



Portland General Electric Company

Bart D. Withers Vice President

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REGION V USE

December 6, 1985

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Mr. D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek CA 94596-5368

Dear Mr. Kirsch:

Response to NRC Notice of Violation

Your letter of November 6, 1985 forwarded Inspection Report 85-36 and a Notice of Violation concerning written procedures covering surveillance and test activities of safety-related equipment. Our response to that Notice of Violation is attached.

Sincerely,

Bart D. Withers
Vice President
Nuclear

Attachment

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

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10 CFR 2.201
RESPONSE TO NOTICE OF VIOLATION

Violation

Section 6.8.1 of the Technical Specifications requires that written procedures shall be established, implemented, and maintained covering surveillance and test activities of safety-related equipment.

1. Periodic Instrumentation and Control Test (PICT) 11-1, Power Range Setpoint Test requires data to be recorded in PICT 11-1 data sheets. Step 7.2.3 of the procedure provides for measuring and recording Power Range High Voltage.

Contrary to the above requirements, Power Range High Voltage was not recorded on several PICT 11-1 data sheets during 1984 and 1985. For example, the voltage reading was not recorded for test of the Power Range Channel No. 44 performed on July 9, 1985, Channel No. 43 performed on May 12, 1984, Channel No. 42 performed on June 20, 1984, and Channel No. 41 performed on October 7, 1984.

2. PICTs 2-1, 2-2, 2-3, 3-1, 3-2, 4-1, 4-2, and 4-3 require the test equipment type and tag number of test instruments used to be recorded in the PICTs data sheets.

Contrary to the above requirements, test equipment type and tag data were not recorded on test data sheets as listed below.

PICT 2-1, dated January 2, 1985; September 3, 1985
PICT 2-2, dated October 3, 1983; January 2 1985; September 3, 1985
PICT 2-3, dated October 3, 1983; January 2, 1985; September 3, 1985
PICT 3-1, dated September 4, 1985
PICT 3-2, dated July 15, 1985; September 5, 1985
PICT 4-1, dated August 28, 1985; September 9, 1985
PICT 4-2, dated August 28, 1985; September 9, 1985
PICT 4-3, dated August 28, 1985; September 9, 1985

This is a Severity Level IV Violation.

Response

1. Additional PICT 11-1 data were reviewed to ensure the Power Range High Voltage was within Specification on those occasions when the data were not recorded. No deviations from the required voltage were found. In addition, PICT 11-1 is being revised to improve the format and readability of the procedure which we consider to be the cause of the noted deficiencies. The procedure revision will be complete by February 1, 1986. In the interim, maintenance personnel have been advised of the deficiencies and the need to record this specific data point.

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Page 2 of 2

2. In each of the stated cases where the equipment type and tag data were not recorded on the data sheets for the ramp generator used, each of the deficient data sheets have been corrected. This correction was possible because there is only one ramp generator onsite. The responsible personnel did not record the ramp generator each time because there could be no question as to which one was used. Additional training has been conducted with the Instrument and Control Technicians to emphasize the need to follow the procedures and for maintaining complete and accurate records.

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