

THE CINCINNATI GAS & ELECTRIC COMPANY



November 29, 1983
LOZ-83-0238

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
CG&E COURSE OF ACTION
W.O. 57300, JOB E-5590, FILE NO. 956C,

PRINCIPAL STAFF			
✓	has	OPRP	
D/RA		DE	
A/RA		DMSP	
RC		ORMA	
PAO		SCS	aug 73 ✓
SGA		IL	has
ENF		File	

This supplements my letter of November 21, 1983 and provides further responses to questions contained in your letter dated November 15, 1983. Attached are responses to NRC Questions 16 and 17, and a supplemental response to NRC Question 2. Please note that these responses do not reflect the replacement of H.J. Kaiser with the Bechtel Power Corporation as Constructor. This change will significantly reduce the Kaiser supervision from that shown in these responses.

In addition, some copies of the previous response did not contain our responses to NRC questions 23 and 24. Additional copies of these responses are also attached.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By *J. Williams, Jr.*
J. WILLIAMS JR.
SENIOR VICE PRESIDENT

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Mr. J.G. Keppler
Regional Administrator
November 29, 1983
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cc: NRC Office of Inspection & Enforcement
Washington, D.C. 20555
NRC Resident Site Supervisor
ATTN: W.M. Hill, Jr.
NRC Zimmer Project Inspector, Region III
ATTN: E. R. Schweibinz
NRC Office of Nuclear Reactor Regulation
ATTN: D.G. Eisenhut
L.L. Kintner
NRC Office of the Executive Legal Director
ATTN: Jim Lieberman

RESPONSES TO NRC-COA QUESTIONS - ROUND 2

ENCLOSURE 1

Question 2: There is a need for CG&E to have a formalized methodology to determine validity of documents which may be used to justify adequacy of SSCs. Describe the key elements of your methodology.

Response: The details of a formalized methodology to determine validity of purchase order, installation and other quality documents which may be used to justify adequacy of SSCs are described in implementing procedures and instructions (e.g. PVQC Procedures and Quality Verification Instructions and checklists.) In summary this methodology consists of first identifying the quality documents required, reviewing their function or purpose, and determining the specific requirements of the applicable design specifications, regulatory codes, and project commitments. These requirements are documented on detailed checklists prepared in accordance with project procedures. Then the project quality documents are reviewed to determine if these requirements are included and if the information provided on the document is valid. This process is accomplished by:

- 1) Determining if the procedures for preparing the document were followed.
- 2) Determining if the individuals performing the work and the individuals inspecting the work were properly qualified and/or certified.
- 3) Determining if the required information is provided and is correct and properly supported.
- 4) Comparing the document to the as-constructed condition through visual and physical inspection to verify its accuracy.

The following is a typical example of document reviews that may take place to check the adequacy of a valve or an instrument. The document reviews would typically consist of three major steps as follows:

I. Pre-Purchased Document Review

The document reviewers would check the purchase order to assure that the design specifications and regulatory and code requirements were detailed in the purchase order to the vendor.

A review is made to assure that QA requirements are provided for in the purchase order. These QA requirements typically include provisions for the vendor to 1) qualify their sub-suppliers, 2) specify the records required of the vendor (such as data sheets, performance curves, CMTRs, code data sheets,

shipping and storage requirements, etc.) and 3) properly document nonconformances and/or purchase order exceptions. Any special shipping requirements, record retention requirements, and document review approval by the vendor will be reviewed for inclusion in the purchase order if required by specification or code. Any source inspection or audit requirements will be reviewed for inclusion in the purchase order. Past Zimmer problems from audit reports, NCR inspection reports, etc., are also reviewed to identify any additional requirements.

Once the requirements are identified, they are incorporated into the QV checklists, which will be utilized for the detailed review and verification of the receiving and installation documentation.

Provisions in the purchase order for documents, such as specifications, that are to be sent to the vendor, will be reviewed. The approved vendors list (AVL) will be checked to assure the vendor was qualified to supply material during that time period.

II. Receiving Documentation

The receiving documentation review includes jobsite receiving reports, documentation from vendors, and source inspection reports (when required).

Receiving reports (MRRs) will be reviewed according to the checklist to assure the quality-related aspects of the document are properly completed for such things as quantity and description of material received. In addition, receipt inspection reports are reviewed to assure that the form 1) is adequate for the purpose intended, 2) is properly completed (noting exceptions as required), 3) properly identifies the material, 4) identifies the required documents, and 5) is traceable to the material. In addition these receipt inspection reports will be reviewed to assure that configuration checks, which are required to be performed upon receipt, were actually made, proper storage was provided, and nonconformance or discrepancies were identified.

Documentation from the vendor is reviewed according to the checklist to assure that it meets the purchase order requirements. A review of the documents will be made to assure that the required technical or purchase order forms are included. Also, source inspection releases, if required by the P.O., will be reviewed. Where concern exists that documentation may have been falsified, additional checks against vendor retained data and the results of visual and physical tests, will be made.

Finally, the source inspection reports, and audit and shop releases will be technically reviewed for adequacy.

III. Storage, Maintenance, and Installation Documents

As part of a separate review, storage and maintenance documents for safety-related SSCs will be reviewed against pre-defined checklists to assure that these SSCs meet vendor and design specifications.

Installation documents will also be reviewed against pre-defined checklists. The inspection documents will be reviewed to assure the forms are adequate for the purpose intended. The data on the document will be reviewed to assure that required inspections have been made, hold points have been verified, cleanliness requirements have been met, special processes have been performed (such as non-destructive examinations), inspectors have been certified and craftsmen have been qualified (when required), and nonconforming items have been documented. Where concern exists that documentation may have been falsified, additional checks against vendor retained data and the results of visual and physical tests, will be made.

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16. Mr. Dickhoner's COA transmittal letter states approval of a substantial increase, approximately doubling the staffing, in the number of CG&E people assigned to the accomplishment of the work which lies ahead. Provide an organization chart which indicates where the old and new CG&E personnel are or will be assigned.

Organization charts providing the response to this question are attached.

CG&E ORGANIZATION

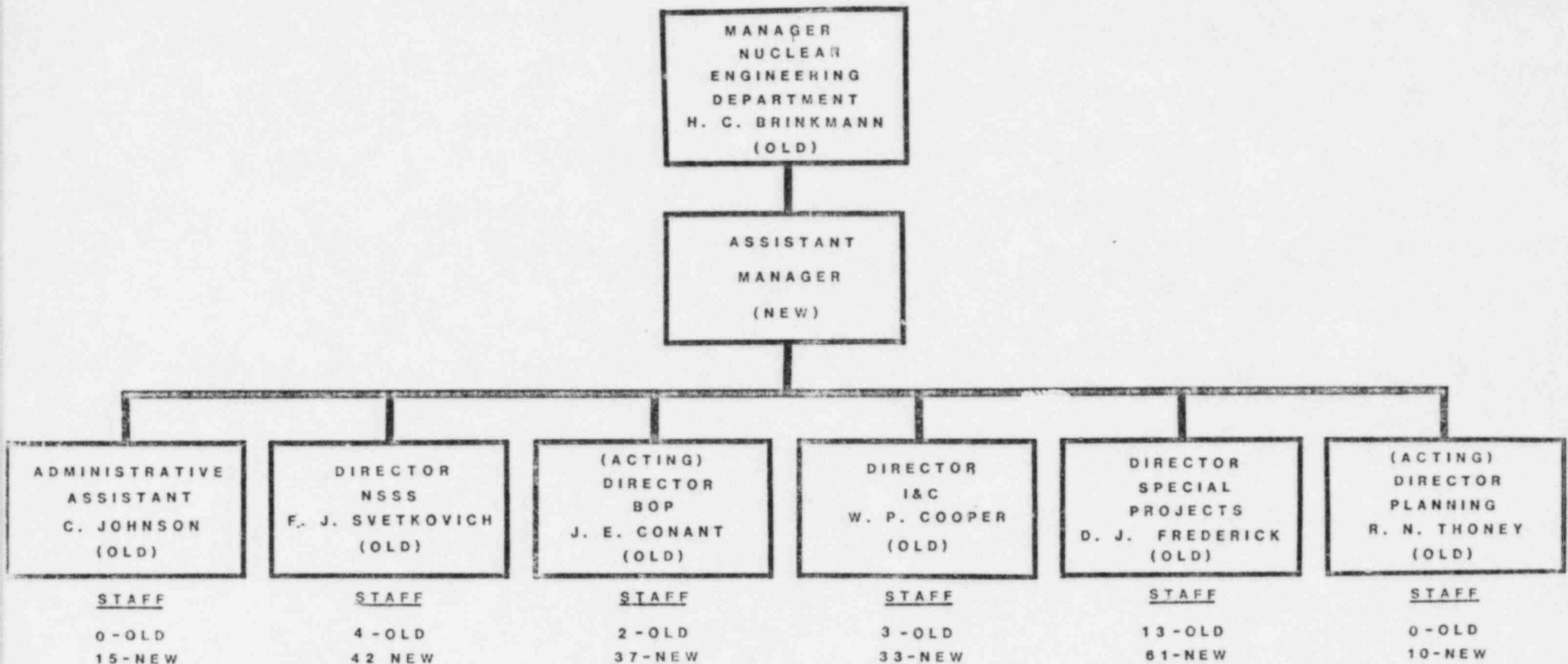
FOR THE ZIMMER PROJECT



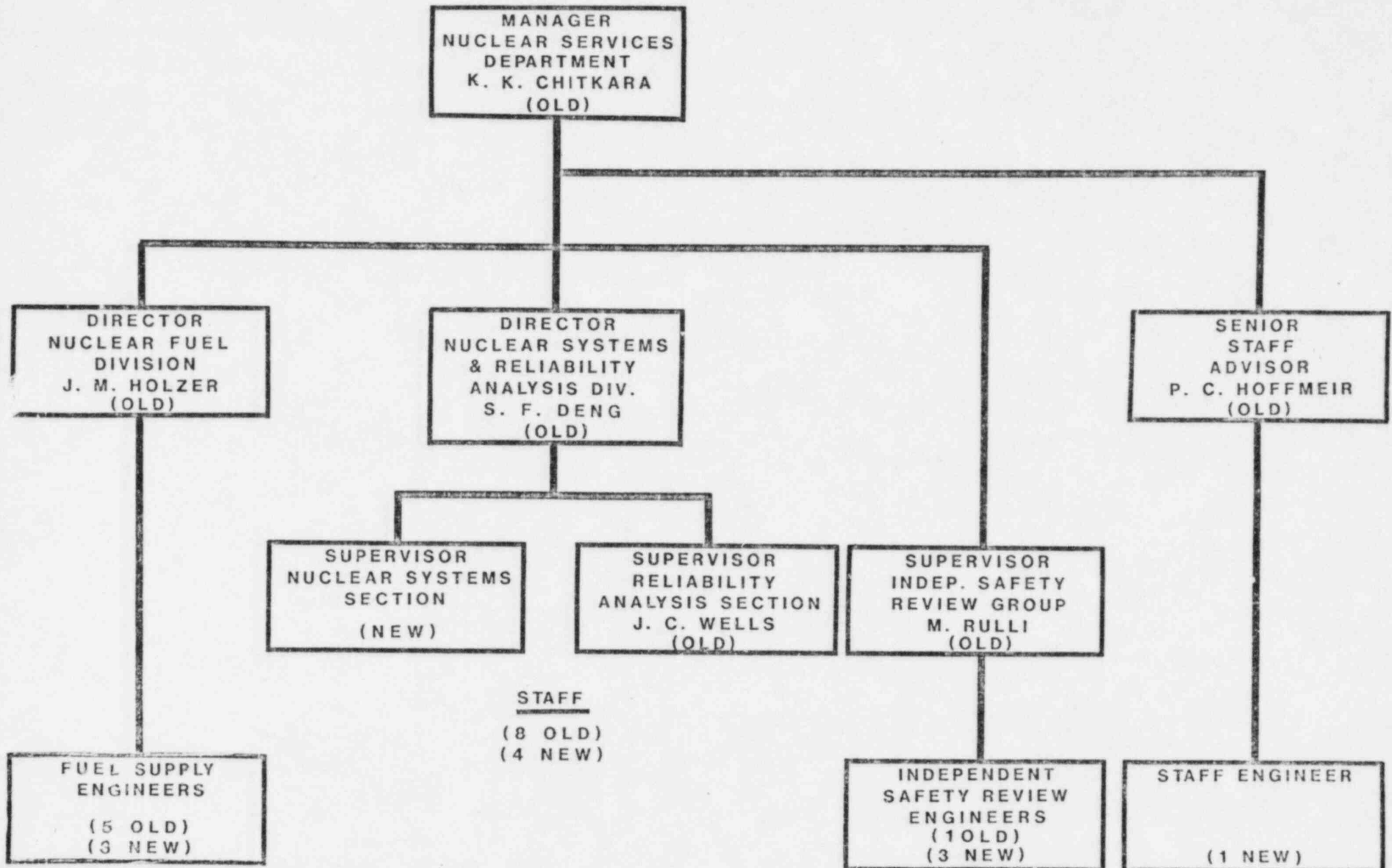
*SECONDED

APPENDIX A

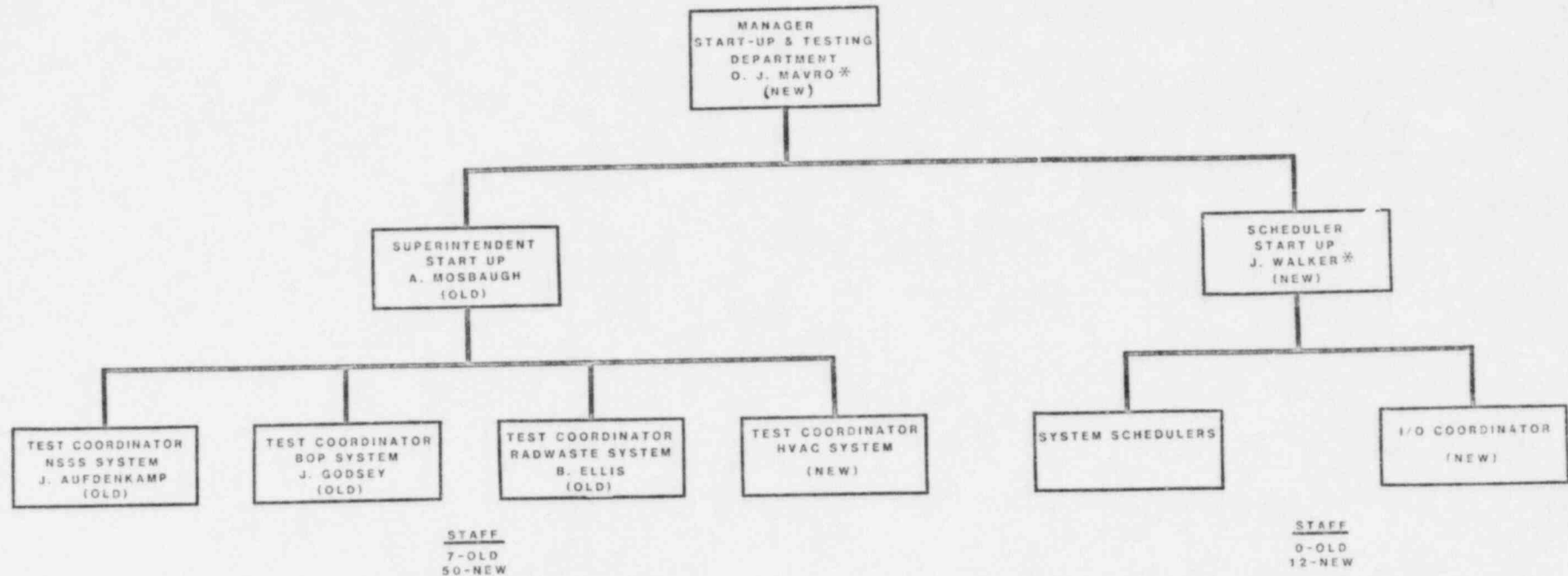
NUCLEAR ENGINEERING DEPARTMENT



NUCLEAR SERVICES DEPARTMENT



START-UP & TESTING DEPARTMENT



* SECONDED

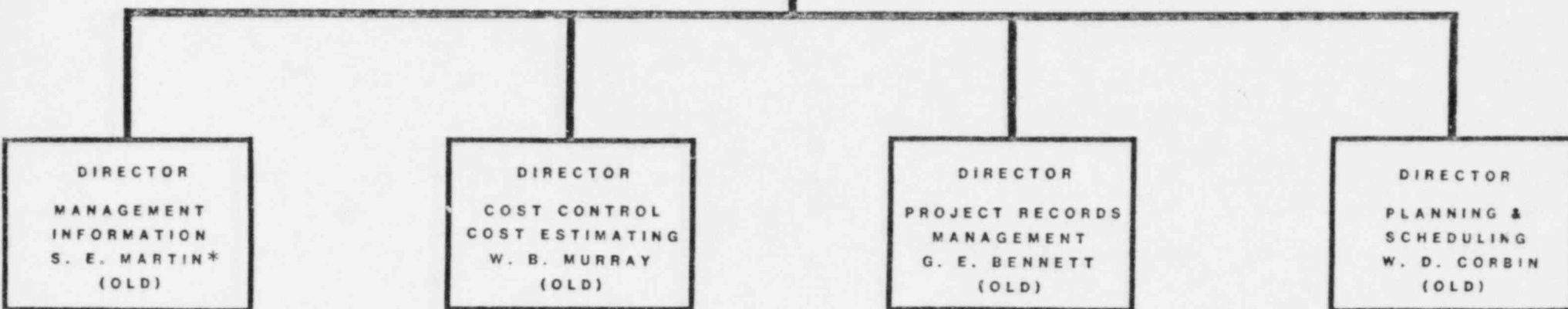
APPENDIX A

NUCLEAR PROJECT CONTROLS DEPARTMENT

MANAGER
NUCLEAR PROJECT
CONTROLS
DEPARTMENT
B. K. CULVER
(OLD)

STAFF
ADMINISTRATOR
E. ROLF
(OLD)

ASSISTANT TO
THE MANAGER
A. HORNICK*
(NEW)



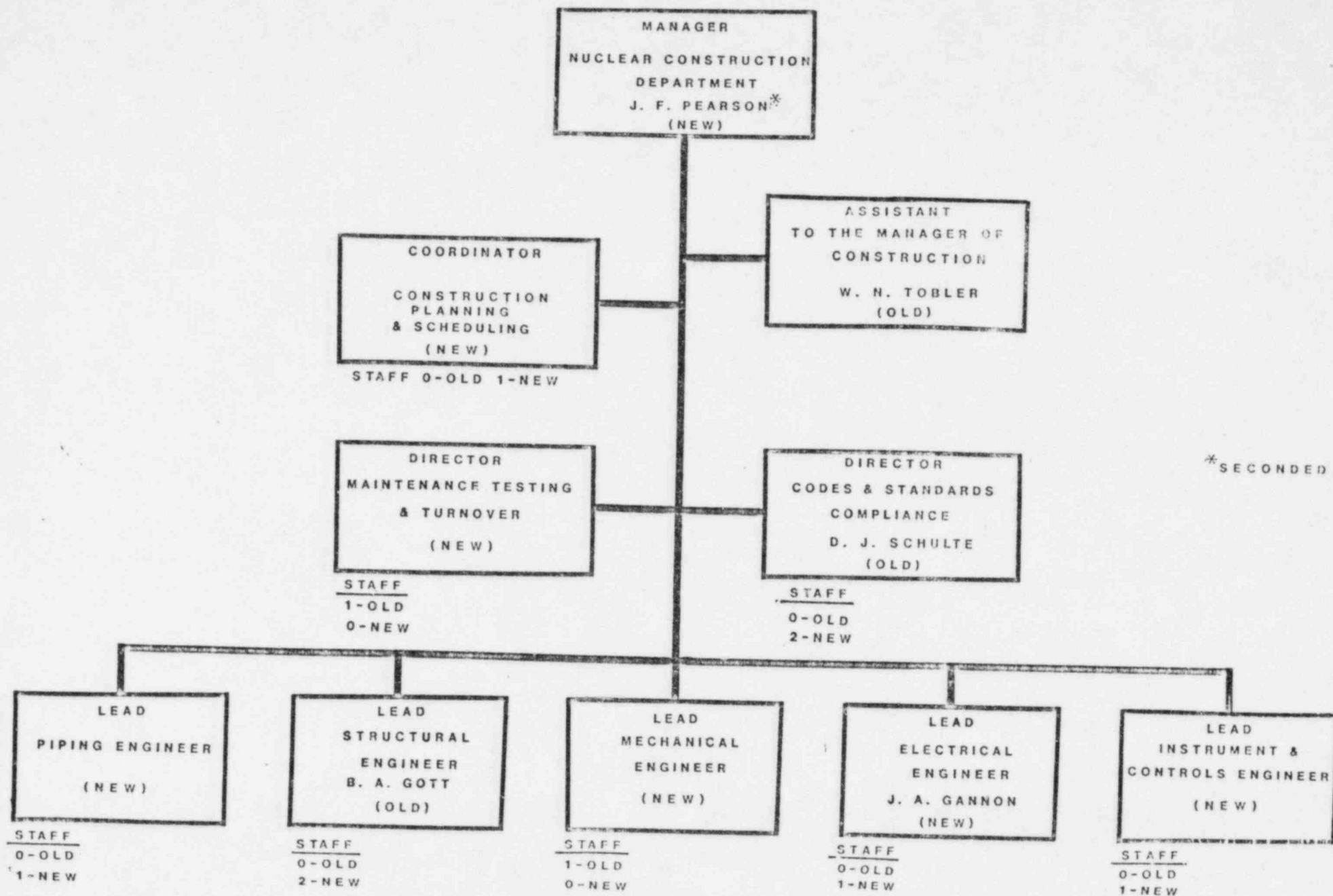
STAFF
3-OLD
0-NEW

STAFF
3-OLD
0-NEW

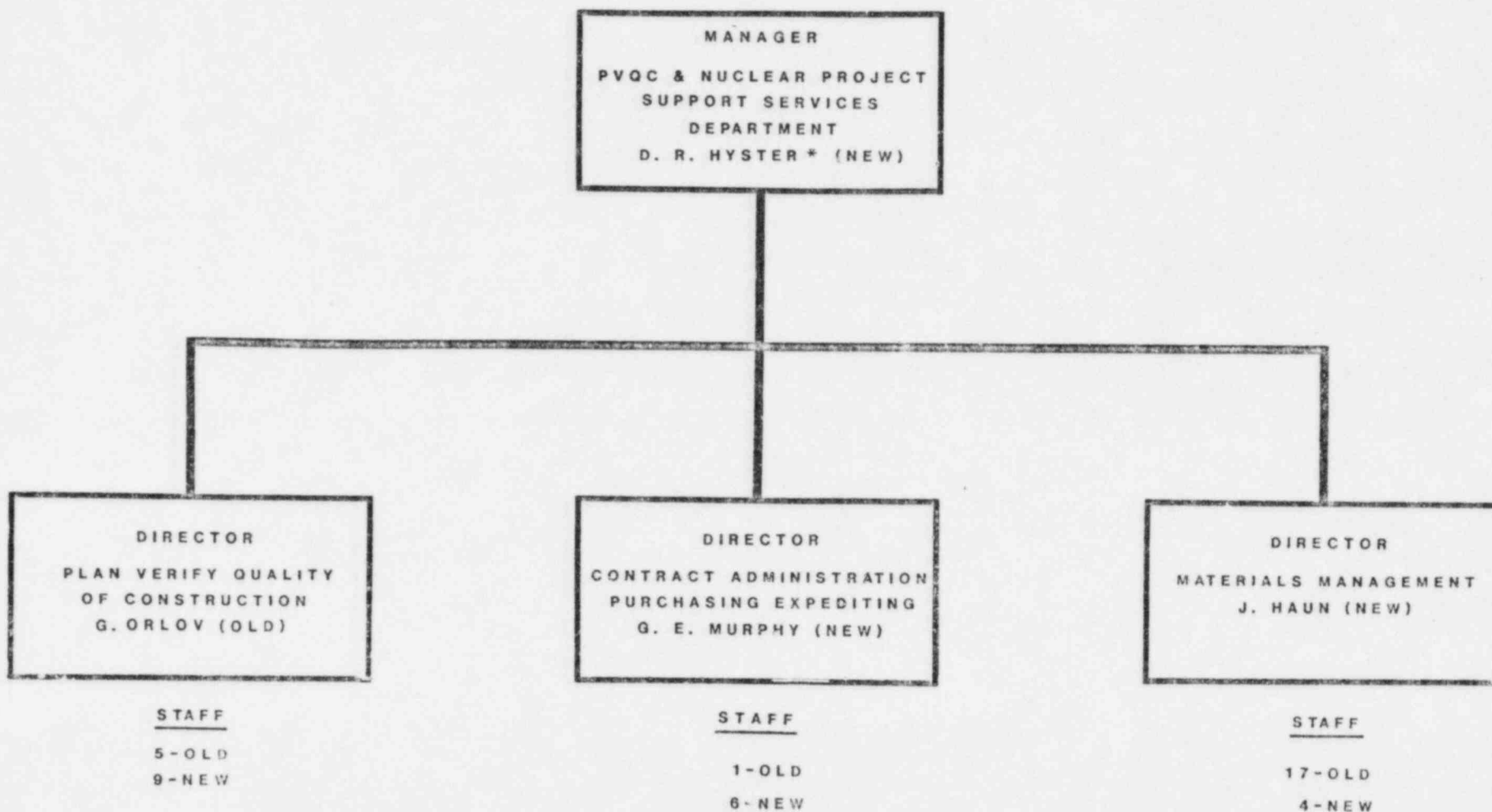
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STAFF
0-OLD
1-NEW

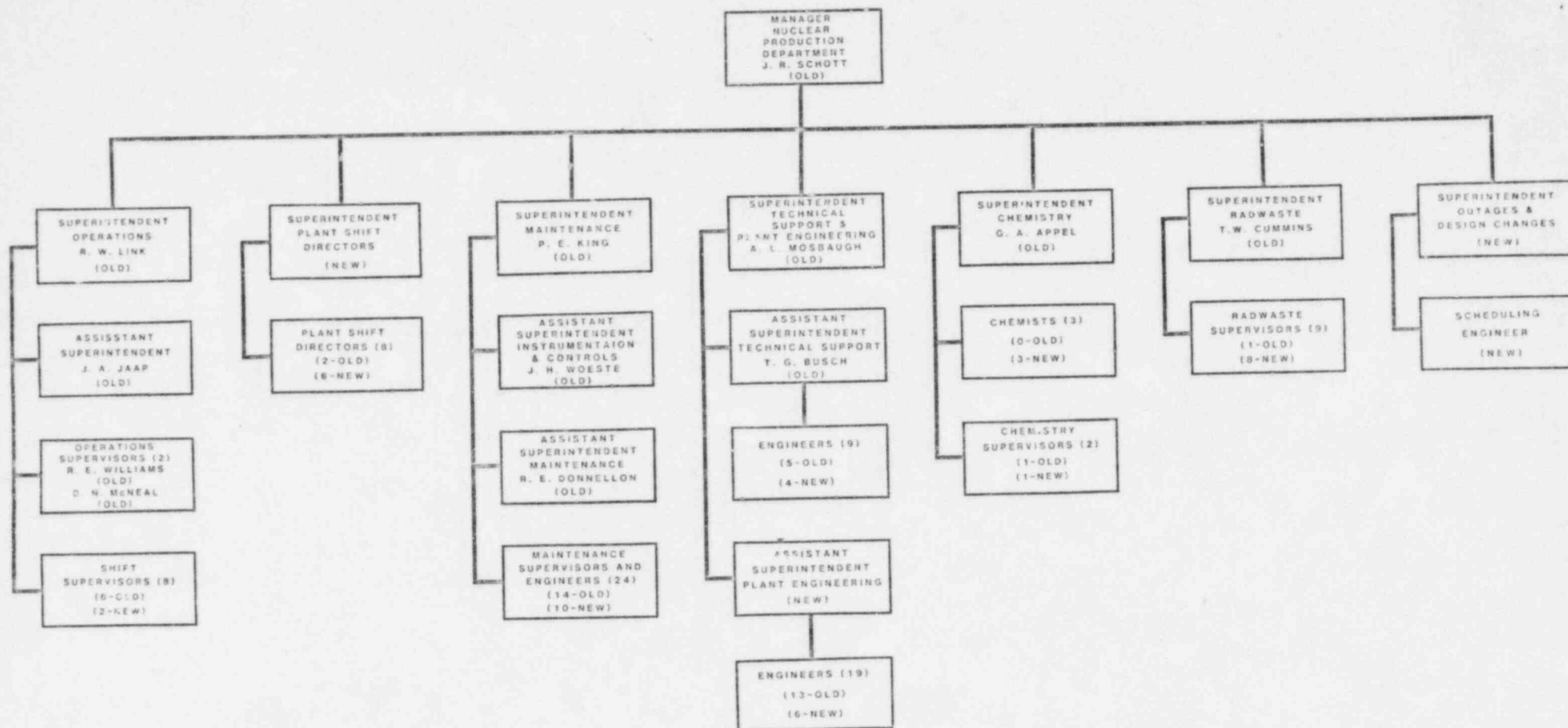
NUCLEAR CONSTRUCTION DEPARTMENT



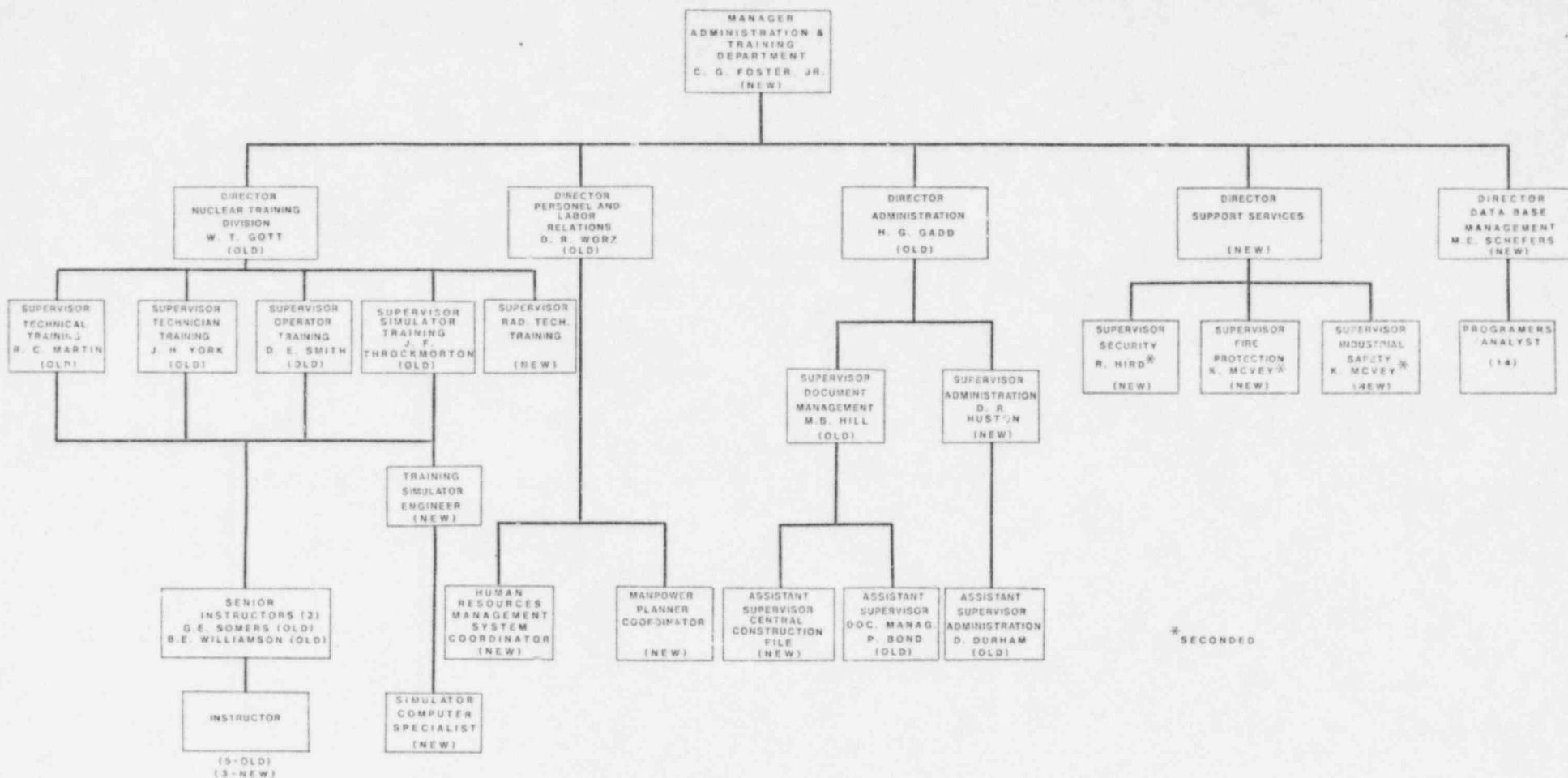
PVQC & NUCLEAR PROJECT SUPPORT SERVICES DEPARTMENT



NUCLEAR PRODUCTION DEPARTMENT

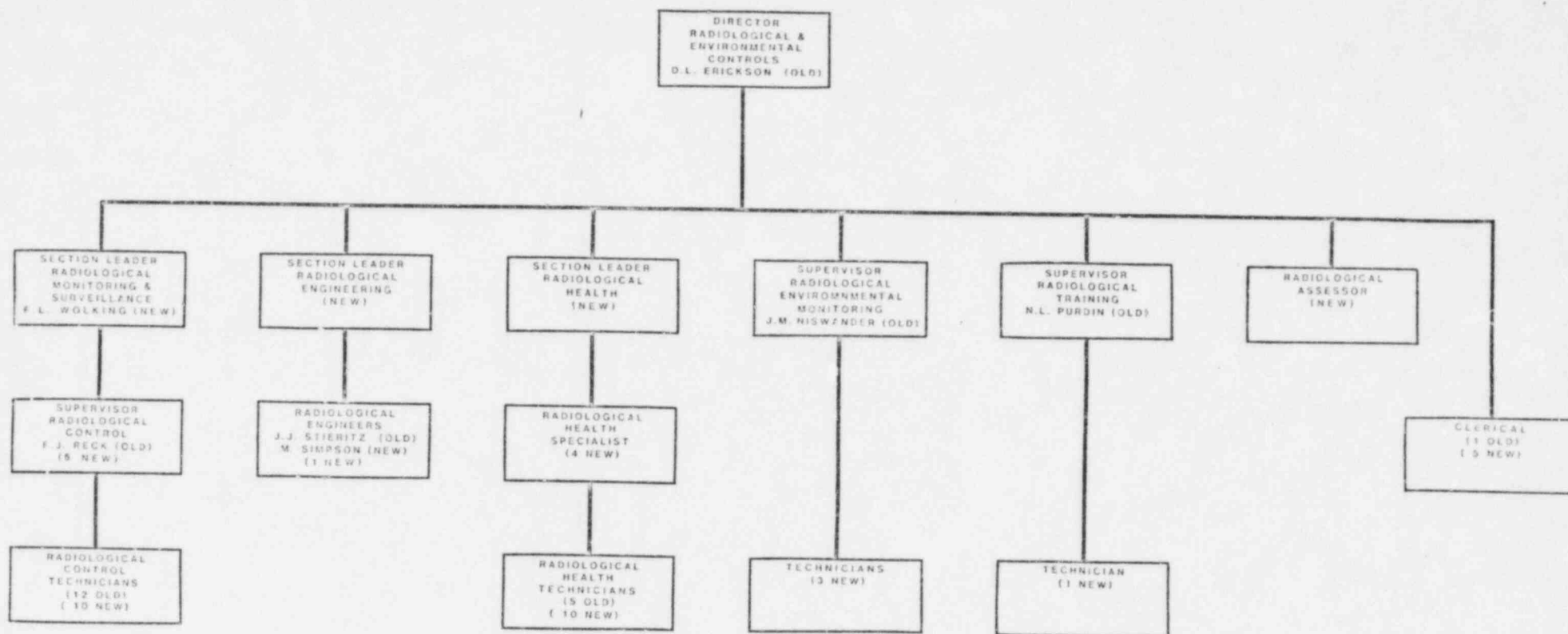


ADMINISTRATION & TRAINING DEPARTMENT

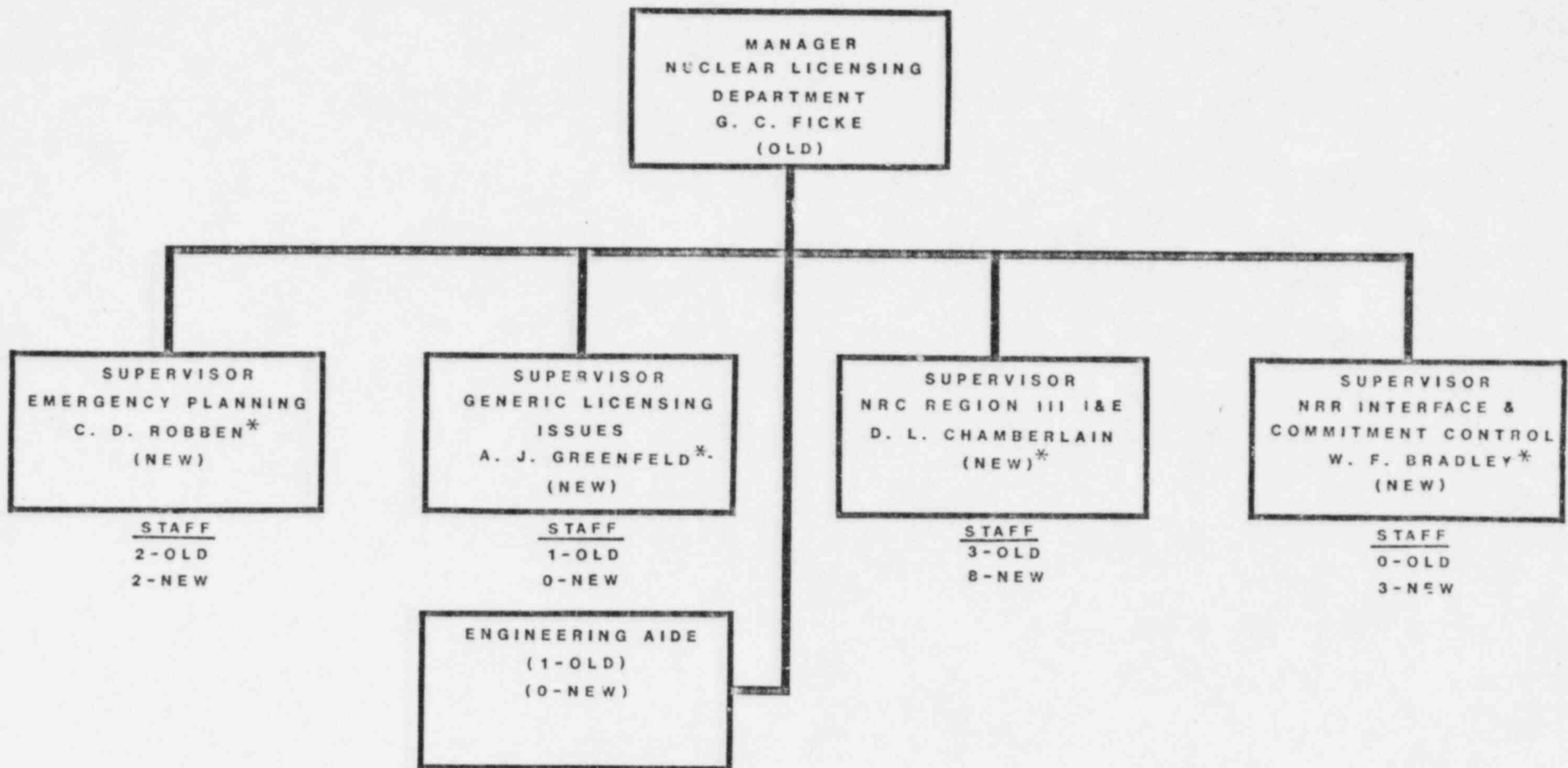


* SECONDED

RADIOLOGICAL & ENVIROMENTAL CONTROLS

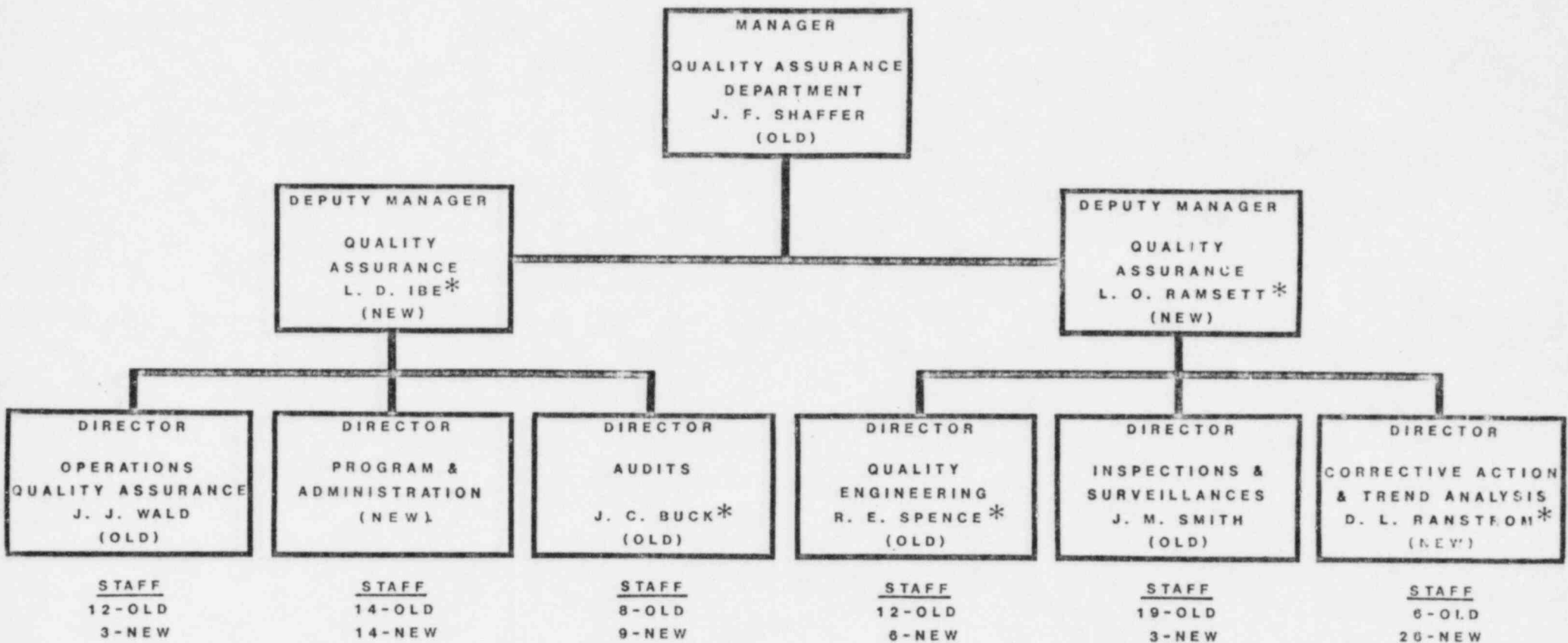


NUCLEAR LICENSING DEPARTMENT



*SECONDED

QUALITY ASSURANCE DEPARTMENT



* SECONDED

17. Provide information indicating which present and former managers and supervisors of CG&E, HJK, S&L and GE in place at the time of the Show Cause Order will still be in responsible positions under the organization described in the COA. If such managers or supervisors will be in positions different from positions occupied prior to the Show Cause Order (SCO), identify both the old and new positions. How and to what extent has CG&E assured itself that these individuals can be relied upon to identify and correct problems at the site?

Present CG&E managers and supervisors are indicated on the organization charts provided with our response to Question 16, and those who held different positions at the time of the Show Cause Order are listed on Attachment 1 to this response along with their former and current positions.

Listed on Attachment 2 are all present and former HJK, S&L, and GE managers and supervisors located at the jobsite along with their present and former positions/status on the Zimmer project.

As stated in the response to the initial set of NRC questions on the COA (Figure 2, No. 4), CG&E has reviewed the resumes of management personnel on Figure 2 and Mr. Williams has personally interviewed each of the CG&E persons who were reassigned from previous Zimmer assignments. CG&E and Bechtel will also be interviewing key H.J. Kaiser personnel.

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In addition, the reorganization and restructuring of the various organizations, along with CG&E bringing in an experienced Project Director (Bechtel) to direct and oversee these organizations, will help ensure that individuals are kept accountable for their responsibilities and can be relied upon to identify and correct problems at the site.

ATTACHMENT 1 TO QUESTION 17 RESPONSE

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
	<u>Nuclear Engineering Department (NED)</u>	
R.L. Thoney	Engineer	Acting Director - Planning
	<u>Start-up Testing Department (STD)</u>	
J. Aufdekamp	Test Coordinator-Leak Rate	Test Coordinator-NSSS
	<u>Nuclear Project Controls Department (NPC)</u>	
B.K. Culver	Manager, Generation Construction Department (GCD)	Manager - NPC
G.E. Bennett	Director-Systems Support Group, GCD	Director-Project Records Management
W.D. Corbin	Startup Scheduler, NPD	Director-Planning & Scheduling
S.E. Martin	Procedure Writer, GCD	Director-Management Information
W.B. Murray	Director-Project Controls Group, GCD	Director-Cost Control, Cost Estimating
	<u>Nuclear Construction Department (NCD)</u>	
W.N. Tobler	Senior Shift Engineer	Assistant to the Manager
D.J. Schulte	Q.A. Engineer	Director-Codes and Standards Compliance
B.A. Gott	Structural Engineer	Lead Structural Engineer
	<u>PVQC & Nuclear Project Support Services Department</u>	
G. Orlov	Assistant Director, Quality Confirmation Program (QCP)	Director, PVQC
N. Bannerjee	Quality Engineer, QAD	Supervisor - Document Review & Inspections

Attachment 1 to Question 17 Response (cont'd.)

R. Kare	Administrative Asst., QCP	Supervisor - Program Assessment
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Nuclear Production Department (NPD)

G.A. Appel	Station Chemist	Superintendent-Chemistry
T.W. Cummins	Shift Supervisor	Superintendent-Radwaste
J.A. Jaap	Engineering Assistant	Assistant Superintendent-Operations
D. Outcult	Associate Engineer - Startup	Plant Shift Director
P.A. Russ	Associate Engineer - Startup	Plant Shift Director

Radiological & Environmental Controls Department (REC)

D.L. Erickson	Rad-Chem Supervisor, NPD	Director, REC
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Nuclear Licensing Department (NLD)

G.C. Ficke	Director-Nuclear Licensing, Licensing & Environmental Affairs Department (LEAD)	Manager - NLD
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Quality Assurance Department (QAD)

J.F. Shaffer	Director, QCP	Manager - QAD
R.E. Spence	Director - Startup QA/QC	Director - Quality Engineering
J.M. Smith	Procedure Writer - Program Development	Director - Inspections and Surveillances

ATTACHMENT 2 TO QUESTION 17 RESPONSE

GENERAL ELECTRIC - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
T. Bloom	Site Resident Manager	Same
W. Heaton	Site Electrical Manager	Same
S.C. Quijano	Not assigned to project	Site QA Engineer
J.A. Steininger	Not assigned to project	Operations Manager
M. Dick	Site QA Engineer	Not assigned to project
A.L. Jenkins	Operation Manager	Not assigned to project

SARGENT & LUNDY - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
T. Daley	Field Project Manager	Same
B.F. Murphy	Nuclear Power Services Project Engineer	Same
H.N. Jamison/J. Eng.	Electrical Coordinator	Same
B.H. Larson	Structural Coordinator	Same
R.J. Suslick	Not assigned to project	Asst. Field Project Manager
T.J. Muzalski	Not assigned to project	Mechanical Design Coordinator
D.D. Felkins	Not assigned to project	Skid Walkdown Task Leader
A.L. Kapil	Non-supervisory project position	Seismic Separation Survey Task Leader
A. Sengupta	Non-supervisory project position	Seismic Separation Study Task Leader
J.E. Rodriguez	Not assigned to project	Quality Control Field Coordinator
D.B. Walker	Not assigned to project	Joint Test Group Member
B.L. Weinhold	Not assigned to project	Piping Support Field Coordinator
J.L. Vagt	Non-supervisory project position	Support Design Section Leader
G.Z. Girgis	Not assigned to project	Piping Analysis Field Lead Engineer
J.E. Grundman	Piping Support Field Engineer	Not assigned to project
M.A. Milad	Support Design Section Leader	Not assigned to project
L. Fergusson	Piping Analysis Field Lead Engineer	Not assigned to project

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>ADMINISTRATION & SERVICE DEPT.</u>		
D. Richardson	Non-supervisory project position	Department Manager
B. Ferree	Warehouse Supervisor	Same
D. O'Keefe	Purchasing Manager	Same
J. Hill	Non-supervisory project position	Accounting Supervisor
R. Wieskamp	Not assigned to project	Office Services Manager
E. Mendez	Not assigned to project	Training Supervisor
D. Taylor	Not assigned to project	Document Control Supervisor
B. Rokey	Accounting Supervisor	Not assigned to project
B. Wilson	Office Services Supervisor	Not assigned to project
G.G. White	Training Supervisor	Not assigned to project
J. Bradford	Document Control Supervisor	Not assigned to project
C. Yohe	Construction Services Manager	Not assigned to project

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>CONTROLS DEPT.</u>		
B. Scott	Department Manager	Same
R. Faria	Not assigned to project	Lead Scheduling Supervisor
See Note (1)	See note (2)	Lead Estimator
See Note (1)	See note (2)	Lead Cost & Engineer

(1) Position is currently open.

(2) Position did not exist at this time.

ENGINEERING DEPT.

B. Evans	Electrical Dept. Manager (1)	Department Manager
M. Goedecke	Welding Manager	Technical Engineer Supervisor
W. Cureton	Not assigned to project	Equipment Supervisor Turnover Supervisor
M. Butterworth	Non-supervisory project position	Welding Manager

(1) See Electrical Dept.

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>INDUSTRIAL RELATIONS DEPT.</u>		
S. Armknecht	Not assigned to project	Department Manager
C. Lowe	Safety Supervisor	Same
J. Heffner	Not assigned to project	Personnel Manager
D. Biller	Personnel Manager	Not assigned to project
<u>PROJECT MANAGEMENT</u>		
M. Noffsinger	Not assigned to project	Project Director
K. Dempsey	Construction Mgr. - 1st shift	Project Manager
J. Connor	Construction Mgr. - 2nd shift	Construction Mgr. - 1st shift
M. Albertin	Project Manager	Not assigned to project
<u>PIPING DEPT.</u>		
R. Cranston	Department Manager	Same
J. Crossman	General Superintendent	Same
J. Taylor	Not assigned to project	Piping Engineer Supervisor
R. Maroske	Design Supervisor	Same
T.R. Bietsch	Piping Engineer Supervisor	Non-supervisory project position

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>ELECTRICAL DEPT.</u>		
J. Mullen	Construction Engineer	Department Manager
D. Schwartz	Not assigned to project	Project Electrical Engineer
B. Evans	Department Manager	Engineering Dept. Manager (1)
E. Kwalick	Project Electrical Engineer	Not assigned to project
(1) See Engineering Dept.		
<u>CIVIL DEPT.</u>		
C. Clifton	Department Manager	Same
G. Adams	General Superintendent	Same
M. Soyoguz	Project Civil Engineer	Same

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>QA MANAGEMENT</u>		
R.A. Davis	Quality Control Manager	Site QA Manager
W.A. Hedzik	Site QA Manager	Not assigned to project
<u>QA ADMINISTRATION</u>		
B.D. Varchol	QA Administration Manager	Same
<u>QA TRAINING</u>		
J. Danner	Training Supervisor	Same
<u>QA PROCEDURE COMMITMENT</u>		
R.F. Becraft	Supervisor	Same
<u>NR/CAR COORDINATION</u>		
J. Killinger	Non-supervisory project position	Coordinator
B. Eckman	Coordinator	Non-supervisory project position

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>QUALITY ENGINEERING</u>		
K. Graybill	Not assigned to project	Quality Engineering Manager
D. McCulley	Supervisor Electrical	Same
K. Bishop	Non-supervisory project position	Senior Supervisor
J. Moskawa	Not assigned to project	Supervisor Mechanical
M. Boorady	Non-supervisory project position	Supervisor Civil
R.A. Ausherman	Quality Engineering Manager	Not assigned to project
R. Staymates	Supervisor Mechanical	Not assigned to project
E. Wagner	Supervisor Welding	Non-supervisory project position
F. Householder	Supervisor Civil	Non-supervisory project position
R. Lawton	Supervisor Calibration and Receiving Inspection	Not assigned to project

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>QUALITY CONTROL</u>		
C.W. Smith	Supervisor Civil	Quality Control Manager
P. Norman	Supervisor Mechanical	Same
C. Melton	Supervisor Hangers	Same
D. Donovan	Non-supervisory project position	Supervisor Civil
C. Cherry	Supervisor Calibration and Receiving Inspection	Same
J. Collins	Not assigned to project	Supervisor Electrical
R.A. Davis	Quality Control Manager	Site QA Manager
R. Prewitt	Supervisor Night Shift	Non-supervisory project position

H.J. KAISER - JOBSITE MANAGERIAL/SUPERVISORY PERSONNEL

<u>PERSON</u>	<u>POSITION AT TIME OF SCO</u>	<u>CURRENT POSITION</u>
<u>QA RECORDS</u>		
J. Murray	Supervisor Senior	Records Manager
M. Bussell	Non-supervisory project position	Supervisor Senior
R. Nonell	Non-supervisory project position	Supervisor Senior
M. Edmonds	Not assigned to project	Supervisor Senior
J. Cochran	Supervisor Hangers	Same
W. Biehle	Supervisor Electrical	Same
D. Damewood	Non-supervisory project position	Supervisor Pre-Purchase
T. Zeak	Non-supervisory project position	Supervisor Piping
F. McCrystal	Non-supervisory project position	Supervisor Civil (Structural)
S. Connor	Supervisor Records Control	Supervisor Civil (Containment)
G. Fones	Records Manager	Not assigned to project
M. Peel	Supervisor Pre-Purchase	Non-supervisory project position
B. Swift	Supervisor Piping	Not assigned to project
T. Royster	Supervisor Civil	Not assigned to project
<u>AUDIT</u>		
W. Fritz	Non-supervisory project position	Supervisor - Audits

WM. H. ZIMMER NUCLEAR POWER STATION
SUMMARY OF MANAGERIAL/SUPERVISORY PERSONNEL POSITION STATUS
BY ORGANIZATION

POSITION STATUS CATEGORY	NUMBER OF PERSONS/CATEGORY		
	GE	S&L	HJK
1) Assigned as manager/ supervisor at SCO and currently assigned to same position at jobsite	2	5	21
2) Assigned as manager/ supervisor at SCO and currently assigned to new managerial/ supervisory position at jobsite	0	0	8
3) Assigned to non- supervisory position at SCO and currently assigned managerial/ supervisory jobsite position	0	3	12
4) Not assigned to project at SCO and currently assigned managerial/ supervisory jobsite position	2	7	14
<hr/>			
Total number of managers and supervisors currently assigned to jobsite (total of categories 1-4)	4	15	55
5) Assigned as manager/ supervisor at SCO and currently not on project	2	3	15
6) Assigned as manager/ supervisor at SCO and currently assigned to non-supervisory position at jobsite	0	0	6

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23. Has the Master Training Plan been developed? If it has not, when do you expect it to be completed?

The Master Training Plan is being developed. It is expected to be completed in December.

24. Define the terms "project direction", "administrative direction", and "access", as used in Figures 1 and 2, Volume 1 of the COA.

The Project Manager provides "project direction" through the establishment of policies, procedures, project objectives and daily communication with key staff members and contractor management. Project direction indicates the individuals or functions with direct line responsibility for implementation of organizational and departmental activities consistent with the direction of the Project Manager.

"Administrative direction" indicates the individuals with key communication interfaces required on a day-to-day basis to ensure that the Project Manager's directions are carried out and activities are coordinated and consistent with project objectives.

Where it was considered advantageous for individual positions or functions to advise, review, recommend or otherwise communicate outside the conventional direct line authority on matters important to the construction and operation of the Zimmer Project, a formal direct "access" path was identified for such communications. Changes in policy or direction as a result of such communication will be directed in accordance with established policies and procedures by the individuals

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with direct line responsibility for construction or operation
of the project.