

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

December 21, 1982  
QA-2177

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 E-29 - LACK OF INSPECTION  
RECORDS FOR NELSON STUDS, DOCKET NO. 50-358,  
CONSTRUCTION PERMIT NO. CPPR-88  
W.O. #57300 JOB E-5590 FILE NO. NRC-7, E-29

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).

Our previous report, QA-2083, dated October 28, 1982, stated that during a review of site documentation, it was discovered that inspection records of Nelson Stud installations for cable tray hangers could not be located, though a program for inspection had existed. In addition, during a field inspection, it was discovered that a small base metal defect existed in the embed plate as a result of the installation of a template used to assure proper stud alignment and configuration.

CG&E's Nuclear Engineering and Quality Assurance Departments have completed an investigation to determine the methods required to confirm the structural adequacy of the installed cable tray supports. This plan is outlined below.

A random sample of installed Nelson Studs will be selected, using a site approved sampling procedure, to receive test loading which will exceed the acceptance requirements of A.S D1.1. Failure of any stud during testing will result in the evaluation of the diminished load carrying ability of the hanger. Rework or repair, should it be required, will be in accordance with approved site procedures.

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Exposed base plates or beams to which the Nelson Studs and tray supports were connected will be examined to determine the worst case base metal defect. A worst case defect will be assumed to be the defect size for all base plates and beams and will be used to determine the acceptability of such base metal defects.

In addition, a review of past NRC inspection reports has identified that NRC inspection personnel found the Nelson Stud installation and inspection program acceptable. Those NRC I.E. reports revealed no nonconformances or items of noncompliance were issued as a result of past NRC inspections over the period from 1976 through 1980.

It is anticipated that our proposed plan will be finalized and NRC approval to commence testing of randomly selected Nelson Studs can be obtained by January 31, 1983. A request for approval to perform this testing will be made by this date in accordance with the method established for performing work under the NRC Show Cause Order and Order Immediately Suspending Construction.

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

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

*Handwritten: For E.A. BORGSMANN*  
By *per telecon 12-22-82*  
E. A. BORGSMANN  
SENIOR VICE PRESIDENT

MAP:as

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