

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

August 12, 1982

QA-1881

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
I.E. REPORT 82-03 - DOCKET NO. 50-358
CONSTRUCTION PERMIT NO. CPPR-88, W.O. #57300
JOB E-5590, FILE NO. NRC-1

Gentlemen:

This letter constitutes a response to the subject Report. Although no response was required, CG&E feels that certain items need to be clarified concerning the commitments reportedly made.

Paragraph 2a(5) of the subject Report states in part. "The licensee stated that about half of the 4700 radiographs reviewed revealed inadequate shimming of penetrameters." This statement is incorrect. ASME Code requires shimming an amount equal to the weld reinforcement. Since weld reinforcement on the inside of the weld may not be readily apparent (i.e. not visually accessible) the code allows a density variation from -15% to +30% in between the penetrameter and the weld area of interest. In accordance with the code criteria only 697 of 4250 ASME Code radiographs reveal shimming variations outside the requirements of the Code.

Paragraph 2a(9) of the subject Report states in part: "The licensee stated that the task (Task IX - Design Document Changes) was extremely difficult because of the problem with relating the Design Document Changes (DDCs) to the specific inspection performed. The management controls were not originally set up to provide clear cross-referencing of the documentation." The implication that management controls were not set up originally is incorrect. The statement should say "The management controls in effect at the time required inspection to be performed to the latest approved drawing and applicable (as listed on the drawing) DDCs. Present controls require the applicable DDCs to be listed on the Inspection Plan, however, management controls did exist during the time period the work was performed although these controls did not assure documentation to the level of detail considered acceptable in 1982." Thus, the difficulty is in attempting to verify from documentation that these controls were implemented.

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In addition, the following committed action completion dates should be revised:

Paragraph 2b(4) states the review of Phase II QC inspection procedures would be completed by February 28, 1982. The actual completion date was February 1, 1982.

Paragraph 3a states that the completion of actions necessary to issue QA personnel qualifications procedures, job description and the QAD organizational chart is scheduled to be completed by February 23, 1982. The actual completion date was March 5, 1982.

Paragraph 3b states that Level III certification is scheduled to be completed by February 26, 1982. The actual completion date was March 5, 1982.

Paragraph 3c states that Level I and Level II certification is scheduled to be completed by March 10, 1982. The actual completion date was March 26, 1982. Furthermore, it should be noted that this action applied only to QAD personnel.

Paragraph 3d states that the re-review of presently effective procedures is scheduled to be completed by March 19, 1982. The actual completion was April 2, 1982.

Paragraph 3e states that a re-review of superceded Phase II inspection procedure revisions and all superceded Phase I procedures is to be completed by April 19, 1982. This item is not yet completed, but is expected to be completed by November 30, 1982.

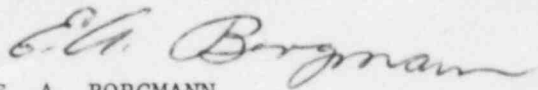
Paragraph 3f states that the review of QCP procedures is scheduled to be completed by March 26, 1982. The actual completion date was April 20, 1982.

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We trust this report satisfies your request to inform you of our differences in the understanding of commitments made as documented in the subject Report. We further request that this response be placed in the Public Document Room in accordance with 10CFR2.790.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E. A. BORGMANN
SENIOR VICE PRESIDENT

FKP:plc

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