THE CINCINNATI GAS & ELECTRIC COMPANY

CINCINNATI, OHIO 45201

50-358

July 11, 1983
JW-SC-0041

J. WILLIAMS, JR
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

PRINCIPAL STAFF			
RA	Ras	NR	
D/RA			
A/RA			
DPRP			
DRMA			
DRMSP			
DE			
ML			
OL		FILE	

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Mr. J. G. Keppler
Regional Administrator
Nuclear Regulatory Commission
Region III
799 Roosevelt Rd.
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Attached for your information are the following:

1. My letter to Mr A. J. Neylan of Torrey Pines Technology, dated June 30, 1983. I am sorry for the delay in transmittal, but due to an oversight you were not copied for distribution.

2. ASME letter dated June 16, 1983 to H. J. Kaiser, Inc. concerning the ASME site renewal audit findings and subsequent ASME letter dated June 21, 1983 to H. J. Kaiser, Inc., identifying the time and location of the ASME Subcommittee on Nuclear Accreditation meeting. By copy of this letter, this ASME correspondence is also being forwarded to Torrey Pines Technology.

If you have any questions, please contact me.

Very truly yours,

J. Williams, Jr.

J. Williams, Jr.

bcf

Enclosures

cc: A. J. Neylan
  Torrey Pines Technology
 NRC Office of Inspection & Enforcement
  Washington, D.C. 20555
 NRC Senior Resident Inspector
  ATTN: W. F. Christianson
 NRC Zimmer Project Inspector, Region III
  ATTN: E. R. Schweibinz

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THE CINCINNATI GAS & ELECTRIC COMPANY

CINCINNATI, OHIO 45201

June 30, 1983
JW-SC-0034

J. WILLIAMS, JR
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

Mr. A.J. Neylan
Project Manager
Torrey Pines Technology
P.O. Box 85608
San Diego, CA 92138

Dear Mr. Neylan:

After our recent meeting, you suggested the desirability of having in writing some of my ideas and philosophy regarding the future conduct of the Zimmer project. This is in response to your request.

As you know, I come to this position after a long Naval career, much of which was in the nuclear program. That program, with its extraordinary record of safety and reliability, demonstrates that the essential ingredient for success in a complex, technical project, is a knowledgeable and insistent customer who will accept nothing but the best within his own organization and who will insist on a comparable degree of professionalism from his contractors, suppliers and others associated with his project.

I have been given a charge by Mr. Dickhoner and the management of CG&E to assure that this spirit and capability which I have found in much of the staff associated with the project are nurtured and sharpened. I have started a complete reorganization and strengthening of the project staff within CG&E. Although my ideas are tentative and my final actions will be influenced by the recommendations of the TPT study, I believe that I can usefully identify for you my management objectives and the basic principles of the organization which I would like to see in place.

I intend, through acquisition of additional competent personnel and some reorganization, to assure that CG&E will have the capability to:

1. manage the organization selected to verify quality of construction and to complete construction;

2. provide the highest professional quality assurance oversight of the selected organization and all other contractors;

3. manage and control the test programs associated with planned completion and start-up;

4. develop highly qualified operations and maintenance personnel;

5. provide for continuing, strong, and stable engineering support;

6. control the material and documents and provide for physical security of the plant; and

7. attract, maintain and provide for the career development of personnel in the nuclear organization, recognizing the unique aspects of constructing and operating a nuclear facility.

It is obvious that the objectives I have set forth require a highly qualified and experienced senior management, as well as large numbers of competent personnel. My sole responsibility at CG&E will be the Zimmer project and I intend to conduct the project in accordance with all applicable rules, licensing requirements and quality standards. In employing me, the Company has obviously implemented a decision that a full-time, nuclear experienced senior executive is required to successfully complete and operate the Zimmer project.

The Company has further accepted my recommendation that the project be staffed with three highly qualified assistant vice presidents, with clearly assigned functions:

1. Assistant Vice President - Nuclear Projects.
   This position has been filled by Mr. G. F. Cole, III. He is directly responsible to me for management and oversight of our construction manager (Bechtel Power Corporation); and monitoring other site contractors such as Kaiser. Mr. Cole has a demonstrated record of experience and background as a nuclear project manager. A copy of his resume will be found in Attachment I to this letter.

2. Assistant Vice President - Nuclear Engineering.
   This position has been filled by Mr. E.J. Wagner. He will direct all CG&E engineering activity in support of the design, construction, test procedure development and technical support of operation of the Zimmer plant. He will monitor all contractors' engineering and design activities. Mr. Wagner brings with him a long and distinquished career in the field of nuclear engineering. A copy of his resume will be found in Attachment I.

3. Assistant Vice President - Nuclear Operations.
   This position will be filled by Mr. D.C. Cruden who will direct plant management, training, material and document control and administration and security. Mr. Cruden's long experience in nuclear operations in the Navy's program will provide the Zimmer project with a solid foundation for the operational phase. Mr. Cruden's resume is in Attachment I.

Also reporting directly to me is a project QA/QC manager and a licensing manager. All of the foregoing are critical slots in the organization and I have been strongly supported by CG&E management in my attempts to attract people with strong nuclear experience and who have demonstrated by their past performance that they are capable of carrying out my objectives.

CG&E management has also supported my requests for hiring a considerable number of engineers to support completion of the project and its operation. We plan to bring more than 130 additional engineers to the project, most of which will have nuclear engineering or operational backgrounds. Obviously, not all of these personnel can be brought on board immediately; in the interim, we will use contractor personnel, but with a definite objective of replacing them with full-time CG&E employees.

In the area of Nuclear Operations I will, under the new organization, insure that radiation protection is accorded the proper level of management attention and that our management of training and supporting facilities is that required to produce the highest level of competence in our operating and maintenance personnel over the decades to come.

Although it is possible that, as a result of the TPT recommendations, the Zimmer organization may be further restructured, the key individuals I have described above are essential. I am confident that individuals with these qualifications will have important roles under any resulting reorganization and that I have not affected in any way my flexibility in responding to your forthcoming recommendations.

As you know, and as I discuss in more detail below, we currently contemplate that Bechtel will play an important role in verifying the quality of construction and in completing its construction. It is my tentative thinking that CG&E will have qualified personnel in essentially every key spot which interfaces with the Bechtel project organization. Thus, we will have our own personnel in each of the major engineering disciplines and every Bechtel project function will have a counterpart in the CG&E organization, including construction, project controls, quality verification, materials management, records, administration and licensing. My current thoughts in this regard are reflected in the draft organization charts, Attachment II.

Of greatest importance, in terms of assuring tight interface relationships, is the QA/QC program. CG&E, as holder of the construction permit, has overall responsibility for the project quality program and it will audit and survey the Bechtel QA/QC program. As indicated above, I intend that the CG&E QA/QC manager report directly to me. In addition to implementing our own NRC-approved QA/QC program, we will review and approve the quality programs of all contractors performing safety-related work. Although we cannot and would not delegate our quality assurance responsibilities, Bechtel will bear heavy responsibilities for the adequacy and proper implementation of quality assurance programs on the project. In addition to maintaining its own NRC-approved program, Bechtel will review the projects' entire QA program, including all QA procedures. It will have important responsibilities for the surveillance and audit of Bechtel's own quality assurance programs, as well as those of Kaiser, Sargent & Lundy and other contractors. We will also insure that the relationship among CG&E and all project contractors is clearly delineated and that each organization is properly tasked in context; that is, each part of the project will understand its QA/QC interface with the rest of the projects.

I have referred to the role I envision Bechtel will have in the verification program and the completion of construction. You are aware, of course, of the breadth of Bechtel's experience in the nuclear field. Importantly, Zimmer is not the first project in which Bechtel has assumed the role of project manager after construction was substantially completed. In both the South Texas Project and WNP-2, Bechtel has replaced the original project manager, has developed programs for evaluating the status of existing plant systems and procedures and has formulated plans for completing construction based upon its evaluation. Somewhat similarly, Bechtel has now undertaken a role as project manager at Diablo Canyon to complete the activities necessary for that plant to begin operation.

My present intention is that, as the project manager, Bechtel will manage day-to-day construction activities and manage the interfaces with the engineering activities, including scheduling the engineering activities to support the project. As noted above, they will have a strong QA/QC function, as well as responsibility for project control, including planning, scheduling and cost control. As mentioned previously, Bechtel will also have responsibility, subject to the surveillance of CG&E, for verifying the quality of construction and for implementing the construction completion program under the Commission's Order to Show Cause. However, I should emphasize that we have not yet firmed up Bechtel's precise scope of responsibilities and that we have no intention of doing so prior to our review of your recommendations.

I am aware of some of the difficulties and problems which have been encountered by both Kaiser and Sargent & Lundy and of those which have been alleged. I believe, however, that both contractors should be retained because of the wealth of experience and background which they possess in connection with the Zimmer project. The strong points of both organizations can be enhanced under a new and strengthened project management headed by Bechtel, operating under the supervision of a strengthened CG&E. This will assure continuity within the project and retention of individuals with project-specific experience and knowledge.

I recognize that, with a large number of companies involved, delineation of interfaces among contractors and between contractors and CG&E must be closely controlled. This will be accomplished by several means. First, we will prepare a detailed division of organizational responsibilities among the companies which lists the responsibilities of each company for various activities associated with management, engineering, construction, licensing and related and miscellaneous services such as QA/QC and project controls. A clear delineation along these lines will greatly diminish the potential for misunderstanding among the companies as to their respective responsibilities.

In addition, we intend to develop detailed interface agreements which delineate lines of authority, responsibility and reporting obligations of the companies for their various tasks.

As you know, among my initial responsibilities are the development and execution of plans for the verification of the quality of construction and for the completion of construction pursuant to the NRC Order to Show Cause. The details of these programs have not yet been formulated. I can, however, tell you of some of my current thinking

and philosophy regarding, especially, the verification program. First, I intend that the construction of every safety-related structure, system and component in the plant will be verified. Verification will be conducted through documentation reviews, walkdowns, physical inspections and both destructive and non-destructive testing. The verification program will be executed under the general direction of Bechtel, subject to surveillance by CG&E. Of course, we will, pursuant to the Order to Show Cause, retain an ir dependent, outside organization to audit the verification program.

I hope that this discussion of my philosophy and current thinking regarding the completion of the Zimmer project is helpful in the conduct of your study. I believe that the plans I have outlined assure a strengthened and deeply involved licensee, augmented in its project management by an organization (Bechtel) with considerable experience in moving into, correcting and completing projects which have encountered difficulty. Although the details of our programs for construction quality verification and completion have not been prepared, and obviously cannot be completed at this time, I want to assure you that they will provide a well considered and straightforward method of determining the quality of the existing construction and insuring the Zimmer project will be completed in accordance with its construction permit and Commission regulations.

I believe the thoughts outlined above indicate that, in taking steps to strengthen the CG&E organization and retaining a competent outside organization (Bechtel), we will, through our reorganization and strengthening of our own activities, in effect achieve a blend of the four alternatives outlined in the Commission's Order to Show Cause. In fact, I think that our tentative plans embody the best features of each alternative and blend them into a comprehensive program which would be better than any of the alternatives singly. Nevertheless, I want to emphasize that these tentative plans constitute only my current thinking and that I await the report and recommendations of Torrey Pines. I can assure you that they will receive our most thoughtful consideration. The planning that we have done thus far will enable us to react promptly and comprehensively to your recommendations and to produce, for NRC approval, a course of action which embodies the best thinking of many competent resources.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By J. Williams, Jr.
J. Williams, Jr.

JW/bcf

Attachments

ATTACHMENT I

RESUMES

G. FRANK COLE, III

MANAGER-NUCLEAR PROJECTS

SPECIAL COMPETENCE

Executive and project management of nuclear power plants. Expertise includes management and supervision of engineering, design and construction of nuclear power plants. His twenty-five years of experience in the nuclear power field has included most all aspects of nuclear power. In addition to total project responsibilities, he has prior experience in instrumentation and control, valves and auxiliary components, and reactor engineering including nuclear fuel, pressure vessels, control drive mechanisms and refueling. Also, he has had significant collateral responsibilities which make him intimately familiar with the operational aspects of nuclear power plants.

EDUCATION

Vanderbilt University, B.S.E.E., 1957
Georgetown University, 27 semester hours graduate Physics, 1957-60
Bettis School Reactor Engineering, six months graduate level nuclear reactor engineering, 1958

PROFESSIONAL REGISTRATIONS

New Hampshire
Pennsylvania

MEMBERSHIP

American Nuclear Society

MILITARY SERVICE

U. S. Navy, 1957-61

EMPLOYMENT HISTORY

1972-Present	UNITED ENGINEERS
1980-Present	Manager-Nuclear Projects
1973-1981	Project Manager
1972-1973	Project Engineering Manager
1957-1972	NAVAL REACTORS
1969-1972	Project Manager
1965-1969	Assistant Division Head
1964-1965	Section Head
1960-1964	Assistant Division Head
1957-1960	Cognizant Engineer

G. FRANK COLE, III

SELECTED EXPERIENCE

As Manager-Nuclear Projects, has executive responsibility for department consisting of approximately 900 engineers, designers and technicians engaged in the planning, design, and construction of nuclear power plants.

UNITED ENGINEERS

Served as Project Manager for the following:

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, Manchester, NH

Two 1150 MWe nuclear powered generating units, Seabrook Station, Units 1 and 2.

NEW ENGLAND POWER COMPANY, Westborough, MA

Two 1150 MWe nuclear powered generating units designated NEP 1 and 2.

CENTRAL MAINE POWER COMPANY, Augusta, ME

One unit 1150 MWe nuclear powered generating plant designated Maine Nuclear Power Station.

NAVAL REACTORS

Worked in the Naval Reactors headquarters office under Admiral H. G. Rickover in the following capacities:

Project Manager - Trident Missile Launching Submarine and the Turbine Electric Drive Submarine.

Assistant Division Head - Reactor Engineering Division

Assistant Division Head - Reactor Control and Instrumentation Section

Section Head - Primary System Valve, Auxiliary Components and Piping.

Cognizant Engineer for Reactor Control, Instrumentation and Electrical Equipment.

Collateral Duties - Team leader for Operating Crew Examinations.
- Examiner of Prospective Engineering Officers and Commanding Officers.
- Coordinator of Preparation of Reactor Plant Operating Manual.

EDWIN J. WAGNER

Assistant to Executive Vice President

Education: Bachelor of Science in Mechanical Engineering, Carnegie-Mellon University; Additional Courses - Case Western Reserve, George Washington University, and Ohio State University.

* * *

BURNS AND ROE, INC. 1975-Present

As Assistant to the Executive Vice President, Mr. Wagner performs a variety of independent technical and management functions. Major assignments include management of the Corporate Cost Effectiveness Program and participation in several senior level technical review groups.

He is a member of the TMI-2 Technical Assistance and Advisory Group (TAAG). TAAG conducts technical evaluations, assists and advises GPU Nuclear Corporation, Department of Energy and the Nuclear Regulatory Commission on technical issues concerning the defueling and cleanup from the TMI-2 accident.

Mr. Wagner is Chairman of TMI-1 Third Party Review Group for the steam generator repairs. This Review Group was organized by GPU Nuclear Corporation to provide independent technical evaluation of the safety of the repair of the steam generator and operation of the plant subsequent to the repairs.

As Director of Engineering and Design, Breeder Reactor Division, Mr. Wagner was responsible for technical direction of all company engineering and design on breeder reactors, including the Clinch River Breeder Reactor. He organized and managed a major training program in Liquid Metal Fast Breeder Reactor Technology for foreign engineers. He continues to participate in Breeder Reactor Division engineering activities as a member of Department of Energy, Project Office Test Readiness Review and Design Review Groups.

As Deputy Director for Engineering, he was responsible for the technical direction of all company engineering activities on fossil and LWR type power plants. These projects included domestic and international plants fueled by coal, oil and nuclear.

Earlier, as Deputy Director for Technical Evaluation, Mr. Wagner was responsible for conducting design verification and special design reviews of engineering and design work performed by Division personnel. He was responsible for monitoring the technical performance of the company, its affiliates and subsidiaries on nuclear and fossil power, and other projects.

WESTINGHOUSE ELECTRIC CORPORATION 1970-1975

Division Engineering Manager:

Managed all the development, design, quality control and service engineering of the Division's products. This included engineering of automatic, high-speed fabrication and assembly lines. Managed the overseas licensing activities of the Division.

NAVAL NUCLEAR PROPULSION PROGRAM 1955-1970

Chief, Nuclear Components Branch:

For 15 years, managed technical activities of Naval Nuclear Propulsion Program, reporting directly to Vice Admiral Rickover, director of the program. Assignments included:

Managed the technical activities of the program contractors and laboratories performing development, design, manufacture, operation, decontamination, and maintenance of mechanical equipment for naval nuclear propulsion plants and Shippingport Atomic Power Station. Plants included both liquid metal and PWR types.

Specification and technical support of the procurement of mechanical equipment for 100 submarines, four surface warships and a nuclear research submarine. Developed government standards and specifications for this equipment.

Headed the development program for application of a new material for the pressure boundary of reactor plant mechanical equipment and for secondary water treatment methods.

Conducted reactor safeguard examinations of naval plant operating personnel.

Conducted formal quality control audits of equipment suppliers.

Chaired technical review groups to evaluate the conduct of major development programs on reactor fuels and new plant designs.

Directed on-site repairs of liquid metal and PWR type shipboard nuclear propulsion plants, land-based prototype naval nuclear propulsion plants and the Shippingport Atomic Power Station.

BABCOCK AND WILCOX COMPANY 1953-1955

Test Engineer:

Developed fossil steam generator equipment, including steam-water separators and means to prevent turbine blade deposits. Developed and applied radioisotope tracer techniques for laboratory and field use.

EDWIN J. WAGNER (continued)

EXXON 1952

Maintenance Engineer:

Specified new pumps and gave technical direction to maintenance of existing refinery pumps.

* * * *

Societies: Member: American Society of Mechanical Engineers

Industry Technical Committees: TMI-2 Technical Assistance and Advisory Group, TMI-1 Steam Generator Third Party Review (Chairman), A/E Advisory Committee, Steam Generator Owners Group (Vice Chairman), Material and Corrosion Committee, EPRI.

Technical Papers: "Total Product Cost Improvement" (Westinghouse International Licensee Conference, 1973); "TMI Initial Recovery - A Unique Engineering Event" (Electric Light & Power, July, 1980); A/E Services for a Nuclear Power Plant" and "A/E Retrofit Services in the Recovery Program" (Chinese Nuclear Society, Beijing, China, October, 1981); "Titanium in Power Plants" (American Power Conference, April, 1982).

THE CINCINNATI GAS & ELECTRIC COMPANY

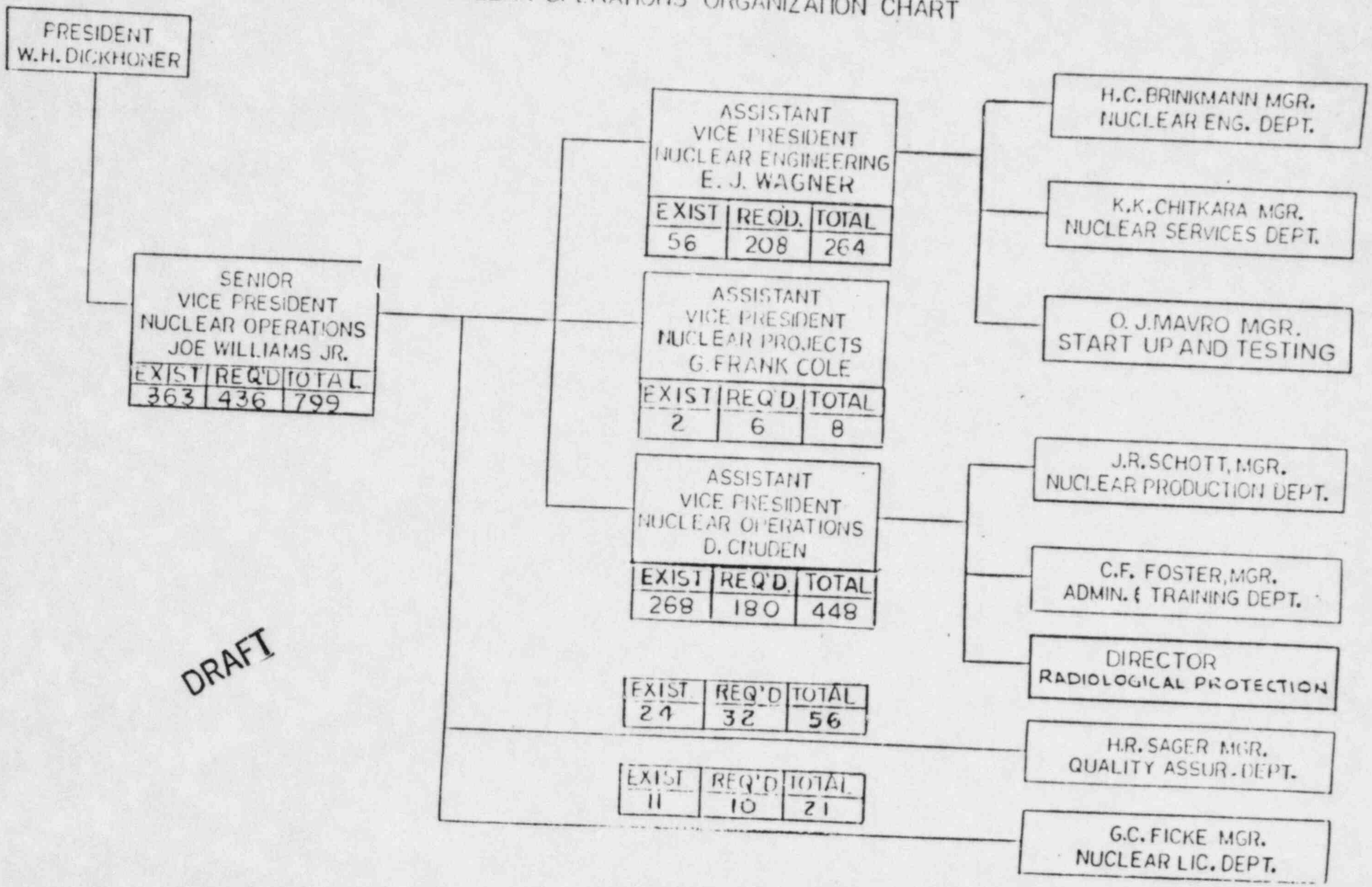
Rear Admiral USN Dave Cruden has accepted the position of Assistant Vice President Nuclear Operations. He will report to Mr. Joe Williams, Jr., Senior Vice President Nuclear Op[illegible]tions. Rear Admiral Cruden retires from the U.S. Navy on July 1, 1983 and will join CG&E to take charge of the operations organizations of the Wm. H. Zimmer Nuclear Station.

A graduate of U.S. Naval Academy, Mr. Cruden has had extensive experience in the field of nuclear naval power. He served as Commanding Officer of Nuclear Power School, Mare Island, Ca., and as Commanding Officer of the HENRY L. STIMSON, a nuclear power submarine. For three years, Mr. Cruden was Senior Officer of the Nuclear Power Examining Board (NPEB), US Atlantic Fleet. In 1974 Mr. Cruden becam Commanding Officer of Submarine Squadron Sixteen consisting of 10 nuclear power Poseidon submarines operating from Rota, Spain. After his tour of duty as Squadron Commander, he was selected for Rear Admiral and subsequently served as Deputy Director Strategic System Project Office, Commander Naval Forces Marianis, Deputy Director of the Defense Supply Agency and in his present capacity as Assistant Deputy Naval Operations, Logistics.

ATTACHMENT II

NUCLEAR OPERATIONS STAFFING

CG&E -NUCLEAR OPERATIONS ORGANIZATION CHART



DRAFT

EXIST	REQ'D	TOTAL
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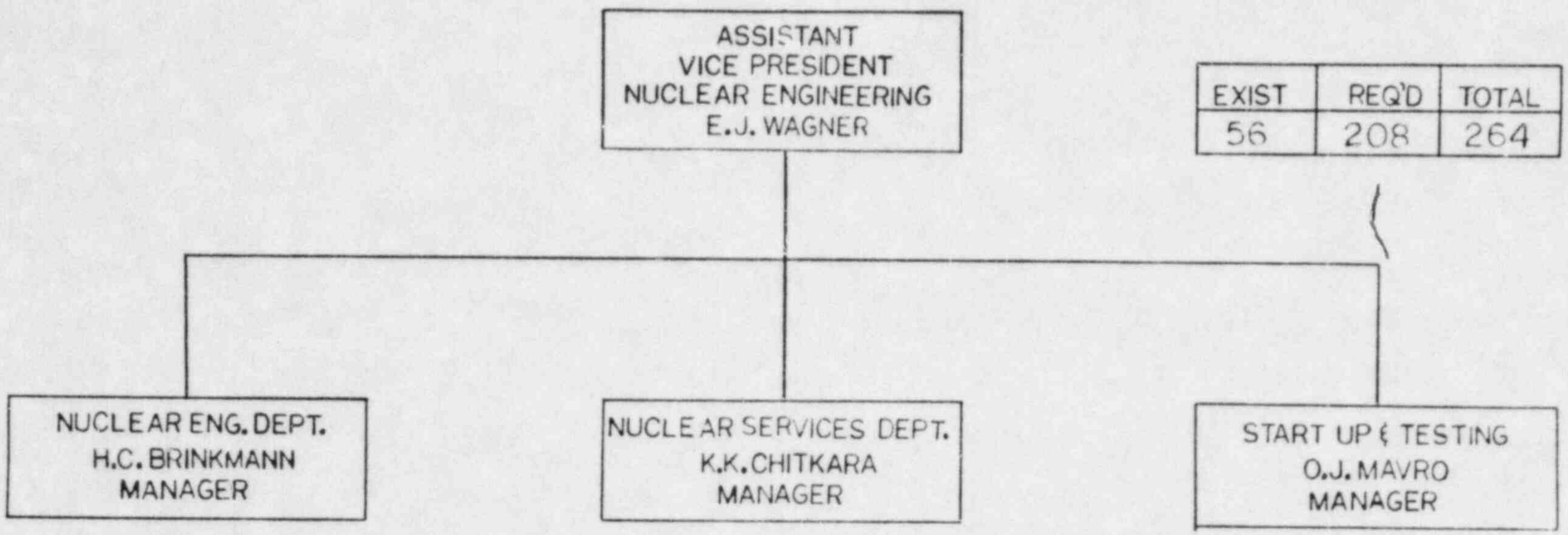


EXIST	REQ'D	TOTAL
31	197	228

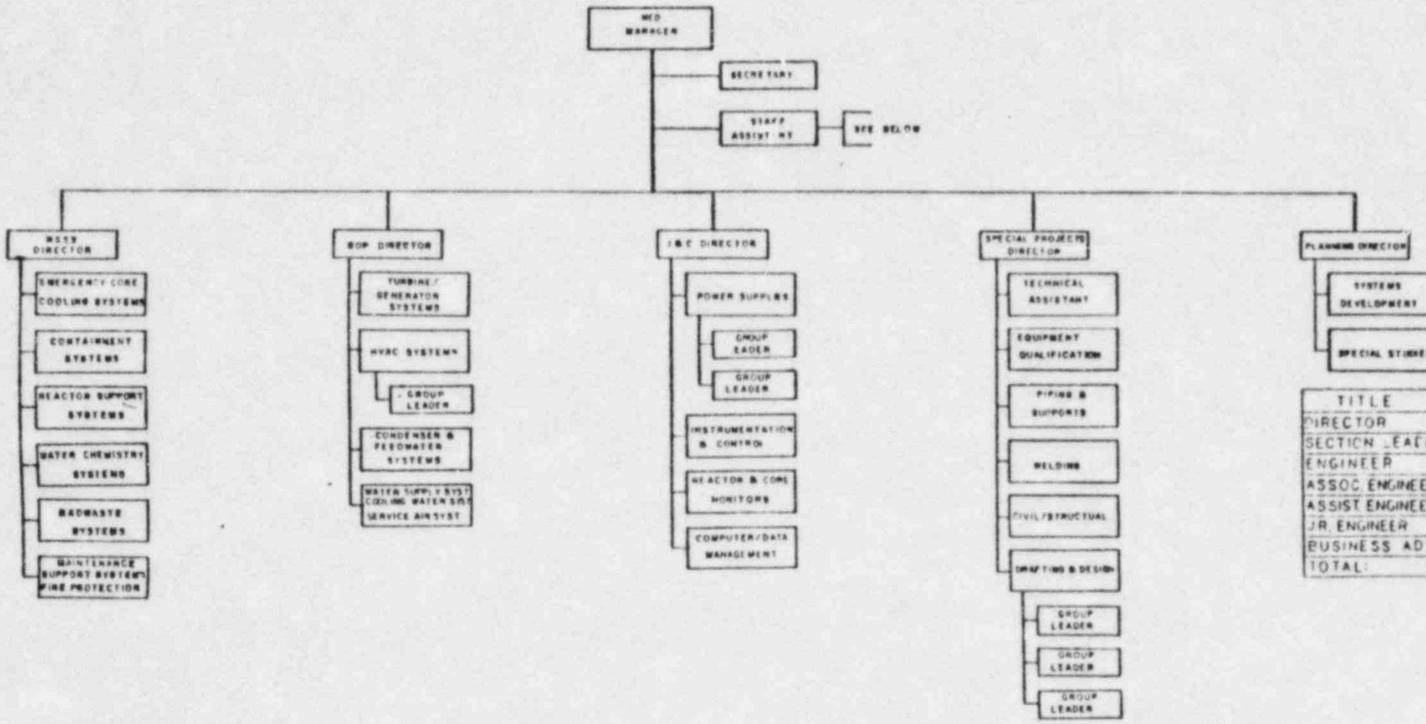
EXIST	REQ'D	TOTAL
24	10	34

*

EXIST	REQ'D	TOTAL
71	0	71

*NOTE: THE S/U & TEST ORGANIZATION IS TO BE COMPOSED OF PERSONNEL FROM VARIOUS CG&E DEPARTMENTS AND CONTRACT PERSONNEL. THE 71 THEREIN, ARE NOT REFLECTED IN THE TOTAL NUCLEAR OPERATIONS' REQUIREMENT.

NED ORGANIZATION CHART



TITLE	EXIST	REQ'D	TOTAL
DIRECTOR	0	1	1
SECTION LEADER	0	2	2
ENGINEER	0	0	0
ASSOC. ENGINEER	0	5	5
ASSIST ENGINEER	0	1	1
JR. ENGINEER	0	0	0
BUSINESS ADV.	0	2	2
TOTAL:	0	11	11

NED TOTAL

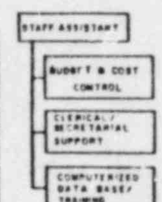
TITLE	EXIST	REQ'D	TOTAL
MANAGER	1	0	1
SECRETARY	0	1	1
DIRECTOR	3	2	5
STAFF ASSISTANT	1	0	1
SECTION LEADER	0	25	25
ENGINEERS	2	7	9
ASSOCIATE ENGR.	8	25	33
ASSISTANT ENGR.	7	27	34
JUNIOR ENGR.	0	33	33
LEVEL III NDE	0	1	1
LEVEL II NDE	0	3	3
CO-OPS	4	8	12
GR. LDR.- DES./DR.	0	3	3
DESIGNER	4	8	12
DRAFTSMAN	0	25	25
TECH ASSISTANT	0	3	3
ENG. AIDE	1	0	1
BUSINESS ADVISOR	0	3	3
CLERICAL	0	23	23
TOTALS:	31	197	228

TITLE	EXIST	REQ'D	TOTAL
DIRECTOR	1	0	1
SECTION LEADER	0	6	0
ENGINEER	0	0	0
ASSOC ENGINEER	3	4	7
ASSIST ENGINEER	2	13	15
JR. ENGINEER	0	10	10
CO-OP	1	2	3
CLERICAL	0	5	5
TOTALS:	7	40	47

TITLE	EXIST	REQ'D	TOTAL
DIRECTOR	0	1	1
SECTION LEADER	0	4	4
ENGINEER	2	1	3
ASSOC ENGINEER	0	12	12
ASSIST. ENGINEER	0	9	9
JR. ENGINEER	0	4	4
CO-OP	0	3	3
CLERICAL	0	4	4
TOTAL:	2	38	40

TITLE	EXIST	REQ'D	TOTAL
DIRECTOR	1	0	1
SECTION LEADER	0	5	5
ENGINEER	0	2	2
ASSOC ENGINEER	1	4	5
ASSIST ENGINEER	2	3	5
JR ENGINEER	0	12	12
CO-OP	1	2	3
CLERICAL	0	4	4
TOTALS:	5	32	37

TITLE	EXIST	REQ'D	TOTAL
DIRECTOR	1	0	1
SECTION LEADER	0	5	5
ENGINEER	0	4	4
ASSOCIATE ENGR	4	0	4
ASSISTANT ENGR.	3	1	4
JUNIOR ENGINEER	0	5	5
LEVEL III NED	0	1	1
LEVEL II NED	0	3	3
GR. LDR.- DES/DRAFT	0	3	3
DESIGNER	4	8	12
DRAFTSMAN	0	23	23
TECHNICAL ASSIST	0	1	1
CO-OP	2	1	3
CLERICAL	0	4	4
ENGINEERING AIDE	1	0	1
TOTALS:	15	59	74



TITLE	EXIST	REQ'D	TOTAL
STAFF ASSISTANT	1	0	1
SECTION LEADER	0	3	3
JUNIOR ENGINEER	0	2	2
BUSINESS ADVISOR	0	1	1
TECHNICAL ASSIST	0	2	2
DRAFTSMAN	0	2	7
CLERICAL	0	6	6
TOTAL:	1	16	17

- MANAGER NUCLEAR SERVICES DEPARTMENT
  - STAFF NUCLEAR ENGINEER (2) — NSD-14/15
  - NUCLEAR FUEL DIVISION DIRECTOR
    - NUCLEAR FUEL SUPPLY SPECIALIST
    - NUCLEAR FUEL MANAGEMENT ENGINEER
  - NUCLEAR SYSTEMS & RELIABILITY ANALYSIS DIV. DIRECTOR — NSD-02
    - NUCLEAR SYSTEMS SECTION SUPERVISOR — NSD-03
      - NUCLEAR SYSTEMS ENGINEER (2 + 1 open) — NSD-05 (1 CO-OP)
    - RELIABILITY ANALYSIS SECTION SUPERVISOR — NSD-04
      - RELIABILITY ANALYSIS ENGINEER (4 + 2 open) — NSD-07
  - INDEPENDENT STAFETY REVIEW GROUP SUPERVISOR — NSD-16
    - INDEPENDENT SAFETY REVIEW ENGINEER (1+ 3 open) — NSD-17/18

STAFF	EXIST.	REQUIRED	TOTAL
ENGINEER:			
SENIOR	2	0	2
CLERICAL	2	0	2
SECRETARY	0	1	1
TOTAL:	4	1	5

ISRG	EXIST.	REQUIRED	TOTAL
DIRECTOR	0	0	0
ENGINEER:			
ENG.	1	0	1
ASSOC.	1	3	4
CLERICAL	0	1	1
TOTAL:	2	[illegible]	6

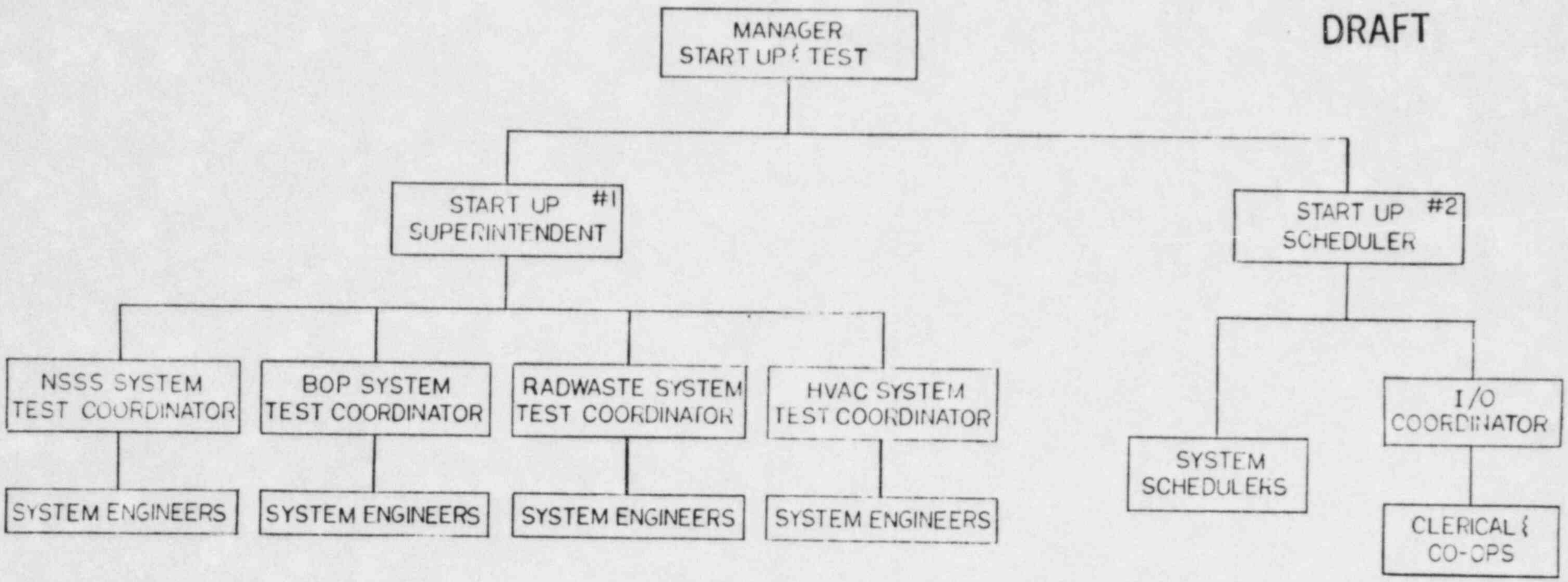
NFD	EXIST.	REQUIRED	TOTAL
DIRECTOR:	1	0	1
SUPERVISOR	0	0	0
ENGINEER:			
NUCLEAR:	4	2	6
BUSINESS DEG:	1	0	1
CO-OP	1	0	1
TOTAL:	7	2	9

NSRAD	EXIST.	REQUIRED	TOTAL
DIRECTOR	1	0	1
ENGINEER:			
SENIOR	0	0	0
ENG.	2	0	2
ASSOC.	5	3	8
ASSIST	0	0	0
JUNIOR	0	0	0
ENGR. AIDE	1	0	1
CO-OP	1	0	1
TOTAL:	10	3	13

DEPARTMENT TOTAL	EXIST.	REQUIRED	TOTAL
MANAGER	1	0	1
DIRECTOR	2	0	2
ENGINEER:			
SENIOR	2	0	2
ENG.	3	0	3
ASSOC.	10	8	18
ASSIST.	0	0	0
JUNIOR	0	0	0
CO-OP	2	0	2
BUSINESS DEG.	1	0	1
ENGR. AIDE	1	0	1
CLERICAL	2	1	3
SECRETARY	0	1	1
TOTAL:	24	10	34

START UP & TEST ORGANIZATION

DRAFT



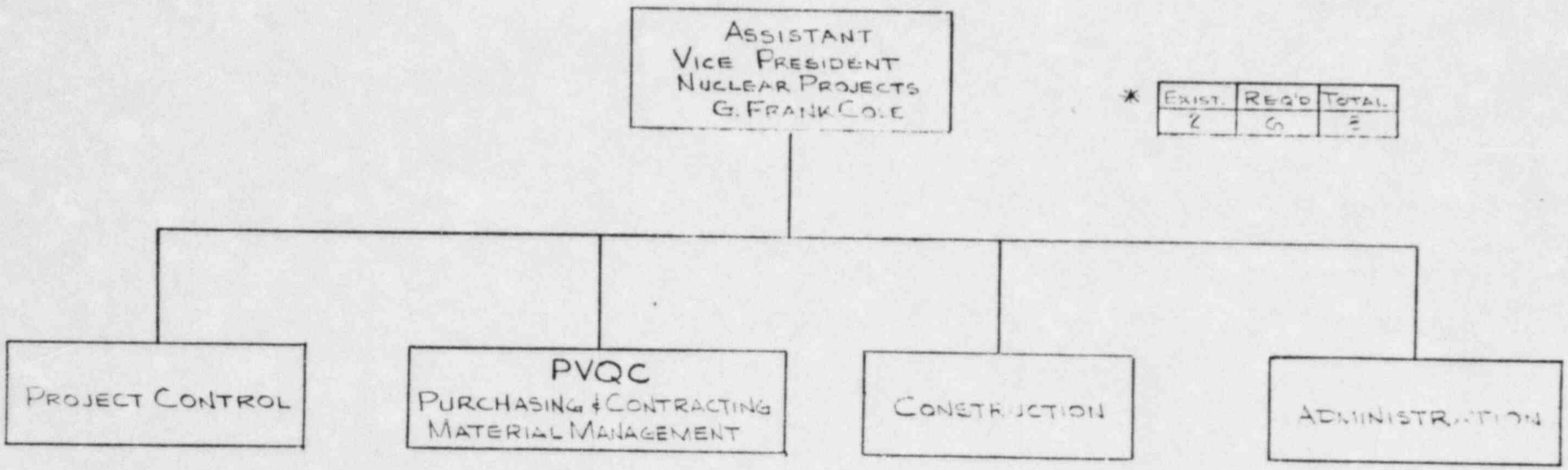
*

#1	EXIST	REQ'D	TOTAL
SUPERINTENDENT	1	0	1
SYS. TEST COORD.	3	1	4
SYSTEM ENG	20	30	50
CO-OPS	1	2	3
CLERICAL	0	1	1
TOTAL	25	34	59

* NOTE: THE SU & TEST ORGANIZATION IS TO BE COMPOSED OF PERSONNEL FROM VARIOUS OG&E DEPARTMENTS AND CONTRACT PERSONNEL. THE NUMBERS SHOWN REPRESENT PEAK PERSONNEL REQUIRED DURING THE TEST PROGRAM.

*

#2	EXIST	REQ'D	TOTAL
SUPERVISOR	1	0	1
SCHEDULING ENG.	1	6	7
CO-OPS	1	1	2
CLERICAL	0	1	1
TOTAL	3	8	11



* EXIST.	REQ'D.	TOTAL
2	6	8

* THIS FUNCTION IS CURRENTLY STAFFED WITH GCD PERSONNEL AND CONTRACTOR SECONDED PERSONNEL. THE BULK OF THE PERSONNEL NEEDED WILL REMAIN IN THESE CATEGORIES. THE SIX(6) REQUIRED BILLETS WILL FORM THE OUTAGE MANAGEMENTS GROUP WHEN THE PLANT GOES INTO OPERATION.

DRAFT

ASSISTANT VICE PRESIDENT
OPERATIONS
D CRUDEN

EXIST.	REQ.D	TOTAL
268	180	448

NUCLEAR PRODUCTION DEPARTMENT
J.R SCHOTT
MANAGER

EXIST	REQ.D	TOTAL
195	120	315

ADMINISTRATION & TRAINING DEPARTMENT
C.F. FOSTER
MANAGER

EXIST.	REQ.D	TOTAL
40	23	63

RADIOLOGICAL PROTECTION

DIRECTOR

EXIST.	REQ.D	TOTAL
32	36	68

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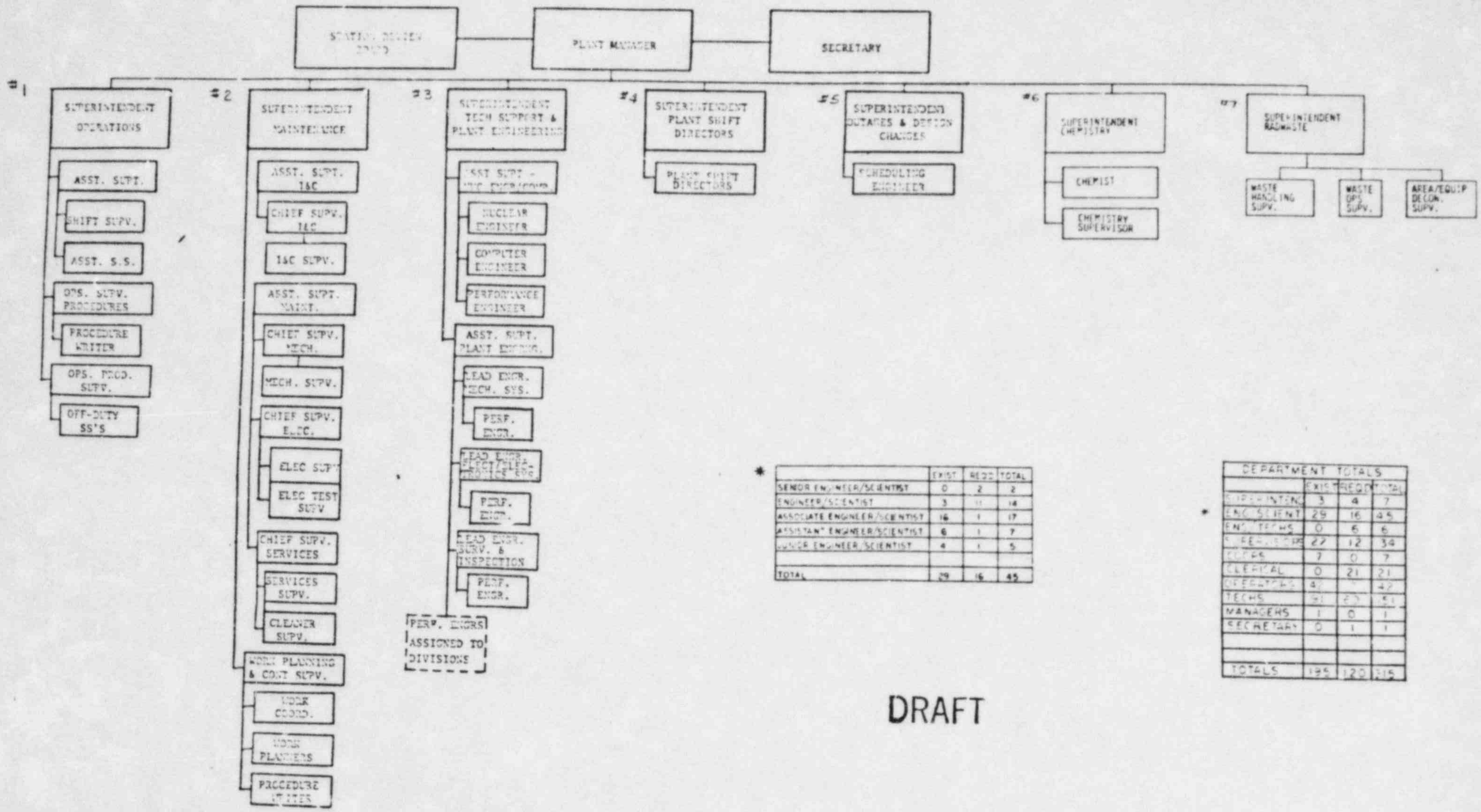
NUCLEAR PRODUCTION DEPARTMENT ORGANIZATION



*

	EXIST	REQ'D	TOTAL
SENIOR ENGINEER/SCIENTIST	0	2	2
ENGINEER/SCIENTIST	3	11	14
ASSOCIATE ENGINEER/SCIENTIST	16	1	17
ASSISTANT ENGINEER/SCIENTIST	6	1	7
JUNIOR ENGINEER/SCIENTIST	4	1	5
TOTAL	29	16	45

*

DEPARTMENT TOTALS			
	EXIST	REQ'D	TOTAL
SUPERINTEND	3	4	7
ENG/SCIENT	29	16	45
ENG/TECHS	0	6	6
SUPERVISORS	27	12	34
CO-OPS	7	0	7
CLERICAL	0	21	21
OPERATORS	42	[illegible]	42
TECHS	91	[illegible]	151
MANAGERS	1	0	1
SECRETARY	0	1	1
TOTALS	195	120	315

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#1	EXIST	REQ'D	TOTAL
SUPERINTENDENT	1	0	1
ENGINEERS	1	0	1
SUPERVISOR	8	6	14
CO-OP			
CLERICAL	0	6	6
OPERATORS	42	0	42
TOTALS	52	12	64

#2	EXIST	REQ'D	TOTAL
SUPERINTND	1	0	1
ENG/SCIENT	2	0	2
SUPERVISORS	12	3	15
CO-OP			
CLERICAL	0	6	6
TECHS	91	11	102
TOTALS	106	20	126

#3	EXIST	REQ'D	TOTAL
SUPERINTND	1	0	1
ENGINEERS	25	7	32
ENG TECHS	0	3	3
CO-OP	7	0	7
CLERICAL	0	3	3
TECHS			
TOTALS	33	13	46

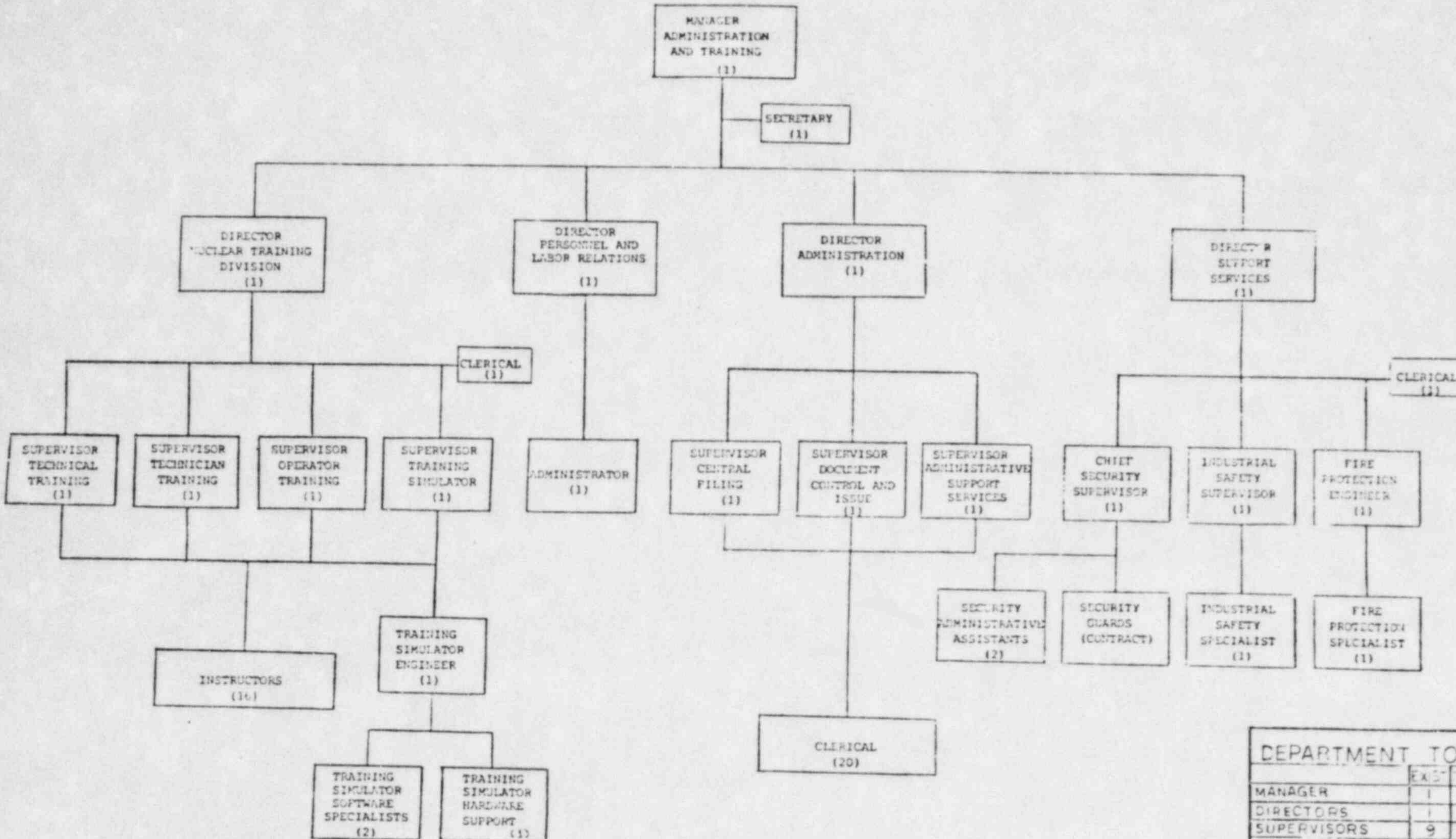
#4	EXIST	REQ'D	TOTAL
SUPERINTND	0	1	1
ENGINEERS	0	6	6
SUPERVISORS	0	0	0
CO-OP			
CLERICAL	0	1	1
TECHS			
TOTALS	0	7	7

#5	EXIST	REQ'D	TOTAL
SUPERINTND	0	1	1
ENGINEERS	0	1	1
ENG/TECHS	0	[illegible]	3
CO-OP			
CLERICAL	0	1	1
TECHS	—	—	—
TOTALS	0	6	6

#6	EXIST	REQ'D	TOTAL
SUPERINTND	0	1	1
ENGINEERS	1	2	3
SUPERVISORS	1	1	2
CO-OP			
CLERICAL	0	2	2
TECHS	0	14	14
TOTAL	2	20	22

#7	EXIST	REQ'D	TOTAL
SUPERINTND	0	1	1
ENGINEERS	–	–	–
SUPERVISORS	1	2	3
CLERICAL	0	2	2
TECHS	0	35	35
TOTAL	1	40	41

ADMINISTRATION AND TRAINING



DEPARTMENT TOTALS

	EXIST	REQ'D	TOTAL
MANAGER	1	0	1
DIRECTORS	1	3	4
SUPERVISORS	9	1	10
ENGINEERS *	0	2	2
TECHNICANS	7	16	23
CLERICAL	22	1	23
TOTAL	40	23	63

*	EXIST	REQ'D	TOTAL
ENG.	0	1	1
ASSOC.	0	1	1

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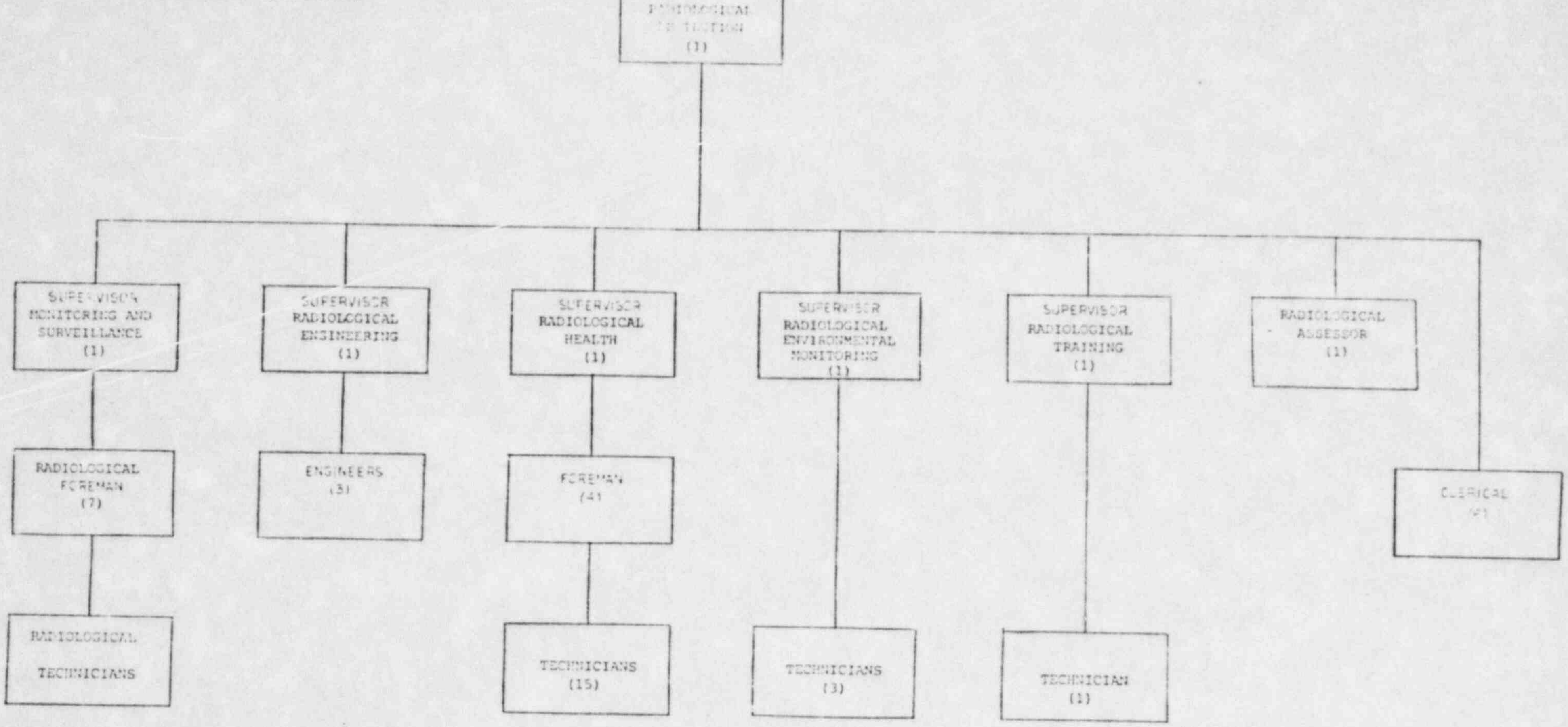
RADIOLOGICAL PROTECTION



RAD. PROT. DEPT. TTL.			
	EXT	[illegible]	TTL
[illegible]ECTOR	1	-	1
* [illegible]NG./SCIENT.	3	6	9
FOREMAN	1	10	11
CLERICAL	1	5	6
TECH.	26	15	41
TOTAL	32	36	68

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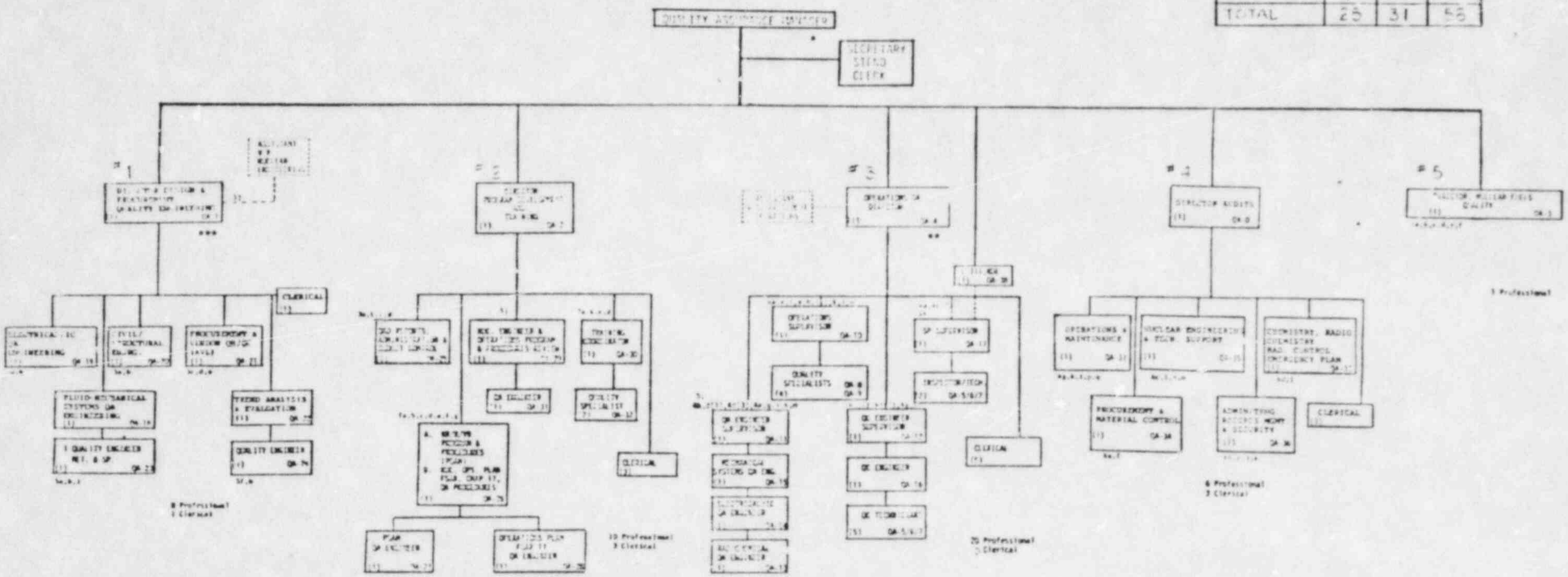
*

	EXIST	REQD	TOTAL
SENIOR	0	0	0
ENG./SCIENT.	2	4	6
ASSOC.	1	0	1
ASSIST.	2	2	2
JUNIOR	0	0	0

#1 THRU #5	EXIST.	REQD	TOTAL
DIRECTORS	[illegible]	2	5
QA ENGINEERS	15	12	27
QC ENGINEERS	2	0	2
ENGINEER	0	5	5
QC TECHNICIAN	4	2	6
CLERICAL	0	10	10
[illegible]	1	[illegible]	[illegible]
TOTAL	25	31	56



* MEMBER NSORB
** MEMBER SPB
*** MEMBER PALAB

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	EXIST	REQ'D	TOTAL
SENIOR	1	7	8
ENG.	2	8	10
ASSOC.	3	0	3
ASSIST.	11	2	13
TOTAL	17	17	34

#1	EXIST.	REQ'D	TOTAL
DIRECTOR	1	0	1
QA ENGINEERS	4	3	7
CLERICAL	0	1	1
TOTAL	5	4	9

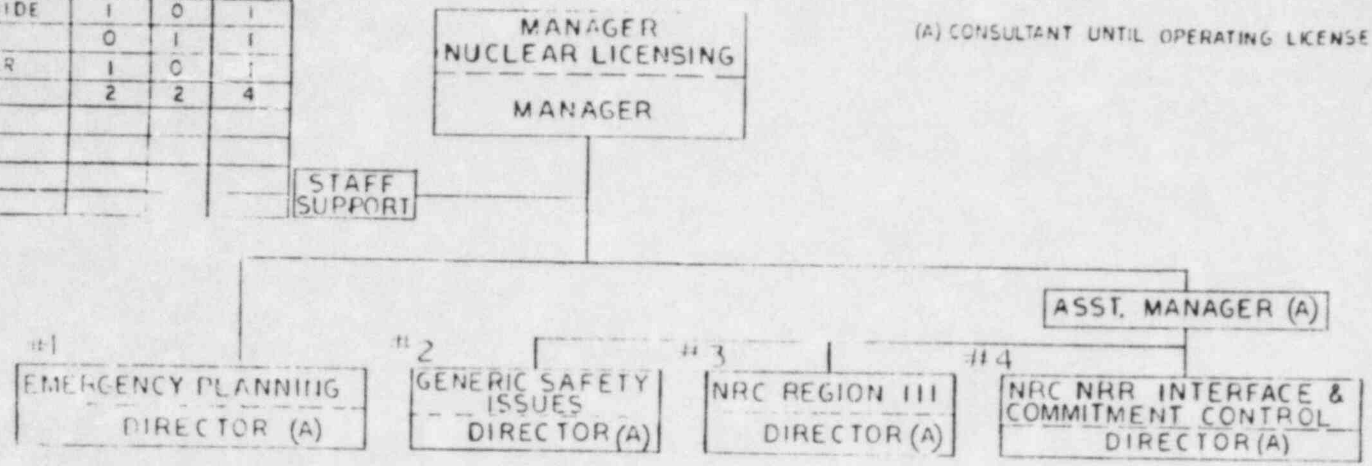
#2	EXIST.	REQ'D	TOTAL
DIRECTOR	[illegible]	[illegible]	[illegible]
QA ENGINEERS	6	3	9
CLERICAL	0	3	3
TOTAL	7	6	13

#3	EXIST.	REQD.	TOTAL
DIRECTOR	1	0	1
QA ENGINEERS	4	6	10
QC ENGINEERS	2	0	2
QC TECHNICIAN	4	2	6
CLERICAL	0	3	3
TOTAL	11	11	22

#4	EXIST.	REQD.	TOTAL
DIRECTOR	0	1	1
ENGINEERS	0	5	5
CLERICAL	0	[illegible]	3
TOTAL	0	9	9

#5	EXIST.	REQD	TOTAL
DIRECTOR	0	1	1
TOTAL	0	1	1

STAFF SUPPORT	CURR.	REQ	TOTAL
ENGINEERING AIDE	1	0	1
SECRETARY	0	1	1
STENOGRAPHER	1	0	1
CLERK	2	2	4



(A) CONSULTANT UNTIL OPERATING LICENSE ISSUANCE

DEPARTMENT TOTAL	EXIST	REQ'D	TOTAL
MANAGER	1	0	1
SR.LIC.(ENG'R.)	0	1	1
LIC.ENG'R.(ASSOC.)	4	6	10
LIC. SPEC.(ASSIST.)	2	0	2
ENGINEERING AIDE	1	0	1
SECRETARY	0	1	1
STENOGRAPHER	1	0	1
CLERK	2	2	4
	11	10	21

#1	CURR	REQ'D	TOTAL
LIC. ENG'R.	1	0	1
LIC. SPEC.	1	0	1

#2	CURR	REQ'D	TOTAL
LIC. ENG'R.	1	1	2

#3	CURR	REQ'D	TOTAL
SR.LIC.ENG'R.	0	1	1
LIC.ENG'R.	0	2	2
LIC. SPEC.	1	0	1

#4	CURR.	REQ'D.	TOTAL
LIC. ENG'R.	2	3	5

NOTES: 1. ADDITIONAL REQUIRED PERSONNEL DURING INITIAL LICENSING WILL BE COMPRISED OF CONSULTANT PERSONNEL.
2. AFTER INITIAL LICENSING, THE POSITIONS VACATED BY THE CONSULTANTS (DIRECTORS) WILL BE FILLED BY CG&E ENGINEERS

DRAFT

The American Society of Mechanical Engineers

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JUN 29 1983

QUALITY ASSURANCE DIVISION

CERTIFIED MAIL #P 35 6707253
RETURN RECEIPT REQUESTED

June 16, 1983

JMV

Mr. D. L. Howard, Dir., QA Prog.
H. J. Kaiser, Inc.
300 Lakeside Drive
Oakland, CA 94623

Subject: ASME Certificate of Authorization
NA & NPT (N-1436 & N-1437) at the
William H. Zimmer Nuclear Power
Station, Unit #1, Moscow, OH;
Exp. 6/25/85

Dear Mr. Howard:

Reference is made to the ASME Nuclear Audit conducted at the subject location on March 22-24, 1982. The purpose of the audit was to verify implementation of the corrective action required to resolve the findings noted in during the ASME site renewal audit conducted on March 22-24, 1982.

As a result of this latest audit, the following findings were noted:

(1) Procurement Document Control

Stamp on purchase orders specified as applicable "1971 ASME Section III and Summer 1973 addenda, paragraph NA-3766.4." Review of the referenced addenda revealed there was no NA-3766.4 in the 1971 ASME Section III through Summer 1973 addenda.

(a) CAR-180 was written relative to this error. The corrective action report states "NB-2130 does not require a certification of Section III, only a certification that the material meets the material specification (SA, SB or SFA) and the special requirements of that subarticle."

Actually, this quoted statement is not what is specified by NB-2130 in that NB-2130 includes . . .special requirements of the Article and NB-2600 which imposes the quality program requirements which are, in the opinion of the team, special requirements of Article NB-2000.

"The requirements of NA-3766.4 are over and above Zimmer commitments. This CAR shall serve as approval to delete this requirement. Future purchase orders will not reference it or the Procedure Specification Sheet."

(3)

Present purchase orders are being placed for SA, SB or SFA material specification compliance only without reference to ASME III or quality program requirements. There is identification at the top of the purchase order identifying item as "essential nuclear", but it is not a requirement imposed on the vendor. Also, at top of PO was reference to a Sargent and Lundy specification, but as best as could be determined it was for HJK information only and was not provided to the vendor.

Current purchase orders reviewed required CMTR's and the CMTR's identified with a quality program, most were ASME QSC Certificate Holders, but team concern is that the CAR-180 correction could result in acceptance of commercial SA, SB or SFA materials.

Disposition: The team considers this item to still be open with corrective action proposed decreasing requirements such that system would not assure Code compliance rather than establishing controls that would assure compliance.

(b) Accepted Vendor's List - Contrary to report of the March 1982 survey, HJK is not performing annual audits of all vendors and through the document review, some vendors that supplied materials have been located that documentation of survey to establish qualification could not be located. These vendors are being surveyed and, where possible, documented evidence of program in effect at time material was procured is being obtained to support use of materials procured.

These vendors are being added to the AVL with no requirement for subsequent audit based on lack of such a requirement in the Code of Record. Expiration date for use of vendor is listed as not applicable (NA) to show an audit is not required.

The above is stated as correction to statement in the March 1982 survey report and is not intended to indicate audits are required. The confusion was because the HJK Manual does include a requirement for annual audits on "HJK site subcontractors" doing procurement.

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During the review of surveys conducted of the vendors it was noted that survey reports for vendors surveyed by HJK QA personnel and a vendor surveyed by a consulting firm performing surveys for HJK were for the minimum requirements of NA-2600 only. Some vendors accepted based on survey report that documented survey for minimum areas required in NA-2600 and not for full program implementation.

For example, the survey report for a manufacturer of pipe and tubing stated calibration of tensile testing equipment as acceptable, "but requirements of NX-2600 are not applicable" since:

(1) no other mechanical tests are conducted;
(2) no Code NDE performed;
(3) no welding or repair welding;
(4) no heat treat coupon control required except for only P-1 less than 2 in. thick.

NX-2600 requires that material manufacturers shall document and maintain a Quality Assurance Program (see NA-4000). As a minimum, the program shall provide for the following as applicable with a list of program areas a through f.

Disposition: In opinion of team, the survey was incomplete in that it did not document review of a Quality Assurance program (NA-4000 as applicable). Based on report, the only program requirement was for calibration of selected equipment.

This is considered as an open item.

(2) Control of Construction Processes

(a) Welder performance qualification records were found with only "Bend-accept" on the form. Type of number of tests were not stated.

(1) Welders on site were requalified if records were suspect. Approximately 100 welders requalified.

(2) All welder performance qualification records have been reviewed and some records include deficiencies of various types which have been classified by HJK.

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In many instances, additional documentation in form of record previously submitted to the State of Ohio was located that included the number and type of bends to suport the Q 1C (QW-484) form that stated "bend accept" or "1 face accept". The "1 face accept" has been determined to mean 1 set of face bends.

Additionally, notarized certification statements have been obtained from weld engineers (on and off site, if located) involved in the welder qualification booth identifying the time of his involvement and stating he performed tests of type and quantity required by Code. Also, an overall statement is included by the senior welding engineer that the test performance was in accordance with the Code.

Current status is that volumes of data defining problems and proposed disposition have been prepared and are awaiting review and concurrence by the owner, State of Ohio, NRC and AIA.

Disposition: This item is still open.

(b) Non-Code valves were being installed in Code piping system. Design specification identified valves as non-Code - actually to "Trial Use and Comment Pump and Valve Code."

Line list identifies above valves as Class B - ASME Section III, Class 2.

Valves were purchased by G.E. on purchase order dated 6/24/71 and supplied to CG&E for supply to HJK for installation.

Valves are 8" and 10" valves on a Class 2 line. Records obtained from CG&E do not indicate valves are Code - actually, on index to records it is stated "Not a Code Item" beside Data Report requirement. Valves involved are 1E22F010, 11 and 23, and appear to be to Pump and Valve Code. Purchase order dated 6/24/71 predates inclusion of mandatory line valve requirements in ASME Section III.

(6)

Disposition: Team concern is that line list identifies valves as ASME III, Class 2. Design specification requirements need revision and ANI must be aware of deviation from Class 2 requirements when N-5 Data Report is signed for the system.

Also, during review it was determined that HJK had not located the particular valves in question, but had written NR-E8824 on some 1" valves where Class 3 valves had been installed in a Class 2 system. These are dispositioned for "cut out and replacement", but action has not been performed to date.

This item is still open.

(3) Examinations, Test and Inspections

NDE reports did not include level of the NDE examiner as required by Code.

NR-5859 identifies NDE reports for which examiner level is not included. Additional list of 25 persons is to be added to the list.

Documentation to support qualifications of some persons has been received, but many are still outstanding. HJK is collecting supporting data for each person determined to have signed the NDE reports.

This subject will be discussed at the next meeting of the ASME Subcommittee on Nuclear Accreditation (SC-NA). You and/or your representatives are invited to attend this meeting to express your views and show cause as to why your Certificates of Authorization and Code Symbol Stamps should not be returned to the Society prior to the Subcommittee's decision.

You will be informed of the exact date, time and meeting location within the next ten (10) days. The hearing will be held whether or not you attend. Please notify this office by July 13, 1983 if you intend to have representatives present including their names and titles.

Since it will be to your advantage for the Subcommittee to have any written information prior to their discussion, you may wish to have such additional information delivered to the attention of the writer prior to July 13, 1983.

Sincerely,

C. J. Gomez

C. J. Gomez
Project Engineering Administrator
ASME Accreditation Department
(212) 705-7646

cc: AIA - Hartford Steam Boiler
Manfred L. Goedecke, HJK
Chmn. SC-NA

The American Society of Mechanical Engineers

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June 21, 1983

Mr. D. L. Howard, Dir. QA Prog.
Henry J. Kaiser, Inc.
300 Lakeside Drive
Oakland, CA 94623

Subject: ASME Certificates of Authorization
NA & NPT (N-1436 & N-1437) at the
William H. Zimmer Nuclear Power
Station, Unit #1, Moscow, OH;
Exp. 6/25/85

Dear Mr. Howard:

Reference is made to our letter of June 16, 1983. The hearing referred to in our referenced letter will begin at 2:00 P.M. at the following location:

Mezzanine 8
The Drake, Chicago
Lake Shore Drive & Upper Michigan Ave.
Chicago, IL 60611
(312) 787-2200

If you have any questions, please let us know.

Sincerely,

C. J. Gomez
Project Engineering Administrator
ASME Accreditation Department
(212) 705-7646

CJG:lin

CJG:lin

cc: AIA - Hartford Steam Boiler
Chmn, SC-NA

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