

Docket File

May 28, 1985

Docket No. 50-344

Mr. Bart D. Withers
Vice President Nuclear
Portland General Electric Company
121 S. W. Salmon Street
Portland, Oregon 97204

Dear Mr. Withers:

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SUBJECT: GENERIC LETTER 83-28 - REQUEST FOR ADDITIONAL INFORMATION

The staff is continuing its review and evaluation of PGE's responses to Generic Letter 83-28 - Generic Implications of the Salem ATWS Event. During the course of our review we have identified the need for additional information, as listed in the enclosure, concerning your position on post-maintenance operability testing of safety-related components and the reactor trip system reliability regarding vendor-related modifications.

It is requested that you provide the information identified in the enclosure within 45 days of receipt of this letter.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than 10 respondents; therefore, OMB clearance is not required under P.L. 96-511.

Should you have any questions concerning the enclosed request, please contact the Project Manager, Lisamarie Lazo (301) 492-7791.

Sincerely,

Original signed by:

E. G. Tourigny, Acting Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure:
Request for Additional
Information

cc w/enclosure
See next page

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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION
RELATING TO GENERIC LETTER 83-28
TROJAN NUCLEAR PLANT
DOCKET NO.: 50-344

1. Position 3.1.1 of Generic Letter 83-28 (GL 83-28) states that licensee reviews should "...assure that post-maintenance operability testing of safety-related components in the reactor trip system is required to be conducted and that the testing demonstrates that the equipment is capable of performing its safety function before being returned to service" (underlining added). While your response to this item (PGE letter dated November 4, 1983) states that all safety-related components in the reactor trip system are required to be tested, and references Administrative Order A0-3-9 to support this statement, we note in your response to Position 3.2.1, paragraph a.(2)(c), that the designated individual "Identifies any Periodic Operating Tests (POTs) required to verify that the performance of the equipment/system has been restored and marks the testing block if required". The referenced AO, therefore, appears to provide for occasions when testing will not be required. Please clarify your response so that it may be determined whether or not Trojan conforms to the guidance of Position 3.1.1.

Specifically, please address the following:

- a. Please state whether all safety-related components in the reactor trip system will be required to be tested following maintenance.
 - b. If testing will be waived in some instances, please describe the criteria to be used in granting such waivers.
2. In your response to Position 3.1.1 of GL 83-28, you also stated that a review of all safety-related tests to ensure that the testing adequately demonstrates that the reactor trip system equipment is capable of performing its safety function before being returned to service, would be completed prior to November 15, 1984. In accordance with the request contained in Position 3.1.1, please submit the results of this review.
 3. As noted above, your response to position 3.2.1 (particularly the reference to A0-3-9, Section II.B.1) suggests the possibility that some components may not be required to be tested. In addition, however, in contrast to your response to Position 3.1.1, your response to this item does not address the criteria to be used in specifying testing. For example, is the demonstration of the capability of safety-related components to perform required safety functions one of the criteria used in prescribing test requirements? Because of these uncertainties, please also respond for the components covered by Position 3.2.1 to Items a, and b listed under Question 1, above. In addition, please state whether the prescribed testing will demonstrate the ability of the components to perform their safety functions. If testing will not demonstrate such a capability, please identify and justify the exceptions.

4. Position 3.2.2 of GL 83-28 states that licensees should submit the results of their checks of vendor and engineering recommendations to ensure that any appropriate test guidance is included in the test and maintenance procedures or the Technical Specifications, where required. Your response of November 4, 1983, states that the review of Westinghouse Bulletins and Letters not previously in your files would be completed by November 15, 1984. In accordance with the request contained in Position 3.2.2, please submit the results of your check of these documents.
5. Your response to Position 3.2.2 states "Maintenance and test procedures for safety-related equipment were originally developed utilizing equipment technical manuals and vendor correspondence. Thus, vendor and engineering recommendations have been reviewed in the past. A re-review of vendor and engineering recommendations beyond those contained in Westinghouse Bulletins and Letters is not planned." This response appears to be deficient in two areas: (1) it categorically excludes from re-review, all safety-related equipment not covered by Westinghouse Bulletins and Letters; and (2) it does not address whether vendor service bulletins and recommendations received subsequent to the original preparation of the procedures have been incorporated in the appropriate procedures. Please provide technical justification for this position, or provide a commitment to extend your re-review to Bulletins and Letters applicable to non-Westinghouse supplied safety-related components, and provide a schedule for timely submission of the results of the expanded re-review.
6. In your response to Position 4.1 of GL 83-28, you state that the implementation of Westinghouse Bulletin WCD-ELEC-18, of December 17, 1971, would be verified prior to restart from the 1984 refueling outage. Please describe the results of this verification effort.

Mr. Bart D. Withers
Portland General Electric Company

Trojan Nuclear Plant

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
Trojan Nuclear Plant
Post Office Box 0
Rainier, Oregon 97048

Robert M. Hunt, Chairman
Board of County Commissioners
Columbia County
St. Helens, Oregon 97501

William T. Dixon
Oregon Department of Energy
Labor and Industries Building
Room 111
Salem, Oregon 97310

Regional Administrator
USNRC, Region V
Office of Executive Director for Operations
1450 Maria Lane, Suite 210
Walnut Creek, California 94596