



Portland General Electric Company

James E. Cross
Vice President and Chief Nuclear Officer

February 8, 1993

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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

Dear Sir:

REPLY TO A NOTICE OF VIOLATION

Your letter of January 8, 1993 transmitted a Notice of Violation associated with Nuclear Regulatory Commission (NRC) Inspection Report 50-344, 92-32. The attachment to this letter contains Portland General Electric Company's response to the violation.

Sincerely,

W. R. Robinson
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. Kenneth Johnston
NRC Senior Resident Inspector
Trojan Nuclear Plant

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REPLY TO A NOTICE OF VIOLATION

Violation A

Technical Specification 6.2.2.g states: "Administrative procedures shall be developed and implemented to limit the working hours of . . . personnel who perform safety-related functions . . . and key maintenance personnel of the unit staff . . . Any deviation from the above guidelines must be authorized by the Plant General Manager or, in his absence, Duty Plant Manager, or higher levels of management, in accordance with established procedures . . ."

Trojan Administrative Order (AO) 3-24, Fitness for Duty and Work Hours, Revision 7, Paragraph 2.1.2.a states: "The work hour limitations in the procedure shall be applied to those groups identified by '(shall)' below. These are groups which fall under the requirements of Trojan Technical Specification (TTS) 6.2.2.g.

- 1) Contractors . . . shall also meet work hour requirements."

Note 4.4.2-1 of AO 3-24 states that "Prior to exceeding the work hour limitations, Attachment 1 must be approved by the Plant General Manager, Duty Plant Manager or higher levels of management." Attachment 1 is titled "DEVIATION FROM WORKING HOUR LIMITATIONS".

Contrary to the above, during the 1991 Refueling Outage, PGE contractors, specifically B&W personnel conducting the stress relieving of sleeved tubes, which was a safety-related function, exceeded the work hour limitation of 72 hours in any seven day period by working 84 hours in a seven day period, without obtaining management authorization in accordance with AO 3-24.

Response to Violation A

Portland General Electric (PGE) acknowledges the violation.

1. Reason For The Violation

The reason for the violation was determined to be a failure of management oversight to ensure the implementing procedure properly addressed the requirements of TTS 6.2.2.g. The Technical Specification requires work hour limitations for those groups or individuals who perform safety-related functions. It was incorrectly determined by PGE management that the contractors performing the stress relieving activities did not require work hour deviations. PGE management should have interpreted the Technical Specification to apply to anyone employed by PGE to perform safety-related maintenance work.

2. Corrective Steps That Have Been Taken And Results Achieved

PGE management determined that the requirements apply to key maintenance personnel performing work on safety-related equipment.

A Licensing Document Interpretation (LDI) Request was initiated to ensure proper interpretation of TTS 6.2.2.g in the future. This LDI will provide additional guidance for recognizing key maintenance personnel, interpreting unit staff application, and determining what constitutes safety-related functions.

3. Corrective Steps That Will Be Taken To Avoid Further Violations

Since the event took place, AO 3-24 was converted to Trojan Plant Procedure (TPP) 13-15. The TPP will be revised to include the LDI guidance on the application of TTS 6.2.2.g related to the interpretation of key maintenance personnel of the unit staff. This procedure will be revised by April 1, 1993.

Should PGE employ contractors to perform safety-related functions as key maintenance personnel in the future, the provisions of TTS 6.2.2.g. will be applied.

4. Date When Full Compliance Will Be Achieved

PGE is in full compliance with the requirements of TTS 6.2.2.g.

Violation B

10 CFR 50, Appendix B, Criterion XVI, states in part that

Measures shall be established to assure that conditions adverse to quality . . . are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the conditions is determined and corrective action taken to preclude repetition.

TPP 16-12, Material Storage and In Storage Inspection and Checks, states, "The Material Manager shall ensure access to Material Services storage facilities . . . is controlled. As a minimum, the following controls shall be applied:

1. All access doors to storage facilities shall be locked or controlled by authorized personnel."

Corrective Action Request (CAR) 91-0269 addressed licensee-identified weaknesses in warehouse access control, and was closed by the licensee on July 9, 1991 after completion of corrective actions specified therein.

Contrary to the above, the licensee's corrective actions were not effective in that, on November 12 and 15, 1992, the access doors to the Trojan issue warehouse were not controlled by authorized personnel.

Response to Violation B

Portland General Electric (PGE) acknowledges the violation.

1. Reason For The Violation

In June 1991 PGE completed corrective actions for warehouse access control weaknesses which were documented in CAR 91-0269. The corrective actions associated with the CAR included (1) a procedure revision to clarify and restrict access control, (2) a reduction in the number of individuals granted unescorted access, and (3) training of warehouse personnel on the requirements of access control. In mid 1991 the three main warehouse entrance doors and the issue counter door were posted "UNAUTHORIZED PERSONNEL KEEP OUT".

The reason for the violation was determined to be a failure on the part of the storeroom personnel to follow the procedure. The procedure requires that access doors be locked or controlled by authorized personnel. The event for the cited violation occurred in November 1992 when an Oregon Department of Energy (ODOE) inspector was able to compromise physical and posted barriers by reaching over the issue counter door and unlocking the door with a key which had been left in the door.

2. Corrective Steps That Have Been Taken And Results Achieved

As a result of the event evaluation, the following controls were implemented to ensure warehouse access control.

- a. The issue counter door is maintained in a locked condition and the key is now stored in a location that is inaccessible from outside the issue counter.
- b. The warehouse door to the issue area is locked whenever the issue counter is left unattended for reasons other than to obtain a part for issuance. If obtaining a part will require an extended period of time, the issue area entrance door is locked.
- c. Warehouse personnel were trained regarding the need for procedural compliance to maintain warehouse access control.

3. Corrective Steps That Will Be Taken To Avoid Further Violations

Based on the corrective steps taken, no additional corrective steps are required.

4. Date When Full Compliance Will Be Achieved

Compliance with 10 CFR 50, Appendix B, Criterion XVI was achieved on February 4, 1992 when the additional controls implemented to ensure warehouse access control were completed.