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THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN
VICE PRESIDENT

July 2, 1979
QA-1159

U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. J. G. Keppler, Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
IE INSPECTION REPORT 50-358/79-15, CONSTRUCTION
PERMIT NO. CPPR-88, DOCKET NO. 59-358, W.O. #
57300-957, JOB E-5590

Gentlemen:

This letter constitutes our formal reply to the subject inspection report. It is our opinion that nothing in the report or in this reply is proprietary in nature.

Our response to the items of noncompliance identified in Appendix "A" of the report is as follows:

Item 1a - Tool Control

Corrective Action Taken and Results Achieved

Tools, which will be used on stainless steel, have been positively identified by marking with white paint and controlled to preclude possible contamination from carbon steel.

Corrective Action to be Taken to Avoid Further Noncompliance

Supplement 6 of SPPM 3.1 was issued to provide positive instruction regarding tool identification and control.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 1b - Anchor Bolt Tensioning Procedure

Corrective Action Taken and Results Achieved

A Henry J. Kaiser Company procedure entitled, "Operating Procedures

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for Stud Tensioner and Pump" was reviewed by Sargent & Lundy and issued for construction use.

Corrective Action to be Taken to Avoid Further Noncompliance

Field Construction Procedure 2-137 which controls the installation of Suppression Pool wall plates and embedments, and which includes installing and tensioning anchor bolts, contains a statement indicating that the tensioning shall be done in accordance with the "Operating Procedures for Stud Tensioner and Pump".

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 1c - Control of Portable Weld Rod Warmers

Corrective Action Taken and Results Achieved

All Henry J. Kaiser Company portable weld rod warmers have been clearly numbered and checked for proper temperature. Those complying with the requirements have been recorded on a master list which is issued to rod shack personnel for their use in issuing warmers. Non-complying warmers have been removed from the rod shack to a repair area.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company Procedure SPPM 3.3, Revision 5, has been revised to clearly identify the control requirements for portable rod warmers.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 2a - Ultrasonic Examination Test Report

Corrective Action Taken and Results Achieved

Written clarification has been obtained from the quencher base plate material supplier. This clarification states that all plates requiring a 100% ultrasonic search are examined by laying out 24" grids on the

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plate surface. Each grid serves as a map and is searched 100% (with appropriate overlap). Each square is reviewed for acceptance as the test progresses.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company receiving inspection personnel have been instructed by the Henry J. Kaiser Company QA Manager to obtain clarification of documentation which is ambiguous before accepting such documents. This instruction session has been documented.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 22, 1979.

Item 2b - Certification of Embeco-636 Grout

Corrective Action Taken and Results Achieved

Henry J. Kaiser Company QA considered the manufacturer's marking of product formulation on each bag of Embeco-636 to be equivalent to a certification, since false labeling of contents is a breach of civil statutes and grounds for civil suit. However, further objective evidence has been obtained from our supplier, Master Builders, in the form of certification covering all Embeco-636 supplied to Henry J. Kaiser Company to date.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company receiving inspection personnel have been instructed by the Henry J. Kaiser Company QA Manager to obtain certification that Embeco-636 grout meets specification requirements. Verification of this instruction is documented. This requirement is also stated in the Henry J. Kaiser Company procedure covering the Installation of Suppression Pool Wall Plates and Embedments.

Date When Full Compliance Will Be Achieved

Full compliance was achieved June 26, 1979.

Item 3a - Traceability of Weld Filler Metal

Corrective Action Taken and Results Achieved

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Each weld rod holding oven now has an accurate rod location map attached designating the size, type, and heat number of the weld rod.

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Corrective Action to be Taken to Avoid Further Noncompliance

Weld rod shack attendants were instructed to maintain the weld rod location maps and to locate rod in the oven according to the map. Future audits will be made to assure compliance.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 3b - Traceability of Liquid Penetrant "Dye" Material

Corrective Action Taken and Results Achieved

Material lot number identification is being applied to each transfer container of penetrant materials. Additionally, inspectors are verifying that penetrant kits are free of visible contaminants.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company Procedure SPPM 4.2 has been revised to require that traceability of penetrant materials is maintained. Also, this procedure makes the inspector responsible to verify that the penetrant container is not contaminated.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 4a - Food in Weld Rod Holding Oven

Corrective Action Taken and Results Achieved

Food products which were heated in Weld Rod Holding Oven #57 were removed immediately and Oven #57 was removed from service.

Corrective Action to be Taken to Avoid Further Noncompliance

Craft personnel were given strict instructions that the practice of cooking food in any field location will not be tolerated and violators will be subject to termination. This is a mandatory item of instruction given during the indoctrination and training of craft personnel as per Field Construction Procedure 1-19.

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Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 4b - Gas-Fired Torches Used for Preheat

Corrective Action Taken and Results Achieved

Weld Procedures 3.1.59 and 3.1.80 were revised to permit preheat by gas-fired torches. Electric Preheaters are being used as required in Weld Procedure 3.1.57.

Corrective Action to be Taken to Avoid Further Noncompliance

Welders were instructed that Procedure 3.1.57 does not permit gas-fired preheat.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 4c - Verification of Weld Interpass Temperature

Corrective Action Taken and Results Achieved

"Tempilstiks" with a 350°F maximum range were issued to construction personnel for use on detecting welding interpass temperatures.

Corrective Action to be Taken to Avoid Further Noncompliance

Welders were instructed to use "tempilstiks" to verify the interpass temperature requirements of welding procedures.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 5a - Nonconforming Weld Filler Metal Material

Corrective Action Taken and Results Achieved

A separate, locked bin was built in the weld rod disbursement room to serve as a quarantine area. The 50 nonconforming weld rod containers were placed in this bin and will be returned to the storeroom for reprocessing.

Corrective Action to be Taken to Avoid Further Noncompliance

Weld rod disbursement room attendants were instructed to place nonconforming weld rod in the quarantine bin. This has been documented in a

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training report conducted by the Henry J. Kaiser Company Site Welding Engineer. Henry J. Kaiser Company Procedure SPPM 3.3, "Welding Filler Material Control", requires that nonconforming weld rod be returned to the rod room for rebaking. The bin in the rod room is labeled "Rod to be Rebaked - Do not issue".

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 6a - Records Reflecting the Status of Work

Corrective Action Taken and Results Achieved

Appendices "B" and "F" to SPPM 8.0 have been revised to authorize the use of 'work sheet' copies of field welding checklists (KE-1 forms) in the field. The inspectors may use these as a means of maintaining inprocess inspection status prior to formally stamping the permanent inspection records which are located near the work station.

Corrective Action to be Taken to Avoid Further Noncompliance

This item will be audited in the future to verify compliance with this requirement.

Date When Full Compliance Will Be Achieved

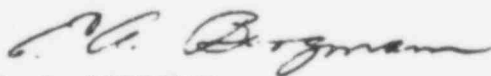
Full compliance was achieved May 29, 1979.

We trust that this letter is an adequate response to your IE Inspection Report No. 79-15.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN
Vice President

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