## THE CINCINNATI GAS & ELECTRIC COMPANY



August 25, 1981 0A-1484

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, Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I IE INSPECTION REPORT NO. 81-18, 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 proprietary in nature.

Our responses to the items of noncompliance listed in Appendix "A", Notice of Violation, are as follows:

Failure to take corrective action to identify and correct procedural nonconformances related to system turnover for preoperational testing and the System Index Test Matrix.

(a) Corrective Action Taken and Results Achieved

As a result of the inspection Cincinnati Gas & Electric QA performed Audit #357 of the Turnover Group on July 13-15, 1981. This audit identified deficiencies similar to those cited in the inspection report in the turnover packages for systems PT-LP-01 and PT-NB-01. Subsequently there have not been any systems turned over for preoperational testing.

(b) Corrective Action Taken to Avoid Further Noncompliance

On June 19, 1981 procedure SU.PRP.01, System Release and Turnover, was revised to require QA signature on all release packages prior to acceptance by the Electric Production Department. Cincinnati Gas & Electric QA has developed the QA procedure for the Guality Engineering group to review the packages to verify the construction test documentation required by the System Index Test Matrix is on file with the Turnover Group, or that those

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> tests not completed are listed on the system punchlist. Packages will not be processed until this procedure is in place.

In addition the Startup Manual (SUM) and procedures SU.PRP.06 -Generation and Control of the System Index Test Matrix, and Admin 2 - Coordination of System Turnover, are being revised to more clearly define the required construction tests and to better define the organizational interface between the Turnover Group and organizations that perform the construction testing.

New System Index Test Matrices will be issued for all systems previously turned over for preoperational testing. Documentation will be reviewed per 06-QA-03 - System Turnover for Preoperational Testing QA Review.

(c) Date When Full Compliance Will Be Achieved

It is anticipated that the review and revision of the applicable procedures will be completed by September 30, 1981. Review of documentation for previously turned over systems will be completed prior to final acceptance of the system.

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

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

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E. A. BORGMANN

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

State of Ohio ) ss County of Hamilton)

Sworn to and subscribed before me this 27th day of August, 1981.

Notary Public Lifeber MARGARET L. HUBE