Docket No. 50-344

SEP 23 1985

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

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

Gentlemen:

Thank you for your letter dated August 19, 1985, informing us of the steps you have taken to correct the items which we brought to your attention in our letter dated July 19, 1985. Your corrective actions will be verified during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

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

bcc w/letter dated 8/19/85:
RSB/Document Control Desk (RIDS)
Mr. Martin
State of Oregon
Resident Inspector

DODDS/dot	CHAFFEE	KIRSCH
9/20/85	9/21/85	9/21/85

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Portland General Electric Company

Bart D. Withers Vice President

August 19, 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:

Response to NRC Notice of Violation

Your letter of July 19, 1985 forwarded Inspection Report 85-16 and a Notice of Violation concerning the placement of a danger tag on a valve in the Containment Spray System. Attached is our response to that Notice of Violation.

Sincerely,

C P Yundt for

Bart D. Withers
Vice President
Nuclear

Attachment

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy

10 CFR 2.201
Response to Notice of Violation

Violation B

10 CFR 50 Appendix B, Criterion V, and the Trojan Nuclear Plant Nuclear Quality Assurance Program, Section 5.0, require in part that activities affecting quality be prescribed by and accomplished in accordance with documented procedures.

Plant safety procedure PS-3-30, "Trojan Holdout and Tagging Procedure", Section VIII requires that when a clearance is released, the person assigned to remove the danger tag shall ensure that the system is returned to service and the tag removed and returned to the control operator.

Contrary to the above, on June 28, 1985, danger tag number 4 of clearance 85-1066 was on a drain valve off the "B" train containment spray header downstream of the containment penetration. The tag was shown as cleared on the clearance sheet that had been filed in the released clearance file.

This is a Severity Level IV violation.

Response

A review of the circumstances surrounding this violation indicates that the root cause was personnel error. Plant Safety Procedure PS-3-30 requires that the person removing a clearance return the system to service, remove the danger tags, and return the tags to the Control Operator, who destroys them. However, when tags are cleared in contaminated areas, they are not returned to the Control Operator, but are disposed of locally and the Control Operator informed that this has occurred.

The operator who removed the clearance was interviewed and is confident that he removed the tag on the drain valve off the "B" train Containment spray header as part of releasing the clearance. This action was further substantiated by a second operator who independently checked the system lineup for other reasons during the same time period. Since the tag was potentially contaminated, the operator clearing it did not return it to the Control Operator, but instead disposed of it in the Containment without destroying it. Based on interviews with Plant operators, it appears that the tag was removed, but inadvertently dropped or discarded in the vicinity of the valve. Other personnel passing through the area probably noticed the tag and incorrectly replaced it on the valve. A review of past practices has not identified any similar events or other problems

with the tagging program. Nevertheless, to help prevent future occurrences, PS-3-30 has been changed to provide personnel with specific directions to destroy tags that cannot be removed from radiological controlled areas when releasing a clearance.

In addition, the "Ready-for-Startup" valve lineup program was reviewed to determine if it would have identified this problem. By the procedure, following a refueling outage, valve lineups have been performed on all locked valves and also on systems that have been in unusual operating lineups or have undergone major maintenance activities. The Containment Spray System had not met this criteria and did not receive a complete prestartup valve lineup. As a result of this finding, the policy for performing startup valve lineups was changed, and now valve lineups are completed on all safety-related systems. A complete valve lineup was performed on the Containment Spray System and several other systems. No other discrepancies in valve position or clearances were identified. In the future, it will be required that valve lineups are performed on all safety-related systems prior to startup from an extended outage.

All the above-identified corrective actions have been completed, and full compliance with Plant procedures and programs has been achieved.

RPS/GAZ/3maw
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