## THE CINCINNATI GAS & ELECTRIC COMPANY



May 18, 1979

E. A. BORGMANN

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 and 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

7 9 09 1 80 55 365 Y 2 1 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. Harpster'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,

F.a. Borgs

E. A. Borgmann

Senior Vice-President