

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

October 7, 1983
LOZ-83-0174

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 Q-11, FAILURE TO IMPLEMENT
THE QA PROGRAM CORRECTIVE ACTION REPORTING
SYSTEM
W.O. 57300, JOB E-5590, FILE NO. 956C, Q-11

This letter constitutes an interim report concerning the subject condition initially reported to the Commission on September 7, 1983 as a potentially reportable deficiency under the requirements of 10CFR50.55(e). CG&E has determined that this condition represents a reportable deficiency under 10CFR50.55(e).

CG&E Management Corrective Action Request (MCAR) 83-13, issued September 7, 1983, identified instances where Condition Evaluation Requests (CER's) and Corrective Action Requests (CAR's) were closed prior to the completion of or verification of corrective action. In accordance with OPP 7.3, site personnel are required to report administrative or procedural deficiencies which are adverse to quality to the Quality Assurance Department through the CER system. The discipline QA engineer is then required to review the CER to determine what further action, if any, is necessary. If action is necessary, the condition is required to be documented on a CAR and issued to the responsible organization for corrective action.

The cause of this condition is considered two-fold: governing and implementing procedures have been found to be insufficient to encompass the entire range of conditions which may be presented, and training of QA engineers to these procedures has been found to be inadequate. In many cases in the past, QA engineers closed CER's based on the initiation of a CAR; however, the CAR was cancelled during the management review and approval process. Since the procedures did not contain provisions for the cancellation of CAR's, the closing of the applicable CER's was not programmatically justifiable.

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To resolve this deficiency, QAD has restructured its organization by the establishment of a CAR/Trending Group. This organization is responsible to assure timely close-out and trending of corrective action documents, and is independent of the QA Engineering Organization.

In addition, the response to MCAR 83-13 documenting the condition has been completed and is being evaluated for acceptability. The response outlines:

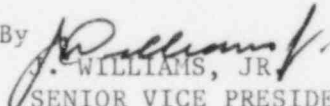
- 1.) A reverification program of CER's, CAR's, and MCAR's.
- 2.) Revisions to governing and implementing procedures to encompass the entire range of conditions identified on CER's.
- 3.) Training of QAD personnel to the governing and implementing procedure revisions.
- 4.) Development of a corrective action program in accordance with FSAR Chapter 17.1, Revision 91.

The evaluation of the response to MCAR 83-13 should be complete and approved by October 31, 1983. A follow-up report detailing the corrective actions to be taken along with a completion schedule will be submitted by November 30, 1983.

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 
J. WILLIAMS, JR.
SENIOR VICE PRESIDENT

DJS/sfr

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