

Mr. G. Fiorelli  
U. S. Nuclear Regulatory Commission  
Region III  
July 27, 1979 - QA-1173  
Page 2

Date When Full Compliance will be Achieved

Full compliance will be achieved by September 15, 1979.

Infraction 1(b) - Late Responses to Field Audit Reports

Corrective Action Taken and Results Achieved

The open field audit file has been reviewed to determine which audits have not been responded to within the specified time period. Efforts are underway to obtain responses by contact with the auditee.

Corrective Action to be Taken to Avoid Further Noncompliance

Review of open field audit response due dates will be conducted weekly on a designated day. To facilitate review, a "Response Due" column will be added to the Field Audit Log sheets, and the due date will be noted when the log entry is made.

Date When Full Compliance will be Achieved

It is expected that full compliance will be achieved by August 31, 1979.

Infraction Item 1(c) - Errors in Field Audit Log

Corrective Action Taken and Results Achieved

The Field Audit Log has been reviewed and coding errors and confusing entries have been corrected. It is believed that the log is current and correct from Audit No. 166 through 256. The present logging system was adopted with Audit No. 166 in March, 1978.

Corrective Action to be Taken to Avoid Further Noncompliance

It is believed that the coding errors resulted from ambiguous instruction and the complexity of the form itself. In May, 1979, the form was revised and the coding simplified, and errors are now expected to be minimized. Also, Procedure 18-QAS-04, entitled "Field Audit Log", will be revised to include more explicit instructions for entries in the log.

Date When Full Compliance will be Achieved

The Field Audit Log is now believed to be in compliance. Revision of Procedure 18-QAS-04 is expected to be complete by August 31, 1979.

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Infraction 1(d) - Henry J. Kaiser Company Failure to Analyze  
Recurring Discrepancies

Corrective Action Taken and Results Achieved

The cognizant Henry J. Kaiser Company QA Engineer will perform a review of the nonconformance reports in his area of responsibility that have been written during the past six months, to evaluate the adequacy and effectiveness of corrective action.

Corrective Action to be Taken to Avoid Further Noncompliance

The results of these analyses will be the basis for a meeting between the Henry J. Kaiser QA Manager and the Henry J. Kaiser Project Manager to determine the need for improvement in training, procedures, equipment, etc. Subsequently, similar analyses will be performed at intervals of no greater than six months. The results will be reported to the Henry J. Kaiser QA Manager and significant findings will result in similar meetings.

Date When Full Compliance will be Achieved

The Henry J. Kaiser QA Manager expects that full compliance will be achieved by September 1, 1979.

Infraction 2(a) - Failure to Observe Audit Schedule

Corrective Action Taken and Results Achieved

An audit of Kaiser QA Procedure No. 4 is now in progress. A checklist for audit of Kaiser QA Procedure No. 7 is being prepared.

Corrective Action to Be Taken to Avoid Further Noncompliance

CG&E QA&S has and continues to augment its staff in an effort to maintain its audit schedule and still keep abreast of other QA activities. During the past 16 months, seven persons have been added, but other QA responsibilities have increased proportionately. At present, the addition of another qualified auditor is planned, whose sole responsibility would be to assist in the performance of scheduled audits.

Date When Full Compliance will be Achieved

It is expected that full compliance will be achieved by August 31, 1979.

Infraction Item 2(b) - Management Review

Corrective Action Taken and Results Achieved

A management audit has been scheduled for the week of July 30, 1979. The audit findings will be available for review by the NRC inspectors.

966 259

Corrective Action to be Taken to Avoid Further Noncompliance

A second management audit will be conducted within the next six-month period as required by FSAR commitments.

The CG&E QA Manual, Section 18, will be revised to require semi-annual management audits, consistent with the FSAR.

Date When Full Compliance will be Achieved

Full compliance will be achieved with the completion of the second semi-annual management audit, which will take place no later than January, 1980.

Infraction 2(c) - Henry J. Kaiser Company Failure to Maintain  
Audit Schedule

Corrective Action Taken and Results Achieved

QAP-10, Special Processes, was audited as a part of the HJK Corporate Audit that was conducted July 1, 1979, and an internal audit covering welding and nondestructive examination has been completed. QAP-16, Control of Nonconforming Material, Parts, and Components, was also audited as part of the Corporate Audit of July 1, 1979.

Corrective Action Taken to Avoid Further Noncompliance

It has been recognized that additional personnel were required to maintain an effective audit program by Henry J. Kaiser Company. A qualified auditor from headquarters staff has been assigned to Zimmer since April, 1979, while a permanent staff auditor was recruited. An experienced auditor has been hired and is expected to report August 1, 1979.

Date When Full Compliance will be Achieved

It is the opinion of Henry J. Kaiser Company that full compliance has been achieved.

Infraction 2(d) - Henry J. Kaiser Company Non-comprehensive Audits

Corrective Action Taken and Results Achieved

The entry level for performing internal system audits is normally the applicable Quality Assurance Procedure which references within the text other supplemental procedures. These documents are reviewed and considered in the planning of an audit, as required by paragraph 3.4.1 of QAP-19. Past practice did not require the auditor to specifically

reference all supplemental procedures on his checklist.

Corrective Action to be Taken to Avoid Further Noncompliance

In the future, supplemental procedures to be audited will be referenced in the audit checklist and the audit report. A matrix of active procedures that relate to each quality assurance element has been prepared and will be utilized for this purpose.

Date When Full Compliance will be Achieved

It is the opinion of Henry J. Kaiser Company that full compliance has been achieved as of the date of this letter.

Infraction 2(c) - Henry J. Kaiser Company Audit Checklists Missing

Corrective Action Taken and Results Achieved

Five of the seven audits performed without checklists were by the Electrical Quality Engineer, who has since left the employment of Henry J. Kaiser Company. Two audits (No. 349 and 354) were spontaneous audits based on detected deficiencies and were recorded as audit findings and put into the audit system for purpose of corrective action tracking and follow-up.

Corrective Action to be Taken to Avoid Further Noncompliance

A training session has been held with all auditors to indoctrinate them in proper implementation of QAP-19, "Audits".

Date When Full Compliance will be Achieved

It is the opinion of Henry J. Kaiser Company that full compliance has been achieved as of the date of this letter.

Infraction Item 2(f) - Audit Finding Classification

Corrective Action Taken and Results Achieved

The findings of CG&E QA&S field audits #217 and #223 have been clearly identified as "Deficiencies" and "Observations", respectively. We plan to review other field audit reports to verify classification of findings.

Corrective Action to be Taken to Avoid Further Noncompliance

Procedure 18-QAS-03, entitled "Distribution and Review of Quality Assurance and Standards Audits" will be revised to include a require-

266 261

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U. S. Nuclear Regulatory Commission  
Region III  
July 27, 1979 - QA-1173  
Page 6

ment that the auditor classify his findings as deficiencies, observations, or suggestions.

Date When Full Compliance will be Achieved

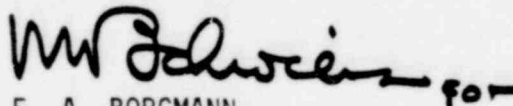
Compliance has been achieved for Field Audits #217 and #223 as of this date. Review of other Field Audit Reports and revision of Procedure 18-QAS-03 is expected to be complete by August 31, 1979.

We trust that this information is an adequate response to your IE Inspection Report No. 79-14.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN  
SENIOR VICE PRESIDENT

RLW:pa

966 262