

DEC 28 1982

Docket No. 50-358

Cincinnati Gas and Electric
Company

ATTN: Mr. W. H. Dickhoner
President

139 East 4th Street
Cincinnati, OH 45201

Dear Mr. Dickhoner:

The NRC staff has reviewed your submittal of November 26, 1982 proposing that Bechtel be approved as the entity to conduct the independent review of CG&E's management of the Zimmer project as required by Section IV.B(1)(a) of the Commission's November 12, 1982 order and has determined that the submittal needs supplementation in the areas identified on the attached list.

We are continuing our review of your submittal and the comments we have received from members of the public on the submittal, but will be unable to complete our review until you have supplemented your proposal as requested. Please contact me to indicate a date by which you anticipate filing the requested information. If you have any question regarding this request, please do not hesitate to contact me.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Attachment: Areas of CG&E's
11/26/82 Proposal Requiring
Supplementation

cc w/attachment:
See attached list

8301040760 821228
PDR ADOCK 05000358
A PDR

1031

OFFICE						
SURNAME						
DATE						

DEC 28 1982

cc w/attachment:

Public Citizen's Critical
Mass Energy Project

Webster W. Posey, Clerk of Council
City of Cincinnati

Ms. Susan L. Fremont, and

Ms. Isabelle Davidson, The Woman's
City Club of Greater Cincinnati

William A. Spratley, Consumers' Counsel

Sylvester Murray, City Manager

Phillip W. Amadon, Coalition for
Affordable, Safe Energy

D. David Altman, Environmental
Advisory Council

Mr. & Mrs. Earl Chowning

Lynne Bernabei, Government
Accountability Project

Ms. Muriel S. Hiatt

Ms. Lenna Mae Gara

Ms. Carolyn B. Miller, President
The League of Women Voters of
the Cincinnati Area

Cincinnati Gas & Electric Co.

Mark Wetterhahn, Esq.

Jerome Vennemann, Esq.

J. R. Schott, Plant Superintendent

J. D. Flynn, Manager, Licensing
Environmental Arrairs 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

Gretchen Hummel, Ohio
Consumers' Counsel

James R. Williams, State
Liaison Officer, Ohio
Disaster Services Agency

By Telephone

OFFICE ▶	RIII	<i>JH</i>	<i>for ARD</i>	<i>JK</i>	<i>Dickhoner</i>	Sniezek - IE
SURNAME ▶	Warnick/ls	<i>RFW for</i>	Bavis	Keppler	<i>report</i>	Burns - ELD
DATE ▶	12/23/82	<i>12/27/82</i>		<i>12/27/82</i>		Eisenhut - NRE by sec.
						<i>12/27/82 RFW</i>

AREAS OF CG&E'S NOVEMBER 26, 1982 PROPOSAL REQUIRING SUPPLEMENTATION

A. Questions Directed to Cincinnati Gas & Electric Company

1. Please provide all documents and a discussion of any oral understanding related to CG&E's plans to utilize Bechtel as described in your November 10, 1982 letter to the NRC Commissioners and activities contemplated in response to the November 12, 1982 Commission Order. Include with this response a chronology of meetings between CG&E and Bechtel and site visits by Bechtel employees in connection with this effort.

B. Questions Directed to Bechtel Power Corporation

1. In performing the management review required by the NRC's Order, it would appear useful to include interviews with NRC personnel directly involved in the past Zimmer investigation, employees at the site, "whistleblowers", representatives of the National Board of Boiler and Pressure Vessel Inspectors, and other individuals who might have valuable information. Also, it would appear useful to review identified construction and quality assurance deficiencies, and determine if they are attributable to or related to management. Please supplement the Bechtel November 23, 1982 letter to address these matters.
2. Please describe how Bechtel Corporate management, if approved by NRC, will determine if the Bechtel team's management review is comprehensive and the findings and recommendations are valid.
3. For each individual being considered to be a participant in the Zimmer management review, please provide a signed, sworn statement by the individual covering the following:
 - a. Whether the employee has engaged in any work or business involved with or related to the engineering or design of the Zimmer plant;
 - b. Whether, during the term of the management review, the employee, or any members of his or her immediate family, shall have cumulative beneficial interests in Cincinnati Gas and Electric Company, Columbus and Southern Ohio Electric Company, or Dayton Power and Light Company (the Applicants), including but not limited to common or preferred stock, bonds or other securities issued on behalf of the Applicants, which exceed five percent of their gross family annual income;
 - c. Whether any member of employee's immediate family is employed by the Applicants.

4. We note that Mr. Soderholm has been assigned to the Midland project for the last two years. In view of the NRC's longstanding concerns for construction and quality assurance problems at Midland, please describe in greater detail Mr. Soderholm's role in connection with Midland and indicate whether there were any construction or quality assurance related deficiencies identified in his area of responsibility.

C. Questions Directed to Both CG&E and Bechtel

1. Bechtel's November 23, 1982 letter describes a continuing Bechtel role in the completion of the Zimmer project. We request that CG&E and Bechtel discuss how this continuing role would not adversely affect Bechtel's objectivity in performing the Management Review and recommending whatever course of action they might deem necessary. Similarly, please discuss whether Bechtel's activities at the site prior to the NRC's acceptance of an independent reviewer adversely affect Bechtel's objectivity in performing the Management Review and recommending a course of action.