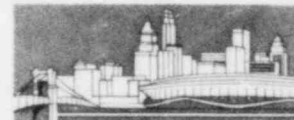


THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

October 25, 1982  
QA-2075

E. A. BORGMANN  
SENIOR VICE PRESIDENT

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

Attention: Mr. J. G. Keppler  
Regional Administrator

RE: WM. H. ZIMMER NUCLEAR POWER STATION UNIT I  
10CFR50.55(e) ITEM M-40, QUESTIONABLE HEAT  
TREATMENT OF PIPE, DOCKET NO. 50-358,  
CONSTRUCTION PERMIT NO. CPPR-88, W. O.  
#57300, JOB E-5590, FILE NO. NRC-8, M-40

Gentlemen:

This letter constitutes an interim report concerning the subject condition, initially reported to the Commission as a potentially reportable deficiency under 10CFR50.55(e).

As stated in our previous report, QA-1854, dated July 8, 1982, approximately 2400' of small bore piping (SA106Gr. B), supplied to the Zimmer site by Mutual Manufacturing and Supply Company of Cincinnati, Ohio, and manufactured by Leland Tube Company of South Plainfield, N.J., is installed in various safety related systems in the plant.

During the course of documentation review, H. J. Kaiser Nonconformance Report #E-4337 was generated which stated that required heat treatment for the subject pipe was not reported on the Certified Material Test Report (CMTR).

Sargent & Lundy (S&L) Specification H-2256, "Erection of Phase II Piping Systems and Mechanical Equipment", requires the subject piping to meet the fabrication requirements of S&L Specification H-2255, "Fabricated Phase II Piping", which specifies the 1971 edition of Section III of the ASME Code with 1972 Winter Addenda. A review of the Code requirements found that heat treatment need not be described on the CMTR, rather, only heat treatments not performed were to be reported.

Henry J. Kaiser Company (HJK) Purchase Order #7070-23116, dated

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October 24, 1977, requires CMTR's for the subject piping to report data in accordance with ASME III, Paragraph NA-3766.4 (no year specified), however, contrary to the above referenced specification requirements, this paragraph does not appear in the Code until the Winter 1973 Addenda. In part, this paragraph requires the CMTR to include times and temperatures of heat treatments.

Section II of the 1971 edition of the ASME Code requires heat treatment for all SA106 material which was cold-drawn; hot finished material need not be heat treated. The piping cited in NR #E-4337, includes four different heats of material, CMTR's for two of these indicate that the material was cold-drawn while CMTR's for the remaining two do not specify to which process the pipe was manufactured. Attempts have been made to resolve this concern with the assistance of the vendor (Leland Tube), however, CG&E has learned that they are no longer in business.

Henry J. Kaiser Corrective Action Report (CAR) #180 was issued and the purchase order requirement was determined to be an erroneously stated requirement, therefore the associated CMTR's have been determined acceptable since they met the committed Code and Design Specification requirements, and the CMTR's certified that the material was fabricated in accordance with the requirements of SA106.

To add confidence to the actual quality of the pipe, a sample of each of the four heats is being tested using destructive examinations. This was originally expected to be completed by October 31, 1982, however, this work has been delayed and is now expected to be completed, with a final report submitted, by February 15, 1983.

We trust the above will be found acceptable as an interim report under 10CFR50.55(e).

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN  
SENIOR VICE PRESIDENT

FKP:ec

cc: NRC Office of Inspection & Enforcement  
Washington, D.C. 20555  
NRC Senior Resident Inspector  
Attn: W. F. Christianson  
Zimmer Project Inspector  
Region III