.1.3).

These Technical Specification changes do not affect any system or component which could cause an impact on the environment.

#### SIGNIFICANT HAZARDS CONSIDERATIONS

This change revises Technical Specification 4.7.8.1.2.c to allow for the performance of diesel engine inspections during operational modes other than shutdown. Revision of Technical Specification 5.4.2 agrees with a calculation of RCS volume performed by Westinghouse in 1975. Figure 5.1-2 is replaced with a new figure that more clearly depicts the 2.5-mile Low Population Zone. These changes are administrative in nature and do not relax any of the criteria used to establish safety limits, do not affect the bases for any limiting safety system settings or limiting conditions for operation, do not affect the term of the operating license nor authorized maximum core power level, and do not involve an unreviewed safety question nor a change in Plant operation. Therefore, these changes do not involve a significant hazards consideration.