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

Operating License NPF-1
Docket 50-344
License Change Application 126

This License Change Application requests modifications to Operating License NPF-1 for the Trojan Nuclear Plant to allow entry into operational modes with selected equipment out-of-service.

PORTLAND GENERAL ELECTRIC COMPANY

By C P Yundt for
Bart D. Withers
Vice President
Nuclear

Subscribed and sworn to before me this 16th day of August 1985.

Notary Public of Oregon

My Commission Expires: 10-8-88

LICENSE CHANGE APPLICATION

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

This LCR revises specific Trojan Technical Specifications (TTS) to allow relief from LCO 3.0.4. The TTS listed below have been revised to depict LCO 3.0.4 as not applicable:

1) 3.2.4 - Quadrant Power Tilt Ratio

2) 3.3.3.5 - Remote Shutdown Instrumentation

3) 3.9.7 - Crane Travel-Fuel Building

4) 3.9.9 - Containment Ventilation Isolation System

5) 3.9.11 - Storage Pool Water Level

6) 3.4.6.1 - RCS Leakage

7) 3.6.4.1 - Hydrogen Analyzers

8) 3.6.4.2 - Electric Hydrogen Recombiners

9) 3.6.4.3 - Hydrogen Vent System

10) 3.6.4.4 - Hydrogen Mixing System

11) 3.9.2 - Instrumentation

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The revisions to Items 1 through 5 above conform with the W - STS (NUREG-0452, Revision 5, draft). The proposed changes to TTS 3.9.7 and 3.9.11 do not increase the probability or consequences of an accident, do not create the possibility of a new or different kind of accident, nor do they reduce a margin of safety since control of loads over the spent fuel pool and water level in the spent fuel pool are irrelevant to entry into OPERATIONAL MODES. The proposed change to TTS 3.9.9 does not increase the probability or consequences of an accident, does not create the possibility of a new or different kind of accident, nor does it reduce a margin of safety since closing the appropriate valves serves the same purpose as having the Containment ventilation isolation system OPERABLE. The proposed change to TTS 3.2.4 does not increase the probability or consequences of an accident, does not create the possibility of a new or different kind of accident, nor does it reduce a margin of safety because the QUADRANT POWER TILT RATIO is still restricted to the same extent as is required in the present TTS to ensure DNB and linear heat generation

limits are met. The proposed change to TTS 3.3.3.5 does not increase the probability or consequences of an accident, does not create the possibility of a new or different kind of accident, nor does it reduce a margin of safety since operability of the remote shutdown instrumentation is not dependent on entry into an OPERATIONAL MODE and the duration of inoperability remains unchanged. This reasoning is identical to that provided for Items 6 through 10 below. Based on the above discussion and since these changes fall within existing regulatory guidance, a significant hazard is not created.

Changes to Items 6 through 10 are proposed for consistency. If a component is declared inoperable in a system governed by these TTS while in Mode 1, Plant operation may continue for up to 30 days. During this 30-day period, if an unrelated reactor trip occurs that requires repairs in Mode 5, the Plant could not return to operation because of LCO 3.0.4. This is the case even if the original 30-day limit had not expired. Had the unrelated reactor trip not occurred, Plant operation could have continued for 30 days with the component inoperable.

Not allowing the Plant to return to operation following the unrelated reactor trip is too restrictive. The ACTION statements already limit the duration of continued operation. This change allows the Plant more operational flexibility while ensuring that ACTION statement time limits are met. The probability or consequences of an accident are not increased. This change does not create the possibility of a new or different kind of accident, nor does it involve a significant reduction in a margin of safety since the duration that equipment can be out-of-service remains unchanged. Therefore, a significant hazard does not exist.

The change to Item 11 above clarifies LCO 3.9.2 to allow entry into Mode 6 with a source range monitor inoperable. As presently written, LCO 3.9.2 precludes detensioning of the reactor vessel head if a source range monitor is inoperable due to LCO 3.0.4. This is too restrictive. Detensioning of the reactor vessel head does not increase the potential for a positive reactivity change. Therefore, the operability of source range monitors is irrelevant to head detensioning. An inoperable source range monitor can result in an unwarranted delay in the commencement of refueling. Revision of LCO 3.9.2 as proposed would allow head detensioning, but would still restrict CORE ALTERATIONS or positive reactivity changes. This change does not increase the probability or consequences of an accident since head detensioning does not cause CORE ALTERATIONS or positive reactivity changes. This change does not create the possibility of a new or different kind of accident, nor does it involve a significant reduction in a margin of safety since detensioning of the reactor vessel head is unrelated to source range monitor operability. Since the intent of LCO 3.9.2 is unchanged, a significant hazard does not exist.

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.

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