

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

REGION III

Report No. 50-358/80-15

Docket No. 50-358

License No. CPPR-88

Licensee: Cincinnati Gas and Electric Company
139 East 4th Street
Cincinnati, OH 45201

Facility Name: Wm. H. Zimmer Power Station

Inspection At: Zimmer Site, Moscow, OH

Inspection Conducted: June 23 - 27, 1980

P. A. Barrett
Inspector: P. A. Barrett

7/23/80

RC Knop
Approved By: R. C. Knop, Chief,
Projects Section 1

7/25/80

Inspection Summary

Inspection on June 23-27, 1980 (Report No. 50-358/80-15)

Areas Inspected: Review of the site QA/QC reorganization and design change control. The inspection involved a total of 31 inspector-hours onsite by one NRC inspector.

Results Of the areas inspected, one apparent item of noncompliance was identified (infraction - failure to establish controls to assure structural design changes are implemented in the field and verified by QC - paragraph 2.d.).

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DETAILS

Persons Contacted

Cincinnati Gas and Electric Company (CG&E)

- *W. W. Schwiens, Quality Assurance Manager
- *B. K. Culver, Project Manager
- *J. F. Weissenberg, Quality Assurance Engineer
- *D. C. Kramer, Quality Assurance Engineer
- *J. R. Schott, Station Superintendent
- *W. B. Murray, General Construction

Kaiser Engineers, Inc.

- *R. Marshall, Construction Manager
- *E. V. Knox, Quality Assurance Manager

*Denotes those attending the exit interview.

Functional or Program Areas Inspected

1. Site QA/QC Reorganization

The inspector discussed the reorganization with the site QA manager. The reorganization essentially involved the merging of Cincinnati Gas and Electric Company, CG&E and Kaiser Engineers Inc., KEI QA/QC managements. The merge was in an interim status. The management change had taken place, but the documented description of the change was not completed. An organizational chart had been developed. Procedures from the previous organization were being used. Job descriptions, duties, and responsibilities will be developed reflecting the new organization by July 15, 1980. Interim descriptions were defined in letters from the QA manager. This matter will be reviewed during a subsequent inspection. (358/80-15-01)

No items of noncompliance or deviations were identified.

2. Design Change Control

- a. The RIII inspector reviewed the controls for two types of design changes: Engineering Change Requests, ECR, and Design Document Changes, DDC. The following changes were selected for the review:

- ECR 1064 dated August 3, 1979
- ECR 87 dated September 12, 1978
- ECR 1039 dated April 11, 1979
- ECR 1054 dated August 7, 1979
- DDC S-2030 dated May 1, 1980

DDC S-2070 dated June 9, 1980
DDC S-2013 dated April 16, 1980
DDC SLM-555 dated March 19, 1980
DDC SLS-491 dated January 15, 1980
DDC SLM-569 dated May 15, 1980
DDC M4892 dated April 1, 1980

The change documents identified how the changes were initiated, the description of the changes, and engineering approvals. The distribution of the change documents were being controlled by the documents affected by the changes. There were a few drawings at different distribution locations which had not been marked to indicate unincorporated changes. The KEI construction manager provided a letter dated June 5, 1980, which requested a corporate audit of this area. The licensee stated that an audit of design change distribution control would be performed and corrective action taken where necessary.

- b. Controls were being used to assure field implementation and verification of ECRs. All ECRs were being controlled by Construction Inspection Plans, CIP and KE-1 forms (weld verification forms). The CIP did not always reference the ECR by number. The licensee stated that the CIPs would describe, with the aid of DDCs, changes required by the ECR. DDCs are used to describe specific changes, whereas ECRs describe functional changes. One ECR may involve several DDCs.

ECR 1064 had been put in the completed construction file indicating the required change had been accomplished, however the relative CIP was still open and filed in a different location. No direct indication was made on the ECR to indicate the open/closed status of the CIP. The CIP was open because final engineering approval had not been received for a DDC related to the ECR. Thus, the licensee stated that a complete review of all CIPs will be done, prior to operational turnover, to assure field implementation and quality control verification of all ECRs. CIP status control will be reviewed during a subsequent inspection. (358/80-15-02)

- c. The RIII inspector observed the completed work and checked QC documentation required by ECRs 1064, 87, 1039, and 1054. Where applicable, the following aspects of the changes were accomplished as specified: Proper materials, location, configuration, concrete pour cards, weld records, and nondestructive examination records.

The CIP package for ECR 1064 included a weld filler metal stores issue slip. The slip indicated the weld procedure and the filler metal that was used for the specific change. Discussions with the personnel involved with implementing the change revealed that the decision, as to which weld procedure and respective filler metal to use, was made by the welding craft personnel. The decision was based on the welding personnel's experience and qualification

scope of the welder, which could have potentially resulted in the wrong weld procedure needed to accomplish the specific design. The scope of uncertainty is limited to structural welds that were made during a period in which KE-1 forms were not used. KE-1 forms define the weld procedure and filler metal, as determined by a welding engineer's interpretation of the design criteria. The licensee stated that a review will be made of all safety related structural welds for the period which KE-1 forms were not used. The review will identify any cases in which the wrong weld procedure and/or filler metal were used. KE-1 forms will be completed for the welds being reviewed and for all future welds before the welds are made. This matter is unresolved. (358/80-15-03)

- d. With one exception, effective controls were being used to assure, (i.e. inspect), field implementation and verification of DDCs. The controls were established for the electrical and mechanical disciplines, but were not incorporated into the QA program. The licensee stated that these controls would be incorporated. Controls (i.e., verification by inspection of DDCs) had not been established in the structural discipline. This is contrary to the requirements of 10 CFR 50 Appendix B, Criterion X and the Wm. H. Zimmer FSAR Chapter 17 as described in Appendix A to the report transmittal letter. (358/80-15-04)
- e. The RIII inspector reviewed the following drawings which had numerous DDCs listed as not incorporated (open):

E-189 sheet 10 of 10 listed 146 open DDCs
E-189 sheet 4 of 10 listed 54 open DDCs
S-468 listed 27 open DDCs
S-446 listed 31 open DDCs
S-398A listed 43 open DDCs

The licensee was aware of the above situations and the difficulties with working with these documents. All documents affected by DDCs are scheduled to be revised to a more workable and practical level of 10 or less open DDCs by July 30, 1980. This DDC concern will be reviewed during a subsequent inspection. (358/80-15-05)

Unresolved Items

Unresolved items are items for which additional information is required to determine if the item is acceptable or in noncompliance with requirements. One unresolved item is addressed in paragraph 2.c.

Exit Interview

The inspector met with the licensee representatives at the conclusion of the inspection on June 27, 1980 and summarized the purpose and findings of the inspection. The licensee acknowledged the findings.