



Portland General Electric Company

Bart D. Withers Vice President

April 22, 1985

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Mr. D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek CA 94596

Dear Mr. Kirsch:

NRC Inspection No. 85-08 of the Trojan Nuclear Plant

Your letter of March 22, 1985 transmitted NRC Inspection Report 85-08, reflecting a special team inspection conducted during the period of February 11-15, 1985. During that inspection, certain weaknesses were identified and documented in a Notice of Violation transmitted with that letter. Furthermore, an additional area of concern was found relative to overtime administration and documented as a Notice of Deviation, which was also transmitted with that March 22 letter. Attached are the PGE responses to the NRC Notice of Violation and NRC Notice of Deviation, respectively.

Sincerely,

Bart D. Withers
Vice President
Nuclear

Attachments

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NOTICE OF VIOLATION

10 CFR 50, Appendix B, Criterion V, states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings." Licensee procedure AO-3-9, Maintenance Requests, Revision 19, states:

1. In Section IV.C.7, "The individual performing the tests shall note satisfactory test completion and sign the code 'Testing/Installation Performed By' line entering the date completed".
2. In Section IV.1, "All maintenance, repairs, or modifications on quality-related equipment must be performed in accordance with approved work instructions written in sufficient detail for a qualified craftsman to perform the work without direct supervision."

Contrary to the above:

1. The Testing/Installation Results section of maintenance request (MR) forms was left blank and unsigned after the completion of quality-related maintenance in the following instances:

<u>MR Number</u>	<u>Description</u>
84-4463	North CCP, Excessive seal leakage
84-4652	Service water seal water booster Pump, seal leak
85-0254	North BIT recirculation pump, mechanical seal leak

2. The work performed for MR 84-1136 was beyond the scope of the applicable work instructions. The work instructions for MR 84-1136 directed that a service water booster pump motor be disconnected and resistance readings be taken on the motor and power cables. The work performed included disassembling and reassembling the motor and shipping it offsite for reconditioning.

This is a Severity Level IV violation (Supplement I).

Response to Notice Violation

The activities identified in this Notice of Violation reflect instances where documentation of activities was less than appropriate for the circumstances and less than that required by procedures. All of the MRs identified to have inadequate testing documentation have been reviewed to ensure that appropriate testing was performed on the equipment upon its return to service to assure its ability to function as required.

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Documentation of that testing has subsequently been included with the applicable MR for incorporation into the Plant Equipment History Files. The "Testing/Installation Performed By" sections have been signed and dated.

All work performed by MR 84-1136 has been reviewed and found to be approved. Documentation of that work has taken place now. When the motor resistance readings were found by the craftsman to be low, the MR was returned to the Electrical Foreman for further instructions. The craftsman was then verbally directed to remove the motor for reconditioning. However, these additional instructions were inadvertently not added to the MR.

The root cause of this Notice of Violation has been determined to be the result of procedural noncompliance. Adequate procedures exist to require the documentation needed in support of the activities performed above. Therefore, as corrective action, a review of these occurrences was conducted with the appropriate personnel to reemphasize the need for and importance of complete documentation of maintenance activities. As such, full compliance of Plant procedures now exists and no further corrective action is necessary.

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NOTICE OF DEVIATION

A letter dated December 29, 1980 from B. D. Withers, PGE, to D. G. Eisenhut, USNRC, in regard to NUREG-0737, item I.A.1.3 stated, "On October 30, 1980, PGE submitted to the NRC a description of our plan for operations shift staffing and a commitment to revise administrative procedures to avoid unnecessary overtime, in response to the NRC letter of July 31, 1980. The minimum shift requirement in the NRC letters of July 31 and October 31, 1980 will be implemented by July 1, 1982. Therefore, the Trojan Plant is in compliance with the NRC requirements in this section, and no further submittal by PGE is required."

NUREG-0737, item I.A.1.3 states that an individual should not be permitted to work more than 72 hours in any 7-day period and that any deviation from this guideline shall be authorized by the plant manager, or his deputy or higher levels of management.

Contrary to the above, the appropriate overtime authorization was not made for the following cases:

<u>Employee #</u>	<u>Hours Worked</u>	<u>Week Ending</u>
1	88	August 17, 1984
2	94	August 17, 1984
3	89	August 17, 1984
4	82	August 17, 1984
5	90	August 17, 1984
6	82	August 17, 1984
7	84	August 17, 1984
8	78	August 10, 1984
9	79	June 8, 1984

This is a deviation.

Response to Notice of Deviation

In July 1984, PGE asked for and received clarification of the work hour limits required by the NRC. Confirmation was received at that time that the work hour restrictions apply to "members of the Plant staff who perform safety-related functions (eg, SROs, ROs, auxiliary operators, health physicists, and key maintenance personnel)." Key maintenance personnel were also identified to be "personnel responsible for the correct performance of maintenance, repair, modification, or calibration of safety-related structures, systems, or components and who are personnel performing or immediately supervising performance of such activities."

It has been confirmed that the personnel referenced in the Notice of Deviation, with the exception of one individual, were all working on safety-related components and subject to the criteria of NUREG-0737.

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However, these individuals were covered by two "blanket deviations" approved by the appropriate levels of management and in accordance with Plant procedures for this period of time. Since the 1984 outage, PGE has changed the work limit (overtime) policy to require deviation approval for all personnel for each instance of deviation, regardless of the type of work they are performing. This new policy exceeds the requirements of NUREG-0737 and will make it easier to control this area in the future. As such, it is felt that all necessary corrective action to respond to this Notice of Deviation has been taken and is complete.

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