

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI OHIO 45201

June 19, 1981
QA-1442

E. A. BORGMANN
SENIOR VICE PRESIDENT

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

Attention: Mr. C. E. Norelius, Acting Director
Division of Engineering & Technical Inspection

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
NRC INSPECTION REPORT NO. 81-08 - 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 responses to the items of noncompliance cited in Appendix "A" of report 81-08 are as follows:

81-08-01 and 02 Failure to Follow Procedures

(1) Corrective Action Taken and Results Achieved

These two items, dealing with failure to follow procedures, are essentially those as addressed by Appendix A Notice of Violation, in IE Report 81-01. These two items were written against the conduct of the same preoperational test, PQ-RD-02, Control Rod Drive Hydraulic Preoperational Test, based upon observations made during the same testing period. Therefore, the corrective actions taken as a result of the Notice of Violation in Report 81-01 are also applicable to items 81-08-01 and 02 and were implemented after the stated violations (81-08-01 and 02).

To summarize, as a result of these occurrences, Revision 10 to SU.ACP.05, Conduct of Preoperational Tests, was issued. This revision gives more explicit directions on the use of the test procedure, reverifications of prerequisites, and the methods available to document deviations from the approved test procedure. When this revision was issued, a training seminar was conducted by the Test Coordinator for all preoperational system engineers and staff engineers in order to ensure that an understanding of and compliance with the new requirements was achieved. Engineers are now fully indoctrinated in the mechanics of test conductance and conduct their tests in accordance with the procedural requirements of

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SU.ACP.05, Revision 10.

(2) Corrective Action to be Taken to Avoid Further Noncompliance

A program of increased QA surveillance of the conduct of preoperational tests in accordance with SU.ACP.05-Revision 10, will be instituted.

(3) Date When Full Compliance Will be Achieved

Full compliance will be achieved by July 30, 1981.

81-08-03 Failure to have an adequate instrumentation calibration program.

(1) Corrective Action Taken and Results Achieved

Incorporated in revision 10 of SU.ACP.05, Conduct of Preoperational Testing, are the requirements of the preoperational testing instrument calibration program. Section 6.4 of SU.ACP.05 reads as follows:

"6.4 Instrumentation Identification and Calibration

6.4.1 When instrumentation is used to:

1. Take data to verify acceptance criteria in a preoperational test covered under Appendix A of 10CFR50...
2. Measure or control the parameters for taking the acceptance criteria above...
3. Measure certain parameters specified in the limits and precautions section that prevent serious damage to equipment, (these generally are accepted limits of operation from technical specifications or G.E. standards such as RPV heatup rates or RPV water chemistry requirements).

The system engineer shall verify proper calibration of the instrumentation before use in the above applications.

6.4.2 The instrumentation used in the above applications shall be either measuring and test equipment as covered under MT.SAD.01 or installed process instrumentation.

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6.4.3 Verification of proper calibration of the instrumentation as addressed in 6.4.1 shall consist of:

1. For Measuring and Test Equipment;

- A. Recording with the data in the preoperational test, the instrument name, number, calibration date and calibration due date as per the calibration sticker and assuring based on those dates that the instrument is "in calibration".

2. For Installed Process Instrumentation;

- A. Recording with the data in the preoperational test the instrument name, number, and calibration date.
- B. Assuring from I&C records that the instrument or instrument loop, as appropriate, has been loop calibrated within 18 months from the date the data is taken.
- C. Including a copy of the loop calibration sheets in the preoperational test results package.

6.4.4 If the instrumentation addressed in 6.4.1 is not properly calibrated, the system engineer should initiate work to have the instrumentation properly calibrated.

Preoperational Tests listed in Attachment A are considered to fall under Appendix A, 10CFR50. For those preoperational tests already completed, a review of the calibration status of instrument loops used per 6.4.1 of SU.ACP.05 - Revision 10, will be conducted. If a loop calibration time exceeds the 18 month criterion, the loop calibration will be repeated and, based upon an evaluation of the "as-found" conditions, a decision will be made as to whether or not the affected portion of the preoperational test needs to be repeated. A training seminar was conducted by the Test Coordinator for all preoperational system engineers and staff engineers in order to instruct them as to the new requirements

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covering instrumentation. All preoperational testing is now accomplished in accordance with these requirements.

(2) Corrective Action to be Taken to Avoid Further Noncompliance

Procedure SU.ACP.05, "Conduct of Preoperational Tests" has been revised to include the requirement that applicable loop calibration data sheets be submitted with the completed preoperational test package. The station I&C department will issue a procedure addressing loop calibration requirements. The increased QA surveillance, identified above, will specifically check for instrument calibration status.

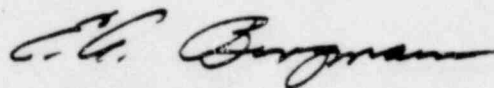
(3) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by August 28, 1981.

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

Very truly yours,

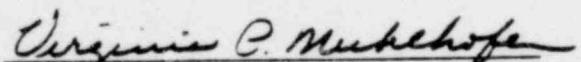
THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E. A. BORGMANN

GMO/ds
Attachment
cc: NRC Resident Inspector
Att: F. T. Daniels

State of Ohio }
County of Hamilton } ss

Sworn to and subscribed before me this 19th day of June, 1981.


Notary Public

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

ZIMMER PREOPERATIONAL TESTS

UNDER

APPENDIX A 10CFR50

PO-AP-1	PO-NB-2	PO-SC-1
PO-AP-2	PO-NR-1	PO-SI-1
PO-AP-3	PO-NR-2	PO-TP-1
PO-AP-4	PO-NR-3	PO-TV-1
PO-AP-5	PO-OG-1	PO-VA-1
PO-AR-1	PO-PC-1	PO-VC-1
PO-CM-1	PO-PC-2	PO-VC-2
PO-DC-1	PO-PR-1	PO-VD-1
PO-DC-2	PO-PR-2	PO-VG-1
PO-DC-3	PO-PR-3	PO-VG-2
PO-DG-1	PO-PR-4	PO-VJ-1
PO-EI-1	PO-PR-5	PO-VL-2
PO-FC-1	PO-PR-6	PO-VP-1
PO-FH-1	PO-RD-1	PO-VQ-1
PO-HC-1	PO-RD-2	PO-VQ-2
PO-HG-1	PO-RD-3	PO-VR-1
PO-HP-1	PO-RH-1	PO-VW-3
PO-IN-1	PO-RI-1	PO-VX-1
PO-LD-1	PO-RP-1	PO-VY-1
PO-LP-1	PO-RR-1	PO-WR-01
PO-MS-1	PO-RR-2	PO-WS-01
PO-NB-1	PO-RR-3	