



Portland General Electric Company

David W. Cockfield Vice President, Nuclear

February 22, 1988

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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NRC
REGION V
1988 FEB 24 P 12:51

Mr. John B. Martin
Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
Creekside Oaks Office Park
1450 Maria Lane, Suite 210
Walnut Creek CA 94596-5368

Dear Mr. Martin:

Response to Nuclear Regulatory Commission (NRC)
Letter of January 22, 1988

By letter of December 30, 1987, Portland General Electric Company (PGE) responded to two Notices of Violation regarding procedural noncompliance and failure to properly implement a Technical Specification requirement. On January 22, 1988, you responded to our letter reemphasizing the need for aggressive action in the area of procedural compliance and identifying concerns with quality verification activities and the time frame proposed by us for determining quadrant power tilt ratio (QPTR).

We would like to assure you of our commitment to procedural compliance. This message has been clearly sent to all employees through supervisor meetings and General Employee Training. The feedback we have received from supervisors indicates the message has been understood. Disciplinary action has been promised for any willful noncompliance. We recognize that stemming this problem involves more than just correcting people's actions, it involves changing attitudes. We intend to continue to emphasize this issue and to monitor the success of our actions.

One of the violations we responded to on December 30, 1987 dealt with failure to properly implement a Technical Specification surveillance requirement. In your January 22, 1988 letter, you expressed a concern with the area of quality verification due to the duration of this discrepant condition. We have had in place for the past several years, a program to systematically verify compliance with Technical Specification requirements, including coverage of each Technical Specification surveillance requirement in Plant procedures. It has been emphasized to quality assurance personnel that literal compliance needs to be verified. A recent audit conducted of reactor physics requirements indicate a generic problem does not exist.

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Finally, your letter stated our assessment of a reasonable time frame for determining QPTR did not appear to be consistent with the time frames for similar determinations at other nuclear power plants. Plant procedures are being revised to provide more definitive criteria for determining if an indicated QPTR exceeds the Technical Specification limits. Within two hours of a valid QPTR alarm, the alarm condition will be rectified or the power reduced in accordance with the Technical Specifications. The validity of the QPTR alarm will be determined by examining other core or primary parameters.

We trust this information is responsive to your concerns. We are confident our actions will prevent further problems in these areas.

Sincerely,

A handwritten signature in dark ink, appearing to be 'SWA', is written over the 'Sincerely,' text.

c: U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk

Mr. William Dixon
State of Oregon
Department of Energy

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