



Portland General Electric Company

Bart D. Withers Vice President

September 6, 1985

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Director of Nuclear Reactor Regulation  
ATTN: Mr. E. J. Butcher, Jr., Acting Chief  
Operating Reactors Branch No. 3  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington DC 20555

Dear Sir:

License Change Application 121

Pursuant to our previous discussions concerning License Change Application (LCA) 121, attached you will find our final agreed-upon revision to this LCA.

Sincerely,

Bart D. Withers  
Vice President  
Nuclear

Attachment

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

Mr. Robert L. King  
Chairman of County Commissioners

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LICENSE CHANGE APPLICATION 121

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

1. Page 5, Quality Assurance

Page 5 of the Operating License is being revised to reflect the correct name of the Quality Assurance Program. This is not due to a change in the program but a change made to the title only.

2. Page 3/4 2-2, Axial Flux Difference (AFD) Surveillance

Surveillance Requirement 4.2.1.1.a.2 is being deleted. This surveillance item requires monitoring the indicated AFD once per hour for 24 hours after the AFD monitor alarm has been placed in OPERABLE status.

Although Surveillance Requirement 4.2.1.1.a.2 is required in Revision 4 to NUREG-0452, it is not clear what the basis for this surveillance is. From our review of this requirement, it appears that this surveillance is to be performed to ensure that any accumulated AFD penalty minutes are adequately accounted for per Specification 3.2.1 or else to ensure that the AFD computer is once again operable, functioning normally, and is recording the appropriate values. If it is a requirement to ensure that the monitor is continuing to function after being returned to an operable status, we do not feel that this Technical Specification Surveillance Requirement is necessary. Other means exist to ensure that the AFD monitor is operable and performing its function once it has been returned to an operable status. Although the operators may periodically want to ensure that the AFD is back in service and operating satisfactorily, it is not felt to be appropriate to include this specific requirement in the Technical Specifications. Since other alarms and indication are available to inform the operators if the AFD monitor becomes inoperable, hourly surveillance for the first 24 hours after restoring the AFD monitor to OPERABILITY is not necessary.

However, if this surveillance requirement is to ensure that any accumulated AFD penalty minutes are adequately accounted for per Specification 3.2.1, this requirement is adequately performed in accordance with Surveillance Requirement 4.2.1.1.b when the monitor is inoperable. Again, when a monitor becomes inoperable, the data acquired in accordance with Surveillance Requirement 4.2.1.1.b would be manually entered into the AFD computer prior to declaring it operable, thereby making one-hour monitoring for the first 24 hours after restoring the AFD monitor alarm to an operable status redundant and unnecessary. Therefore, it is felt that Surveillance Requirement 4.2.1.1.a.2 is duplicative, unnecessary, and serves as an unwarranted burden to the operators.

3. Pages 3/4 4-19 and 4-20, RCS Specific Activity

The Technical Specification 3.4.8 ACTION statement for MODES 1, 2, 3, 4, and 5 is being modified as shown in Attachment 1 to account for the recent changes to the reporting requirements of 10 CFR 50.72 and 50.73. Since these changes to 10 CFR 50.72 and 50.73 occurred after issuance of NUREG-0452 (W-STs), Revision 4, the draft copy of W-STs, Revision 5 was used as a basis for the revision to this Specification. This change removes all portions of the ACTION statement pertaining to a REPORTABLE OCCURRENCE and the information required to be submitted with it.

4. Page 3/4 7-38, Control Building Modification Connection Bolts

The APPLICABILITY of Technical Specification 3/4.7.11 is being revised to correct an error. The APPLICABILITY shall be "AT ALL TIMES" instead of the current "ALL MODES".

SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The revisions associated with this change request fall into one of three categories: (1) editorial changes or minor rewording made to correct errors, (2) clarify requirements, or (3) changes made to make the Technical Specifications agree more closely with the W-STs. Therefore, a significant hazard consideration is not deemed to exist for this change since it either: (1) does not make substantive changes to the Technical Specifications, (2) clarifies requirements without changing their intent and thereby continues to meet all existing requirements, or (3) clearly falls within existing regulatory guidance (NUREG-0452, Revision 5, draft).

Deletion of Surveillance Requirement 4.2.1.1.a.2 is not felt to involve a significant hazard inasmuch as it is an administrative change, and has no direct affect on reactivity or reactor safety. Deletion of this surveillance requirement does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The surveillance requirement merely deletes from the Technical Specification the burden of monitoring instrumentation on an hourly basis for the first 24 hours after returning it to an operable status because such monitoring is unnecessary and duplicative to other alarms and indications that exist in the control room. As such, no significant hazard would be created by its deletion.

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.