

JUL 3 1985

Portland General Electric Company
121 S. W. Salmon Street
Portland, Oregon 97204

Attention: Mr. Bart D. Withers
Vice President, Nuclear

SUBJECT: QUALITY ASSURANCE PROGRAM FOR TROJAN OPERATIONS

On April 29, 1985 you submitted Revision 10 of the Nuclear Quality Assurance Program (NQAP) for the Trojan Nuclear Plant. We have reviewed the revision submitted and have determined that additional information or clarification is needed addressing the following areas of your manual:

Chapter 3.0 Design Control

- a. Section 3.2.3. Deletion of the Nuclear Safety and Regulation Department's review and concurrence with the Request for Design Change safety and environmental evaluations prior to review by the Plant Review Board is a reduction in the QA program commitments. Additional justification is requested for this deletion in order to evaluate the acceptability of this change.
- b. Section 3.2.4. Revision 10 does not address the requirement for the appropriate engineering department's approval of Detailed Construction packages. Please provide clarification for this omission or if this action is no longer a requirement, justification for the apparent reduction in QA program commitments.

Chapter 15.0 Nonconforming Material, Parts or Components and Corrective Action

Section 15.1 (Purpose). This section fails to provide a statement concerning corrective action. A description of the Purpose as stated in Chapter 16.0 of Revision 9 is needed since Revision 10 is incorporating requirements for corrective action.

Chapter 16.0 Nonconforming Activities and Corrective Action

Section 16.2.3 of Revision 9 required corrective actions associated with nonconforming activities to be submitted to the plant General Manager for approval. Revision 10 replaced "the plant General Manager" with "the responsible organization management". Since organizational structures have been subject to change there are no assurances that the proper level of management attention would be provided to resolve plant problems. It is requested that you revise Revision 10 to specify the plant General Manager or provide justification for this apparent reduction in QA program commitments.

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The completion of our review will depend on the satisfactory responses to these items.

If you have any questions regarding this matter please contact W. J. Wagner of my staff on (415) 943-3731.

/s/

D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects

cc:

C. M. Trammell, NRR
J. W. Gilray, QUAB
S. A. Richards, RV
Section Chiefs
Branch Chiefs
Document Control Desk

RV/jk

PATE *[Signature]*

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YOUNG *[Signature]*

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WAGNER *[Signature]*

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