



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

March 4, 1988

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

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

Dear Sir:

Response to Notice of Violation

Your letter of February 5, 1988 transmitted a Notice of Violation associated with NRC Inspection Report 50-344/88-01. Attached is our response to that Notice of Violation.

Sincerely,

Attachment

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission

Mr. William Dixon  
State of Oregon  
Department of Energy

Mr. R. C. Barr  
NRC Resident Inspector  
Trojan Nuclear Plant

8803080377 880304  
PDR ADOCK 05000344  
Q DCD

IED/1/1

REPLY TO NOTICE OF VIOLATION

Violation

Plant Technical Specification 4.0.5 provides requirements for periodic inservice testing and states in part that, "Inservice...testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME boiler and pressure vessel code..."

To meet the surveillance requirements of ASME Section XI, the fourth sentence of paragraph 6.1.4.2 (pumps) of PET-9-4 (Revision 7) states, "The plant test engineer or designee shall review the test to determine the need for increased frequency of testing on the alert list", and the last sentence of paragraph 6.2 (valves) states, "IST-related parameters shall be compared to the data (from the most recent, previous data) for each valve, and will be used to determine the ultimate operability of that valve."

Contrary to the above, data sheet POT-5-1-DA for POT-5-1 auxiliary feedwater system testing performed on December 23, 1987, was filed in the licensee's records vault without a plant test engineer signature and the applicable IST data had not been reviewed and logged in the associated 1987 IST pump and valve data log for procedure data sheet POT-5-1-DA/DB. Members of the ASME surveillance and testing group were unable to verify that they had reviewed data sheet POT-5-1-DA data to determine if increased testing was required or had compared the December 23, 1987 data to the most recent previous data.

This is a Severity Level IV Violation (Supplement I).

Response

PGE acknowledges the violation.

1. Reason for Violation

The reason for the violation was personnel error in that a staff clerk incorrectly routed the data sheet to the System Engineer only. The data sheet was not routed to the Plant Test Engineer, as required. Following the System Engineer review, the data sheet was sent directly to the records vault.

2. Corrective Action Taken and Results Achieved

This subject was discussed immediately with the clerical staff following identification by the NRC Inspector. The routing problem had been corrected before discovery of this event. A review of all Inservice Testing (IST) data sheets located in the vault was performed by the Plant Test Engineer dating back to April 1987 to ensure the data had been properly

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

Document Control Desk  
March 4, 1988  
Attachment  
Page 2 of 2

reviewed. Including the subject data sheet, a total of seven were found during this review which had bypassed the IST review. All data sheets were from the same time period. The records have now been brought up to date.

3. Corrective Action Taken to Avoid Further Violations

- a. Clerical reviews prior to sending data sheets to the vault now include a verification that all signature blocks are complete.
- b. Specific guidance will be added to the clerical staff guidelines policy manual used to control the data sheet handling functions to ensure proper routing of data sheets.

4. Date When Full Compliance Will Be Achieved

Specific guidance will be added to the clerical staff guidelines policy manual by June 1, 1988.