

DEC 29 1982

Docket No. 50-358

Cincinnati Gas and Electric
Company

ATTN: Mr. Earl A. Borgmann
Senior Vice President
Engineering Services and
Electrical Production

139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

This refers to a meeting held on August 25, 1982, at the Wm. H. Zimmer Nuclear Power Station between Mr. J. E. Shaffer and others of his staff, and Mr. T. P. Gwynn of this office to discuss the administrative controls necessary to assure that equipment, materials, and components related to previously voided nonconformance reports (NR's) (which could be considered evidence) are properly controlled and safeguarded.

It was determined that sufficient controls were not then in place to adequately provide traceability and security of items associated with the voided nonconformance reports. Nonconforming items were not tagged in accordance with site procedures to preclude further processing; no specific controls were established to assure the safekeeping of records/documents related to these nonconforming items once the items have (had) been removed from the system(s); no specific controls were provided to assure the unique traceability of each nonconforming item to its associated records once the items have (had) been removed from the system(s); the facility presently provided for the safekeeping of nonconforming items, was not constructed so as to provide a secure storage area; and no specific controls were established by which the NRC could concur with the disposition and apply a "hold point" beyond which work to remove or rework the nonconforming items could not proceed without the notification and/or presence of the resident inspector. These items were discussed specifically with respect to CC&E nonconformance report number Q-QAD-82-1738-E; however, they are of generic concern to the NRC, especially with respect to all nonconforming conditions identified by Task VII of the Quality Confirmation Program (QCP).

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Although temporary controls were provided with respect to NR Q-QAD-82-1738-E, the above concerns require management review and the establishment of implementing procedures.

In order to achieve and maintain necessary traceability and control of evidence as discussed above, it is necessary that the following be addressed:

- (1) All hardware items associated with previously voided nonconformance reports (including voided NR's, "control number" NR's, and "inspection report" NR's) shall be immediately and conspicuously tagged identifying the item as potential evidence and precluding further processing (rework or modification) or removal from its installed condition without the concurrence of the NRC.
- (2) The NRC resident inspector shall prescribe required "hold points" at the time of concurrence in the disposition of the previously voided NR, such that he may have the opportunity to witness the removal of the item.
- (3) When possible, indelible or permanent identification markings shall be placed on the item to provide assurance that the item remains traceable when removed from the field and placed in the "QCP Task VII storage area."
- (4) The cabinet presently provided as the "QCP Task VII storage area" shall be modified such that the only method by which easy ingress can be accomplished is by utilization of the lock (i.e., hinges installed from the inside, no exposed screws or other closure devices, etc.). The keys associated with that lock shall be placed in the custody of the NRC resident inspector with a backup key in the custody of the CG&E Nuclear Production Department Security Supervisor. The secure storage area will be expanded as necessary to retain the materials as potential evidence.

We believe that the above actions as a minimum are necessary; however, there may be other equivalent methods by which control over this potential evidence may be achieved. We request that you inform this office at your earliest convenience of the actions which you intend to take in order to achieve and maintain control, traceability, and security for items and records associated with previously voided nonconformance reports as discussed above.

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

Sincerely,

James G. Keppler
Regional Administrator

- cc: J. R. Schott, Plant
Superintendent
- J. D. Flynn, Manager, Licensing
Environmental Affairs Department
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- Harold W. Kohn, Power
Siting Commission
- Citizens Against a Radioactive
Environment
- Helen W. Evans, State of Ohio
- Robert M. Quillin, Ohio
Department of Health
- Thomas Applegate
- Thomas Devine, Associate
Director, Institute for
Policy Studies
- Dave Martin, Office of
Attorney General
- Mark Wetterhahn, Esq.
- Jerome A. Vennemann, Esq.
- Gretchen Hummel, Ohio
Consumers' Counsel
- James R. Williams, State
Liaison Officer, Ohio
Disaster Services Agency

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SURNAME	Schweibenz/ls. Hunter	Warnick	Lewis	Davis	Keppler	
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