

THE CINCINNATI GAS & ELECTRIC COMPANY



August 4, 1982
QA-1917

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
I. E. INSPECTION REPORT #82-01, DOCKET NO.
50-358, CONSTRUCTION PERMIT NO. CPPR-88,
W.O. #57300 JOB E-5590 FILE NO. NRC-1

Gentlemen:

This letter constitutes our response to the subject Inspection Report and Notice of Violation. It is our opinion that nothing in this report is of a proprietary nature.

NRC Finding 1

Contrary to Criterion I of Appendix B to 10CFR50, clearly established and documented authorities and duties of all QA Department personnel were not provided for Quality Engineers and Quality Control Technicians.

A. Corrective Action Taken and Results Achieved

Examples of this alleged item of noncompliance are identified as Items 358/82-01-01a in Section I, Paragraph 1 and 358/82-01-01b in Section I, Paragraph 2e in the Report.

CG&E takes exception to the finding that Criterion I of Appendix B to 10CFR50 was violated. In December 1981, generic position descriptions were established and approved for Quality Engineers, Quality Specialists and Quality Control Technicians in addition to specific position descriptions for the Directors of Quality Control Technicians, of Quality Assurance Engineering, of Program Development and Administrative Control, of Auditing and of Operations QA.

The Supervisors of the Quality Confirmation Program (QCP) and Document Verification Group (DVG) are temporary positions

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until the completion of construction and therefore no specific job descriptions had been written. As explained to the Inspectors in January and February, the generic job descriptions were felt to adequately cover the QCP coordinators and supervisors of QCP and DVG.

In addition to the position descriptions, procedures described the generic responsibilities of Quality Engineers, or QC Technicians and delineated the quality related activities to be performed by individuals filling these generic position descriptions.

To provide additional clarification CG&E agreed to directly correlate job descriptions with the organization charts, and to develop a matrix of minimum level job descriptions required to perform activities described in each procedure controlling quality affected activities.

Written QAD job descriptions are in use, corresponding directly to the job classification matrix and the procedure job function qualification matrix of Quality Assurance Procedure 02-QA-04, Rev. 1. These job descriptions contain the classification name (e.g. Quality Control Technician I), the duties applicable to that classification, and the qualifications required for the individual to meet that classification. The job classification matrix contained in Quality Assurance Procedure 02-QA-04, Rev. 1 lists individual job classifications by functions to be performed and by levels, stating who a particular classification/level reports to and interfaces with, as well as indicating the required American National Standards Institute Certification required to fulfill that classification. The procedure job function classification matrix also contained in Quality Assurance Procedure 02-QA-04 Rev. 1 lists each Quality Assurance Procedure number and title specifying the required duties for each procedure per qualification level (e.g. Level I, II or III).

Item 82-01-01b states that since no job description was available for the Procedures and Training Supervisor, the Inspector could not complete an evaluation of the individual's qualifications. As stated above the generic position description for a procedures and training supervisor did exist but had not been explicitly correlated to this function.

B. Corrective Action Taken to Avoid Further Noncompliance

Although CG&E does not agree that this is an item of noncompliance, the corrective action described in "A" above is sufficient to prevent

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any potential future noncompliance.

C. Date When Corrective Action Will Be Achieved

Complete compliance has been achieved.

NRC Finding 2

Contrary to Criterion II of Appendix B to 10CFR50, CG&E failed to provide adequate certification of qualifications for all QAD department personnel including the Acting QA Manager/Supervisor of Quality Engineering, Quality Engineers and Reviewers.

A. Corrective Action Taken and Results Achieved

Examples of Noncompliance are cited in the subject Report as Item numbers 358/82-01-03a through 358/82-01-03h.

In general, relative to this finding, ANSI N45.2.6-1978 defines the minimum capabilities of individuals performing at Level I, II and III. Determination of capability is made by evaluation of education, training, test results, or demonstration. This standard does not specifically address reviewing and approving procedures or evaluating the adequacy of such procedures. Regulatory Guide 1.58, Rev. 1, Section C.5 specified for a Level III, ". . .should be capable of reviewing and approving inspection, examination and test procedures. . .". By the Regulatory Guide's own definition, the work "should" indicates a set of recommendations and not requirements.

In addition, an informal survey of the industry by CG&E has shown no support for the interpretation that a Level III must review and approve inspection procedures.

While we concur that the evaluations of individuals capability to perform at each level could have been more explicitly documented we disagree that 82-01-03c, portions of 82-01-03b, 82-01-03f are examples of failure to comply with 10CFR50 Appendix B Criterion 2 as stated.

82-01-03a

The Acting QA Manager/Director of Quality Engineering is a registered professional engineer in Ohio, and meets the generic position description for a Senior QE. He has received additional testing and examination and has been certified Level III (quality

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documentation reviewer) and Level II for the mechanical discipline.

Individuals within the Quality Engineering Group, working for the Director - Quality Engineering, are certified Level III to specific disciplines and sub-specific categories and perform Quality and technical reviews of inspection procedures as required by QA Procedure 05-QA-05 Rev. 4. Therefore, it is not required that the Director - Quality Engineering be expressly certified Level III in the specific discipline and sub-specific category applicable to a particular inspection procedure he may be signing for final approval. This is done in his administrative capacity as Acting Manager - QAD.

Based on the Level III certification, detailed experience documented on his resume, experience qualification statements, and the specific disciplined Level III Quality Inspection Procedure review, he is fully qualified to act in the administrative capacity of Director - Quality Engineering as well as that of Acting Manager - QAD. In this capacity two individuals certified as Level III in accordance with ANSI N45.2.6 and 02-QA-04 and with broad QA experience are designated to perform technical evaluations of those procedures or activities for which such qualifications are required.

A review for appropriate Quality and Technical content was performed for QAD Procedures, 19-QA-04, Rev. 0, 19-QA-07, Rev. 0 and 19-QA-01, Rev. 2 and was completed in April, 1982 by certified Level III QAD personnel.

82-01-03b

The QCP Cable Separation Task Coordinator's resume and certification form has been updated to reflect relevant examination and testing experience justifying his certification as a Level II in the electrical discipline. As with all CG&E QA personnel, specific job descriptions have been established and incorporated specifically on the certification form. The expanded resume reflecting relevant examination and testing experience fully justifies activities performed prior to September, 1981 with the exception of performing review, evaluation and approval of inspection instructions.

The Level II electrical examination has been rewritten to provide for a more relevant examination pertaining to Quality

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Assurance Department Electrical Inspectors. This examination is presently undergoing still another revision, broadening the scope to include pertinent quality assurance and electrical discipline questions.

A review and evaluation of the technical review checklist for inspection instruction QACMI E-7 Rev. 14B was performed by an individual certified Level III in the electrical discipline on March 5, 1982. Procedure reviews are performed in accordance with Procedure 05-QA-05 Rev. 4, "Quality Assurance and Design Engineering Review of Inspection Procedures," dated March 29, 1982. This procedure details requirements for the Technical and Quality Review of Inspection procedures ensuring only certified Level III personnel perform this function.

As previously stated, reviewing and approving of inspection procedures by a Level III is not a requirement of Regulatory Guide 1.58, Rev. 1. In this respect, CG&E does not consider the individual's review of QACMI E-7, Rev. 14B to be a valid example of this item of noncompliance.

81-01-03c

Again, CG&E does not consider this item to be an example of this item of noncompliance for the same reasons stated in response to item 81-01-03b above; however, QACMI E-7 Rev. 15 and E-8 Rev. 14 were again reviewed by an individual in CG&E QA certified Level III in the electrical discipline on May 3, 1982. Procedure reviews are performed in accordance with procedure 05-QA-05 Rev. 4. This procedure details requirements for the technical and quality review of inspection procedures ensuring only certified Level III personnel perform this function.

81-01-03d

A review of QACMI E-8, Rev. 14 was performed by an individual in QAD certified Level III in the electrical discipline on June 6, 1982. Procedure reviews are performed in accordance with procedure 05-QA-05 Rev. 4, "Quality Assurance and Design Engineering Review of Inspection Procedures", dated March 29, 1982. This procedure details requirements for the technical and quality review of inspection procedures ensuring only certified Level III personnel perform this function.

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81-01-03e

Task Coordinators not specifically performing or directing inspection functions were not certified to ANSI N45.2.6-1978. During the NRC exit conference for this inspection, CG&E committed to evaluate or certify an individual's capability to perform required quality related activities along the guidelines developed in ANSI N45.2.6-1978 and Regulatory Guide 1.58, Rev. 1, for all QAD personnel. All QAD personnel are presently certified to 02-QA-04 "Evaluation and Certification of QAD Personnel," prior to performing quality related activities. For those individuals who were not certified per this past standard practice, certification was effected using only experience gained prior to employment at ZPS-1, thus ensuring quality activities performed at ZPS-1 were justifiably accomplished per the ANSI and Regulatory Guide criteria for certification.

81-01-03f

Exception is taken to NRC interpretation that the CG&E job description for Quality Specialist II (QS-II) requires certification as a Lead Auditor. The qualifications section states that the individual must be able to be certified as lead auditor in accordance with ANSI N45.2.23. If documented evidence exists that the individual is capable and able to be certified in accordance with ANSI N45.2.23, then that individual meets the requirements of the QS-II position, without actually being certified as a Lead Auditor. The "duties" section of the QS-II job description states in part that the individual will assure conformance and compliance with Quality Assurance and Code requirements, performing such duties as a Lead Auditor under supervision from time to time, as required. Therefore, certification as a QS-II is possible without actual certification to ANSI N45.2.23 until such time as that individuals services as a lead auditor are required. As previously stated in this report, all QAD personnel are now certified in accordance with 02-QA-04.

To date, only one individual within QAD has been certified using the criteria of the Senior Quality Engineer (SQE) job description. This individual has been certified to ANSI N45.2.6 and ANSI N45.2.23 as required by the SQE job description.

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81-01-03g

Certification of Qualification Records have been corrected as indicated by the following:

- a. Manager, Quality Assurance Department
 - (1) A date of certification expiration has been established.
 - (2) Basis for certification (records) have been established.
- b. Director, Quality Confirmation Program.
 - (1) A certification of qualification has been established.
- c. Engineer, Design Document Changes, Quality Confirmation Program
 - (1) A certification of qualification has been established.
- d. Acting Director, Quality Control Division
 - (1) A date of certification expiration has been established.
 - (2) Certification for Level III in the Civil/Structural discipline has been established and signed by the Manager, QAD.
- e. Engineer, Design and Engineering Documentation, Quality Documentation Division.
 - (1) A date of certification expiration has been established.

81-01-03h

All CG&E QAD inspection personnel have been certified to the requirements of ANSI N45.2.6-1978, Regulatory Guide 1.58, Rev. 1 and applicable QAD procedures since the NRC inspection dated January 25-29, 1982. Personnel certification and test records are all centrally located in the QAD training files. Training to the required codes and procedures necessary for the individual to perform specific job and inspection functions have been computerized for ease of reference to completed training. Training attendance lists are retained by the Training Coordinator as documented evidence that training as listed in the computerized

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training run actually transpired. Evidence of certification including supportive documentation to effect subject certification, and the training required to perform specific job functions are available and centrally located for the Quality Assurance Department.

B. Corrective Action Taken to Avoid Further Noncompliance

As part of indoctrination upon initial employment in the CG&E Quality Assurance Department, all personnel are trained to perform their specific job function in accordance with 02-QA-04, "Evaluation and Certification of QAD Personnel," and 02-QA-01, "Indoctrination and Training of QA/QC personnel." Employees are not permitted to perform their job function until properly certified. These controls assure that all personnel will be qualified to their individual job descriptions.

C. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

NRC Finding 3

Contrary to Criterion V of Appendix B to 10CFR50, procedures QACMI E-7, Revision 15, "Cable Pulling," and QACMI E-8, Rev. 14, "Cable Wire Termination Inspection," did not adequately address the quality requirements.

CG&E Response

Examples of noncompliance are identified in the subject Report as 82-01-04a and 82-01-04b. Since each example describes various items, each item, listed by paragraph number, will be independently addressed.

82-01-04a

3a(2)

The Original instructions from Cerro Wire and Cable Company, a division of the Rockbestos Company, in 1976, stated a minimum cable pulling temperature of -10°F. This was reflected in earlier revisions of QACMI E-7. In June of 1980, the Rockbestos Company changed the minimum pulling temperature to +14°F and this change was not reflected in QACMI E-7 Rev. 15.

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Our cable installation records show no Cerro or Rockbestos safety related cables were installed outdoors during the winter months from the initial receipt of their cable to the present. Foothill Electric Company cable installation procedure requires cable reels stored outdoors, be moved inside buildings 24 hours prior to any cable removal from that reel. H. J. Kaiser Quality Assurance procedures have always had the requirement to prohibit cable pulls below minimum temperatures.

A. Corrective Action and Results Achieved

A review has been completed of all Cerro and Rockbestos cable pulls, between June, 1980 and January, 1982 when the predicted lowest day or night time temperature was +15°F or below. This review showed a total of 36 days in this temperature range when 108 cables were installed inside heated buildings and 3 non-safety related cables installed outdoors, where the daytime temperature was above minimum at the time of cable installation.

B. Corrective Action Taken to Avoid Further Noncompliance

Inspection Procedure E-7, Rev. 15, was superceded by Inspection Procedure EIP-4, Rev. 0, issued January, 1982, which reflects the minimum pulling temperature for Rockbestos cable of +14°F.

C. Date Corrective Action Will Be Achieved

Corrective action was achieved January, 1982.

3a(?)

Cable Pulling Procedure E-7 Rev. 15, states in Paragraph 5.5.1.2: All essential hand pulls shall require controlled tensions with the following exceptions: (A) The conduit run is less than 70 feet and has less than 270° in bends. (B) The permissible maximum tension as shown on the Pull Card is not in excess of 100 pounds.

To provide a basis for these exceptions, actual field demonstrations were conducted in 1976. The demonstration consisted of three different size conduit systems of 70 feet in length with 3 - 90° bends, the maximum allowable by our procedure. Nine different power, control and shielded instrument cables; from a 3 conductor AWG #9 to a single twisted pair AWG #16. The thermocouple cable tested was AWG #20.

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The documented demonstrations verified that in no case did the recorded tension for any cable exceed the recorded tension of 70 pounds and this was for the 3 conductor AWC #9 where the maximum allowable tension was 290 pounds. The single twisted pair AWC #16 required only 5 pounds of pull where the maximum allowable was 55 pounds.

We contend that the exclusion of metered tensions in these short runs of conduit has been justified by actual field demonstrations and we maintain this practice is not contrary to Section II of N45.2-1971. To further prove our position, measurements and tests have been conducted to assure the quality of every cable. Current and voltages applied to cables assure insulation, continuity of conductor and shield have not been compromised.

A. Corrective Action and Results Achieved

The results achieved to date is that every cable installed in conduit under the exceptions permitted by our procedure have successfully passed all tests proving there has been no mechanical or electrical damage from the cable installation.

B. Corrective Action to Avoid Further Noncompliance

We maintain that no corrective action is required.

C. Date Corrective Action Will Be Achieved

Not applicable.

3a(4)

Procedure E-7, Rev. 15 "established that the Foothill Electric Company Superintendent was responsible for assembling the design document packages, including changes by which the pulling activities were to be accomplished. This statement appeared to be in conflict with the QA and document control programs in that there appeared to be no requirement for Quality Assurance Department personnel to verify that the proper and latest design documents were being used prior to commencing work."

The work packages (design document packages) have always been assembled by Foothill Electric Company discipline engineers. The procedure referred to the Superintendent as the assembler and not his designee since the procedures are written to the "Key man" concept. The cable pulling Construction Inspection Plan (CIP)

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requires the Quality Control inspector to review the electrical installation specification H-2173, the cable tabulation drawing, the cable pull card and list any applicable Design Document Changes prior to permitting a cable pulling operation, thus assuring a quality review before commencing work. Furthermore, the completed work package containing the design documents are reviewed by Quality Engineering as required by GQP-11.

A. Corrective Action Taken and Results Achieved

Procedure E-7 Rev. 15, has been superseded by Procedure EIP-4 Rev.), effective 2/8/82, which now includes a statement for verification by the inspector that the cable pull card matches the current revision of the design documents. The Construction Inspection Plan still requires the inspector to make his review.

General Construction Procedure GCP-3 on assembly of work packages by discipline engineers require Quality Assurance Department review.

B. Corrective Action Taken to Avoid Further Noncompliance

The assembly of work packages and review by Quality Assurance is prescribed in Procedure GCP-3.

C. Date Corrective Action Will Be Achieved

Procedure EIP-4 Rev. 0 was effective February, 1982. Work package procedure GCP-3 was in effect November, 1981.

3a(5)

The cable pulling procedure E-7 addressed the control of cable separation and cable grip support requirements, however, the Construction Inspection Plans (CIP) did not document these two requirements.

A. Corrective Action Taken and Results Achieved

Task VI of the Quality Confirmation Program is responsible for evaluating cable separation. More definitive design criteria regarding separation has been added to the FSAR and S&L installation specification H-2173.

Cable grip suspension systems in cable tray risers were designed by S&L and have been installed. Installation specifications require

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cable grips on vertical runs of cable over 35 feet when installed in conduit. Cable grip installation will be verified.

B. Corrective Action Taken to Avoid Further Noncompliance

The cable pulling checklist has been revised to include verification of cable grip installation. This same checklist also requires verification of compliance with cable separation requirements.

C. Date Corrective Action Will Be Achieved

The revised checklist was in effect February, 1982. The verification of cable grip installation will be completed by December 31, 1982.

3b(3)

One of the considerations for the selection of nuclear grade AMP Termination lugs was the ability to visually inspect the crimp after the crimp was made by recognizing the unique indent made when a proper crimp was made with a crimping tool that was properly calibrated. In addition, the Construction Inspection Plan requires the inspector to pull on the cable to assure tightness of the termination. In-process inspection is mandatory when the termination is to be covered and can not be visually inspected. The quality of a crimped termination can be determined in a past inspection and need not be part of an inprocess inspection. All soldered terminations were witnessed and verified by inspection personnel. We are not in violation of Criterion I or X of Appendix B, to 10CFR50.

We feel no corrective action on this item is required.

3b(4)

Cable Termination Procedure E-8, states that records of tool calibration checks, shall be maintained and made available to inspection personnel upon request. The instructions included no requirement to assure that the calibration of the tools were actually verified.

Foothill Electric Company is assigned the responsibility for calibration of terminating tools and their procedure INI-010 required maintenance of equipment calibration log and tool GO-NO-

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GO gage calibration records. This log required entries of calibration tool number, the calibration period, date of initial issue, scheduled calibration date and actual calibration date.

A. Corrective Action Taken and Results Achieved

Procedure E-8 was superceded by Cable and Wire Termination Inspection Procedure EIP-5, which became effective in January, 1982. This procedure requires inspection personnel to perform and record verification of terminating tool calibrations and select five different cables per week to reverify the termination and calibration of the tool used.

B. Corrective Action Taken to Avoid Further Noncompliance

A new Foothill Calibration Procedure, ECP-6 Rev. 0, which became effective March, 1982, requires Quality Assurance evaluation of the program. Weekly calibration reports are made by H. J. Kaiser Quality Assurance which includes terminating tools. The calibration procedures are included in scheduled audits, both by H. J. Kaiser Quality Assurance and CG&E Quality Assurance.

C. Date Corrective Action Will Be Achieved

Procedure ECP-6 became effective in March, 1982. Audits are scheduled for August, 1982.

3b(5)

The response to this item is as stated in our response to 3b(3) above.

3b(6)

The Construction Inspection Plan (CIP) addresses the use of a torque wrench relative to cable terminations. However, the instruction does not specify which cable terminations are required to be torqued or the specific valve that must be applied.

There are two conditions when torque wrenches are to be used on terminations. One is the joining of copper bus on switchgear shipping sections to form completed units and the bolting of medium voltage lugs to load side buses within switchgear units. In both cases, the torque value used is the value recommended by the manufacturer. All essential switchgear was supplied by the ITE Company, who issued their recommended torque values for the two conditions stated above. These torque values were complied with, when bolting took place and verified by QA.

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A. Corrective Action Taken and Results Achieved

The manufacturers recommended torque values have been incorporated in Exhibit M, of Cable and Wire Terminating Procedure EIP-5 Rev. O. Electrical terminations requiring torquing are no longer being made.

B. Corrective Action Taken to Avoid Further Noncompliance

The torque values for cables terminated in ITE supplied equipment is currently in EIP-5.

C. Date Corrective Action Will Be Achieved

Corrective Action was achieved January 29, 1982.

3b(7)

All requests for determination or retermination of cables after initial termination are initiated by the FEC Discipline Engineer as covered by their Cable Termination Procedure ECP-5. The request to determine or reterminate is sent to CG&E EOTD, who control all such requests because of the possibility of energized conductors. A daily cable termination log is maintained by the responsible superintendent and a determination log maintained by EOTD. It is possible to determine the status of any cable from these logs including a computer printout of "Cable Status", which is issued by FEC. Prior to February, 1982, when a cable was reterminated, the EOTD retested the cable issuing their test report EC-1. Copies of this report were sent to HJK QA as notification to reinspect the re-termination.

A. Corrective Action Taken and Results Achieved

Procedure ECP-5 Rev. O, initiated the Work Package requirement for any cable termination and determination. Upon a request to determine a cable and approval is granted by EOTD, a Work Package is assembled which includes a QA Cable Inspection Checklist in the package and QA is notified to inspect the determination and pull back and complete the CIP as part of the package requirements. When a request is made to reterminate a cable, the EOTD is notified and after the EC-1 Test Report is received by FEC, the retermination work package is assembled, which again contains a QA Cable Inspection Checklist. All essential cable termination and retermination work packages are reviewed for completeness by Quality Engineering, thus assuring QA activity in the work.

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B. Corrective Action Taken to Avoid Further Noncompliance

Computerized Cable Status Reports are maintained in addition to daily cable status logs. New procedures governing work packages and cable terminations have been initiated.

C. Date Corrective Action Will Be Achieved

Corrective action was achieved in February, 1982.

3b(8)

The verification of cable separation does not specify the separation criteria for associated (Non-Class 1E) or Reactor Protection system cables in panels. The FSAR is vague with regard to separation of non-safety associated and safety-related cables within panels.

A. Corrective Action Taken and Results Achieved

Revision 83 to the FSAR included a more definitive description of separation criteria of associated cables. Sargent & Lundy has generated additional associated cable design criteria in Drawing E-280, which deals with cable outside of panels. Revisions are in progress to revise this drawing to encompass additional cable separation inside panels.

B. Corrective Action Taken to Avoid Further Noncompliance

Task VI of CG&E Quality Confirmation has been delegated the responsibility to perform a 100% computer assisted analysis of associated cables to assure separation criteria for essential circuits have been met. A 100% inspection will be conducted of cables between the Spreading Room and control panels and cables at floor and wall penetrations. A 100% inspection will also be made of cable separation inside and outside of panels which require cable separation to assure Class 1E and associated cables have been properly separated from different division Class 1E, associated, and non-Class 1E cables.

C. Date Corrective Action Will Be Achieved

Task VI of the QCP is expected to complete this task, December 31, 1982.

3b(9)

The "Purpose" stated in Procedure E-8 Rev. 14, on Cable Wire Termination Inspection states this procedure is to delineate the

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inprocess and past inspections requirements for essential cable terminations, however, the inspection checklist and record (CIP) does, (and we believe the word "not" was omitted in the report) require any inprocess inspections.

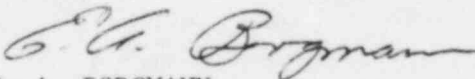
Please refer to our reply to Paragraph 3b(3) in which we take the position that not all terminations made require inprocess inspection. The procedure in Paragraph 5.3.2 and 5.3.3, clearly defines the craft mandatory hold point where further construction shall not proceed without inprocess inspection. All other terminations can be adequately inspected after the termination is made.

We feel no corrective action is required.

We trust the above will be found acceptable and a response to the subject Report.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
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SENIOR VICE PRESIDENT

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