



Portland General Electric Company

Stephen M. Quennoz
Trojan Site Executive

January 28, 1997

VPN-006-97

Trojan Nuclear Plant
Docket 50-344
License NPF-1

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

License Change Application (LCA) 241 - Clarification of Technical Specification
Training Requirements

The purpose of this letter is to transmit LCA 241 which requests amendment of Facility Operating (Possession Only) License No. NPF-1. This LCA proposes to clarify the controls that will be used for the revision and maintenance of the Certified Fuel Handler Training Program (PGE-1057) which is required by Permanently Defueled Technical Specification 5.4.1.

LCA 241 clarifies that NRC prior approval of changes to the Certified Fuel Handler Training Program are not required. This clarification permits PGE to modify the program to be consistent with the changing nature of the facility as decommissioning progresses and as enhancements to the program are identified, as described in Section 4 of the existing program. It is PGE's position that this LCA does not constitute a significant hazards consideration.

This LCA was discussed in PGE letter (VPN-005-97) dated January 27, 1997, which formally requested NRC staff review and approval of Revision 4 to the Training Program. Prior to the permanent shutdown of Trojan, Section 6.4.1 of the Technical Specifications permitted changes to the training program without prior NRC approval. Because PGE believes there is no reasonable basis for greater NRC scrutiny of changes to training programs for a shutdown plant than for an operating plant, LCA 241 has been developed to allow PGE to make changes to the Program.

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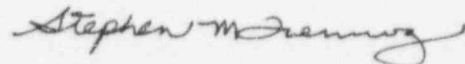
January 28, 1997

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Attachment I provides the background and reason for the proposed change, a description of the proposed change, and a no significant hazards consideration determination. PGE has determined that no new types of accidents are involved. Attachment II provides a copy of the affected Technical Specification page with the proposed change annotated.

Also attached is one signed copy of a Certificate of Service for LCA 241 to the Chief Executive of the County in which the facility is located and to the Director of the Oregon Office of Energy.

Sincerely,



Stephen M. Quennoz
Trojan Site Executive

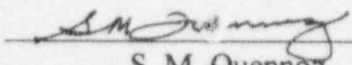
c: M. T. Masnik, NRC, NRR
D. G. Reid, NRC, NMSS
R. A. Scarano, NRC Region IV
David Stewart-Smith, OOE
A. Bless, OOE

STATE OF OREGON,
COUNTY OF COLUMBIA

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I, S. M. Quennoz, being duly sworn, subscribe to and say that I am the Trojan Site Executive, for Portland General Electric Company, the licensee herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

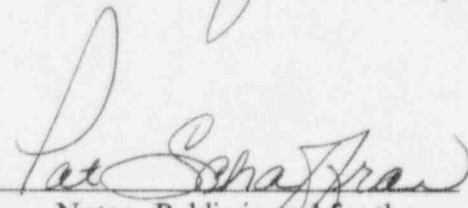
Date Jan 28, 1997


S. M. Quennoz,
Trojan Site Executive
Portland General Electric Company

On this day personally appeared before me, S. M. Quennoz; to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act.

GIVEN under my hand and seal this 28th day of January, 1997.




Notary Public in and for the
State of Oregon

Residing at Watskanie
My commission expires 7-27-99

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY
THE CITY OF EUGENE, OREGON, AND
PACIFIC POWER & LIGHT COMPANY
(TROJAN NUCLEAR PLANT)

)
)
) Docket 50-344
) Operating License NPF-1
)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of License Change Application 241 to the Operating License for the Trojan Nuclear Plant, dated January 28, 1997, have been served on the following by hand delivery or by deposit in the United States Mail, first class, this 28th day of January 1997:

State of Oregon
Attn: David Stewart-Smith
Oregon Office of Energy
625 Marion Street NE
Salem, Oregon 97310

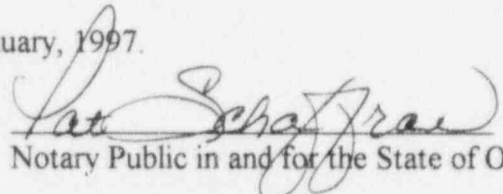
Mr. Jack Peterson
Chairman of County Commissioners
Columbia County Courthouse
St. Helens, Oregon 97051



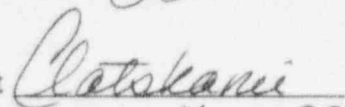
H. R. Pate
Manager, Licensing, Compliance,
and Commitment Management

On this day personally appeared before me H. R. Pate, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act.

GIVEN under my hand and seal this 28th day of January, 1997.



Notary Public in and for the State of Oregon

Residing at 
My commission expires 7-27-99

ATTACHMENT I

LICENSE CHANGE APPLICATION (LCA) 241
CLARIFICATION OF TECHNICAL SPECIFICATION TRAINING REQUIREMENTS

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1. Background and Reason for the Change

By letter dated, January 27, 1993, PGE informed the NRC of its plans to replace the 10 CFR, Part 55 NRC licensed operator program with an NRC approved certified fuel handler (CFH) training and retraining program. In NRC letter dated March 23, 1993, the NRC staff requested additional information and by letter dated April 8, 1993, PGE provided the requested information such that by letter dated April 27, 1993, the NRC approved the Certified Fuel Handler Training Program. PGE also requested an Amendment to the Facility Operating License (NPF-1) by License Change Application (LCA) 230, "Revision of Facility Staffing and Training Requirements," also dated January 27, 1993. This LCA was approved as License Amendment 191, by NRC letter dated May 6, 1993.

The Safety Evaluation related to License Amendment 191 states that "[t]he requirement for an operator training program is being deleted to reflect the non-operating defueled condition of the plant" and described the general acceptance criteria for Certified Fuel Handler Training Program as a "program consistent with the level of hazard at the facility in order to maintain the facility in a safe, and stable condition."

The NRC approval letter for the Certified Fuel Handler Training Program (April 27, 1993) stated "[t]he staff has completed its review of the PGE proposed CFH training program and has determined that it is consistent with the defueled condition of the facility. Therefore, the staff concludes that the PGE proposed Certified Fuel Handler Training and Retraining Program presented in your letter dated January 27, 1993, is acceptable as modified by the April 8, 1993 response. It is requested that the information and commitments presented in your April 8, 1993 response be incorporated in the CFH training program at the next revision of the program."

Consistent with the general NRC staff instruction to revise the Program to incorporate the April 8, 1993, information and commitments, PGE reissued the CFH Training Program as the initial June 1993 issue (equivalent to Revision 0). The information and commitments from the April 8, 1993, response, as well as several editorial changes, were included in the initial June issue of the Program as described in PGE License Document Change Request (LDCR 93-025). A number of other comparatively minor changes were implemented by Revisions 1, 2, and 3.

During the course of the internal approval of Revision 4 to the CFH Program, questions were raised by members of the NRC staff whether changes to the CFH Program required prior NRC approval. Recognizing the past 10 CFR Part 55 NRC licensed operator program could be revised without prior NRC approval (pursuant to the wording of the then existing Technical Specification 6.4.1), PGE had continued to control the CFH Program in a similar manner. It seemed reasonable that the training program for a defueled facility should not require greater NRC staff involvement than the training program for an operating plant.

Previous revisions were based on the past PGE position that prior NRC approval of changes were not required. This position was supported by the April 27, 1993 direction to revise the Program, the Section 4 of the Program direction to perform annual assessments "of the effectiveness of the training program" and the Technical Specification 5.4.1 requirement that the Program be "maintained under the direction of the Plant General Manager" (License Amendments 191 issued May 6, 1993, 194 issued March 31, 1995 and 195, issued October 31, 1996). In addition, the April 8, 1993, PGE response to Questions 6 and 9 of the NRC Request for Additional Information described the planned methods and criteria for determining the future changes in the core topics listed in Sections 2.1 and 3.1 of the CFH Program, respectively.

Revision 4 to the CFH Program was provided to the NRC staff for approval by PGE letter dated January 27, 1997. Revision 4 will not be implemented until NRC staff approval has been received, or until a License Amendment which clarifies the controls that are to be used for the CFH Program has been issued by the NRC staff. This LCA requests such an Amendment to the License.

2. Description of Change

The proposed change to the Trojan Permanently Defueled Technical Specifications are as follows:

Section 5.4, "Training," Subsection 5.4.1 - This section is being revised to clarify that PGE is authorized to make changes to the certified fuel handler training program. The change specifies that changes to the training program are to be consistent with the level of hazard at the facility and maintain the facility in a safe, and stable condition.

Specifically, Subsection 5.4.1 will read as follows:

A retraining and replacement training program for the CERTIFIED FUEL HANDLERS shall be maintained under the direction of the Plant General Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971, consistent with the level of hazard at the facility and to ensure the facility is maintained in a safe, and stable condition.

The revised text is drawn from the Westinghouse Improved Standard Technical Specifications format, which is consistent with the format adopted at Trojan in License Amendment 194. The ANSI Standard referenced is the same standard and edition which existed in the Trojan Technical Specification 6.4.1, prior to License Amendment 191 and is, therefore, consistent with the historical licensing basis of the facility. The concluding phrase of the Subsection is derived from the NRC SER for License Amendment 191, which authorized the use of the Trojan Certified Fuel Handler Training Program, in lieu of the 10 CFR Part 55 operator licensing process. It is necessary to have the concluding phrase to reflect that elements of the ANSI standard are not applicable to a defueled facility.

Specifically, the need to train operators on plant startup and shutdown procedures and emergency shutdown systems described in Section 5.5.1 of the ANSI Standard N18.1-1971 are not germane to Trojan. Variants of the typical operating plant training for the remaining subject areas (e.g., normal plant operating conditions and procedures; operational limitations, precautions, and set points; emergency plans and security procedures; abnormal operating procedures; changes in equipment and operating procedures; general safety and radiation safety; alarms and instrumentation signals; and operation of selected auxiliary systems important to overall plant safety) are necessary to reflect the defueled status of the facility.

The intent of the concluding phrase is also to permit adaptations of the training program to reflect the changing status of the facility as decommissioning progresses, including the movement of the spent nuclear fuel to the Independent Spent Fuel Storage Installation (ISFSI). The concept of adapting ongoing programs to the changing status of a decommissioning facility was codified by the NRC in the recent final rule on Decommissioning. An example of this is the change that was made to 10 CFR 50.48, "Fire Protection," Subsection (f)(2) and (3), which now reads:

"The fire protection program must be assessed by the licensee on a regular basis and revised as appropriate throughout the various stages of facility decommissioning." [Emphasis added]

"The licensee may make changes to the fire protection program without NRC approval if these changes do not reduce the effectiveness of fire protection for facilities, systems, and equipment which could result in a radiological hazard, taking into account the decommissioning plant conditions and activities." [Emphasis added]

Acknowledgment of the distinctive characteristics of a facility going through the decommissioning process is also reflected in 10 CFR 50.65, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants."

Section 4 of the Certified Fuel Handler Training Program (PGE-1057) currently requires that periodic assessments of the effectiveness of the program be made. The PGE response to the NRC Request for Additional Information (PGE letter dated April 8, 1993, Response to Question 6) indicated that "changes to the core topics will be based on a logical assessment of changes in needs, using a Systems Approach to Training methodology. The Systems Approach to Training Process used for the Certified Fuel Handler Program contains the following five key elements and is intended to provide a training system that will ensure successful performance on the job by trained individuals. The elements are:

1. Analysis of job performance requirements and training needs.
2. Derivation of learning objectives based upon the preceding analysis.
3. Design and implementation of the training program based upon the learning objectives.

4. Trainee evaluation
5. Program evaluation and revision."

These commitments reflect the PGE's dedication to ensuring the facility is maintained in a safe, and stable condition through providing effectively trained personnel.

3. No Significant Hazards Consideration Determination

In accordance with the requirements of 10 CFR 50.92, "Issuance of amendment," this license amendment request is judged to involve no significant hazards consideration based upon the following:

1. The proposed license amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change is a clarification of the method of control that will be used for the Certified Fuel Handler Training Program, and as such, is administrative in nature and has no impact on the probability or consequences of accidents previously evaluated. The physical structures, systems and components of the facility and the operating procedures for their use are unaffected by this proposed clarification. The proposed administrative controls provide adequate confidence that personnel that perform the certified fuel handler functions will have been adequately trained for the changing conditions of the facility. Since the training program will prepare the operations personnel for fuel handling operations, including responses to abnormal events/accidents, there will be no increase in the probability of occurrence or in the consequences of an accident previously evaluated.

2. The proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This change ensures the qualifications of the operations personnel are commensurate with the tasks to be performed and the conditions to which they may be required to respond. This change does not affect plant equipment or the procedures for operating plant equipment and, therefore, does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed license amendment does not involve a significant reduction in a margin of safety.

This change ensures the qualification of the operations personnel are commensurate with the tasks to be performed and the conditions to which they may be required to respond. The assumptions for a fuel handling accident in the Fuel Building are not affected by the

proposed change. The proposed amendment does not, therefore, involve a reduction in a margin of safety.

4. Schedule Consideration

It is requested that the proposed amendment be made immediately effective.