

AUG 28 1985

Docket No. 50-344

Portland General Electric Company  
121 S. W. Salmon Street  
Portland, Oregon 97204

Attention: Mr. Bart D. Withers  
Vice President Nuclear

Gentlemen:

Thank you for your letter dated July 15, 1985, in response to the Notice of Violation, forwarded by our letter dated June 13, 1985.

Your actions in response to this matter were examined during an inspection conducted at the Trojan plant on August 5-9, 1985 and found to be acceptable.

Sincerely,

*original signed*  
Ross A. Scarano, Director  
Division of Radiation Safety and  
Safeguards

bcc w/copy ltr dtd 6/13/85:  
W. Dixon, DOE  
Mr. Martin  
Joan Zollicoffer  
RSB/Document Control Desk (RIDS)  
Resident Inspector

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Portland General Electric Company

Bart D. Withers Vice President

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REGION VICE

July 15, 1985

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission  
Creekside Oaks Office Park  
1450 Maria Lane, Suite 210  
Walnut Creek CA 94596-5368

Dear Mr. Martin:

Response to Notice of Violation

This letter is in response to the Notice of Violation forwarded by your letter dated June 13, 1985. The Notice addressed the failure to evaluate extremity radiation exposure due to nonpenetrating radiation following the steam generator insert handling occurrence of August 16, 1984.

During the transfer, 8 steam generator inserts were moved from inside the Containment bioshield to a shielded cask in the Fuel Building. Due to possible inadequate monitoring, an exposure investigation was conducted to assign extremity and airborne radiation exposures.

The steam generator insert transfer exposure investigation included a time motion study of 7 individuals over a one-hour period to determine radiation doses to the individuals' extremities and the airborne radioactivity levels to which the individuals were exposed.

Failure to explicitly include nonpenetrating radiation in the initial exposure investigation resulted from the manner in which the extremity exposures were determined. Ratios of contact to whole body radiation measurements were used in the evaluation to determine extremity radiation doses. These radiation measurements should include both penetrating and nonpenetrating radiation, therefore, accounting for nonpenetrating radiation in the exposure investigation.

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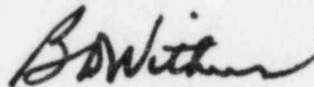
Portland General Electric Company

Mr. John B. Martin  
July 15, 1985  
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When questioned by your NRC inspector, it was determined that there was no documented proof that these readings included nonpenetrating radiation. Therefore, as noted in the NRC report, a further evaluation was completed which explicitly includes a radiation dose attributable to nonpenetrating radiation.

Although the subject evaluation was deficient in not explicitly addressing the nonpenetrating radiation exposure, PGE considers the manner in which exposure investigations are conducted to be adequate. The omission addressed in the Notice of Violation was not due to programmatic or training deficiencies. However, it is recognized that the persons performing the evaluation and those reviewing the evaluation should have identified this potential weakness in the evaluation. Therefore, the results of this evaluation will be reviewed with the Radiological Safety Branch and Trojan Radiation Protection personnel, who may perform exposure investigations in the future. This action will be completed by August 15.

Sincerely,



Bart D. Withers  
Vice President  
Nuclear

Attachment

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