



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 195 TO POSSESSION-ONLY LICENSE NO. NPF-1

PORTLAND GENERAL ELECTRIC COMPANY

EUGENE WATER AND ELECTRIC BOARD

PACIFIC POWER AND LIGHT COMPANY

TROJAN NUCLEAR PLANT

DOCKET NO. 50-344

1.0 INTRODUCTION

By letter dated November 2, 1995, Portland General Electric Company (PGE or the licensee) submitted a request for changes to the Facility Operating License No. NPF-1 for the Trojan Nuclear Plant (Trojan). The changes requested revise Section 5.0, Administrative Controls, of the Trojan Nuclear Plant Permanently Defueled Technical Specifications (PDTS), Appendix A, to reflect changes in the organization of Portland General Electric (PGE) Company as they apply to the oversight and management of the Trojan Nuclear Plant.

2.0 BACKGROUND

The Trojan possession-only license allows the licensee to possess and maintain but not operate the facility. On March 31, 1995, the NRC issued Amendment No. 194 to License No. NPF-1 replacing the Appendix A Technical Specifications for the Trojan Plant with a new set of Permanently Defueled Technical Specifications. Trojan is permanently defueled and cannot be operated or have fuel placed in the reactor under the terms of its license.

3.0 DISCUSSION AND EVALUATION

PGE submitted letters to the NRC dated September 29, 1994, January 19, 1995, and October 10, 1995, notifying the NRC staff of changes in its organizational structure as it applies to oversight and management of the Trojan Plant. The proposed amendment included in the letter of November 2, 1995, revises Section 5.0, Administrative Controls, of the permanently Defueled Technical Specifications to reflect the organizational changes.

Sections 5.1.1 and 5.2.1.b of the Defueled Technical Specifications identifies the General Manager, Trojan Plant as having overall responsibility for the facility. Section 5.2.1.c identifies the Vice President and Chief Nuclear Officer as having the corporate responsibility for overall nuclear safety. The General Manager, Trojan Plant organizationally reports to the Vice President and Chief Nuclear Officer. The Vice President and Chief Nuclear Officer reports to the PGE Chief Executive Officer on Trojan Nuclear Plant activities.

The November 2, 1995, amendment request renames the General Manager, Trojan Plant to the Trojan Site Executive and Plant General Manager. This individual would report to the Senior Vice President, Power Supply at the corporate level. The Vice President and Chief Nuclear Officer at the corporate level would be eliminated. The Senior Vice President, Power Supply, will continue to report to the PGE Chief Executive Officer on Trojan Nuclear Plant activities.

The Trojan Site Executive and Plant General Manager will have overall responsibility for the facility, and will have control over those facility activities necessary for operation and maintenance of structures, systems and components necessary for the safe storage of irradiated fuel. The Trojan Site Executive and Plant General Manager will also have corporate responsibility for overall nuclear safety. The Trojan Site Executive and Plant General Manager will be located at the Trojan Site.

Currently the General Manager, Nuclear Oversight; General Manager Engineering/Decommissioning; General Manager, Plant Support and Technical Functions; Manager, Maintenance; Manager, Operations; and Manager, Personnel/Radiation Protection at the Trojan site report to the General Manager, Trojan Plant. The proposed change would have these Trojan line managers and associated organizations reporting to the same individual with the new title Trojan Site Executive and Plant General Manager.

The licensee's proposal eliminates the position Vice President and Chief Nuclear Officer at the corporate level and has the Trojan Site Executive and Plant General Manager reporting to another existing corporate executive, the Senior Vice President, Power Supply. The corporate level vice president no longer is required to have any nuclear related qualifications. A number of site related activities that were previously reported to the corporate level Vice President and Chief Nuclear Officer would now be reported to the Plant General Manager. These activities include the advice of the Independent Review and Audit Committee (IRAC) on matters relating to safe storage of irradiated fuel, the designation of the chairman, the members, and alternates that compose the IRAC, results of reviews as defined in Section 5.5.2.2, Review Responsibilities, and audits defined in Section 5.5.2.3, Audit Responsibilities. The licensee has retained the requirement in Section 5.5.2.1.5, Functions, to notify the cognizant individual at the corporate level, in this case the Senior Vice President, Power Supply, within 24 hours of any safety significant disagreement between the IRAC and the Plant General Manager.

The regulations (10 CFR 50.40(b), and 10 CFR 50 Appendix B.I.) require that the applicant be technically qualified to engage in licensed activities, and that the authorities and duties of persons performing activities affecting structures, systems, or components important to safety be clearly established and delineated. Standard Review Plan (SRP), 13.1.1., Management and Technical Support Organization, NUREG-0800, dated July 1981, provides guidance in the NRC staff review of the licensee's corporate organizations. The licensee's corporate organization should provide sufficient support to ensure safe dismantlement of the facility.

The changing of the title of the Trojan Site Executive and Plant General Manager to the Trojan Site Executive and Plant General Manager is an administrative change and the staff finds it acceptable. The NRC staff also finds the elimination of the corporate level position of Vice President and Chief Nuclear Officer and the reporting of the senior manager at the site to the corporate level Vice President, Power Generation acceptable. The significant reduction in risk to the public and onsite workforce since the Trojan Plant ceased operation and the unique nature of the decommissioning of the facility no longer requires specialized expertise at the corporate level. Many of the independent functions that were performed at the corporate level can now safely be reviewed at the Trojan site. The retention of the notification requirement of the cognizant corporate level Senior Vice President in the case of a safety significant disagreement between the IRAC and the Plant General Manager provides an additional level of independent review and audit on safety significant matters at the site.

The staff has determined that the proposed changes in the Trojan organizational structure does not adversely affect the licensee's ability to safely decommission the facility, that organizational duties and responsibilities continue to be clearly delineated, and that the licensee continues to meet the intent of guidance provided in SRP 13.1.1 at the corporate level. Therefore, the staff finds the licensee's proposal acceptable and in compliance with 10 CFR 50.40(b) and 10 CFR 50 Appendix B.I. and consistent with the guidance in SRP 13.1.1.

#### 4.0 STATE CONSULTATION

In accordance with the Commission regulations, the appropriate member of the Oregon Department of Energy was notified of the proposed issuance of this amendment. The State official had no comment.

#### 5. ENVIRONMENTAL CONSIDERATION

The amendment is administrative in nature. The commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 58404) dated November 27, 1994. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6. CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed changes, (2) the change will be in compliance with the Commission regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: October 31, 1996