

THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN  
SENIOR VICE PRESIDENT

QA-1515  
October 8, 1981

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

Attention: MR. J. G. Keppler,  
Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1  
IE INSPECTION REPORT NO. 81-18, DOCKET NO.  
50-358, CONSTRUCTION PERMIT NO. CPPR-88,  
W.O. #57300, JOB E-5590, FILE 957-2 & NRC-1

Gentlemen:

This letter constitutes our additional response to the items of concern you expressed in the transmittal letter for inspection report 81-18, per phone conversation between Mr. P. Gwynn, USNRC Resident Inspector and Mr. D. J. Schulte, Cincinnati Gas & Electric Company - Quality Assurance Department, on September 3, 1981.

CG&E activities relating to the auditing program were described in the draft response to your Immediate Action Letter, dated April 8, 1981, which was submitted to the NRC by letter dated May 18, 1981. Additional management action taken and planned to improve the effectiveness of quality assurance program implementation with regard to:

- 1) qualifications of audit personnel,
- 2) timeliness of audit responses from participating organizations,
- 3) tracking implementation and verification of corrective action, and
- 4) methods to ensure the underlying cause of the deficiency has been identified and corrected to preclude repetition.

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The description of CG&E's action to each of the four items is as follows:

- 1) CG&E is committed to Regulatory Guide 1.146 which endorses ANSI N45.2.23 - 1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants. Quality Assurance Procedure, 18-QA-02 Rev 3, requires audit personnel to be qualified in accordance with the requirements of ANSI N45.2.23, 1978. Presently all lead audit personnel except the Station Quality Engineer, are qualified in accordance with this standard with supplementary audit personnel being utilized as auditor-in-training. The Station Quality Engineer will be certified in accordance with ANSI N45.2.23, 1978, by October 30, 1981.

An auditor training course has been scheduled for the week of October 12, 1981. This course will be presented by Gilbert Commonwealth and includes an actual sample audit for trainee participation.

- 2) Concerning timeliness of audit responses; open audit items are being tracked by computer with a printout listing the audited organization and schedule response date. Procedure OPP 7.4 requires the audited organization to respond to open audit items within thirty (30) days of the issuance of the audit report or by the date agreed upon at the audit exit meeting, whichever is less. It is the responsibility of the lead auditor to review the printout and to notify organizations that are delinquent in responding to open audit items, and reporting this through supervision to the Senior Vice President.
- 3) The computer listing described above is updated with information concerning response dates, corrective action taken, dates of scheduled completion of corrective action and verification of this corrective action. Printouts of this information are provided weekly to the QA Manager and Audit Supervisor. This process is approximately 70% complete at present with the anticipated completion of entering all open audit information within three (3) weeks.
- 4) Procedure 18-QA-01 Rev 2 requires the underlying cause of any deficiency identified during the course of an audit to be addressed. This procedure makes the lead auditor responsible for verifying, through review of objective evidence, that the underlying cause has been corrected to preclude repetition prior to that item being closed.

To support this effort the QA audit staff is being increased to eight qualified auditors.

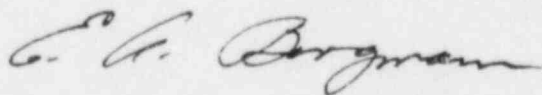
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We trust that the above constitutes an acceptable response to the subject letter.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By

  
E. A. BORGMANN  
SENIOR VICE PRESIDENT

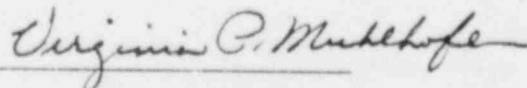
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cc: NRC Resident Inspector  
Attn: W. F. Christianson

NRC Office of Inspection and Enforcement  
Washington, DC 20555

State of Ohio )  
County of Hamilton) ss

Sworn to and subscribed before me this 8<sup>th</sup> day of  
October, 1981.

  
Notary Public

VIRGINIA P. MUELHOFER  
Notary Public, State of Ohio  
My Commission Expires July 26, 1982