

DEC 30 1982

Docket No. 50-358

Cincinnati Gas and Electric
Company

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

139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

This refers to your letter (QA 1940) dated September 10, 1982, regarding qualifications for personnel performing collection of as-built data for the seismic analyses of safety-related piping systems in accordance with IE Bulletin 79-14.

Your letter states in part that, "Because the individuals collecting the data are not making a determination of 'conformance . . . to predetermined quality requirements', they are not required to be certified inspectors in accordance with ANSI N45.2.5, 'Qualifications of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants'." We agree that the activities, as described, can be performed by personnel trained and certified to an equivalent program.

The training of personnel performing quality-related activities to achieve and maintain suitable proficiency is addressed by the FSAR, QA Procedures, and Owner Project Procedures. We understand that the personnel performing the IEB 79-14 walkdown activities can include design engineers, field engineers, technicians, and QA/QC inspectors who have been indoctrinated, trained, and certified in accordance with the above commitments.

Cincinnati Gas and Electric
Company

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We will gladly discuss any questions you have regarding personnel qualifications (RG 1.8 and 1.58) requirements.

Sincerely,

"Original signed by R. F. Warnick"

R. F. Warnick, Acting Director
Office of Special Cases

cc: J. R. Schott, Plant Superintendent
J. D. Flynn, Manager, Licensing
Environmental Affairs Department

cc w/ltr dtd 9/10/82:
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

RIII

EW
Schweibinz/jp
12/22/82

RIII

EW
Hunter

RIII

W
Yin
12/23/82

RIII

W
Danielson
for

RIII

RW
Warnick
12/29/82

E.S.



CINCINNATI, OHIO 45201
September 10, 1982
QA-1940

THE CINCINNATI GAS & ELECTRIC COMPANY

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 1
I. E. BULLETIN #79-14 - DOCKET NO. 50-358
CONSTRUCTION PERMIT NO. CPPR-88, W.O.
#57300, JOB E-5590, FILE NO. NRC-10

Gentlemen:

The purpose of this letter is to document CG&E's interpretation of the requirements for personnel qualifications of individuals performing the data collection for the seismic analyses for as-built safety related piping systems in accordance with I. E. Bulletin 79-14.

I. E. Bulletin 79-14 states in part: ". . . For portions of systems which are normally accessible, inspect one system in each set of redundant systems and all nonredundant systems for conformance to the seismic analysis information set forth in design documents. . ."

The 79-14 program at Zimmer consists of a process of measurement and engineering evaluation. Individuals collecting measurement data are contracted through the NUS Company. The term "inspection", as used in the 79-14 bulletin is not taken to mean the definition stated in ANSI N45.2.10, "Quality Assurance Terms and Definitions," which defines "Inspection" as "A phase of quality control which by means of examination, observation or measurement determines the conformance of materials, supplies, components, parts, appurtenances, systems, processes or structures to predetermined quality requirements."

~~8-69210451~~
E.A.B.
ML

SEP 24 1982

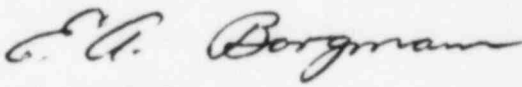
Mr. J. G. Keppler
U. S. Nuclear Regulatory Commission
Region III
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Because the individuals collecting the data are not making a determination of "conformance. . .to predetermined quality requirements," they are not required to be certified inspectors in accordance with ANSI N45.2.6, "Qualifications of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants." 79-14 personnel collect the required data and forward the measurements to the architect/engineer for evaluation. This data collection effort does not require making judgement as to acceptance or rejection, therefore, this process does not involve quality assurance "Inspection."

We trust the above will be found as an acceptable interpretation of this terminology.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E. A. BORGMANN
SENIOR VICE PRESIDENT

FKP:as

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