THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201 September 22, 1982 0A-2008

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 I 10CFR50.55(e), ITEM M-38, POSSIBLE CARBON STEEL IN STAINLESS WELDS, DOCKET NO. 50-358, CONSTRUCTION PERMIT NO. CPPR-88, W.O. #57300 JOB E-5590 FILE NO. NRC-8, M-38

Gentlemen:

This letter constitutes an interim report concerning the subject condition, initially reported to the Commission under the requirements of 10CFR50.55(e).

Weld record documentation indicates the possibility of the inclusion of carbon steel filler material in stainless steel reactor recirculation system pipe welds. KE-2 forms, which are used for requesting issuance of filler materials, indicate that the proper filler material required for these welds (ER-308 for GTAW welding process and E 308-16 for the SMAW process) was requested. The heat numbers recorded on the KE-2 form upon issuance of the material by the weld rod issue clerk are, however, traceable to carbon steel filler material (E 70-S2 for GTAW and E-7618 for SMAW). The five welds involved are designated RR B-2 (described by HJK NR E-4359), RR B-20 (NR E-4351), and RR A-12, A-14, and A-22 (NR E-4352). As stated in the previous report, QA-1795, dated May 28, 1982, it is highly unlikely that carbon steel filler material was substituted for stainless steel filler material. This statement is based on the depositions of three experienced welders, the weld rod issue clerk, and a Q.C. inspector involved with these welds.

In order to provide additional credence in this hypothesis, one weld, RR A-22, has been removed from the reactor recirculation piping system and sent to a materials laboratory for analysis. Weld RR A-22 was chosen because if carbon steel is present on any of the above welds, this should have the highest per weight content of carbon



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steel. Metcut Inc. will transverse section the weld into one-half inch segments and perform a nitric acid etch in order to determine any inclusions of carbon steel material. Only one half of the weld is to be so tested, so as to leave the other half of the weld remaining for any subsequent independent testing by CG&E if such testing is later deemed necessary. This analysis is scheduled to be completed by October 8, 1982 with a report to follow on October 15, 1982. The results of this analysis will be reported to the NRC by November 15, 1982.

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

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

ByCo

E. A. BORGMANN SENIOR VICE PRESIDENT

GMO/FKP:plc

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