THE CINCINNATI GAS & ELECTRIC COMPANY

CINCINNATI, OHIO 45201

E. A. BORGMANN
SENIOR VICE PRESIDENT

April 9, 1981

Docket No. 50-358

Mr. Harold Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: WM. H. ZIMMER NUCLEAR POWER STATION
UNIT 1 - CASELOAD FORECAST PANEL SITE VISIT

Dear Mr. Denton:

At the exit meeting held with the NRC Caseload Forecast Panel on February 26, 1981, our Electric Production Department representatives, who are responsible for the preoperational testing program, were unable to attend. As a result, I did not have available at the time sufficient details to address the Panel's conclusion that the preoperational test program is the critical path item to completion of the Zimmer Station or rebut the completion date projected by the Panel. Now that I have had an opportunity to review the matter with the appropriate individuals, I wanted to express my deep concern to you about the Forecast Panel's predicted completion date of August, 1982, which is eight months beyond the Company's present estimate and wish to point out several apparent misinterpretations of data submitted to the Panel on February 24 and 25 by our Electric Production Department personnel which led to what the Company believes is an erroneous result. This data was submitted in response to the Panel's request for information as indicated in item number 8 of the Caseload Forecast Panel Site Visit Meeting Agenda.

It appears that the Panel made their projection for preoperational testing duration solely on the basis that to date 15 of 116 tests have been completed. This Panel's apparent reasoning was that, at the rate of 6 tests per month, a 17 month period would be required to complete the other 101 tests. This was converted to an August, 1982 completion date.

It was pointed out to the Panel on several occasions that in addition to 15 completed tests, 54 tests were in progress, over half of which are more than 80% complete. When these partially completed tests are considered, a weighted total completion average of 49% results. The Panel apparently ignored this data. This information as supplied to the Panel on February 24, 1981, in the form of overhead viewgraphs, has been included as an attachment to this letter.

During the clarifying session held on February 25, 1981, with the Panel, our Electric Production representatives explained and described the calculational basis for reporting preoperational testing progress. A copy of the February Monthly Status Report was presented to the Panel providing additional facts and showing how our calculations are performed.

On the average, the preoperational tests in progress are about 65% complete. This equates to the equivalent of approximately 34 additional completed tests (.65 x 54). This would leave the equivalent of 67 tests not begun. Using the NRC's assumed completion rate of 6 tests per month, a remaining 11 month test duration period is computed. If the weighted completion average of 49% were used, a 10 month duration would be required to complete the remaining tests. Again, this information and discussions centering around these calculations were held with the Panel.

It should be noted that a 10 to 11 month remaining test period as calculated above, is consistent with historical test durations. Industry averages indicate 18 month preoperational testing programs. Using the NRC derived number of 6 tests per month, a 19 month total test period would result for Zimmer (116 - 6), with 11 months remaining for completion of the testing program.

During testing discussions, the Panel made reference to the minimal size of the testing staff. Again, in the Panel's summary report, it was noted that the testing effort would be the most difficult effort to accelerate by increased manpower because of scheduling interferences and equipment exceptions. In regard to test personnel, we emphasize that CG&E has now assumed overall control of the test program. We have a CG&E coordinator responsible for radwaste testing, have integrated six (6) CG&E engineers into the testing program, and have plans to use approximately six (6) additional CG&E testing engineers for preoperational testing.

To: Mr. Harold Denton April 9, 1981

Re: Wm. H. Zimmer Nuclear Power Station Page #3
Unit 1 - Caseload Forecast Panel Site Visit

A final point that the Panel has completely ignored is the methods and procedures currently being implemented that provide detailed scheduling tools for construction. testing, and manpower needs. One integrated schedule is being utilized on the Zimmer project and the construction work schedule is based on the systems startup sequence that has been in effect for over 3 years. Recent changes and improvements in scheduling methods were explained to the Panel. Considerable time was expended in making the Panel aware of the use of schedules during both the construction and testing presentations.

In our opinion, the NRC Caseload Forecast Panel has erred in its projection of the amount of testing work remaining on the Zimmer Project. Inasmuch as the Panel's date is used for a number of different purposes within the NRC and may directly or indirectly affect the ability of CG&E to complete construction and obtain an operating license, you can understand our deep concern with what we believe is a significant error in the estimate. Based on the information summarized above and included in the attachment, I trust our position has been clarified and will result in the Forecast Panel's reassessment to an earlier completion date.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By E. A. Borgmann
E. A. BORGMANN

EAB:mjl
Enclosure
cc: Charles Bechhoefer
M. Stanley Livingston
Frank F. Hooper
Troy B. Conner, Jr.
James P. Fenstermaker
Steven G. Smith
William J. Moran
J. Robert Newlin
William G. Porter, Jr.
James D. Flynn
F. T. Daniels
W. Peter Heile
James H. Feldman, Jr.
John D. Woliver
Mary Reder
David K. Martin
George E. Pattison
Andrew B. Dennison

State of Ohio)
County of Hamilton) ss

Sworn to and subscribed before me this 9th day of April, 1981.

VIRGINIA P. MUHLHOFER
Notary Public, State Of Ohio
My Commission Expires July 28, 1982

Virginia P. Muhlhofer
Notary Public

EPD Preop. Presentation

Viewgraphs

Preoperational Procedure and Testing Status

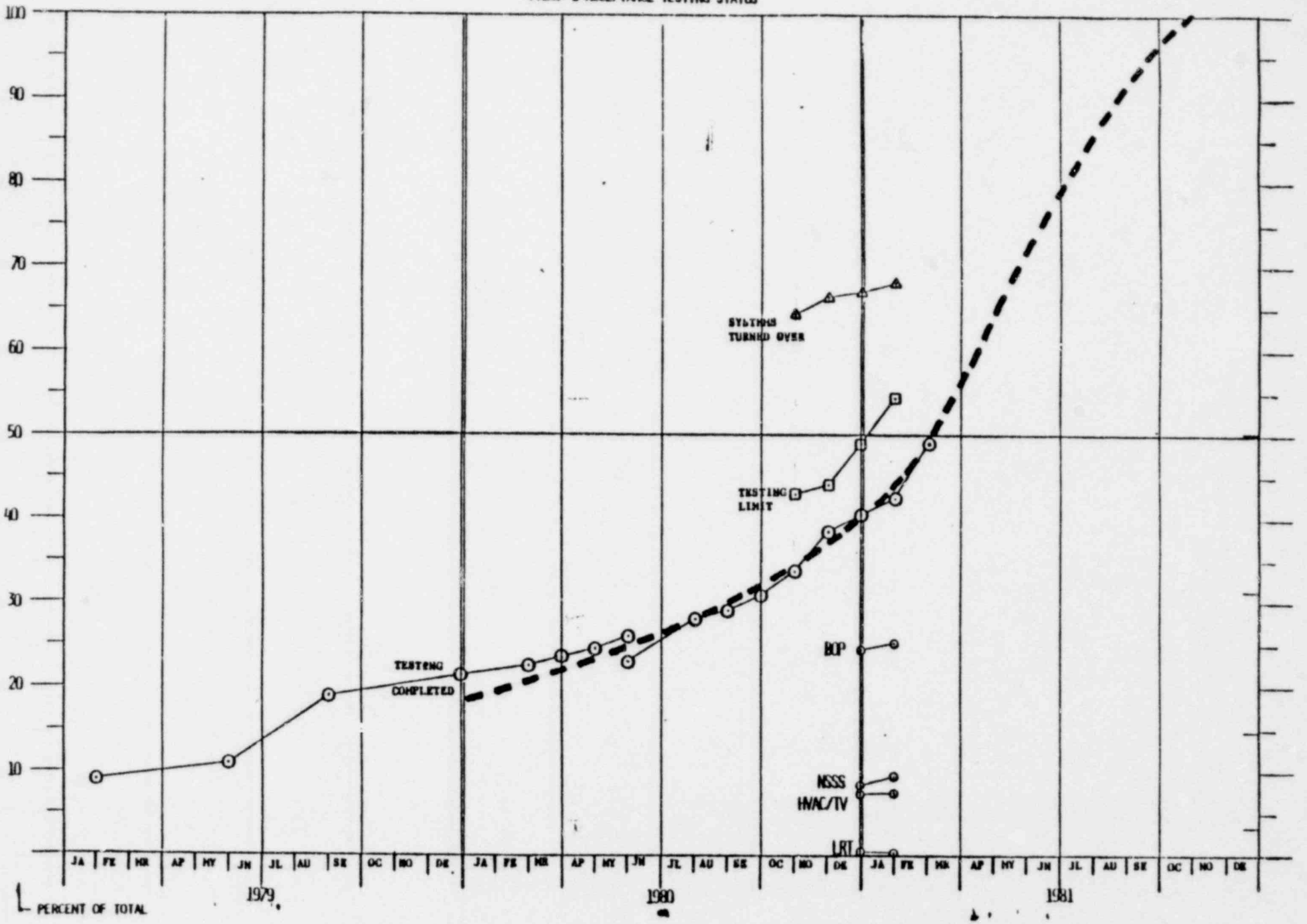
Date: 2-25-81

	Test Procedures req'd for Fuel	Test Procedures Drafts not Begun	Test Procedures Draft Being Written	Test Procedures in Review	Test Procedures Final Approved		Tests Req'd for Fuel	Tests not Begun	Tests in Progress	Tests 100% Complete	Test Results Approved		No. of Systems & Subsystems Turned Over Req'd for Fuel	No. of Systems & Subsystems Turned Over	
BOP	51	0	0	4	47		51	11	29	10	1		107	67	
NSSS	36	0	0	5	31		36	19	14	3	0		42	27	
HVAC/TV	24	1	0	1	22		24	12	10	2	0		22	16	
LRT	5	0	0	0	5		5	4	1	0	0		46*	45*	
Totals	116	1	0	10	105		116	46	54	15	1		171	110	
	100%	.9%	0.0%	8.6%	90.5%		100%	39.7%	46.5%	12.9%	.8%		100%	64.3%	

* PC Turnovers not included in totals.

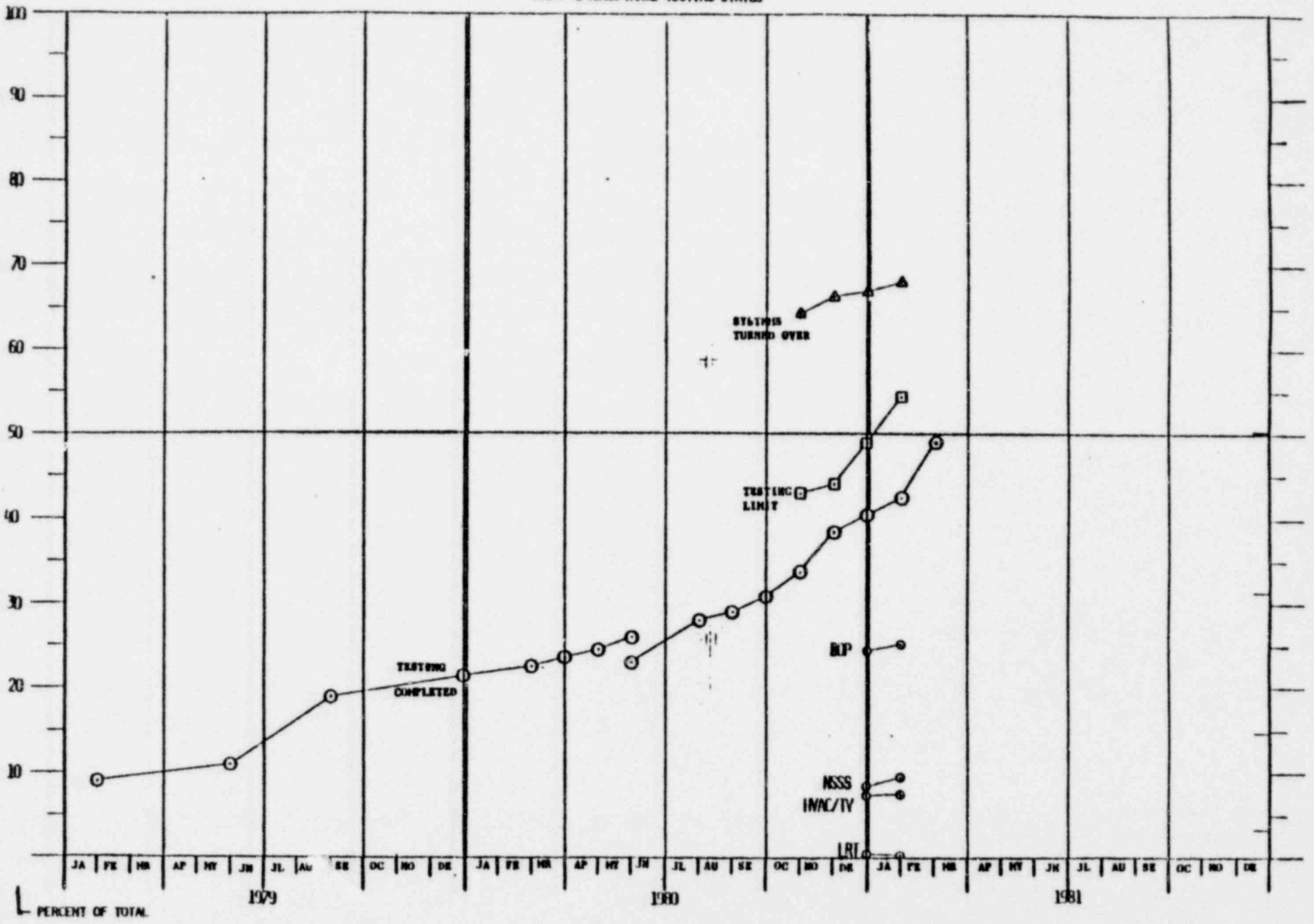
WM. H. ZIMMER NUCLEAR POWER STATION

PREOP & ACCEPTANCE TESTING STATUS



WM. H. ZIMMER NUCLEAR POWER STATION

PREOP & ACCEPTANCE TESTING STATUS

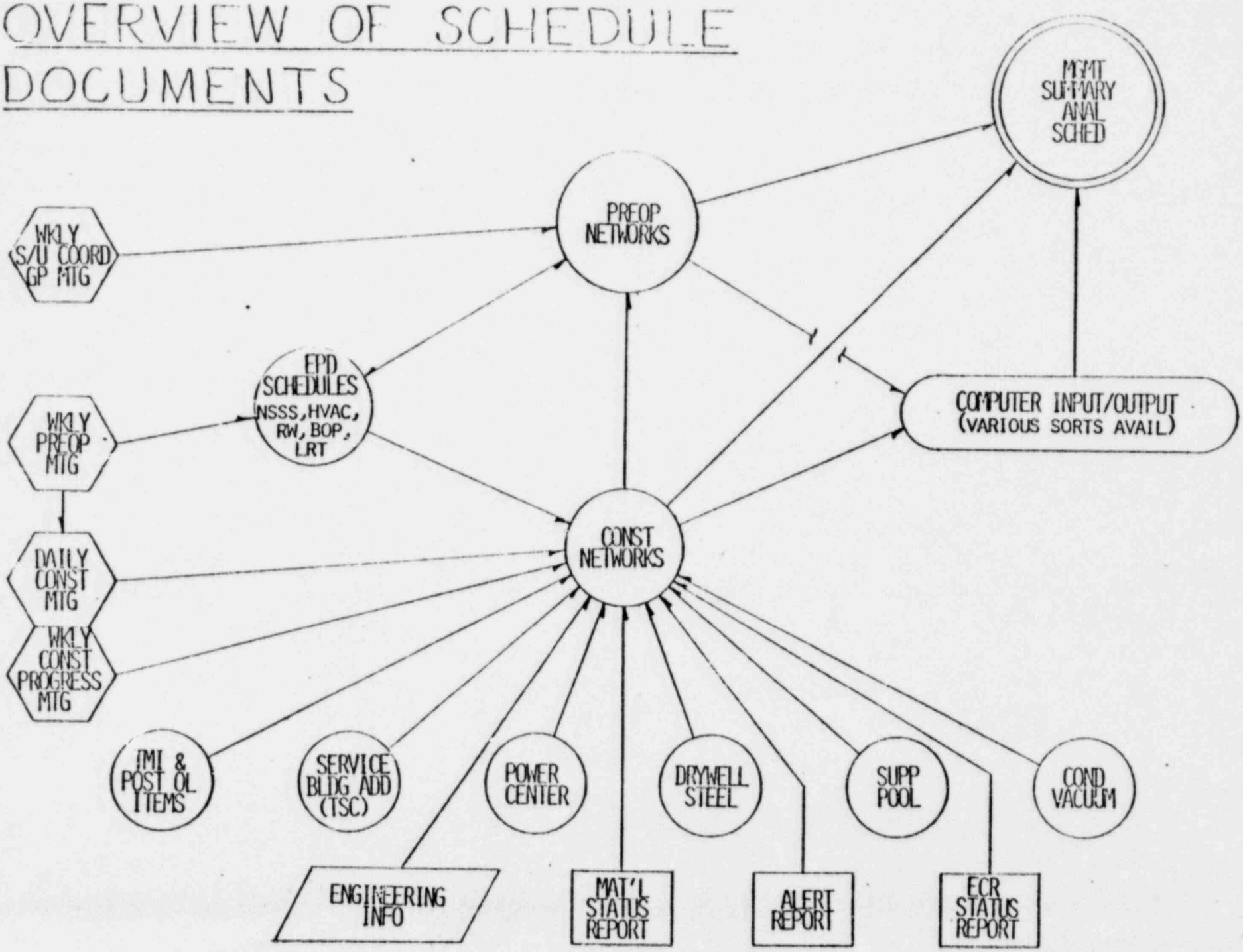


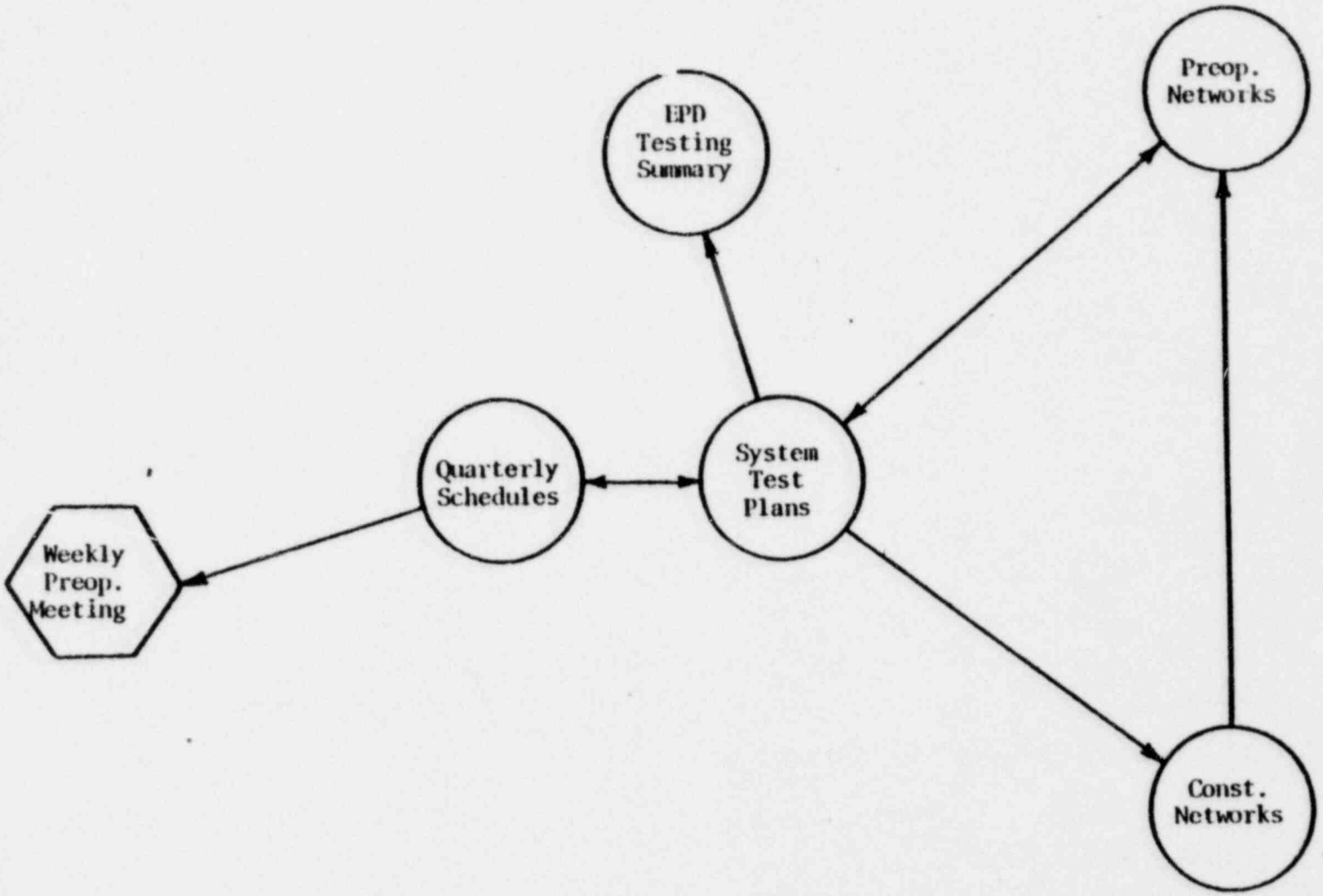
PREOPERATIONAL TESTING MANPOWER

Period		Preoperational Test Program Supervision	Preoperational Test Engineers
1979 & 1980	Consultants	4	18
	CG&E	0	1
1981	Consultants	3	18
	CG&E	3	6 + 6*

* Future (Part Time)

OVERVIEW OF SCHEDULE DOCUMENTS





EPD SCHEDULING ACTIVITIES