

PORTLAND GENERAL ELECTRIC COMPANY
EUGENE WATER & ELECTRIC BOARD
AND
PACIFIC POWER & LIGHT COMPANY

Operating License NPF-1
Docket 50-344
License Change Application 124

This License Change Application requests modifications to Operating License NPF-1 for the Trojan Nuclear Plant to revise Containment leak testing and the table of Containment isolation valves.

PORTLAND GENERAL ELECTRIC COMPANY

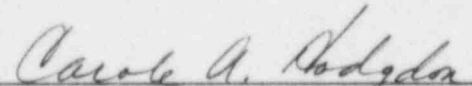
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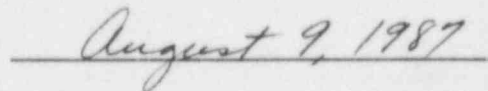
Bart D. Withers
Vice President
Nuclear

Subscribed and sworn to before me this 29th day of July 1985.




Notary Public of Oregon

My Commission Expires:



LICENSE CHANGE APPLICATION 124

The following changes to Facility Operating License NPF-1 are requested (proposed replacement pages are provided as Attachment 1).

1. Page 3/4 6-1, Specification 4.6.1.1:

Part a.1 was revised to include those portions of penetrations inside Containment in the exception. This was done since verification every 31 days of these portions of penetrations (inside Containment) would not be in the best interest of the ALARA program during critical operations. Reference to Table 3.6-1 was deleted since the table does not provide any exceptions. A new Surveillance Requirement 4.6.1.1.c was added to describe the necessary surveillance for those portions of penetrations inside Containment. This surveillance is similar to the W-STS.

2. Page 3/4 6-2, Specification 3.6.1.2:

Parts a.1 and a.2 were revised to clarify the definition of the integrated leakage rate, La, and the test leakage rate, Lt.

Section b. was revised to exclude air locks from this specification. Appendix J, Part II.G.2, of 10 CFR 50 states that air locks require Type B tests. This implies that the 0.60La limit of Part III.B.3, Acceptance Criterion, applies. However, Appendix J, Part III.D.2.iv, Periodic Retest Schedule, Type B tests, states that "The acceptance criteria for air lock testing shall be stated in the Technical Specifications." Trojan Technical Specification 3.6.1.3 specifies limiting leakage rate criteria. This is interpreted as excluding the air locks from the 0.60La limit.

Reference to Table 3.6-1 was deleted since this table lists only Type C barriers (valves). The revised wording is adequate in that it specifies all penetrations and valves subject to Type B and C tests.

3. Pages 3/4 6-3 and 6-4, Surveillance Requirement 4.6.1.2:

Part d. has been deleted and replaced by new Sections d., e., and f. The new Parts d., e., and f. more accurately reflect the requirements of 10 CFR 50, Appendix J. The old Part e. was incorporated in the new Part d. The old Part f. was deleted since Trojan does not use a continuous leakage monitoring system.

The new Part g. was transferred from the present Surveillance Requirement 4.6.3.1.5 discussion of leakage rate testing (with minor rewording) to consolidate all leakage rate test requirements in one Surveillance Requirement. The old Part g. was relettered to Part h., with some rewording.

4. Pages 3/4 6-15 and 6-16, Surveillance Requirement 4.6.3.1:

Surveillance Requirement 4.6.3.1.1 was modified to recognize the fact that some Containment isolation valves do not have a required isolation time (only automatic valves have required isolation times).

Surveillance Requirement 4.6.3.1.2 was revised to apply only to the automatic valves, since these are the only valves that close on an isolation signal.

Surveillance Requirement 4.6.3.1.3 was revised to apply only to automatic Containment isolation valves since these valves are the only valves that have an isolation time limit.

Surveillance Requirement 4.6.3.1.5 was modified as follows:

- a. The portion pertaining to leakage rate testing was moved to Surveillance Requirement 4.6.1.2.g (see Item 3 above), with no change to the intent (slight rewording).
- b. The remaining portion of this requirement was modified to reference the new Surveillance Requirement 4.6.1.2.g and make editorial corrections.

5. Pages 3/4 6-17 through 6-24, Table 3.6-1, Containment Isolation Valves:

The major changes made to this table are discussed below.

- a. The sections of the table were revised to be more consistent with the classification and use of the valves. For example, Sections A and B are now "automatic . . .", which pertains to Type I penetrations with valves that close on an isolation signal (Penetration Types I through IV are defined in FSAR Section 6.2.4.)
- b. All valves that are part of the steam generator secondary side systems have been deleted. The steam generators and all related secondary piping inside the Containment structure are considered as extensions of the Containment boundary and subject to Appendix J, Type A testing only.
- c. Type IV penetrations require only one isolation barrier. The extra barriers listed for the Type IV penetrations have been deleted.

6. Page B 3/4 6-1, Specifications 3/4.6.1.2/3 Basis:

These bases were revised to agree with the changes made above. Section 3/4.6.1.2 has a paragraph added from Section 3/4.6.3 (as shown) to consolidate all discussion of leakage rate testing in one section.

7. Page B 3/4 6-4, Specification 3/4.6.3 Basis:

The paragraph concerning leakage rate testing of the Containment purge valves was moved to B 3/4.6.1.2 as discussed in No. 6 above. Also, a paragraph was added outlining the criteria and reasoning for not listing some Containment isolation valves in Table 3.6-1. Included is a list of the valves which meet this criteria.

SIGNIFICANT HAZARD CONSIDERATION DETERMINATION

Most of the changes made are reformatting revisions and/or editorial corrections that do not significantly change the requirements and, therefore, do not involve a significant hazard. For the reasons discussed below, the remaining changes do not involve a significant increase in the probability or consequences of an accident, do not create the possibility of a new or different kind of accident, nor do they involve a significant reduction in the margin of safety.

1. Exclusion of the air locks leakage rate from the 0.60La limit is considered to not involve a significant hazard since a separate limit is specified by Technical Specification 3.6.1.3 as required by 10 CFR 50 Appendix J, Subsection III.D.2.iv and is therefore within regulatory requirements.
2. The revisions and additions to Surveillance Requirement 4.6.1.2 were made to make the listed requirements more closely agree with 10 CFR 50 Appendix J, and therefore do not involve a significant hazard since it agrees with current regulatory requirements.
3. Surveillance Requirements 4.6.3.1.2/3 were made applicable only to automatic isolation valves since these are the only valves that have a required isolation time and close on an isolation signal. Therefore, this is considered a clarification only and not a significant change.
4. The changes made to Table 3.6-1 are discussed below.
 - a. All valves relating to steam generator (SG) secondary systems have been deleted. Since the SGs are considered an extension of Containment, these valves are not Containment isolation valves and therefore do not belong in this table. The valves are excluded from Type C testing and do not have a required isolation time. Therefore, deleting these valves from the table does not significantly reduce any current surveillance activity.
 - b. Eleven valves were added to Table 3.6-1. This does not involve a significant hazard since the revision constitutes an additional requirement not presently required.

- c. Eight valves associated with non-SG systems have been deleted from Table 3.6-1. This is considered to not involve a significant hazard since each penetration relating to these valves has been reviewed for compliance with regulatory requirements. Therefore, this change does not involve a significant hazard.
 - d. Valves MO-2069A/B have been excluded from Type C leakage rate testing by this revision. This penetration is normally open during a LOCA for sump recirculation. Leakage rate testing is therefore unnecessary. This is a correction of an error and therefore not a significant hazard.
5. The basis for Specification 3/4.6.3 has been revised to include Containment isolation valves not listed in Table 3.6-1 and the reasons for not including them in the table. Functional testing of these check valves is considered unnecessary (for Containment isolation purposes) since the valves are already in the closed position and/or are connected to redundant pressure sources such that any flow through the penetration would go into the Containment (valves need not close to prevent leakage outward through the penetration). Based upon the above discussion, not listing these check valves in Table 3.6-1 is not considered a significant hazard.

NOTE: Non-automatic power-operated valves that can meet the above criteria have been left in Table 3.6-1 for conservatism since Surveillance Requirement 4.6.3.1.1 can be easily performed for power-operated valves.

SAFETY/ENVIRONMENTAL EVALUATION

Safety and environmental evaluations were performed as required by 10 CFR 50 and the Trojan Technical Specifications. This review determined that an unreviewed safety question does not exist since Plant operations remain consistent with the Updated FSAR, adequate surveillance is maintained, and there is no conceivable impact upon the environment.