

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

July 28, 1982
QA-1872

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
SYSTEMATIC ASSESSMENT OF LICENSEE'S PERFORMANCE
(SALP), DATED JUNE 24, 1982 - DOCKET NO. 50-358,
CONSTRUCTION PERMIT NO. CPPR-88, W.O. #57300,
JOB E-5590, FILE NO. NRC-15

Gentlemen:

This letter serves to document CG&E's comments concerning the subject Report, as requested in your letter, dated June 24, 1982. CG&E is generally pleased with the Report and your recognition of the significant progress made during the assessment period. We have, however, noted the following and wish to make suggestions to improve the Report.

A. Enclosure 2, Section IV.2.a

NRC Finding:

This section of the Report states that no inspection activity has specifically addressed the areas of Containment and other safety related structures since April 8, 1981.

CG&E Comment:

Contrary to this statement, Mr. D. Keating of the NRC performed inspections in this area on January 25-28, 1982. The results of this inspection are documented in I.E. Report 50-358/82-01, and no items of noncompliance were noted.

B. Enclosure 2, Section IV.3.a, Page 5

NRC Finding:

This section of the Report identifies nine (9) items of noncompliance related to piping supports.

CG&E Comment:

Only three of the nine items cited remain open, (50-358/80-25-06, 08 and 09). All will be completed as part of the Zimmer Quality Confirmation Program.

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C. Enclosure 2, Section IV.3, Page 6, last paragraph

NRC Finding:

This section identifies two inspections which are construed to be I. E. Inspections #50-358/81-17 and #50-358/82-04. The implication is made that these reports identified licensee commitments not being implemented in a timely manner.

CG&E Comment:

A review of these reports has found that the latter makes no reference to a lack of commitment implementation. In fact, of previous open items reviewed in 50-358/82-04, all were closed by the NRC Inspector.

In addition, CG&E has added a computerized control and tracking system to assure that NRC commitments are identified and implemented for I.E. Inspection Reports, Bulletins, Circulars, Information Notices and reportable deficiencies. This is an indication that improvements continue to be made in our commitment control system.

D. Enclosure 2, Section IV.8.a

NRC Finding:

The Commission states that the licensee's ability to staff certain lower level positions, seems to be less than desired.

CG&E Comment:

Capability to analyze events with a risk assessment/systems overview approach has been under development since September, 1981. Efforts have primarily been in the area of developing fault-tree computer models to analyze some of the ECCS Systems. Four engineers are presently staffing the group involved in the risk assessment effort.

Since the April 8, 1981 Immediate Action Letter, CG&E, in addition to Quality Assurance Personnel improvements, has increased its technical staffs with additional fulltime engineering personnel. These additions include nine (9) new engineers in the Nuclear Engineering Department, thirteen (13) on the Technical Staff of the Nuclear Production Department, and eight (8) in the Nuclear Services Department.

E. Enclosure 2, Section IV.9.a

NRC Finding:

This section states that documentation of air monitoring equipment calibration and maintenance has been poor.

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CG&E Comment:

CG&E has found that this is based upon findings cited in I.E. Inspection Report #358/81-24. In our response to this report, QA-1525 dated October 15, 1981, it was stated that the vendor of air samplers performs quarterly calibrations and maintains at its offices, documentation of calibrations in accordance with their prescribed schedule. Copies of calibration data sheets were transmitted with our reply. To assure vendor adherence to their procedures, CG&E has increased its effectiveness in the areas of vendor audits.

F. Enclosure 2, Section IV.12.a (2)

NRC Finding:

"Severity Level III, 10CFR50, Appendix B, Criteria IVII:

Reports reviewed were false and did not furnish evidence of activities affecting quality. (358/81-13-02)".

CG&E Comment:

As stated in CG&E's February 24, 1982, response to the 81-13 Investigation Report, we strongly object to the use of the word "false" as there was no evidence of any willful intent to deceive. The acts of "whiting out" NR Log entry of a Control Number or deletion of NR's initiated in error, for example, were done only in good faith compliance with established QA procedures and were certainly not attempts to falsify QA records.

G. Enclosure 2, Section IV.12.a (3)

NRC Finding:

"Severity Level III, 10CFR50, Appendix B, Criterion I:

Lack of sufficient organizational freedom for QC inspectors as a result of harrassment and intimidation".

CG&E Comment:

Again, as stated in CG&E's February 24, 1982 response to the 50-358/81-13 Investigation Report, we object to the terms of "harrassment" and "intimidation". Inspectors have freely indicated that their perception of activities such as dousings,

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are representative only of typical horseplay found at any construction site. CG&E, the constructor, and collective bargaining units have all taken positive steps to limit such horseplay, which may be perceived as intimidation. As an example; on May 28, 1982, CG&E stopped all construction as a result of a dousing incident and did not restore construction until all craft personnel signed a written statement acknowledging their understanding of the criminal implications of such actions.

H. Enclosure 2, Section IV 12.a (Pg. 14, Para. 3)

NRC Finding:

"Further evidence is the fact that several recent reports relate to problems that occurred some time ago".

CG&E Comment:

CG&E wishes to point out that the time a problem occurs is not necessarily the same time in which the licensee becomes cognizant of the problem, as the above statement implies. 10CFR50.55(e) requires "the holder of the permit shall notify the Commission of each deficiency found....". This indicates that the reporting requirements are not imposed until the deficiency (problem) is discovered.

Furthermore, 10CFR50.55(e) requires permit holders to notify the Commission of significant deficiencies in design and construction. Many conditions are not determined reportable until evaluations and reviews can make that determination. CG&E's Owners Project Procedure (OPP) 7.2 requires notification of "potentially reportable" items as well, therefore, the procedural requirements are more stringent than those of the regulation.

I. Enclosure 2, Section IV 12, Page 14

NRC Finding:

This section of the report makes reference to five recent items of noncompliance.

CG&E Comment:

CG&E received the Notices of Violation for these items after receipt of the SALP Report, and therefore, will reserve any comment until a formal response to each item is submitted.

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J. Enclosure 2, Section IV 13.c

NRC Finding:

This section states that an independent verification of the QCP should be evaluated.

CG&E Comment:

CG&E, as it has stated in response to recent Congressional hearings, maintains that an independent, third party program for quality confirmation, is not necessary. Since issuance of the April 8, 1981 Immediate Action Letter, the Quality Confirmation Program has proven effective and independent of cost and schedule. The addition of an independent review would only add unnecessary cost and delay and would not provide any additional assurance of plant quality.

K. Enclosure 2, Section V.B.1

NRC Finding:

"...The licensee uses 10CFR50.55(e) reports for any Part 21 reports received...."

CG&E Comment:

A point of clarification should be made in that all Part 21 reports received are not necessarily reported under 10CFR50.55(e), however, they are evaluated as potentially reportable deficiencies under our 10CFR50.55(e) program. It should be further noted that not all of the twenty (20) referenced reports are admittedly reportable. Some are considered "potentially" reportable and may later be retracted. As an example, the Report does not indicate that item (o) of this list was retracted by CG&E on January 20, 1982.

In addition, CG&E understands that the title "Construction Deficiency Reports (CRD)" means deficiencies which are subject to provisions of the Construction Permit. This understanding is significant in that several deficiencies were a result of inadequate vendor design, quality assurance or manufacture and are not representative of Zimmer specific design or construction deficiencies.

If there are any questions you may have regarding these comments, please

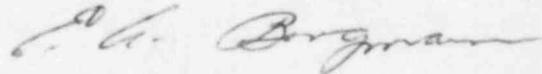
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contact Mr. H. R. Sager, Manager, Quality Assurance Department, Cincinnati Gas & Electric Company.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC CO.

By



E. A. BORGMANN
SENIOR VICE PRESIDENT

FKP:ec

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