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JAN 17 1986

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:

Subject: NRC Inspection of the Trojan Nuclear Plant

This refers to the special team inspection conducted by Mr. W. Albert and other members of our staff on December 2-13, 1985, of activities authorized by NRC License No. NPF-1, and to the discussion of our findings held by Mr. Albert with you and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the enclosed inspection report. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspectors.

This inspection focused its effort upon your programs and controls associated with the Auxiliary Feedwater System, the emergency Diesel Generators, and the 125 VDC Power System and the implementation and adherence of those programs and controls in the following areas: Operator Recovery Actions; Motor-operated Valve Programs; Technical Specification Surveillance Program; Maintenance Programs; Plant Modifications; Offsite Safety Committee Activities; and Health Physics Programs.

Overall Conclusions

In general, the team concluded that serious attention must be devoted to those management systems which ensure reliable performance of installed safety-related equipment. This need is demonstrated by the findings of the team with regard to quality control inspections of maintenance activities and the control of temporary modifications. We are particularly concerned with the findings in the quality control area, as these findings again reflect a historical lack and appreciation by the management of the utility for a strong quality control program in support of nuclear plant operations. We are similarly concerned that quality control presence may be missing in other areas and in need of management attention. Please advise us of your plans to assess this question and your anticipated corrective actions.

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Areas Inspected and Results

A. Operator Recovery Actions

The area of Operator Recovery Actions was examined and it was determined that the level of operator knowledge and understanding of the emergency procedures associated with operator recovery actions for the 'Loss of Secondary Coolant' and 'Loss of All AC Power' procedures was extensive. However, three items of concern were identified in the procedures which addressed recovery actions.

B. Motor Operated Valves

The scope of this inspection included the components that make up the interface between the Auxiliary Feedwater System (AFS) and the Service Water System (SWS) with emphasis on the motor-operated valves between these systems. Maintenance and testing of motor-operated valves in general was also reviewed. No problems or concerns were identified.

C. Surveillance Program

The surveillance program for implementing technical specification requirements which apply to the Auxiliary Feedwater System, Station 1E 125-volt Batteries and Emergency Diesel Generators was examined and found to be adequate. The results of the examination revealed that there were minor weaknesses in the station battery and the auxiliary feedwater system diesel's starting battery surveillance procedures. The licensee's station management committed to revise these procedures.

An examination of approximately 500 surveillance records for the three systems examined found that quality control inspection was not being performed during the performance of the surveillances. This lack of a quality control function was evident from the lack of quality control hold points or inspection points in any of the procedures examined. The absence of the quality control function in the technical specification surveillance program, which also implements a major portion of the preventive maintenance program for the plant's safety-related equipment, is perceived as a major weakness in the licensee's overall quality assurance program and is discussed under "Maintenance" below.

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D. Maintenance

The maintenance program was examined for conformance with regulatory requirements, Technical Specifications, and licensee commitments. The inspectors interviewed approximately 30 PGE staff members, reviewed 35 PGE procedures and examined approximately 500 Maintenance Requests and Procedural Test Data sheets. Three areas of concern were identified in the Preventive and Corrective maintenance program as follows: 1) failure to systematically analyze performance data, 2) use of post-maintenance testing and 3) methods by which maintenance requests are classified as safety or non-safety related. None of these items were severe enough to warrant a violation or deviation. However, it was found that there was a definite lack of independent quality control verification in maintenance work. This matter is considered to be a violation of NRC requirements.

E. Procedural Control

Procedural controls were examined to determine whether or not procedures were being revised to reflect plant modifications. Additionally, the temporary modification program was examined to assess the adequacy of the licensee's program for controlling lifted electrical leads and jumpers. It was concluded, except for minor deficiencies, the program was meeting NRC requirements.

F. Modifications

The plant modification program was inspected to determine whether controls and procedures were established and implemented for changes to plant design. The inspectors concluded that overall the program was functioning according to requirements, however, the deficiencies found in the installation of one of the changes appear to constitute a violation of requirements.

G. Offsite Review Committee

Although team effort in this area was limited, the procedures governing the Trojan Nuclear Operations Board (TNOB), (the offsite safety review committee), were reviewed and the quarterly meeting held on December 10, 1985 was attended. It was concluded that the TNOB was meeting the requirements of the Technical Specifications and the commitments in the FSAR.

H. Radiation Protection, Plant Chemistry and Radwaste

The inspection in this area included radiation protection and the chemistry organization and management, training and qualification and liquid and gaseous waste disposal, information notices and the licensee's response to a Generic Letter. No violations of NRC requirements were identified in this area.

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In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room.

Should you have any questions concerning this inspection, we will be glad to discuss them with you.

Enforcement action by the NRC relating to this inspection will be the subject of separate correspondence.

R. Pate

For - D. F. Kirsch, Deputy Director
Division of Reactor Safety and Projects

Enclosure:
Inspection Report
No. 50-344/85-33

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