

THE CINCINNATI GAS & ELECTRIC COMPANY



January 10, 1984  
LOZ-83-0263

J. WILLIAMS, JR.  
SENIOR VICE PRESIDENT  
NUCLEAR OPERATIONS

Docket No. 50-358

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

Attention: Mr. J.G. Keppler  
Regional Administrator

Gentlemen:

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT 1  
10CFR50.55(e), ITEM E-53, 4.16KV SWITCHGEAR  
WIRING DIAGRAM DISCREPANCIES  
W.O. 52300, JOB E-5590, FILE NO. 956C, E-53

PRINCIPAL STAFF			
✓ VRA	✓ DE	✓ DRMP	
✓ VRA		✓ DRMS	
		✓ DRMA	
✓ TO		✓ SCS	
✓ SA		✓ AL	
✓ GF		✓ File	

This letter constitutes a final report concerning the subject condition initially reported to the Commission on September 22, 1983 as a potentially reportable deficiency under 10CFR50.55(e). CG&E has since determined that the condition is not reportable.

Our last response, LOZ-83-0185, of October 10, 1983 advised that the subject conditions were identified in nonconformance reports years ago and were being reviewed as part of the Quality Confirmation Program.

CG&E has completed a review of historic design documents. Although wiring deficiencies did exist, they were not of a significant nature and would not have adversely affected safe operation of the plant. A detailed evaluation of the 70 deficiencies identified in our last report follows:

- (a) Twenty (20) of the deficiencies were due to incomplete construction. Design changes were made to the connection diagrams after the switchgear was shipped from the factory. These changes were not accomplished in the field prior to construction testing. The design changes gave directions to field construction staff to remove, add, change nameplates or modify installation of devices and/or connections, etc. in the switchgear. These changes were forwarded to field staff when there was not enough time for them to be incorporated into the switchgear at the factory prior to its shipment to the plant. The

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changes requested by these directions were not of safety significance and did not impact the safety of plant operation.

- (b) Thirty-two (32) deficiencies were due to minor disagreements between physical wiring and the schematic or connection diagrams. These wiring errors apparently occurred during fabrication. In each case the schematic and connection diagrams were correct. These discrepancies were discovered during the CG&E standard procedure of conducting a point to point wiring check of switchgear wiring against the current schematic and connection diagrams. The errors were of a minor nature and did not represent a significant deficiency in fabrication or construction which required extensive evaluation, redesign or repair. In many cases the physical wiring in the switchgear, although deviating from the connection diagrams, was electrically equivalent and had no impact on the design or operation of the switchgear or its protection systems.
- (c) Nine (9) discrepancies resulted due to the ground wire used for connecting instruments, relays, and CT's to the switchgear ground bus, not being upgraded from #14 AWG to #12 AWG by construction before the equipment was turned over for testing. In all cases, connection diagrams reflected a note for the field to verify if the larger size conductors were actually provided in switchgear. Operation of the switchgear devices with #14 AWG connections to the switchgear ground bus would not have degraded plant safety.
- (d) Six (6) discrepancies resulted from drafting errors involving mislabeling, and inconsistencies between connection diagrams and schematic drawings. In all cases, one or the other document, and physical wiring in the switchgear were correct. These errors did not affect system and plant operation in any way. Therefore, safety of the plant was not affected.

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- (e) Two (2) discrepancies were due to breakage of devices during shipment, erection or after system turn over. In each case new replacement components were directed to be installed. Equipment breakage during plant construction is detected during surveillance and system walk downs and defective and/or broken devices are replaced by new devices prior to pre-operational tests. The equipment breakage identified here does not represent significant damage to a structure, system or component which required extensive evaluation, redesign or repair to meet the design basis and therefore is not reportable.
- (f) One (1) discrepancy was an auxiliary relay contact that did not close consistently when tested at 3V dc. This auxiliary relay was specified and correctly rated to operate at 125V dc. Application of only 3V to the coil did not develop adequate ampere turns to operate the relay successfully. The relay operated satisfactorily when operated at the rated voltage. Since the relay operates satisfactorily when operated at the rated voltage, this, in fact, is no discrepancy at all.

All these discrepancies were observed against drawings issued in 1976-77. All these discrepancies were resolved and the changes to the documents and to the switchgear were completed in 1976-77.

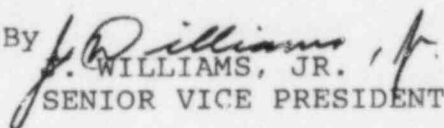
In summary, although wiring deficiencies did exist, they were not of a significant nature, would not have adversely affected safe operation of the plant, and are therefore not reportable under 10CFR50.55(e).

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

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By  J. WILLIAMS, JR.  
SENIOR VICE PRESIDENT

DJS/sfr

cc: NRC Office of Inspection & Enforcement  
Washington, D.C. 20555  
NRC Resident Site Supervisor  
ATTN: W.M. Hill  
NRC Zimmer Project Inspector, Region III  
ATTN: E. R. Schweibinz