

THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN
VICE PRESIDENT-ENGINEERING

June 21, 1979

United States
Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. James G. Keppler
Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION
UNIT 1 - IE INSPECTION REPORT
50-358/7906

Gentlemen:

This letter constitutes our formal reply to the subject Inspection Report. It is our opinion that nothing in our report or in this reply is of a proprietary nature. Our responses to the deficiencies identified in Appendix A are as follows:

Item 1a - SU.ACP.16

Corrective Action Taken and Results Achieved

Construction craft laborers, under the direction of a shift supervisor, were utilized to clean the immediate, enclosed area around the 1B and spare 125 VDC battery chargers. After cleaning internals of the spare 125 VDC charger of accumulated dust, insulation and concrete pieces, a protective polyethylene plastic sheet covering was placed over this charger. A replacement for the missing side panel has been ordered and will be installed when received.

The HPCS pump and motor were visually inspected and were returned to construction for corrective action on a GE FDDR.

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The equipment in the LPCS system involved in the flooding incident was identified and appropriate maintenance work requests generated to detail and document corrective measures required and taken.

The system jockey pump motor was removed and oven dried for two hours at approximately 200°F. Meggar readings far in excess of 1000 meg ohms at 500 volts were obtained after the drying cycle.

The oil system was flushed, refilled with new oil, and after bumping the motor for correct rotation, was run for about one-half hour. After this initial run-in period, the oil was again changed. In addition, the motor leads were relugged. The affected instrumentation was removed, thoroughly cleaned and dried, (in some cases, oven dried at approximately 150°F). Micro switches, potentiometers, PC cards, etc. were cleaned with methanol and an electronic contact lubricant and cleaner, process pipe lines were completely blown free of water, electrical cables relugged, and instruments recalibrated.

All equipment under construction's jurisdiction was appropriately dispositioned on nonconformance reports and corrective measures carried out by that organization.

Corrective Action to be taken to Avoid Further Noncompliance

As required by SU.ACP.16, monthly inspections of systems turned over for preoperational testing, are being conducted and corrective measures taken as a result of those inspections. Construction craft laborers are assigned to the Electric Production Department to improve response time in implementing any action requests generated by the inspections. Assignments are given to the laborer foreman, completion dates determined, and reinspection dates established. To further improve this effort, a station staff engineer will be assigned the responsibility of weekly cleanliness inspection of systems turned over for preoperational testing until such time that the station's permanent Building Services Foreman has been obtained. Additionally, a memorandum will be issued to the construction forces reminding them of their responsibilities in this situation.

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SU.ACP.03, Conduct of Flush, has been modified and now specifies that all systems be turned over to the Electric Production Department for operation prior to commencing any flushing operation. This assures that all administrative responsibility and authority for system operation is vested within one group. The QA&S Group has placed a hold point in all remaining flushing procedures that requires them to witness and verify the correct positioning of all system boundary valves prior to commencing and flushing operation. Additionally, QA&S has instituted a Flushing Stop Work Order that is issued after their verification of boundary conditions and requires that no entrance into the pressure boundary may be conducted without QA&S authorization.

The CG&E Stop Work Order will remain in effect until the system is returned to construction for completion of other construction activities as may be necessary. At that time, the Henry J. Kaiser Company cleanliness control procedure will be implemented.

Based on the above requirements, the Stop Work Order will remain in force as long as the system is in the custody of the Electric Production Department and/or until the system is turned over for preoperational testing.

The changes made to SU.ACP.03 and the revised QA&S procedures are applicable to the LP/RHR flooding incident as well.

Date When Full Compliance will be Achieved

Full compliance will be achieved for all the above described corrective actions by June 29, 1979.

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Item 1b - SU.ACP.16

Corrective Action Taken and Results Achieved

The events leading up to this specific incident were reviewed with the shift supervisor and the plant operator who were on duty at the time. The importance of adherence to procedures and definitive communication was stressed. The incident was discussed with the entire operating group.

Corrective Action Taken to Avoid Further Noncompliance

In addition to added emphasis on procedural adherence, each member of the operating staff was instructed on appropriate and proper methods of receiving and transmitting instructions. This instruction was conducted during the incident review sessions.

Item 2 - GE Inspection Procedure 22A4387, Revision 4

Corrective Action Taken and Results Achieved

Inspection Procedure 22A4387, Revision 4, was prepared and approved by General Electric to be implemented by Reactor Controls, Inc. during construction site inspection of the 137 control rods. General Electric site personnel provided surveillance and technical advice during the implementation of this procedure.

The General Electric Company is of the opinion that the instructions of the inspection procedure are appropriate for the circumstances. The purpose of the inspection was to assure that there was no inadvertent mechanical damage which may have occurred to the control rods during shipping or handling operations. The purpose of placement of the 40 pound clamp on the control rods was to ascertain that the localized high spots (greater than .280) on the control rods were not the result of mechanical damage to the absorber rods which could possibly result in component interferences.

Based on the above information, there is no correction action necessary to the implementation of the subject procedure and no degradation as to the quality of the control rods resulted.

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Corrective Action Taken to Avoid Further Noncompliance

It is The Cincinnati Gas & Electric Company's position that the General Electric Company's procedure was not definitive and The Cincinnati Gas & Electric Company will continue to pursue obtaining corrective action from the General Electric Company in regard to the subject and other General Electric Company procedures. The Cincinnati Gas & Electric Company will implement random audits of existing General Electric procedures to assure that they are definitive and adequate for the intended application.

Date When Full Compliance will be Achieved

In regard to the inspection procedure for the control rods, full compliance has been achieved. Audit of the remaining General Electric Company procedures will continue as an ongoing process and corrective action will be requested of General Electric Company on a case-by-case procedural review and possible deficiency identification.

To summarize our response to your request to establish prompt management action to strengthen the overview and discipline of our preoperational testing program, the following actions in addition to those previously established and reviewed by your inspectors, have been implemented:

1. Each system requiring flushing shall be turned over to the jurisdiction of the Electric Production Department which will eliminate possible conflict regarding administrative control.
2. Prior to the conduct of all remaining system flushes the QA&S Section has established a hold point which requires verification that the boundary valves have been appropriately lined up prior to implementing the flushing operation.
3. After completion of flushing operations the QA&S Section will issue a Stop Work Order applicable to the system flushed to ensure that no inadvertent construction activities affect the integrity and cleanliness requirements of the system flushed.

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4. During the construction of all flushing activities appropriate trained and qualified Electric Production Department personnel will monitor and direct the activities.

We trust that the contents of this letter will serve as an adequate response to your Inspection Report 50-358/7906.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN
Senior Vice President

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