

THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN  
VICE PRESIDENT

October 8, 1980  
QA-1350

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

Attention: Mr. James G. Keppler  
Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I  
NRC INSPECTION REPORT NO. 80-19, DOCKET NO.  
50-358, CONSTRUCTION PERMIT NO. CPPR-88,  
W.O. #57300-957, JOB E-5590

Gentlemen:

This letter constitutes our response to the subject Inspection Report. It is our opinion that nothing in the report or in this letter is of a proprietary nature.

Our response to the items of noncompliance, as cited in Appendix "A" of the report, are as follows:

1. Tagging of Systems Turned Over For Preoperational Testing
  - (a) Corrective Action Taken and Results Achieved
    - (1) The revision 1 to the Residual Heat Removal (RH) system release was promulgated via the correct form on August 25, 1980 and signed as complete by EPD on September 24, 1980.
    - (2) A complete review and field check of the Residual Heat Removal (RH) System releases including replacement of missing and mutilated tags, was conducted and completed by the GCD Preop. Turnover Group on October 2, 1980.
  - (b) Corrective Action To Be Taken To Avoid Further Noncompliance
    - (1) A complete review and field check of all essential systems' releases including replacement of missing and mutilated tags shall be conducted by the GCD/Preop. Turnover Group and be complete within 60 working days.

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- (2) A GCD Administrative Procedure shall be generated for the conduct of periodic audits in accordance with SU.ACP.15 within 30 working days.

(c) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 31, 1980.

2. System Releases

(a) Corrective Action Taken and Results Achieved

- (1) Revision 4 of the Tagging Release for the Residual Heat Removal System was issued on September 23, 1980 to resolve all discrepancies.
- (2) As previously mentioned, a complete review and field check of the RH System was conducted and completed of all green tags on October 2, 1980.

(b) Corrective Action To Be Taken To Avoid Further Noncompliance

The GCD Preop. Turnover Group is in the process of a system-by-system review of the matrix generation listing of components which require tagging. These components are to be listed on a new computer listing showing scope, "tagged by", "witnessed by", date, reaudit date.

This item will be complete within 60 working days.

(c) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by December 31, 1980.

3. Discrepancies Between Valve List and S&L Drawings

(a) Corrective Action Taken and Results Achieved

- (1) Valves 1E12F370 and 1E12F371 are listed by the Mechanical Department Valve List as being shown on P&ID M-51-3 but do not appear. (M-51-3, Rev. L)

These valves are shown on M-53-1. This typographical error will be corrected on the next issue of the Mechanical Department Valve List. Rev. 9, the next issue of the Mechanical Department Valve List, is scheduled to be issued by October 20, 1980.

- (2) Valve 1E12F385B is mislabeled as 1E12F386A on C&ID M-751-7, Rev. H.

This error has already been corrected on M-751-7, Rev. K1 dated August 15, 1980 as part of the regular design control review.

- (3) Valves 1E12F396 and 1E12F397 are on C&ID M-751-11 but are not listed on the Mechanical Department Valve List.

Valves 1E12F396 and 1E12F397 are listed on Rev. 8 dated August 29, 1980, of the Mechanical Department Valve List.

(b) Corrective Action To Be Taken To Avoid Further Noncompliance

Sargent & Lundy, as the overall designer of the plant, is in the best position to assure that all involved drawings and documents are revised when a change is made. Sargent & Lundy does have in-house procedures to assure that all such changes are identified and implemented. The fact that two of the three items questioned by the inspector were already implemented before the Inspection Report was received suggests that the system does work. It should be noted that the third item in the Inspection Report was a typographical error. The valve in question was actually shown on the proper system drawings.

It should be pointed out that the plant is still in the construction phase and many changes are being incorporated daily. While we realize our responsibilities for keeping documents current and correct, it is important to note that a single change may affect many documents, and unfortunately all documents are not revised at the same time; therefore, there will probably always be a lag in issuance between certain documents.

It should also be pointed out that the extent of GED design reviews has always been intended to spot check only. This has been clearly stated in procedures which have been audited by QA and also outside management auditors.

In summary, we believe that sufficient design review controls exist to minimize the occurrence or errors of this type and no further procedural controls need to be imposed.

(c) Date When Full Compliance Will Be Achieved

We consider this area to be in compliance at this time.

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4. Weld Pod Control (Weld Rod Warmer Not Plugged In)

(a) Corrective Action Taken and Results Achieved

In the particular instance cited where the inspector observed a portable rod warmer not plugged in, the observation was correct. Although the welder had withdrawn the rod for temporary supports, the HJK procedure does not distinguish between essential, nonessential, and temporary. Consequently, the welder was terminated for cause.

(b) Corrective Action To Be Taken To Avoid Further Noncompliance

All welders have an indoctrination and training session prior to starting work on the project, with group training programs at periodic intervals. Henry J. Kaiser Company has on file a form which each welder signs informing him that violation of project rules holds the penalty of termination. The HJK Welding Engineering Group performs audits daily and maintains a log. HJK has terminated welding personnel in the past for violation of work rules and will continue to do so in the future.

(c) Date When Full Compliance Will Be Achieved

This item is considered to be in compliance at this time.

We trust that the above will constitute an acceptable response to the subject Inspection Report.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 

E. A. BORGMANN  
SENIOR VICE PRESIDENT

JFW:ec

cc: NRC Resident Inspector  
Attn: F. T. Daniels