

THE CINCINNATI GAS & ELECTRIC COMPANY



December 30, 1983
LOZ-83-0250

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-30, LACK OF INSTALLATION
INSPECTION OF NON-CLASS 1E CABLES IN PANELS
W.O. 57300, JOB E-5590, FILE NO. 956C, E-30

This letter constitutes an interim report concerning the subject condition reported to the Commission on October 27, 1982. Our last report, LOZ-83-0155, was submitted on September 30, 1983. CG&E has determined this condition to be a reportable deficiency under 10CFR50.55(e).

The subject condition occurred when construction and inspection procedures were not revised to provide instructions for the installation and inspection of non-essential (white) and associated cables in accordance with revised separation criteria issued by the architect engineer. This lack of inspection resulted in a lack of documentation verifying compliance with the separation criteria.

Two types of cable configurations could occur in such a manner that a redundant safety function might be degraded due to a single failure or event.

The first concern is interaction between an essential cable of one division and a redundant associated cable of another division.

The second concern is that a non-essential (white) cable could provide a common denominator for a single failure between two redundant essential cables.

Therefore, the lack of installation verification by inspection of Non-Class 1E (Associated and White) cables when

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bundled with Class 1E cables is a significant deficiency . The failure to properly incorporate instructions and criteria in construction and inspection procedures also represents a breakdown in the Constructor's Quality Assurance Program. As a result, this deficiency is reportable under the requirements of 10CFR50.55(e) .

As we indicated in LOZ-83-0155, an evaluation of the cable installation for all essential panels would be performed to identify and resolve any violations. NEP 8.5, "Engineering Review of Cable Separation for Essential Panels," was implemented in June, 1983 to address this concern. The program established a method of field review to verify that Class 1E and associated cables have been properly separated from redundant Class 1E, associated and non-essential (white) cables. The field review encompassed the inspection of cables for separation inside essential panels and outside essential panels to their first raceway. The Quality Assurance Department provided 100% Q.C. surveillance of the field activities to ensure program compliance. Potential deviations were dispositioned and analyzed under EPP-5, "Cable Analysis for Cables in Air and Panel" by Sargent & Lundy (S&L) with a review by CG&E. A total of 184 panels were encompassed by the program. Out of the 2293 potential deviations identified, 575 will require some rework. Copies of all interaction sheets will be attached to Nonconformance Reports (NR's) on a per panel basis and processed accordingly.

Rework associated with these NR's will be accomplished in accordance with the Course of Action submitted to the Commission on October 5, 1983. Construction and inspection procedures will be written and training programs established for any new work. A final report will be submitted upon completion of the corrective action.

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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 

J. WILLIAMS, JR.
SENIOR VICE PRESIDENT

DJS/MJ/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
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