



Portland General Electric Company

Stephen M. Quennoz
Trojan Site Executive

November 27, 1996

VPN-070-95

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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

Dear Sirs:

Trojan Nuclear Plant Defueled Safety Analysis Report, Revision 4

Pursuant to 10 CFR 50.4(b)(6), the enclosure to this letter provides one original and ten copies of Revision 4 to the Trojan Nuclear Plant Defueled Safety Analysis Report (DSAR). In accordance with 10 CFR 50.71(e), Revision 4 includes changes to the DSAR since the last submittal. The attachment to this letter includes a brief description of each change included in this revision. Changes to each page are identified by margin bars adjacent to the change and revision numbers at the page bottom. Each copy of Revision 4 is accompanied by a set of instructions for insertion into the DSAR.

I hereby certify that Revision 4 accurately presents changes made since Revision 3 necessary to reflect information and analyses submitted to the Commission or prepared pursuant to Commission requirements.

Sincerely,

Stephen M. Quennoz
Trojan Site Executive

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PDR ADOCK 05000344
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Attachment

Enclosures

- c: L. J. Callan, NRC Region IV
D. Stewart-Smith, ODOE
Dr. B. D. Spitzberg, NRC Region IV
R. A. Scarano, NRC Region IV
M. T. Masnik, NRC, NRR

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Description of Changes

- LDCR 95-015 Change to Figure 3.3-2 to remove detail showing component cooling water flowing to equipment and components that are no longer needed or required in the permanently defueled and shutdown plant condition and that have been deactivated.
- This change was made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.
- LDCR 96-002 Figures 3.2-15 through 3.2-22 were identified as "historical information only." The changes are administrative in nature since the figures represent the general layout for the operating plant condition and historical reference for the design basis of the Control, Auxiliary, and Fuel Building complex. Ongoing decommissioning activities have resulted in changes to the systems and components identified by the figures. The figures were identified as historical information to prevent an excessive number of changes to the DSAR as decommissioning activities proceed. Procedures governing the plant design control process exist to require evaluation of modifications to safety related structures and maintenance of appropriate design drawings.
- These changes were made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.
- LDCR 96-008 The NRC approval of the Trojan Nuclear Plant Decommissioning Plan on April 15, 1996, necessitated the changes associated with this LDCR. Section 7.5 was revised to reflect the approved Decommissioning Plan. PGE-1061, "Trojan Nuclear Plant Decommissioning Plan," and PGE-1063, "Supplement to Applicant's Environmental Report - Post Operating License Stage," were added to the list of material incorporated into the DSAR by reference in Section 1.5. These changes ensure the documents are considered in the evaluation and review processes for future activities.
- Reference to PGE-1062, "Large Component Removal Plan," was deleted from the list. The project is completed and the document is historical.

LDCR 96-015

A change to Section 3.3.2.3, "Design Evaluation," was made to correct the longest time interval between spent fuel pool cooling system failure and its detection from 16 hours to 24 hours. The correction from 16 hours to 24 hours is based on operations crew work schedules changing from 8 to 12 hour shifts. This error was initially identified by NRC Inspection Report 95-06. Section 6.3.2 states that "...under the assumed conditions spent fuel pool boiling would not occur for at least 35 hours," therefore, no detrimental effect on the system's design evaluation is incurred.

These changes were made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.

LDCR 96-016

Table 3-5.1 was revised to identify that Trojan will use optical storage systems as an exception to compliance with Regulatory Guide 1.88. Optical storage systems are consistent with provisions contained in NRC Generic Letter 88-18, "Plant Record Storage on Optical Disks."

This change was made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.

LDCR 96-017

Table 3-5.1 was revised to express "compliance with exception" to Regulatory Guide 1.39, "Housekeeping Requirements for Water-Cooled Nuclear Power Plants," Revision 2. This Regulatory Guide endorses the application of recommendations made in American National Standards Institute Standard N45.2.3, "Housekeeping During the Construction Phase of Nuclear Power Plants." The cleanliness and housekeeping standards are designed to control work activities, conditions, and environments that can affect the quality of important parts of a nuclear power plant. These parts include structures, systems, or components whose satisfactory performance is required for the plant to operate reliably, to prevent accidents that cause risk to the health and safety of the public, or to mitigate the consequences of such accidents if they were to occur.

The plant no longer operates and has a relatively long time available to respond to, and mitigate the consequences of, any accident postulated in the DSAR. Therefore strict application of these requirements is no longer necessary. Specifically the use of a log book to control material above the spent fuel pool will no longer be required, but the option for its use will not be precluded. If a log for the control of material is not used, a visual inspection of the tops of spent fuel assemblies will be performed.

These changes were made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.

- LDCR 96-018 The DSAR was revised to clarify the discussion of the Fuel Building crane mechanical stops and limit switches. It adds the provision that the crane mechanical stops and electrical limit switches may only be bypassed or removed while following an approved procedure and only with the Shift Manager's approval. This change clarifies PGE's commitment to the NRC associated with NUREG-0612, "Control of Heavy Loads." The subsequent commitment (reference PGE letter to NRC dated January 22, 1982, and PGE letter to NRC dated May 17, 1982) acknowledges the adequacy of procedural control in lieu of the stops and limit switches to control heavy load movement near the spent fuel pool and implements procedure and review controls for deviations and changes affecting safe load paths.
- These changes were made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.
- LDCR 96-024 Section 4.2.1.1, Figure 4.2-1, and Figure 4.2-2 were changed to remove references to the spent fuel pool bridge crane cantilevered arm. The arm was removed under existing design process controls. The changes are administrative in nature.
- These changes were made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.
- LDCR 96-026 Designations of the triaxial peak accelerographs in Table 4.1-1, Page 1 of 2, were changed to the correct as-built locations. The changes are administrative in nature and has no impact on safety. No physical changes were made to the devices.
- These changes were made under the provisions of 10 CFR 50.59 but not previously submitted to the Commission.
- LDCR 96-027 Title changes were made to the DSAR to implement approved License Amendment 195.
- LDCR 96-033 Changes to Section 1.4 of the DSAR reflect the Final Decommissioning Rule and NRC approved exemption of offsite emergency planning.
- LDCR 96-034 The DSAR was revised to delete references to the Emergency Diesel Generators (EDGs) and Diesel Fuel Oil storage tanks which have been removed from the plant. Portions of the Service Water System which provide a make-up flow path to the SFP have been reclassified from SC-I to SC-II. The SFP heat-up times have been updated to reflect reductions in decay heat production at 3.5 years after shutdown. In addition, Figure 3.3 has been updated to show the the removal of the east end of the WSH warehouse.



Portland General Electric Company

CPY-104-96

TO: Distribution

FROM: C. P. Yundt *CPY*

DATE: November 27, 1996

SUBJECT: Transmittal of Revision 4 to the Trojan Nuclear Plant
Defueled Safety Analysis Report (DSAR)

Enclosed are replacement pages for your Controlled Copy of the Trojan Nuclear Plant Defueled Safety Analysis Report (DSAR). The pages are to be inserted in accordance with the accompanying instruction sheet.

Please acknowledge receipt of your copy by completing the lower portion of this transmittal and returning it to the location given below.

CPY/CKC

Enclosure

11/27/96

ACKNOWLEDGMENT

Trojan Nuclear Plant Defueled Safety Analysis Report (DSAR)

Revision 4

I hereby acknowledge receipt of Controlled Copy number 31 the subject document. All changes have been made in accordance with the instructions, and superseded pages have been destroyed.

Signature of Copy Holder

Date

Return to: Pat Schaffran/TCB-3
Trojan Nuclear Plant
71760 Columbia River Highway
Rainier, Oregon 97048

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