



Portland General Electric Company

Bart D. Withers Vice President

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REGION V IAC

September 26, 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 94596-5638

Dear Mr. Kirsch:

TROJAN NUCLEAR PLANT
Response to NRC Notice of Violation

Your letter of August 27, 1985 forwarded Inspection Report 85-20 and a Notice of Violation concerning the inservice testing of additional valves when a valve in a system fails to function properly during a regular test. Our response to that Notice of Violation is attached.

Your letter also identified concerns with an apparent lack of management control and attention to the Inservice Testing (IST) Program. In this regard, PGE has already implemented steps and is in the process of evaluating additional measures to alleviate this concern.

A management assessment program was implemented in early 1985 to promote greater management overview of all aspects of Plant operation. The IST Program has already been evaluated under the management assessment program and significant improvements in the IST Program have already been identified. The overall responsibility for the IST Program scope belongs to the Nuclear Plant Engineering Department (NPED). The Trojan Plant Staff has been assigned the responsibility for implementation of the IST Program.

Additionally, PGE intends to improve the documentation of IST activities. In particular, the IST Program manual, PGE-1022, will be revised for the second 10-year interval and will more extensively address the specific implementation and interpretation of ASME Code requirements. Test activity documentation will also be revised as necessary.

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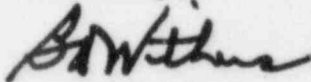
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We believe the actions described above will improve the IST Program and will increase management involvement in the decision-making processes attendant to such a program.

Sincerely,

A handwritten signature in dark ink, appearing to read "B. Withers", written in a cursive style.

Bart D. Withers
Vice President
Nuclear

Attachment

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

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10 CFR 2.201
Response to Notice of Violation

Violation

Paragraph 4.0.5 of Trojan Nuclear Plant Technical Specifications states in part:

" . . . inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves will be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda. . ."

ASME Section XI, Subsection IWV-3513, Additional Tests, states in part:

"When any valve in a system fails to function properly during a regular test, additional valves in the system shall be tested . . ."

Contrary to the above requirement:

- (1) The Component Cooling Water (CCW) Safety Valve PSV-3323B failed a test in 1985, but the companion valve PSV-3323A was not tested.
- (2) The Residual Heat Removal (RHR) System has four relief valves. During 1982, two valves were tested and both failed to meet the acceptance criteria. In 1983, one valve was tested and it failed. Also, during 1984 two valves were tested and both failed the test. None of the remaining relief valves were tested during the regular tests.

This is a Severity Level IV Violation.

Response

As stated, Subsection IWV-3513, Additional Tests, requires additional valves to be tested when a valve fails during the regular testing. For testing completed prior to the 1985 refueling outage, the additional testing was not being done as required.

Prior to the 1985 refueling outage, changes were made to the safety valve testing program to bring it into compliance with the Code. The remainder of the safety valve testing required to be completed in the first 5 years was completed during the 1985 refueling outage in accordance with the new criteria. Additional testing was accomplished as required if a failure was observed.

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With regard to the CCW System safety valves, one valve was tested during the 1985 refueling outage and failed as noted. The tracking variable N, as defined in IWV-3513, for these valves had been rezeroed on June 1, 1983. For the 1985 outage, N had incremented to 23, requiring $.77$ valves ($N/60 \times$ number of valves in group) to be tested as specified in IWV-3513. This value was rounded up and one valve was tested. When this valve failed, N was increased by 12 as specified in the Code. With $N=35$, a total of 1.17 valves were required to be tested. Since the fraction was less than 0.5, it was rounded down and the second valve was not tested. Not testing the second valve was determined to be acceptable since there was no reason to suspect a common mode failure. The Code requirement to increment N by 12 if a valve fails its test did not lead to additional testing immediately in this case, but did ensure additional testing will occur sooner. In fact, the second CCW System safety valve will be tested during the 1986 outage instead of the 1987 outage. We believe our application of the testing requirements for these valves meets the intent of the Code.

For the RHR System, the tracking variable N was reset to zero at the completion of the 1984 outage. For the 1985 outage ($N=9$), one valve was required to be tested. This test was performed satisfactorily.

Please note that, although not reflected in the Inspection Report, significant improvements in the safety valve testing program had been made prior to the NRC inspection of June 12-21, 1985. The majority of the data reviewed by the NRC Inspectors had been compiled prior to these changes.

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