

THE CINCINNATI GAS & ELECTRIC COMPANY

May 7, 1981

Docket No. 50-358

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: WM. H. ZIMMER NUCLEAR POWER STATION -
UNIT 1 - COMMENTS ON NUREG 0619

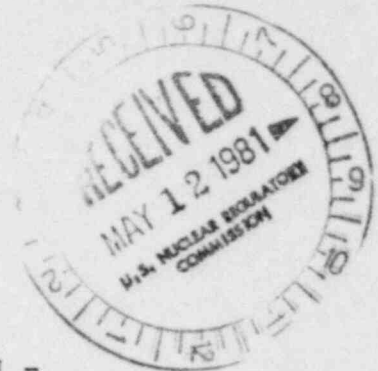
Dear Mr. Denton:

This letter is in response to NUREG 0619 and a November 13, 1980 NRC letter from Dariell E. Eisenhut to OL applicants. This letter supplements a June 30, 1980 letter from Mr. E. A. Borgmann to Mr. H. Denton discussing the same topic. CG&E's response to NUREG 0619 is as follows:

In conjunction with our augmental ISI program, you are already aware that the Zimmer CRD return line is carbon steel and thus not subject to IGSCC (see page E-7, comment 3 of NUREG 0619).

CG&E believes that the valve out solution is an acceptable and preferable solution to the thermal stressing of the nozzle, rather than the cap and cut solution. Valving out is desirable in that it allows full use of the CRD system as a high pressure water source for the vessel should this ever be necessary. Please refer to our June 30, 1980 letter on this subject.

Additionally, at this stage of construction, cutting and capping would require many retests including an additional stress cycle due to the primary vessel hydrostatic test. CG&E does not believe cutting and capping of the CRD return line is technically justifiable for the Zimmer Station.



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To: Mr. Harold Denton, Director

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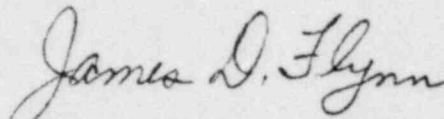
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With regard to the feedwater nozzle cracking portion of NUREG 0619, the Zimmer plant meets this requirement as specified without further modification.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 

JAMES D. FLYNN, Manager
Licensing and Environmental Affairs

JDF:bt

cc: Charles Bechhoefer
M. Stanley Livingston
Frank F. Hooper
Troy B. Conner, Jr.
James P. Fenstermaker
Steven G. Smith
William J. Moran
J. Robert Newlin
William G. Porter, Jr.
E. A. Borgmann
F. T. Daniels
W. Peter Heile
James H. Feldman, Jr.
John D. Woliver
Mary Reder
David K. Martin
George E. Pattison
Andrew B. Dennison