

U.S. NUCLEAR REGULATORY COMMISSION  
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-358/78-11

Docket No. 50-358

License No. CPFR-88

Licensee: Cincinnati Gas and Electric Company  
138 E. 4th Street  
Cincinnati, Ohio 45201

Facility Name: William A. Zimmer Nuclear Power Station

Inspected At: William A. Zimmer Site

Inspection Conducted: May 23-26 and June 22-23, 1978

Inspector: RFW for  
T. L. Harpster

7-31-78

Approved by: RFW <sup>Warnick</sup>  
R. F. Warnick, Chief  
Reactor Projects Section 2

7-31-78

Inspection Summary

Inspection on May 23-26 and June 22-23, 1978 (Report No. 50-358/78-11)

Areas Inspected: Routine, unannounced inspection of plant procedures, operational and corporate staffing. The inspection involved 26 inspector-hours onsite by one NRC inspector.

Results: No items of noncompliance or deviations were identified. One unresolved item identified regarding staffing.

780905014B

4 pp.

## DETAILS

### 1. Personnel Contacted

E. Borgmann, Vice President Engineering  
S. Saloy, Manager Electric Production  
J. Flynn, Manager Licensing and Environmental Affairs  
R. Dirr, Principal Mechanical Engineer  
H. Brinkmann, Lead Project Engineer  
C. Beringhaus, Principal Electrical Engineer  
K. Chitkara, Principal Nuclear Fuel Group Engineer  
J. Schott, Station Superintendent  
W. Schwiers, Principal QA and Standards Engineer

The inspector also interviewed other licensee employees, including members of the General Engineering Department and the Reactor Operations staff.

### 2. Staffing

#### a. Operational Staffing

The inspector reviewed qualifications of personnel assigned to selected positions within the operating organization to ensure that: the organizational structure is in accordance with the Final Safety Analysis Report (FSAR); key staff positions are filled or will be filled prior to operating license issuance; and the qualifications of personnel assigned to these positions meet the minimum requirements established in the FSAR and ANSI 18.7-1971.

- (1) The reactor engineer does not meet the minimum requirements for this position as stated in the FSAR and ANSI 18.7. The reactor engineer is currently augmenting his experience by participating in startup activities at the Hatch Nuclear Station.

This item is considered to be unresolved.

- (2) The position of maintenance supervisor is vacant as a result of a staff resignation. The licensee is presently attempting to fill this position.
- (3) The licensee is increasing the size of the station engineering staff. Two engineers have been hired; one has resigned; additional engineers are being sought.

- (4) Presently, the QA/QC staff consists of one station quality engineer whose responsibilities include development of the QA program and implementing procedures for preoperational testing, startup and operations. Three additional positions have been proposed, but are unfilled for this area.

The inspector discussed selected inspection findings with Mr. E. Borgmann, Vice President Engineering and other corporate and station management personnel. The inspector emphasized that while minimum regulatory staffing requirements were satisfied (with the exception of the reactor engineer), the following observations were potential problem areas which could affect the licensee's ability to adequately conduct the preoperational and startup test programs, and which would influence subsequent power operations.

- (1) The size and limited experience of the plant staff would not be adequate to cope with the additional staffing problems created as a result of the normal attrition of personnel during the startup and test programs.
- (2) Because of the heavy reliance on contracted technical support, much of the base line knowledge and experience gained as a result of participation in the startup and test program would leave with the contracted support personnel.
- (3) Operational QA/QC controls would not be developed, implemented, and refined in time to be effective during the test and startup programs.

b. Corporate Staffing

The inspector interviewed selected management personnel at the corporate office to ascertain whether adequate technical support was available to support startup and test program activities and subsequent power operations at the Zimmer site.

The inspector discussed the following observations with both corporate and station management.

- (1) Personnel from the mechanical and electrical sections do not have the "plant system" knowledge that will be required to support subsequent plant operations.
- (2) There is presently no personnel in the electrical group with expertise in the plants complex instrumentation and control systems.

- (3) There is no corporate health physics expertise to backup the site.
- (4) The Nuclear Fuel Groups participation in the startup and test activities has not been resolved.

The inspector commented that the corporate technical staff needs to gain a baseline familiarity with the facility systems to be able to adequately augment the site personnel's expertise and to provide for the resolution of test deficiencies, analysis of transients and operational anomalies, design changes, etc., during the startup and test programs and subsequent plant operations.

c. Staffing Meeting

A meeting has been scheduled for July 13, 1978, in Bethesda, Maryland to discuss apparent weaknesses in the utilities organizational staffing. The meeting will be attended by Cincinnati Gas and Electric Company management, NRC Division of Project Management, and the Office of Inspection and Enforcement, Region III.

3. Plant Procedures

The inspector reviewed draft and approved administrative control procedures to determine the adequacy of management controls in implementing and maintaining a viable procedure system; and to confirm that the scope of the plant procedures system is adequate to control safety related operations within applicable regulatory requirements.

The inspector provided comments to the appropriate station staff members based on his review. Additional procedures will be reviewed as they become available.

4. Management Interviews

The inspector met with licensee representatives during the course of the inspection to summarize the scope and findings of the inspection.

THE CINCINNATI GAS & ELECTRIC COMPANY



May 18, 1979

E. A. BORGMANN  
Vice President - Engineering

James G. Keppler  
Director  
United States Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

I am writing you concerning our telephone conversation of May 14 during which you indicated that Region III wished to interview some of our people further with regard to certain statements made to the Advisory Committee on Reactor Safeguards (ACRS). These statements apparently concerned our staffing plan and some conflict between the statements made and our actual staffing intentions. Obviously, I was quite concerned and looked into the matter promptly. The facts in this matter from our standpoint are as follows:

Following the subcommittee meeting, Mr. Harpster, your inspector, along with his supervisor, Mr. Warnick, telephoned Mr. James R. Schott, our plant superintendent, and voiced his feelings to the effect that CG&E's plans with respect to backup personnel should be clarified at the full ACRS meeting. Mr. Schott advised Mr. Harpster that he had not seen the transcript but indicated that he had not tried to mislead anyone with his testimony.

After Mr. Harpster's call to Mr. Schott, we reviewed the transcript of the ACRS subcommittee meeting of February 27 and concluded that we agreed with Mr. Schott's testimony concerning backup capability. Apparently any problem stems from the discussion of backup to operating personnel between Subcommittee Chairman Bender and Mr. Schott. In essence, Mr. Bender was trying to assure himself that adequate backup would exist for each key supervisor. The maintenance supervisor was used as the example in the discussion which was prompted in part by the fact that our former maintenance supervisor had resigned.

What Mr. Schott stated was that backup capability would be assured at the second line supervisory level and would be full time. Our intention is to have a dedicated backup for each of the following sections: operating, maintenance, I & C, rad-chem, technical, and training. It was not our intention, however, to

Y 21 1979

Attachment 4

ENCLOSURE

2/14

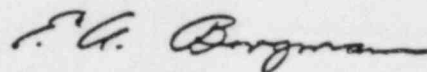
May 18, 1979

necessarily give these backup personnel the title of "Assistant" per se.

Both CG&E and Mr. Schott personally believe that our intentions were clarified at the full committee meeting by describing the roles of the maintenance engineer and the other supervisors, including their support. This was done through the use of a view graph and Xerox copies of the plant organization chart which were distributed to members of the committee. It was not until your call that anyone at CG&E had knowledge that this matter had not been fully resolved to Mr. Barpster's satisfaction.

I hope this letter now resolves this matter to the satisfaction of Region III. However, in the event you wish to discuss the subject further with our personnel, we will be pleased to cooperate. As you know, the pre-hearing conferences are scheduled for May 21-23 with the evidentiary hearing scheduled to begin on June 19. For this reason, timely resolution of this apparent misunderstanding is essential.

Very truly yours,



E. A. Borgmann  
Senior Vice-President