



**TORREY PINES TECHNOLOGY**

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A Division of **GA Technologies Inc.**

September 12, 1983  
Project 2474  
TPT:CG&E:023

Mr. J. Williams, Jr.  
Senior Vice President  
Cincinnati Gas and Electric Company  
139 East Fourth Street  
Cincinnati, Ohio 45202

Reference: Letter, J. Williams, Jr. to A. J. Neylan,  
JW-SC-0085, August 30, 1983.

Dear Mr. Williams:

In TPT's view, the recommended Zimmer Independent Design Review should be conducted in a manner such that the review would provide adequate data for a defensible conclusion that the design of all safety-related systems is (or, is not) acceptable and in compliance with design criteria and regulatory requirements.

There are two ways, in TPT's view, that such a review could be conducted, viz.

- 1) In a "top down" manner as typically performed by TPT in independent design reviews of other nuclear projects. In such a review, the overall design process is first examined to check its adequacy. Next, the implementation of the design process is assessed by checking a sample of the "paperwork." Finally, a technical assessment of a relatively small representative sample of the design work is performed. The final conclusion on adequacy is then based on the results of these three tasks.

or

- 2) In a "bottom up" manner as typically performed by other organizations on other nuclear projects. In such a review, a technical assessment is performed of a statistically significant sample of the design work. (This would probably require sampling from more than one typical safety-related system.) Depending on the results from the initial assessment, the sample may be enlarged based on standard statistical sampling rules.

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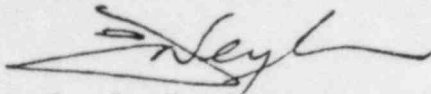
Mr. J. Williams, Jr.

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On the second point in your letter, we concur that the design verification be conducted in parallel with the verification of the quality of construction. Of course, depending on the results of the design review, there is some risk of rework.

Sincerely,

A handwritten signature in dark ink, appearing to read "A. J. Neylan", with a stylized flourish extending from the end.

A. J. Neylan  
Project Manager

Copy: Mr. J. G. Keppler - NRC - Region III