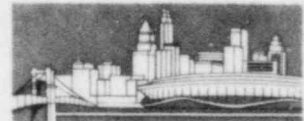


THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

November 19, 1982
QA-2127

E. A. BORGMANN
SENIOR VICE PRESIDENT

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

Attention: Mr. J. G. Keppler
Regional Administrator

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT 1
10CFR50.55(e) - E-23, DEFICIENCIES IN GE
PANEL INSTALLATIONS, DOCKET NO. 50-358,
CONSTRUCTION PERMIT NO. CPPR-88,
W.O. 57300, JOB E-5590, FILE NRC-7, E-23

Gentlemen:

This letter constitutes an interim report concerning the subject deficiency initially reported to Mr. E. R. Schweibinz of the NRC under the requirements of 10CFR50.55(e).

Our previous report stated that two (2) areas of concern had been identified regarding internal wiring in Class 1E essential panels containing Reactor Protection System (RPS) and/or Neutron Monitoring cabling. The following deficiencies were identified:

- 1) A separation distance of six (6) inches between certain wires of different channels in the Neutron Monitoring System was not maintained as specified on the design documents.
- 2) A separation distance of one (1) inch between designated wiring was not maintained as specified on the design documents.

We have reported the discrepancies to the vendor and have requested a resolution to these concerns. In response, the vendor has performed an evaluation of the electrical separation requirements for the panel in question. This evaluation concludes that plant safety has not been compromised by the discrepancies between as-built wiring and the design documents. Consequently the concerns are not reportable per 10CFR50.55(e) or 10CFR21 since no significant safety hazard is involved. The report states that the separation requirements will be removed from the appropriate elementary and connection diagrams since they are not necessary to ensure plant safety. No other corrective action is required.

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The vendor's conclusions are based on the following:

- 1) A failure analysis of the wiring requiring a six (6) inch separation demonstrates that shorts and hot shorts will not disable any of the safety functions in the panel.
- 2) The separation criteria of one (1) inch was specified to minimize Electro-Magnetic and Radio Frequency Interference (EMI/RFI). The use of twisted shielded wiring and grounding together with the low-sensitivity of the instruments involved to EMI/RFI precludes the need for criteria.

Although a preliminary review of the vendors report has been performed, the detailed evaluation required to verify the conclusions has not been completed. This evaluation will include an analysis of the panel to determine if a potential exists for the loss of a redundant safety division. The results of the analysis will be verified by field inspections of the panel, including the interface between the panel and the raceways.

The final evaluation of this deficiency should be completed by January 17, 1982. The final report to be submitted at that time will either verify the vendors conclusions that the discrepancies do not compromise plant safety or identify the corrective actions required to resolve this deficiency.

We trust that the above will be found acceptable as an interim report under 10CFR50.55(e).

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 

E. A. BORGMANN
SENIOR VICE PRESIDENT

MJ/cse

cc: NRC Office of Inspection & Enforcement
Washington, D. C. 20555
NRC Senior Resident Inspector
Attn: W. F. Christianson
NRC Zimmer Project Inspector
Region III