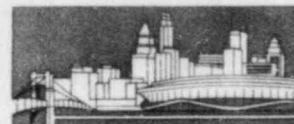


THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201
February 21, 1983
EAB-SOL-27

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 1
CONCURRENCE OF NON-CONSTRUCTION ITEMS UNDER
SHOW CAUSE ORDER OF NOVEMBER 12, 1982.
Docket No. 50-358 Construction Permit No. CPPR-88
W. O. 57300 Job E-5590 File 957

PRINCIPAL STAFF			
✓ RA	ENF		
D/RA	SCS		+ 3
A/RA	PAO		
DFRP	SLO		
DRMA	IRC		
DRMSP			
DEP			
ML			
OL	FILE		

Gentlemen:

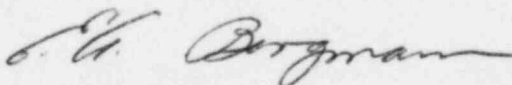
The intent of this letter is to clarify Item 11 of your November 30, 1982 letter (attached) to Mr. E. A. Borgmann. Item 11 covered the physical movement of mechanical equipment, provided it does not enhance Construction. The NRC reply to this work request was that it did not contain sufficient information to permit blanket approval and that CG&E should request approval of such work by Region III on a case by case basis.

The following is offered as a clarification to Item 11. This Item is intended to mean that where Permanent Plant Material is in the Power Plant, Fab Shops or Warehouse, it can be moved to secure locations or locations for inventory purposes, so long as movement is not for permanent installation.

A prompt reply to this request would be appreciated.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC CO.

By 
E. A. Borgmann
Senior Vice President

JCH:rem
cc: NRC Office of Inspection and Enforcement
Washington, D. C. 20555

NRC Senior Resident Inspector
Attention: W. F. Christianson

8303090101 830303
PDR ADOCK 05000358
A PDR

FEB 25 1983



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLEN, ILLINOIS 60137

NOV. 30 1982

ATTN	RECEIVED	DAI
	EABolgmANN	
	DEC 01 1982	
File		
Return to		

Docket No. 50-358

Cincinnati Gas and Electric
Company

ATTN: Mr. Earl A. Borgmann
Senior Vice President
Engineering Services and
Electric Production
139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

This is in response to your letter (QA-2110) dated November 18, 1982, and revised on November 22, 1982 (copies enclosed).

Your request for NRC concurrence prior to performing the 16 activities listed in your November 18, 1982 letter is not considered to be a request to relax the order as provided for in paragraph IV.B.(3) of the November 12, 1982 Order to Show Cause and Order Immediately Suspending Construction. Rather, it is considered to be a request for clarification of the scope of the activities suspended by the order.

As discussed in the meeting with you on November 17, 1982, the NRC requested that activities which might be considered to be covered by the order be submitted to Region III for review and approval.

During telephone conversations on November 19, 1982, RIII personnel informed CG&E that items 9, walkdown of essential systems, and 15, document reviews, of the November 18, 1982 letter were clearly not prohibited by the order and that they could continue. CG&E's revised letter dated November 22 deleted those two items.

The following activities are not considered to be safety-related construction activities suspended by the order, and they may be continued within your existing management controls and your established quality assurance programs. The item numbers listed below correspond to the numbers contained in your November 22, 1982 letter.

8212140335

NOV. 30 1982

1. Removal of paints and coatings necessary to inspect welds, not to infringe on the established corrective action system and the verification program and not to include grinding, cutting, etc.
2. Removal of fireproofing and insulation to inspect welds and heat number traceability. Grinding and cutting steel are not permitted.
3. Removal of hangers or parts of hangers looking for heat number traceability, not to include cutting, chipping, grinding, burning, etc.
4. Essential HVAC air flow testing and balancing.
5. Routine maintenance of essential components such as lubrication, cleaning, changing filters, etc. on HVAC, motors, etc.
6. Receiving of essential material; however, the issue or reissue of essential materials for essential application is not to be performed except in support of item 5 above and the verification program.
9. Conduct evaluations of existing essential coatings which require taking samples and conducting tests. Samples are to be limited in size such as paint chips and the authorization does not include cutting steel, grinding, etc.
13. Hydrostatic and pneumatic testing and NDE activities.

The following items did not contain sufficient information to permit blanket approval. We believe such work should be requested by CG&E and approved by NRC Region III on a case by case basis.

11. The physical movement of mechanical equipment, provided it does not enhance construction.
12. The application of fire barriers classified as important to safety not listed as essential.

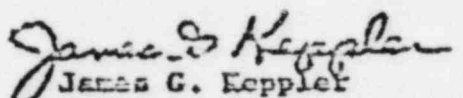
The following activities may not continue at this time:

6. Shipment of essential material offsite to vendors for fabrication. This is considered to be safety-related construction work.
7. Grinding activities to prepare essential welds for NDE examinations. Grinding on essential materials is considered to be a safety-related construction activity.

10. Electrical testing of cables and logic testing. Although testing is not specifically prohibited by this order, the proposed testing involves determinating and terminating leads which is normally considered to be a construction activity. Region III is not prepared to issue blanket approval for electrical testing of cables and logic testing, but will consider approval of such testing on a specific case basis.
14. Installation of mirror insulation on the RPV vessel is not approved since it would cover areas that may require inspection.

We will gladly discuss any questions you have concerning this matter.

Sincerely,


James G. Koppler
Regional Administrator

Enclosures: As stated

cc w/ltre dtd 11/16; 11/22/82:
NE/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Power Siting Commission
Citizens Against a Radioactive
Environment
Helen W. Evans, State of Ohio
Robert M. Quillin, Ohio
Department of Health
Thomas Applegate
Thomas Davino, Associate
Director, Institute for
Policy Studies
Dave Martin, Office of
Attorney General
Mark Wetterhahn, Esq.
Jerome A. Vennemann, Esq.

THE CINCINNATI GAS & ELECTRIC COMPANY

ZIMMER NUCLEAR POWER STATION, P.O. BOX 201, MOSCOW, OH 45153

E. A. BORGSMANN
SENIOR VICE PRESIDENT



CINCINNATI, OHIO 45201

November 18, 1982

QA-2118

Revised Nov. 22, 1982

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 1
CONCURRENCE OF NON-CONSTRUCTION ITEMS UNDER
SHOW CAUSE ORDER OF NOVEMBER 12, 1982
DOCKET NO. 50-358, CONSTRUCTION PERMIT NO.
CPPR-88, W.O. 57300, JOE E-5550, FILE ENC-3

Gentlemen:

This letter is a revision to our letter QA-2118 of November 18, 1982. The revision required the removal of items No. 9 and No. 15 from the original letter because they do not constitute physical construction as covered by your Show Cause Order and therefore should not have been included.

This revision confirms the exchange of information in a telephone conversation between Messrs. D. Hunter of your staff and B. K. Culver on November 19, 1982.

Reference is made to the meeting held in Cincinnati, Ohio November 17, 1982 in Mr. Dickmeyer's office. We wish to continue certain activities which we believe do not violate the spirit of the November 12, 1982 Show Cause and Order of Immediate Suspension of Essential Construction. However, we wish concurrence on these items prior to their performance:

1. Removal of paints and coatings necessary to inspect welds. Repainting to protect welds. Is this permitted?
2. Removal of fireproofing and insulation to inspect welds and heat number traceability. Can this be done?
3. Removal of hanger or parts of hanger looking for heat number traceability. Is this permitted?
4. Essential HVAC is ready for air test and balancing. May we proceed?
5. It is necessary to perform routine maintenance on essential components such as lubrication, cleaning, changing filters, etc., on HVAC, motors, etc. Will this be permitted?

82121403#2

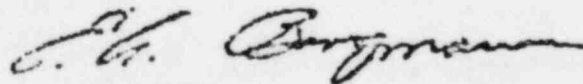
NOV 24 1982

J. G. Keppler
QA2118
November 18, 1982
Page 2

6. HJK would like to ship essential material off site to vendors for fabrication.
 7. Grinding is required in some cases to prepare essential welds for NDE examination. Is this permitted?
 8. Are we prohibited from receiving and reissuing essential material to contractors on site provided they are not used in construction?
 9. We would like to continue walkdown of essential systems both for engineering, inspection and traceability.
 10. We would like to conduct evaluations of existing essential coatings which require taking samples and conducting tests.
 11. We would like to continue electrical testing of cables and logic testing. Is this permitted?
 12. Is it permitted to physically move mechanical equipment provided it does not enhance construction?
 13. Are we permitted to continue application of fire barriers classified as important to safety not listed as essential?
 14. May we proceed with hydrostatic, pneumatic testing and NDE?
 15. Review and acceptance of quality-related documentation - may it proceed?
 16. Installation of mirror insulation on the RV vessel. May it proceed?
- A prompt communique in response to our request would be appreciated.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E. A. BORGHMAN
SENIOR VICE PRESIDENT

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