

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION
UNIT 1
QUALITY ASSURANCE IMPROVEMENT PROGRAM
STATUS REPORT
MAY 1, 1982

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PDR FOIA
DEVINE82-A-11 PDR

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
IMMEDIATE ACTION LETTER
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THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 1

CONCERNING QA STAFFING

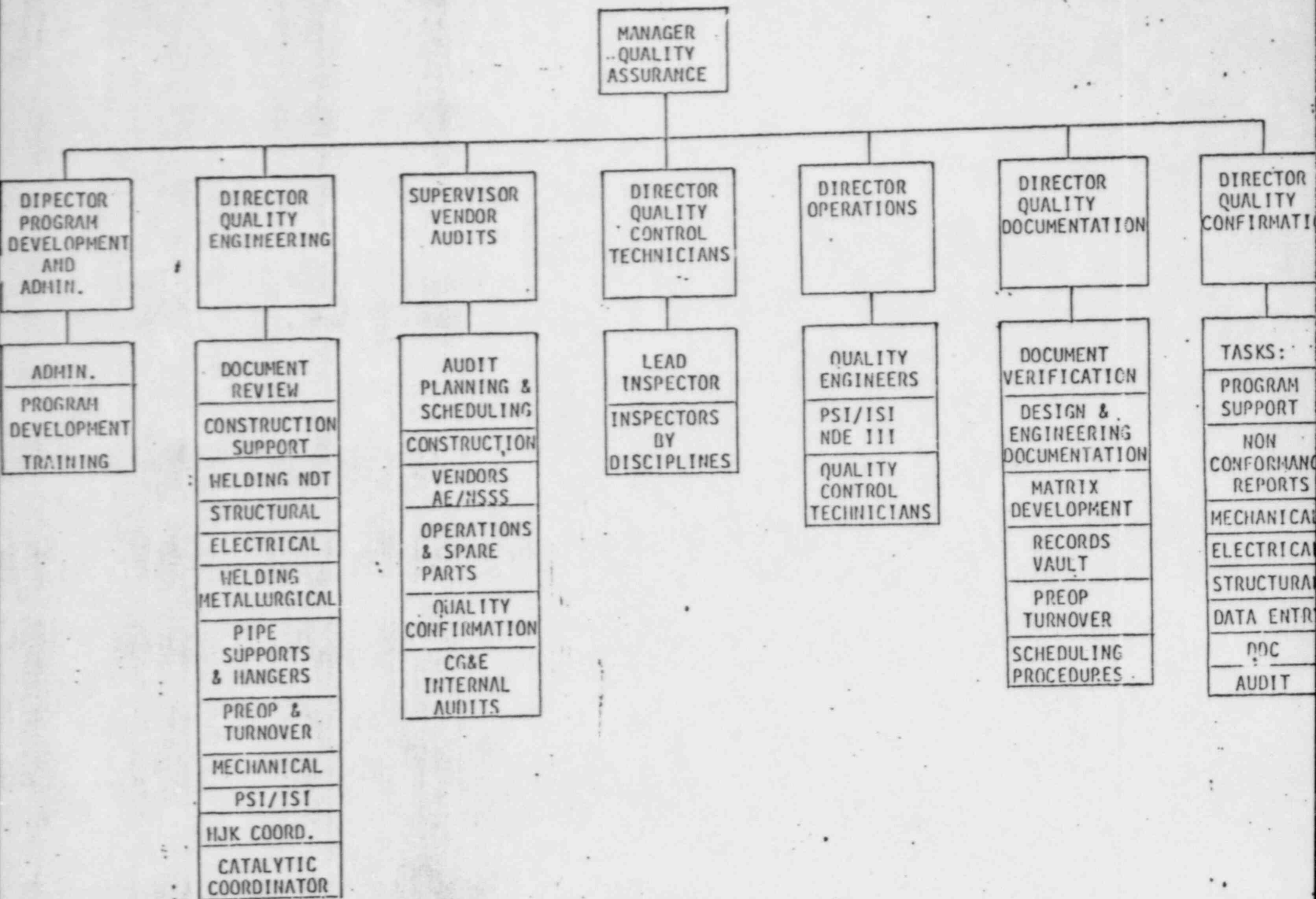
CG&E WILL INCREASE THE SIZE AND TECHNICAL EXPERTISE OF THE CG&E QA ORGANIZATION BY ADDING INDIVIDUALS QUALIFIED IN THE AREAS OF RADIOGRAPHY AND NONDESTRUCTIVE TESTING, PIPING SUPPORTS AND HANGERS, WELDING, STRUCTURAL DESIGN AND FABRICATION, ELECTRICAL DESIGN AND CONSTRUCTION, AND METALLURGY. WE UNDERSTAND CG&E WILL UTILIZE TEMPORARY PERSONNEL QUALIFIED IN THESE AREAS UNTIL PERMANENT STAFF MEMBERS HAVE BEEN HIRED.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 1 RESPONSE

CONCERNING QA STAFFING

CG&E HAS INCREASED THE SIZE AND TECHNICAL EXPERTISE OF ITS QUALITY ASSURANCE DEPARTMENT QAD STAFF, AS STATED IN OUR LETTER OF MAY 18, 1981. TEMPORARY PERSONNEL AS WELL AS ALL CG&E QAD PERSONNEL, INCLUDING QUALITY ENGINEERING, QUALITY CONTROL (INSPECTION) AND QUALITY CONFIRMATION PERSONNEL HAVE PROVIDED WORK HISTORIES, AND HAVE BEEN EVALUATED, AND CERTIFIED TO SUB SPECIFIC DISCIPLINES, ACCORDING TO THE REQUIREMENTS OF THEIR PARTICULAR JOB FUNCTIONS AND (WHERE APPLICABLE) IN COMPLIANCE WITH ANSI N45.2.6-1978. THIS WAS ACCOMPLISHED FOR ALL JOB FUNCTIONS REQUIRING LEVEL III QAD PERSONNEL, BY MARCH 5, 1982, AND FOR LEVEL I AND II QAD PERSONNEL BY MARCH 26, 1982. THIS EVALUATION/CERTIFICATION PROCESS IS AN ON-GOING ACTIVITY AS PERSONNEL ARE ADDED, TRANSFERRED TO DIFFERENT JOB FUNCTIONS OR ARE TERMINATED FROM THE QUALITY ASSURANCE DEPARTMENT.

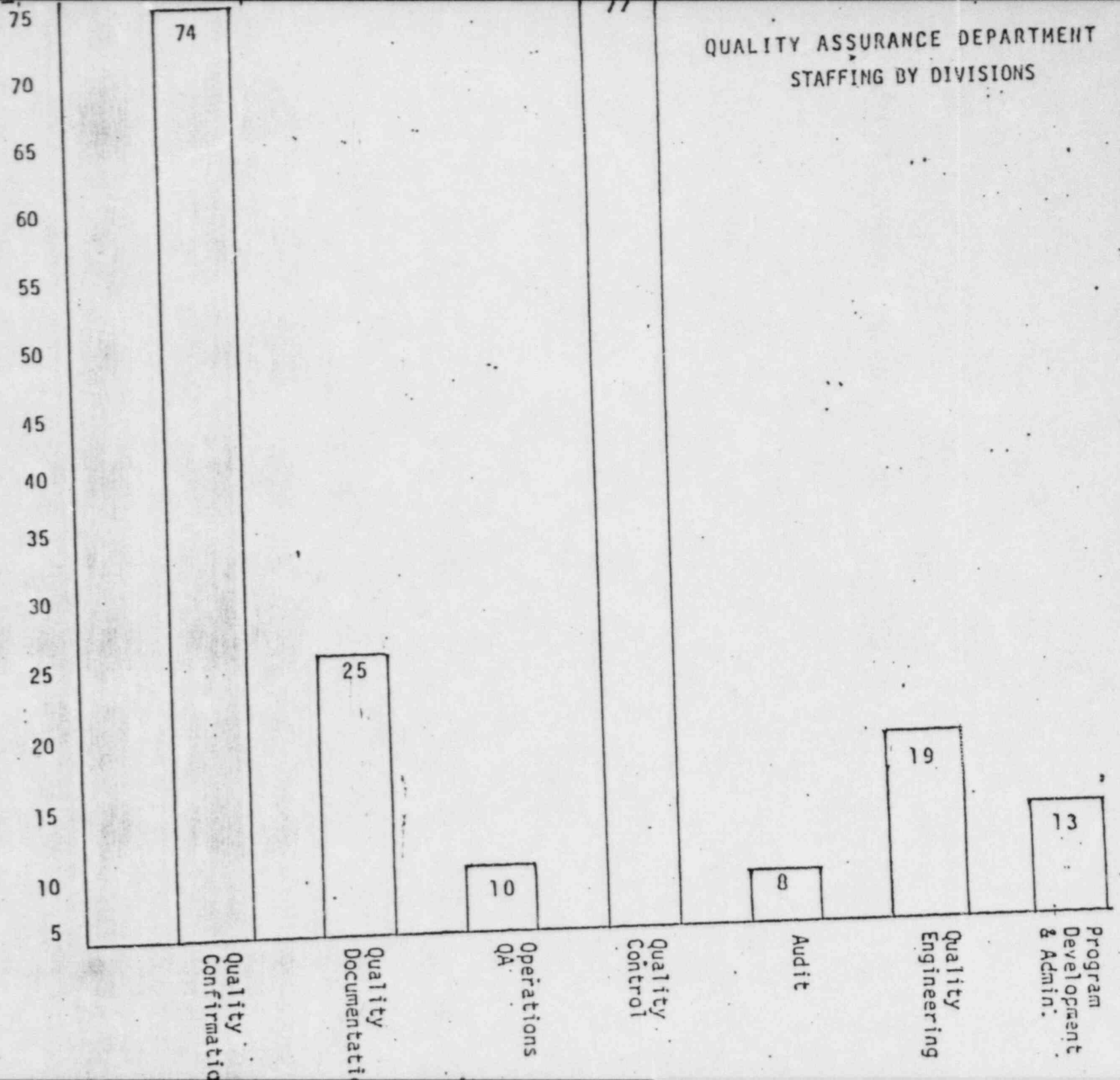
ORGANIZATION CHART: CONSTRUCTION QUALITY ASSURANCE DEPARTMENT



CG&E QAD STAFFING CHART

POSITION	APRIL 8, 1981	MAY 18, 1981	FEB. 15, 1982	MAY 1, 1982
MANAGER-QAD	1 (CG&E)	1	1 (CG&E)	1 (CG&E)
PROGRAM DEVELOPMENT AND ADMIN. DIVISION	3	8	12 (4-CG&E)	13 (4-CG&E)
QUALITY ENGINEERING DIVISION	5 (4-CG&E)	8	16 (4-CG&E)	19 (5-CG&E)
AUDIT DIVISION	1	3	8 (1-CG&E)	8 (1-CG&E)
QUALITY CONTROL DIVISION		20	61 (4-CG&E)	74 (3-CG&E)
OPERATIONS QA DIVISION	4 (4-CG&E)	4	9 (6-CG&E)	10 (7-CG&E)
QUALITY DOCUMENTATION DIVISION	1 (CG&E)	3	28 (3-CG&E)	25 (3-CG&E)
QUALITY CONFIRMATION DIVISION		2	74 (3-CG&E)	74 (3-CG&E)

QUALITY ASSURANCE DEPARTMENT
STAFFING BY DIVISIONS



QAD STAFFING PERSONNEL BY DIVISION AND POSITION:

<u>DIVISIONS</u>	<u>POSITION</u>	<u>ORGANIZATION</u>
	MANAGER-QAD	CG&E
PROGRAM DEV.&ADMIN. :	DIRECTOR	CG&E
	PROC. & TRAINING SUPV.	CG&E
	TRAINING COORDINATOR	CG&E
	PROCEDURE COORDINATOR	CG&E
	SENIOR CLERK/TYPIST	HJK
	CLERK RECORD/FILE	HJK
	CLERK	HJK & OLS
QUALITY ENGINEERING :	DIRECTOR	CG&E
	COORD. HJK	GCA
	COORD. CATALYTIC	NIC
	COORD. DOCT. REVIEW	SAI
	COORD. CONST. SUPPT.	SAI
	WELDING NDT.	S&L
	ELECTRICAL	CG&E
		SAI
	STRUCTURAL	SAI
	WELDING	GCA
	METALLURGICAL	CG&E
	PIPE SUPPORTS	
	& HANGERS	GCA
	PREOP & TURNOVER	GCA
	MECH. HVAC	CG&E
	MECH. PIPING	CG&E
	PSI/ISI	GCA
		GCA
		SAI
AUDIT :	DIRECTOR (ACTING)	
	AUDIT PLANNING &	
	SCHEDULING	CG&E
	CONSTRUCTION	SAI

AUDIT: (CONT'D)

VENDORS AE/NSSS
QUALITY CONFIRMATION
OPERATIONS &
SPARE PARTS

SAI
NES
SAI

QUALITY CONTROL

DIRECTOR
SENIOR LEAD INSP'T
HANGER LEAD INSP'T
PIPING/NDE LEAD
INSP'T
CIVIL/STRUCT/MECH.
LEAD INSP'T.
ELEC. LEAD INSP'T.
TECH SIL KRAMIG
WY&B (HVAC)
HJK WAREHOUSE

CG&E
SAI
NES
SAI
SAI
SAI
NES
BSG.

OPERATIONS QA:

DIRECTOR
QUALITY ENGR.
PSI/ISI/NDE III
DATA ENTRY CLERKS :

CG&E
CG&E
CG&E
OLS

QUALITY DOCUMENTATION:

DIRECTOR
DOCUMENTATION
VERIFICATION SUPV.
MATRIX DEVELOPMENT
PREOP TURNOVER
SCHEDULING
QUALITY RECORDS VAULT
DESIGN & ENGR. DOCT.
RECORDS CLERKS :

CG&E
MDA
GPC
MDA
MDA
CG&E
CG&E
OLS

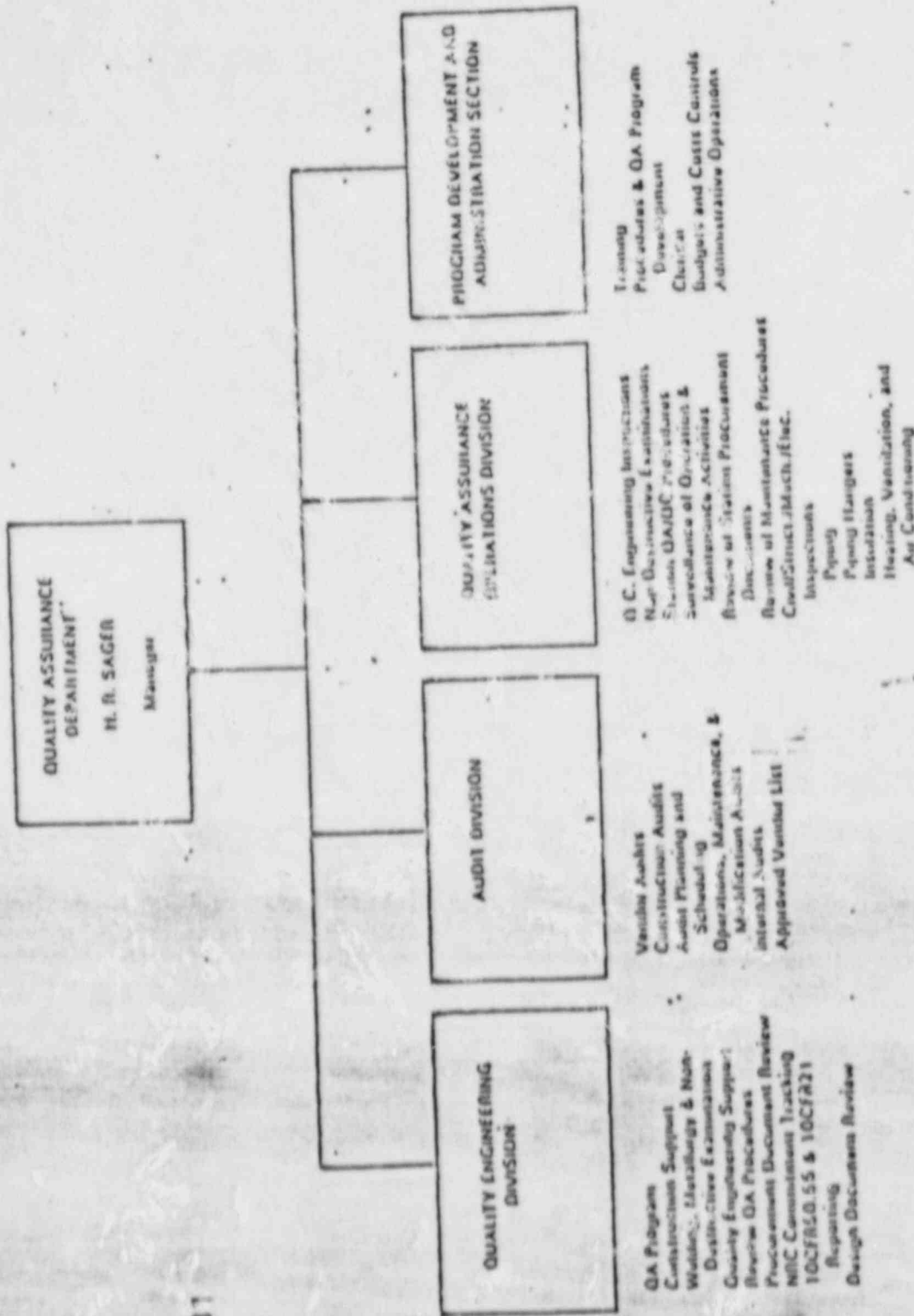
QUALITY CONFIRMATION:

DIRECTOR
ELECTRICAL ENGR.
MECHANICAL ENGR.
DESIGN DOCT. CHG. ENGR.
PROGRAMMING SUPPT.
STRUCTURAL ENGR.

CG&E
CG&E
GCA
GCA
CG&E
CG&E (TEMP.)



December, 1981



QUALITY ASSURANCE
DEPARTMENT

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 2

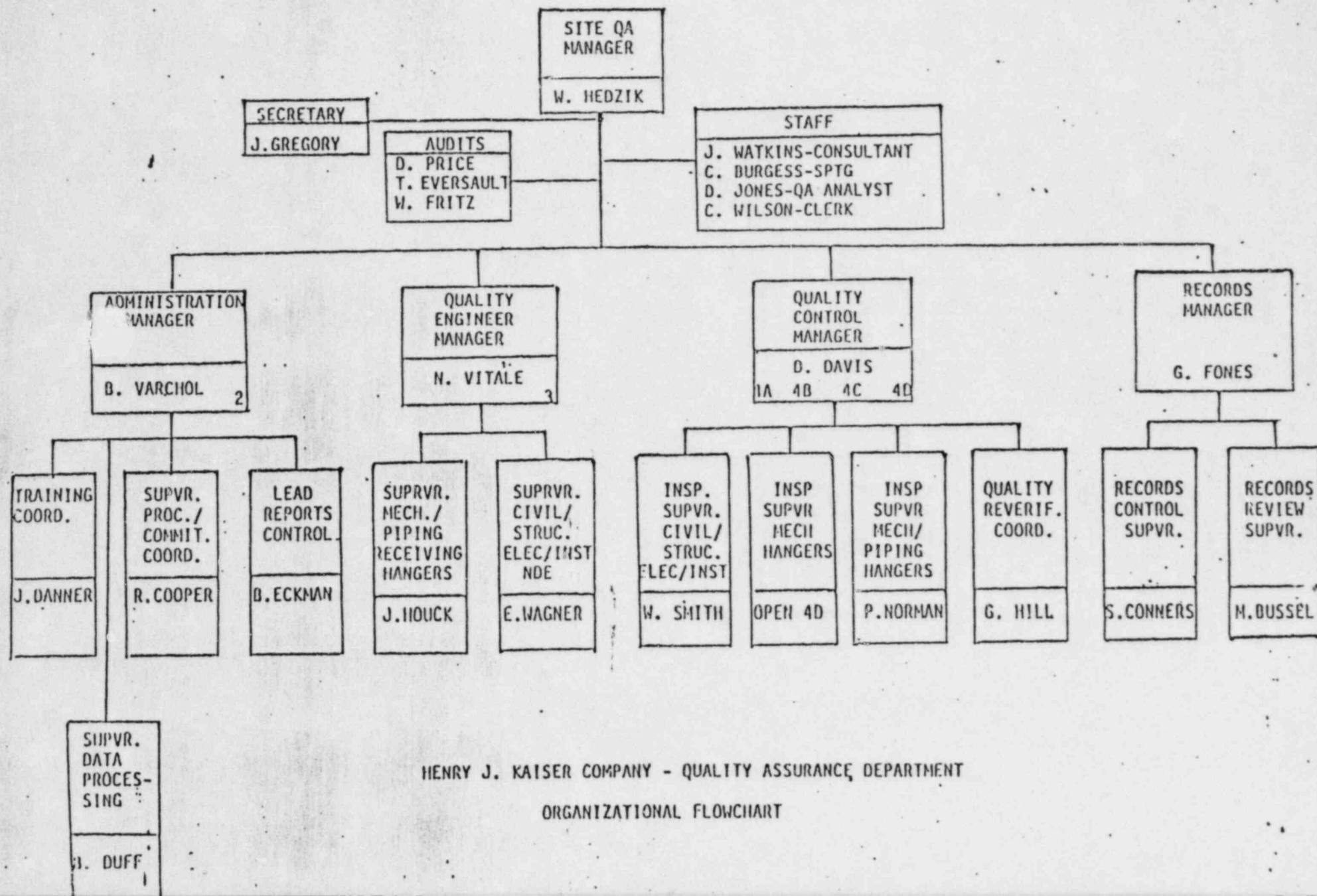
CONCERNING INDEPENDENCE AND SEPARATION BETWEEN
KAISER CONSTRUCTION AND KAISER QA/QC

CG&E WILL TAKE ACTION BY APRIL 15, 1981, TO
ASSURE INDEPENDENCE AND SEPARATION OF THE QA/QC
FUNCTION PERFORMED BY KAISER FROM THE CONSTRUCTION
FUNCTION. REGION III WILL BE INFORMED OF ACTIONS
TAKEN.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 2 RESPONSE

CONCERNING INDEPENDENCE AND SEPARATION BETWEEN KAISER
CONSTRUCTION AND KAISER QA/QC

IN OUR LETTER DATED APRIL 7, 1981, TO THE PRESIDENT OF HENRY J. KAISER COMPANY, CG&E OUTLINED THE ACTIONS REQUIRED TO ELIMINATE ANY DOMINATION BY CONSTRUCTION OF THE QA ORGANIZATION AND THE QC INSPECTORS, AND THIS HAS BEEN ACCOMPLISHED IN A TIMELY MANNER. THE INDEPENDENCE OF THE QA/QC ORGANIZATION HAS BEEN EMPHASIZED AND EFFECTIVE LEADERSHIP HAS BEEN ESTABLISHED.



HENRY J. KAISER COMPANY - QUALITY ASSURANCE DEPARTMENT
ORGANIZATIONAL FLOWCHART

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER

.. ITEM 3

CONCERNING QC INSPECTIONS

USING THE PERSONNEL DESCRIBED IN ITEM 1 ABOVE
CG&E WILL CONDUCT 100% REINSPECTIONS OF QC INSPEC-
TIONS CONDUCTED BY KAISER AND OTHER CONTRACTORS
AFTER THE DATE OF THIS LETTER. THIS WILL CONTINUE
UNTIL A REVISED CG&E AUDIT PROGRAM AS DESCRIBED IN
ITEM 10, BELOW, IS IMPLEMENTED BY THESE QUALIFIED
INDIVIDUALS AND RIII RELEASES THIS REQUIREMENT.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT I
NRC IMMEDIATE ACTION LETTER
ITEM 3 RESPONSE

CONCERNING QC INSPECTIONS

CG&E IS CONDUCTING 100% REINSPECTION OF ACCEPTED INSPECTION ACTIVITIES CONDUCTED BY KAISER AND OTHER SITE CONTRACTORS. INSPECTION RESULTS HAVE PROVIDED FEEDBACK FOR IMPROVEMENT IN BOTH INSPECTION PROCEDURES AND INSPECTOR PERFORMANCE.

CG&E'S AUDIT PROGRAM IS BEING REVISED TO INCLUDE SURVEILLANCE OF CONSTRUCTION ACTIVITIES AS DESCRIBED IN IAL ITEM 10. THIS SURVEILLANCE PROGRAM IS EXPECTED TO REDUCE THE REQUIREMENT FOR 100% REINSPECTION.

WHEN THE SURVEILLANCE PROGRAM TO REDUCE 100% REINSPECTION IS INITIALLY IMPLEMENTED:

- 1) 50 OF EVERY 100 CONTRACTOR ACCEPTED INSPECTIONS WILL BE COVERED BY REINSPECTION.
- 2) 15 OF EVERY 100 CONTRACTOR ACCEPTED INSPECTIONS WILL BE COVERED BY SURVEILLANCE.
- 3) MONTHLY THE LEVELS OF REINSPECTION AND SURVEILLANCE WILL BE ADJUSTED BASED ON THE RESULTS OF REINSPECTION AND SURVEILLANCE. (SEE ATTACHMENT 1).
- 4) ADJUSTMENT TO THE REINSPECTION LEVEL IS BASED ON A RATIO OF CG&E ACCEPTED INSPECTIONS COMPARED TO THE CONTRACTOR ACCEPTED INSPECTIONS REINSPECTED BY CG&E. (SEE ATTACHMENT 2)

ITEM 3 RESPONSE (CONT'D)

- 5) THE ADJUSTMENTS TO THE SURVEILLANCE LEVEL IS THE RATIO OF CG&E'S SURVEILLANCES WITH SATISFACTORY INSPECTION PERFORMANCE TO THE TOTAL NUMBER OF CONTRACTOR INSPECTIONS WHICH WERE MONITORED BY CG&E SURVEILLANCE. (SEE ATTACHMENT 3)

Total Number of Contractors

Inspections-----

Contractors
rejected
inspections

Total number of ----- 100%
contractors accepted
Inspections

Initial level of
coverage by both
Surveillance &
Reinspections

Maximum level of ----- 50
Reinspection (50%)

SURVEILLANCE
PROGRAM

Beginning level-----
of Surveillance

Minimum level -----
of Surveillance

Reinspection
per I.A.L.

100%

90

80

70

60

50

40

30

20

10

0

↓ Surveillance program
coverage will be ex-
panded to compensate
for reduction of
reinspection level

30

20

10

(Item 3 Response)

Adjustments of inspection and surveillance levels due to reinspection results.

$X = \frac{\text{CG\&E Accepted Inspections}}{\text{Contractor Accepted Inspections Reinspected by CG\&E}}$

$Y = \frac{\text{CG\&E Surveillances with Satisfactory Inspection Results}}{\text{Contractor Accepted Inspections Monitored by CG\&E}}$

IF	THEN
$.90 \leq X$	Reduce reinspection level by 10 out of every 100 contractor accepted inspections performed, provided that $Y \geq .95$.
$.80 \leq X < .90$	Increase surveillance level by 5 out of every 100 contractor accepted inspections performed.
$.70 \leq X < .80$	Increase surveillance level by 10 out of every 100 contractor accepted inspections performed.
$.60 \leq X < .70$	Increase surveillance level by 15 out of every 100 contractor accepted inspections performed.
$.50 \leq X < .60$	Increase surveillance level by 20 out of every 100 contractor accepted inspections performed.

Attachment #3
(Item 3 Response)

Adjustments of the surveillance level due to surveillance results.

$X = \frac{\text{CG\&E Accepted Inspections}}{\text{Contractor Accepted Inspections Reinspected by CG\&E}}$

$Y = \frac{\text{CG\&E Surveillances with Satisfactory Inspection Results}}{\text{Contractor Accepted Inspections Monitored by CG\&E}}$

IF

THEN

-
- | | |
|--------------------|---|
| $.95 \leq Y$ | Reduce surveillance level by 5 out of every 100 contractor accepted inspections performed, provided that $X \geq .90$. |
| $.85 \leq Y < .95$ | Increase surveillance level by 5 out of every 100 contractor accepted inspections performed. |
| $.75 \leq Y < .85$ | Increase surveillance level by 10 out of every 100 contractor accepted inspections performed. |
| $.65 \leq Y < .75$ | Increase surveillance level by 15 out of every 100 contractor accepted inspections performed. |
| $.55 \leq Y < .65$ | Increase surveillance level by 20 out of every 100 contractor accepted inspections performed. |
| $.45 \leq Y < .55$ | Increase surveillance level by 25 out of every 100 contractor accepted inspections performed. |

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 4

CONCERNING QC INSPECTION PROCEDURES

ALL QC INSPECTION PROCEDURES WILL BE REVIEWED AND REVISED (WHERE APPROPRIATE) BY QUALIFIED DESIGN ENGINEERS AND QA PERSONNEL. THESE REVIEWS WILL BE CONDUCTED BY PERSONNEL INDEPENDENT OF THE CONSTRUCTION ORGANIZATION TO CONFIRM THAT THE PROCEDURES INCLUDE APPROPRIATE INSPECTION REQUIREMENTS AND APPLICABLE HOLD POINTS. THE CONSTRUCTION ACTIVITIES CONTROLLED BY THESE QC INSPECTION PROCEDURES WILL NOT BE PERFORMED AFTER THE DATE OF THIS LETTER UNTIL THE APPLICABLE PROCEDURE HAS BEEN REVIEWED AND APPROVED.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 4 RESPONSE

CONCERNING QC INSPECTION PROCEDURES

A PROGRAM TO REVIEW AND APPROVE ALL QC INSPECTION PROCEDURES WAS ESTABLISHED AS FOLLOWS:

1. A PROCEDURE WAS APPROVED ESTABLISHING THE QUALIFICATIONS REQUIRED TO REVIEW AND APPROVE THESE PROCEDURES AND THE METHOD OF REVIEW AND APPROVAL.
2. ALL QC INSPECTION PROCEDURES WERE REVIEWED BY QUALIFIED DESIGN ENGINEERS AND QA PERSONNEL FOR INCLUSION OF APPROPRIATE INSPECTION REQUIREMENTS AND APPLICABLE HOLD POINTS.
3. THE REVIEWS WERE CONDUCTED BY PERSONNEL INDEPENDENT OF THE CONSTRUCTION ORGANIZATION.
4. CONSTRUCTION ACTIVITIES WERE NOT PERFORMED UNTIL AFTER THE APPLICABLE PROCEDURES HAD BEEN REVIEWED, REVISED (WHERE APPROPRIATE), AND APPROVED BY CG&E.
5. THE HJK PROCEDURES WERE REORGANIZED AND REVISED IN TWO PHASES:

PHASE I - INITIAL REVIEW: CONSTRUCTION AND INSPECTION INSTRUCTIONS WERE SEPARATED INTO CONSTRUCTION PROCEDURES AND INSPECTION PROCEDURES AND THEN REAPPROVED AND REISSUED IN A CONTROLLED MANNER, INCLUDING REVISIONS AND TEMPORARY CHANGES THAT WERE REQUIRED. THE LAST PHASE I PROCEDURE WAS APPROVED BY CG&E ON JANUARY 12, 1982.

ITEM 4 RESPONSE (CONT'D)

PHASE II - CONTINUING REVIEW: COMMENTS FROM PHASE I PROCEDURES AND REASSESSMENTS OF QA/QC PROGRAMS WERE THEN CONSOLIDATED AND USED TO CREATE THE HJK PHASE II PROCEDURES. THE EFFORTS ON THE TWO PHASES OF PROCEDURES OVERLAPPED FOR A PERIOD OF SEVERAL WEEKS WITH THE FIRST PHASE II PROCEDURE BEING APPROVED BY CG&E ON DECEMBER 14, 1981. THIS REVIEW AND APPROVAL PROCESS WAS COMPLETED BY CG&E ON FEBRUARY 1, 1982, WITH ALL 38 PROCEDURES APPROVED.

6. SINCE THESE INITIAL INSPECTION REVIEWS OCCURRED, AN INTENSIVE EFFORT HAS TAKEN PLACE TO EVALUATE AND CERTIFY ALL CG&E QAD PERSONNEL TO SUB SPECIFIC DISCIPLINES, ACCORDING TO JOB FUNCTIONS, IN COMPLIANCE WITH ANSI N45.2.6-1978. THIS WAS ACCOMPLISHED FOR ALL QAD JOB FUNCTIONS REQUIRING LEVEL III CERTIFICATIONS BY MARCH 5, 1982. THESE LEVEL III PERSONNEL ARE CURRENTLY RE-REVIEWING ALL QC INSPECTION PROCEDURES SINCE APRIL 8, 1981 FOR SPECIFIC PROCEDURE ADEQUACY; UPGRADING, IF REQUIRED; AND EVALUATION OF IMPACT TO ON GOING WORK AS WELL AS PREVIOUSLY ACCOMPLISHED WORK ACTIVITIES. THIS IS BEING ACCOMPLISHED AS FOLLOWS:

A) HJK PHASE II PROCEDURE RE-REVIEW: (38 PROCEDURES)

THIS EFFORT WAS COMPLETED BY CG&E ON APRIL 2, 1982. A TOTAL OF SIX (6) PROCEDURES - 3 WELDING AND 3 ELECTRICAL REQUIRED PROCEDURE REVISIONS TO ASSURE COMPLIANCE WITH PROJECT REQUIREMENTS. A CONDITION EVALUATION REQUEST (CER) IS BEING PROCESSED FOR EACH PROCEDURE TO EVALUATE THE SIGNIFICANCE OF ANY CONDITION ADVERSE TO QUALITY IF DETERMINED TO EXIST AND ASSURE APPROPRIATE CORRECTIVE ACTION.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT I
PROCEDURES REVIEW AND APPROVAL STATUS
APRIL 8, 1981 THROUGH MAY 1, 1982

INSPECTION PROCEDURES

I. HJK

TOTAL NO. OF APPROVED HJK PHASE I INSPECTION PROCEDURES	69
TOTAL NO. OF HJK PHASE I INSPECTION PROCEDURES REVIEWED AND APPROVED BY CG&E.	69
NO. OF ADDITIONAL REVISIONS MADE TO PHASE I INSPECTION PROCEDURES	98
NO. OF PHASE I REVISIONS REVIEWED & APPROVED BY CG&E.	98
TOTAL NO. OF APPROVED HJK PHASE II INSPECTION PROCEDURES	38
TOTAL NO. OF HJK PHASE II INSPECTION PROCEDURES REVIEWED & APPROVED BY CG&E	38
TOTAL NO. OF NEW HJK PHASE II INSPECTION PROCEDURES IN FOR CG&E REVIEW & APPROVAL	1
TOTAL NO. OF ADDITIONAL REVISIONS MADE TO PHASE II INSPECTION PROCEDURES	11
TOTAL NO. OF PHASE II REVISIONS REVIEWED & APPROVED BY CG&E	11

II. CATALYTIC

TOTAL NO. OF APPROVED CATALYTIC INSPECTION PROCEDURES	16
TOTAL NO. OF CATALYTIC INSPECTION PROCEDURES REVIEWED & APPROVED BY CG&E	16
TOTAL NO. OF NEW CATALYTIC INSPECTION PROCEDURES IN FOR CG&E REVIEW & APPROVAL	2

NOTE: AS OF MAY 1, 1982, 2 ESSENTIAL CATALYTIC WORK
PACKAGES HAVE BEEN REVIEWED BY CG&E'S NED AND QAD AND
ARE APPROVED.

PROCEDURES REVIEW AND APPROVAL STATUS (CONT'D)

III. NES

TOTAL NO. OF APPROVED NES INSPECTION PROCEDURES	13
TOTAL NO. OF NES INSPECTION PROCEDURES REVIEWED & APPROVED BY CG&E	13
NO. OF ADDITIONAL REVISIONS MADE TO NES INSPECTION PROCEDURES	10
NO. OF NES PROCEDURE REVISIONS REVIEWED & APPROVED BY CG&E	10

IV. TECH SIL

TOTAL NO. OF APPROVED TECH-SIL INSPECTION PROCEDURES	16
TOTAL NO. OF TECH-SIL INSPECTION PROCEDURES REVIEWED & APPROVED BY CG&E	16
NO. OF ADDITIONAL REVISIONS MADE TO TECH-SIL INSPECTION PROCEDURES	16
NO. OF TECH-SIL PROCEDURE REVISIONS REVIEWED & APPROVED BY CG&E	16

V. KRAMIG

TOTAL NO. OF APPROVED KRAMIG INSPECTION PROCEDURES	6
TOTAL NO. OF KRAMIG INSPECTION PROCEDURES REVIEWED & APPROVED BY CG&E	6

VI. WY&B

TOTAL NO. OF APPROVED WY&B INSPECTION PROCEDURES	12
TOTAL NO. OF WY&B INSPECTION PROCEDURES REVIEWED & APPROVED BY CG&E	12
NO. OF ADDITIONAL REVISIONS MADE TO WY&B INSPECTION PROCEDURES	14
NO. OF WY&B PROCEDURE REVISIONS REVIEWED & APPROVED BY CG&E	14
NO. OF WY&B INSPECTION PROCEDURES DELETED, DATED 11/23/81	1

PROCEDURES REVIEW AND APPROVAL STATUS (CONT'D)

OTHER PROCEDURE REVIEWS PERFORMED BY CG&E QAD

I. H. J. KAISER COMPANY	321
II. CATALYTIC INC.	74
III. CG&E OWNERS PROJECT PROCEDURES	39
IV. CG&E DEPARTMENT PROCEDURES	103
V. WALDINGER, YOUNG AND BERTKE	11

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER

ITEM 5

CONCERNING TRAINING

QA/QC PERSONNEL AT THE ZIMMER SITE WILL RECEIVE TRAINING ON ANY NEW PROCEDURES AND PRACTICES RESULTING FROM ACTIONS TAKEN TO FULFILL PROVISIONS OF THIS LETTER PRIOR TO IMPLEMENTATION OF THE PROCEDURES. IN ADDITION, REFRESHER TRAINING WILL BE GIVEN PRIOR TO JUNE 1, 1981, ON (A) THE IDENTIFICATION AND DOCUMENTATION OF NONCONFORMANCES, DEFICIENCIES, AND PROBLEMS, (B) THE PROCEDURE FOR RESOLVING NONCONFORMANCES, DEFICIENCIES, AND PROBLEMS, (C) THE FEEDBACK MECHANISM FOR INFORMING THE IDENTIFYING INDIVIDUAL OF THE RESOLUTION OF THE NONCONFORMANCE, DEFICIENCY, OR PROBLEM, AND (D) THE AVENUE OF APPEAL SHOULD THE IDENTIFYING INDIVIDUAL DISAGREE WITH THE ADEQUACY OF THE RESOLUTION.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 5 RESPONSE

CONCERNING TRAINING

TRAINING IS PERFORMED FOR EACH INDIVIDUAL PRIOR TO THEIR IMPLEMENTATION OF A PROCEDURE ON NEW OR REVISED PROCEDURES. DURING THE PERIOD FROM APRIL 8, 1981 THROUGH MAY 1, 1982, THE CG&E QAD TRAINING GROUP SCHEDULED AND CONDUCTED 1337 TRAINING SESSIONS.

HJK QA/QC PERSONNEL ARE TRAINED ON EACH NEW OR REVISED PROCEDURE PRIOR TO ITS IMPLEMENTATION. DURING THE PERIOD FROM APRIL 8, 1981 THROUGH MAY 1, 1982, THE HJK QA TRAINING DEPARTMENT HAS CONDUCTED 1137 TRAINING SESSIONS.

REFRESHER TRAINING ON ITEMS 5A THROUGH 5D ABOVE WERE COMPLETED PRIOR TO JUNE 1, 1981.

INSTRUCTIONS FOR THE "AVENUE OF APPEAL" CONTAINED IN PROCEDURES AND INDOCTRINATION TRAINING INCLUDES DETAILS FOR RESOLVING DISAGREEMENT AS TO THE ADEQUACY OF DISPOSITION AND CORRECTIVE ACTION ON THE NONCONFORMANCE REPORT.

ALL INSPECTION PERSONNEL HAVE PROVIDED WORK HISTORIES TO THE QAD TRAINING COORDINATOR, AND HAVE BEEN EVALUATED AND CERTIFIED TO SUB SPECIFIC DISCIPLINES, ACCORDING TO THE REQUIREMENTS OF THEIR PARTICULAR JOB FUNCTIONS AND IN COMPLIANCE WITH ANSI N45.2.6-1978. THIS PROGRAM IS PROVIDING ADDITIONAL CONFIDENCE THAT PERSONNEL WHO PERFORM QUALITY RELATED FUNCTIONS ARE ADEQUATELY TRAINED AND QUALIFIED IN THE AREA OF THEIR ASSIGNED TASKS.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 6

CONCERNING DEVIATIONS FROM CODES AND FSAR STATEMENTS

PRIOR TO MAY 1, 1981, THE PROCEDURES GOVERNING THE IDENTIFICATION, REPORTING, AND RESOLUTION OF DEVIATIONS FROM CODES AND FSAR STATEMENTS WILL BE REVIEWED FOR ADEQUACY AND REVISED AS APPROPRIATE. THE PROCEDURES WILL REQUIRE CG&E TO REVIEW AND APPROVE THE RESOLUTION OF ANY SUCH DEVIATIONS.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 6 RESPONSE

CONCERNING DEVIATIONS FROM CODES AND FSAR STATEMENTS

MANAGEMENT DIRECTIVES FOR IDENTIFYING, REPORTING AND RESOLVING DEVIATIONS FROM CODES AND FSAR COMMITMENTS HAVE BEEN ISSUED.

A NEW S&L PROJECT INSTRUCTION ESTABLISHES THE REQUIREMENT TO SUBMIT CORRECTIONS TO THE FSAR AS CHANGES ARE IDENTIFIED. FORMAL ISSUE OF FSAR CHANGES WILL BE MADE SEMI-ANNUALLY.

THE FSAR HAS BEEN REVIEWED AND CORRECTIONS SUBMITTED WITH FSAR REVISION 75.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 7

CONCERNING THE VOIDING OF NONCONFORMANCE REPORTS

THE PROCEDURES GOVERNING NONCONFORMANCE REPORTING
WILL BE REVIEWED FOR ADEQUACY. THE REVIEW WILL BE
ACCOMPLISHED NOT LATER THAN APRIL 10, 1981. THE
DISPOSITION OF EACH NONCONFORMANCE REPORT TOGETHER
WITH APPROPRIATE JUSTIFICATION WILL BE DOCUMENTED.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 7 RESPONSE

CONCERNING VOIDING NONCONFORMANCE REPORTS

ACTION HAS BEEN TAKEN TO ELIMINATE VOIDING OF
NONCONFORMANCE REPORTS AND THE REVIEW OF VOIDED NON-
CONFORMANCE REPORTS IS INCORPORATED IN QUALITY CONFIR-
MATION PROGRAM TASK 6.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER

ITEM 8

CONCERNING QA/QC RECORDS

THE REVIEW AND ALTERATION OF EXISTING QA AND QC RECORDS HAS BEEN STOPPED. THESE RECORDS WILL BE CONTROLLED BY CG&E UNTIL A PROGRAM DEFINING RECORDS CONTROL, USAGE, AND ADEQUACY HAS BEEN PREPARED BY CG&E AND AGREED TO BY RIII.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 8 RESPONSE

CONCERNING QA/QC RECORDS

CG&E COMPLETED CONSTRUCTION AND OCCUPIED AN IMPROVED PHYSICAL FACILITY FOR RECORD HANDLING AND STORAGE.

CG&E HAS ESTABLISHED PROCEDURES THAT PROVIDE FOR IMPROVED RECEIPT, CONTROL AND MAINTENANCE OF QA/QC DOCUMENTATION.

CLEAR LINES OF RESPONSIBILITY FOR QA/QC DOCUMENTATION HAVE BEEN ESTABLISHED BETWEEN CG&E AND HJK. (SEE FLOWPATH ITEM 8 ATTACHMENT - 1)

A COMMITMENT CONTROL PROGRAM TO EFFECTIVELY TRACK COMMITMENTS HAS BEEN DEVELOPED. THE SOFTWARE AND HARDWARE IS IN PLACE AND OPERATING AT THE STATION FOR THIS PURPOSE.

ITEM NO. 8 HAS BEEN CLOSED BY THE NRC ON INSPECTION REPORT NO. 81-28 ITEM 5-B. DATED 12-21-81.

MJR CONSTRUCTION
CIVIL/STRUCTURAL
ELECTRICAL
MECHANICAL
PIPING
MANIFES

COMPLETED CONSTRUCTION QA RECORDS

DOCUMENTATION FOR
IN-PROCESS
CONSTRUCTION AND
INSPECTION

UNACCEPTABLE
DOCUMENTATION

MJR QC
REVIEW FOR COMPLETENESS
OF PACKAGE
INSPECTIONS, COMPLETE PIA
PROCEDURE
ETC.

OPEN ITEMS
RESOLVED/REVERIFIED

DOCUMENTATION WITH
OPEN ITEMS
FOR RESOLUTION BY
MJR FIELD

UNACCEPTABLE

MJR QC REVIEW
CORRECT PROCEDURES
TECHNICAL ADEQUACY
ETC.

UNACCEPTABLE

ACCEPTABLE

DOCUMENTATION WITH OPEN
ITEMS FOR RESOLUTION/
REVERIFICATION BY MJR
FIELD

MJR QA RECORDS
MANAGEMENT GROUP
VERIFY ACCEPTABLE
MATERIAL WELDERS ETC
ALL RECORDS REQUIRED BY
PROCEDURES, SPECS ETC
TECHNICALLY ADEQUATE

UNACCEPTABLE

COMPLETED ACCEPTABLE DOCUMENTATION

WALDINGER
DOCUMENTATION
PACKAGES

COMPLETED
ACCEPTABLE
DOCUMENTATION

CATALYTIC
DOCUMENTATION
PACKAGES

COMPLETED
ACCEPTABLE
DOCUMENTATION

CCAE QA DOCUMENTATION
VERIFICATION GROUP
(a) SUBCONTRACTORS PACKAGES
CCAE QADVC CLERK
SIGN TRANSMITTAL-IF APPLICABLE
ASSIGN TRANSMITTAL & FROM OWN
SUBCONTRACTORS TRANS LOG
(ATTACHMENT 7.6)
(b) CCQE DOCUMENT PACKAGES
CCQE QADVC CLERK
SIGN RECEIPT (ATTACHMENT 7.2)
ASSIGN TRANSMITTAL &
(ATTACHMENT 7.3)

COMPLETED
ACCEPTABLE
DOCUMENTATION

CCQE DOCUMENTATION PACKAGES
VERIFICATION GROUP
QAE
AUDIT
QADVC (FREIBURCH)

QADVC CLERK
PRG. TRACK LOG (ATTACH 7.5)
NOTIFY COGNIZANT QADVC PERSONNEL
FILE

06-QA-05

COGNIZANT QADVC PERSONNEL
OBTAIN DOCUMENT
UTILIZE CHECKLIST/MATRICE, AS
APPROPRIATE
SAMPLING PLANS - IF DEVELOPED
& ALLOWED
UTILIZE REVIEW GUIDELINES
(ATTACH 7.6)

UNACCEPTABLE
USING DEN PER
06-QA-06

REJECT
DEN
06-QA-06

DOCUMENTATION
WITH OPEN
ITEMS FOR
RESOLUTION
BY CCQE

ACCEPT

COGNIZANT QADVC CLERK
COMPLETE VAULT TRANS FORM
(ATTACH 7.7)

QADVC CLERK
ASSIGN VAULT TRANS & (ATTACH 7.8)
FROM VAULT TRANS LOG
UPDATE PACKAGE TRACKING LOG
DELIVER DOC. PRG V/REPRODUCED
VAULT TRANS FORM (ATTACH 7.7)

RECORDS VAULT
RECEIPT ACKNOLEDGEMENT
(ATTACH 7.7)
STORAGE - 06-QA-02

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT I
NRC IMMEDIATE ACTION LETTER

ITEM 9

CONCERNING CONDITIONS ADVERSE TO QUALITY

CG&E WILL PERFORM A 100% REVIEW OF ALL SURVEILLANCE AND
NONCONFORMANCE REPORTS WRITTEN BY CONTRACTOR PERSONNEL AFTER
THE DATE OF THIS LETTER. THIS PROGRAM WILL CONTINUE UNTIL
RIII RELEASES THIS REQUIREMENT.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER
ITEM 9 RESPONSE

CONCERNING CONDITIONS ADVERSE TO QUALITY

PROJECT PROCEDURES REQUIRE ALL CONTRACTORS TO
SUBMIT SURVEILLANCE AND NONCONFORMANCE REPORTS TO
CG&E FOR REVIEW.

QUALITY ENGINEERS ARE REVIEWING ALL SURVEILLANCE
AND NONCONFORMANCE REPORTS TO ESTABLISH QUALITY TRENDS,
TO ASSURE APPROPRIATE DISPOSITION, AND, TO DETERMINE
THE ADEQUACY OF CORRECTIVE ACTION.

THE CINCINNATI GAS & ELECTRIC COMPANY
WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1
NRC IMMEDIATE ACTION LETTER

ITEM 10

CONCERNING THE AUDIT PROGRAM -

THE EXISTING CG&E AUDIT PROGRAM WILL BE REVIEWED AND
REVISED BY JUNE 1, 1981 TO INCLUDE TECHNICAL AUDITS OF
CONSTRUCTION WORK AND MORE COMPREHENSIVE AND EFFECTIVE
PROGRAMMATIC AUDITS.