

# THE CINCINNATI GAS & ELECTRIC COMPANY



B. R. SYLVIA  
VICE PRESIDENT  
NUCLEAR OPERATIONS

November 15, 1982

U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Attention: Mr. J.G. Keppler  
Regional Administrator

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT 1 - NRC ALLEGATIONS -  
WELDER QUALIFICATION - DOCKET NO. 50-358, CONSTRUCTION PERMIT  
NO. CPPR-88, W.O. #57300, JOB E-5590 - FILE NO. NRC-15 &  
I.E. INSPECTION REPORT NO.

Gentlemen:

By letter dated October 27, 1982, CG&E was notified by the NRC that "NRC Region III has been advised of allegations that relevant documentation on the welders at the Zimmer Site was prepared for, or reviewed at, a meeting between Cincinnati Gas & Electric Company (CG&E) and H.J. Kaiser (HJK) held on July 8, 1982, but that such documentation was not discussed with, or made available to, Region III at the meeting on this subject held on July 9, 1982 among CG&E, HJK and Region III. Substantial documentation was made available to Region III in connection with the July 9 meeting, but additional relevant documentation was allegedly not made available."

The July 8, 1982 meeting between CG&E and HJK was a routine Zimmer Site management meeting. One of the topics scheduled for discussion near the end of the meeting was the resolution of current welder performance qualification. These concerns over welder performance qualification records were identified earlier in 10CFR50.55(e) Report M-45 and in numerous HJK and CG&E nonconformance and Corrective Action Reports which were available to the NRC. Generic categories of document deficiencies identified in these CARs and NRs were discussed at the meeting for the purpose of

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determining resolutions acceptable to CG&E and HJK management. The results of this discussion were presented to the NRC in a meeting on July 9, 1982. Additional supporting documentation was subsequently made available to the NRC.

CG&E's approach to formulating a response to the aforementioned allegation was to seek information from each individual who attended the July 8, 1982 meeting. Everyone attending the meeting was asked to identify documentation or reports made available or discussed at the meeting, or used in preparing for the meeting.

On the basis of the information given to me by the meeting participants, and my personal knowledge, I have determined that no reports or documentation other than that already made available to Region III were prepared for use at either the July 8, or July 9, 1982 meeting. A list of documents or reports either used at the July 8 and/or July 9, 1982 meetings or used in preparation for these meetings is provided as Attachment 1. This list is a compilation of the information provided by each of the July 8, 1982 meeting attendees. This list, of course, does not include all information generated as part of the general review of welder performance qualification records not prepared specifically for or discussed at the July 8, or July 9, 1982 meetings. These records have been and are available for NRC review.

Very truly yours,

By *B.R. Sylvia*  
B.R. Sylvia  
Vice President - Nuclear Operations

BRS/bcf  
Attachments  
cc: D. Hunter  
W.F. Christianson

State of Ohio            )  
County of Clermont) <sup>ss</sup>

Sworn to and subscribed before me this  
15th day of November, 1982

*Linda F. Johnson*  
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Notary Public  
*My commission expires 8-2-23*

ATTACHMENT 1

HJK QA Documentation Group

- A) Current Welder Qualification Status Report (July 9, 1982)
- B) Current Welders with Gladstone Laboratories Test
- C) Welder Status Index
- D) Current Welders Status
- E) QA Records Review Welder Status Checklist

HJK Welding Department

- A) Welder Qualification List

CG&E Quality Confirmation Program

- A) QCP Welder Qualification Log generated by 19-QA-21
- B) Welder Qualification Record: #50-238
- C) Welder Qualification Record: #9-3174
- D) Welder Qualification Record: Number not recalled

Other documents referenced during the July 8, 1982 meeting

- A) HJK Procedure: WCP-2
- B) HJK Procedure: SPPM 3.2, R.4
- C) HJK Procedure: SPPM 3.2, R.7
- D) Various CARs and NRs referenced in the above documents.