

MAY 6 1983

Docket No. 50-358

Cincinnati Gas and Electric
Company
ATTN: Mr. Earl A. Borgmann
Senior Vice President
Engineering Services and
Electric Production
139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

This is in response to your letter (EAB-SOL-11) dated January 7, 1983, requesting the NRC's concurrence in the performance of certain additional work activities at the Zimmer site which you believe do not violate the November 12, 1982 Show Cause Order and Order Immediately Suspending Construction.

The NRC has reviewed your letter and concluded that the activities listed in Section A, below, are not safety-related construction activities that are suspended by the Commission's Order and may be undertaken at this time. Your letter contains insufficient information to determine whether the activities listed in Section B, below, are within the scope of activities prohibited under the Order. The activity identified in Section C, below, is considered to be a safety-related construction activity, which may not be undertaken at this time.

A. The following activities are not considered to be safety-related construction activities suspended under the Order and may be continued within the existing management controls and established quality assurance program. The applicable codes and standards shall be appropriately addressed during the performance of the activities. The item numbers listed below correspond to the numbers contained in your January 7, 1983 letter.

1. OPERATIONAL PROGRAMS USED TO SUPPORT AND CONTROL ACTIVITIES

Station Directive (Typical)

SA.SAD.01	Instructions for SAD's
SA.SAD.04	Station Procedures
SA.SAD.06	Review, Approval, Issue & Revision of Implementing Procedures

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EC.SAD.01	Equipment Control
EC.SAD.02	Safety Tagging
EC.SAD.03	Jumper & Lifted Wire Control
EC.SAD.04	Caution Tagging
EC.SAD.05	Work Requests
EC.SAD.07	Cleanliness Control
EC.SAD.08	Housekeeping
MT.SAD.01	Control of Measuring & Test Equipment

These are typical station directives. Additional directives necessary to control and support routine activities permitted under the Order (such as maintenance, preventive maintenance, calibration, surveillance, and preservation of structures, systems, components, and equipment) are to be provided as necessary prior to performing the activities.

The Preoperational Testing Manual specifies controls for systems in preoperational test status.

2. INSTRUMENT CALIBRATION

Continuing calibration and surveillance of instruments and maintenance of set point adjustments, maintenance of records, etc., on previously turned-over systems. Maintenance of instrumentation and controls providing a protective service (e.g., low suction pressure trip on fire pump) is included under this activity.

NOTE: This does not include the electrical and electronic check-outs of equipment turned-over to CG&E for the purpose of performing initial or final construction checkouts, testing, calibration, etc. (See Paragraph C).

Previously identified directives are to be utilized to control this activity. Other procedures, such as calibration procedures, are to be utilized, reviewed, and approved in accordance with the previously listed directives.

Electronic Printed Circuit Boards (PCB's) maintenance on previously turned-over equipment is permitted, including removal of the PCB and replacement with a new board or returning the PCB to the vendor for repair and upon return, reinstallation and testing in the logic circuit (See Note above).

3. CORRECTIVE MAINTENANCE ACTIVITIES FOR PROTECTION OF EQUIPMENT

Work to protect and/or preserve equipment and components in operation is to be performed within the established controls and under the

MAY 6 1983

surveillance of the Operations QA organization. Applicable Quality Assurance requirements codes, standards, and regulations are to be addressed during performance of the activities (ASME, housekeeping, tool control, cleanliness, personnel qualifications, etc.).

Per a telephone conversation between E. R. Schweibinz of my staff and J. C. Herman of your staff on April 4, 1983, it is our understanding that the paragraph at the bottom of page 2 of your letter was inadvertently included and that it was not your intent to attach copies of Work Requests to your letter.

"Examples of such work are shown per the attached copies of Work Requests (WR's) generated by plant personnel and which would normally be performed by plant maintenance personnel."

4. FLUSHING

Flushing of non-essential systems turned-over from construction and in support of the preoperational testing program controlled within the program directives and procedures is permitted. The flushing activities will include activities such as the removal, installation, replacement, and reinstallation of temporary strainers, hoses, and piping. The applicable codes and specifications and safety-related interfaces are to be appropriately addressed.

6. EQUIPMENT OPERATION

Periodic and/or routine operation of previously turned-over equipment to support post-maintenance checkout, preventative maintenance calibration, surveillance, or to support plant safety is permitted.

8. SPECIFIC MAINTENANCE TASKS

a. Service Water Pump Modification

The return of the pump from the vendor, receipt inspection, reinstallation, and testing of the modified service water pump is permitted. Applicable codes, standards, and regulations are to be followed during the performance of the activities (ASME, housekeeping, tool control, cleanliness, personnel qualifications, etc.). ASME interface activities are to be performed by the H. J. Kaiser Company.

b. Service Water Structure Air Compressor

The temporary electrical feed to the compressor motor, controlled within the Work Request Program and the Jumper and Lifted Wire Directive is permitted. The permanent installation (using approved design documents) is not to be performed at this time.

9. PUNCHLIST COMPLETION OF NON-ESSENTIAL SYSTEMS TURNED OVER FOR PREOP TESTING

Punchlist work by Catalytic, Inc., performed within the established procedures and controls, is permitted. The following are examples of nonessential systems turned-over for prooperational testing:

AS-1	CP-1	OT-1	WF-3	WW-1
CB-1	CW-1	SH-1	WG-2	WX-1
CD-1	DV-1	TO-1	WG-3	WX-2
CD-2	HD-1	WE-2	WM-1	WY-1
CL-2	MC-1	WF-2	WT-1	WZ-1
CL-3				

Applicable codes, standards, regulations, and safety-related interfaces are to be addressed during the performance of the activities (ASME, AWS, housekeeping, tool control, cleanliness, personnel qualifications, fire protection, etc.).

11. WELDER QUALIFICATION

Qualifying welders in accordance with the requirements, codes, and standards to support nonsafety-related work is permitted.

12. WELD PROCEDURES

Development, qualification, approval and implementation of additional weld procedures required to support on-going nonsafety-related work is permitted.

B. The following items did not contain sufficient information to permit blanket approval and are not permitted at this time. We believe such activities should be requested by CG&E for consideration by NRC Region III on a case by case basis. The requested items should not include safety-related construction and rework activities except in those limited instances required to support maintenance of the plant in an acceptable condition and to support the quality verification programs.

4. FLUSHING of essential systems.
5. PREOPERATIONAL TESTING of safety-related structures, systems, and components.
7. SPECIAL TESTING of safety-related structures, systems, and components.
- 8.c. Service Water Strainer Backwash System modification or changes to system configuration.

Cincinnati Gas and Electric
Company

MAY 6 1983

10. 50.55(e) Items concerning safety-related structures, systems, or components.
- C. The following are considered to be safety-related construction activities and may not continue at this time.
2. INSTRUMENTATION CHECKOUT, including the electrical and electronic checkouts of safety-related equipment turned-over to CG&E for the purpose of the performing of initial or final construction checkouts, testing, calibration, etc., may not continue at this time. (See Note under A.2. above).

We will gladly discuss any questions you have concerning this matter.

Sincerely,

"Original signed by R. F. Warnick"

R. F. Warnick, Director
Office of Special Cases

Enclosure: ltr dtd 1/7/83:

cc w/encl:

J. R. Schott, Plant Superintendent
J. D. Flynn, Manager Licensing Environmental
Affairs Department
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Ohio EPA
Citizens Against a Radioactive Environment
James W. Harris, State of Ohio
Robert H. Quillin, Ohio Department of Health
Thomas Applegate
Thomas Devine, Associate Director, Institute
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Dave Martin, Office of Attorney General
Mark Wetterhahn, Esq.
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James R. Williams, State Liaison Officer,
Ohio Disaster Services Agency
Paul Ryder, Ohio Governor's Office

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Warnick

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Lewis
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Davis
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for Keppler
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