

THE CINCINNATI GAS & ELECTRIC COMPANY



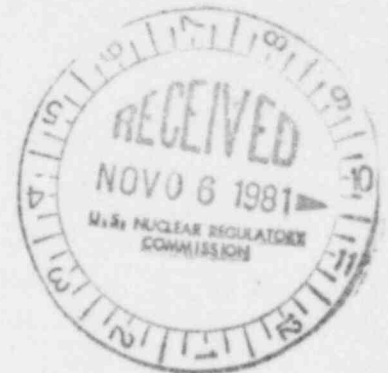
September 4, 1981
QA-1496

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, Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
AUDIT SURVEILLANCE AND INSPECTION PROGRAM BY
CG&E TO SUPPORT CATALYTIC WORK AT ZIMMER
STATION - DOCKET NO. 50-358, CONSTRUCTION
PERMIT NO. CPPR-88, W.O. #57300-957, JOB E-5590



Gentlemen:

This letter provides the methods which Cincinnati Gas & Electric presented to Region III on August 19, 1981, describing how Catalytic work efforts will be monitored to assure compliance with project requirements. Messrs. Warnick, Davis and Daniels, considered these methods to be acceptable and agreed to allow these exceptions to the Immediate Action Letter of April 8, 1981.

Catalytic will perform selected activities involving Engineering Change Requests (ECR's) and Quality Confirmation Program work activities under the direction of Cincinnati Gas & Electric's Generation Construction Department. Catalytic will also perform selected punchlist items and maintenance on turned over systems under the direction of Cincinnati Gas & Electric's Nuclear Production Department.

Each of these work activities will be controlled through the Catalytic work package concept. Cincinnati Gas & Electric will review the first ten (10) work packages developed by Catalytic, prior to release for work, to assure that technical and quality requirements for the project have been met in these work packages. Thereafter, copies of all work packages will be sent to Cincinnati Gas & Electric, Quality Assurance Department. One-in-four of these work packages will be reviewed to verify consistent quality and compliance with project requirements. Selection will be based upon importance of the package and complexity of the task as judged by Cincinnati Gas & Electric Quality Engineers. Based on our review of these packages showing consistent quality, the frequency of reviewing packages will be reduced to one-in-ten. The results of the twenty-five percent monitoring will be reported to Region III prior to Cincinnati Gas & Electric changing to a review of ten percent of these packages.

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Mr. J. G. Keppler, Director
U. S. Nuclear Regulatory Commission
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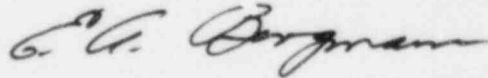
The first six packages in each discipline, i.e., civil-structural, mechanical, electrical, or piping will be monitored utilizing 100% surveillance of inspection requirements. Upon determining acceptable inspection practices, the frequency will be reduced to one-in-four in each discipline. When a review of ten (10) consecutive inspection packages at the twenty-five percent frequency indicates consistent inspection practices, this inspection monitoring will be reduced to a one-in-ten frequency in each discipline. Again, Region III will be notified of the results of this inspection surveillance and the intent of Cincinnati Gas & Electric to go to a ten percent monitoring frequency.

After one month of work by Catalytic at the Zimmer Station, a comprehensive program audit covering all aspects of Catalytic activities will be performed by Cincinnati Gas & Electric. Then at approximately two month intervals selected activities will be audited to verify specific procedure implementation. This schedule will be generated such that, after one year of activity, approximately all of the program areas which Catalytic is performing work at Zimmer will have been audited.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN
SENIOR VICE-PRESIDENT

HRS:ac

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