

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

April 13, 1983

LOZ-83-0017

E. A. BORGMANN
SENIOR VICE PRESIDENT

Docket No. 50-358

U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Attention: Mr. J.G. Keppler
Regional Administrator

Gentlemen:

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT 1
10CFR50.55(e), ITEM M-61, FIRE PROTECTION PIPING
SUSPENDED FROM ESSENTIAL CABLE TRAY HANGERS
W.O. 57300, JOB E-5590, FILE NO. 956C, M-61

This letter constitutes an interim report concerning the subject condition initially reported to the Commission on October 13, 1982 as a potentially reportable deficiency under the requirements of 10CFR50.55(e). Our review of this item is complete and it has been determined to be a reportable design deficiency under 10CFR50.55(e).

As stated in our previous report, QA-2257, dated February 11, 1983, Grinnell Fire Protection Systems Company of Providence, RI, contractor for the Fire Protection (FP) system piping, originally installed the FP piping in the Cable Spreading Room as non-seismic. In September, 1977, the FP piping design was revised to require the piping to be seismically supported with appropriate quality controls applied to the installation.

System modifications included rerouting of the FP piping to provide seismic support from essential cable tray hangers. The scope of the original Grinnell contract did not require a quality assurance program, therefore, Grinnell installed the rerouted piping with temporary supports. Several Design Documents Changes (DDC's) were generated to require the principal constructor, H.J. Kaiser Company (HJK) to add the necessary FP piping supports to the cable tray hangers. These FP piping support DDC's were classified "non-essential", and documentation is not available to indicate that the modifications were subjected to a design review by Sargent & Lundy Engineers (S&L).

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In response to CG&E Corrective Action Request (CAR) 82-80, S&L stated that at the time the FP piping design was revised to be non-essential, seismically supported, retention of design support documentation was not a requirement for low energy Class D pipe under the S&L QA program.

S&L conducted a walkdown of the FP piping in 1981 and performed calculations in accordance with the S&L Simplified Dynamic Analysis (SDA) procedures. Sheets 20, 21, 24 and 25 of design drawing M-426 were reissued showing the as-built conditions and details of the FP piping and supports. Structural analysis of the cable tray hangers supporting the FP piping identified the need for bracing of existing cable tray hangers to accommodate the additional seismic loads, and DDC SLE-532 was issued to accomplish these modifications. These modifications have been partially incorporated and will be completed through the normal construction and inspection process following the lifting of the NRC November 12, 1982 "Order to Show Cause and Order Immediately Suspending Construction". A follow-up report will be submitted by July 31, 1983.

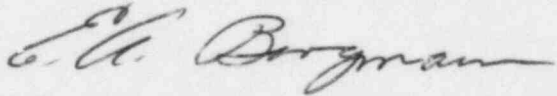
CG&E has performed an audit of the current S&L design control process and has determined that their present QA program is adequate for preventing a recurrence of this deficiency. The S&L system classification criteria now requires documentation of a design review for all seismically designed non-essential piping systems and the retention of this documentation.

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

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E.A. BORGMANN
SENIOR VICE PRESIDENT

FKP/DJS/RNT/cse

cc: NRC Office of Inspection & Enforcement
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