

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Construction Inspection

IE Inspection Report No. 050-358/77-02

Licensee: Cincinnati Gas and Electric
Company
139 East 4th Street
Cincinnati, OH 45201

Wm H. Zimmer Nuclear Power Station
Moscow, OH

License No. CPPR-88
Category: A

Type of Licensee: BWR (GE) 807 MWe

Type of Inspection: Mid QA, Announced

Dates of Inspection: January 25-28, 1977

Principal Inspector: *T. E. Vandel*
T. E. Vandel

3-24-77
(Date)

Accompanying Inspectors: *E. J. Jablonski*
E. J. Jablonski

3/24/77
(Date)

W. J. Key
W. J. Key

3/24/77
(Date)

D. L. Kelley
D. L. Kelley, RIV

3/24/77
(Date)

Other Accompanying Personnel: R. F. Heishman
(January 28, 1977, only)

Reviewed By: *D. W. Hayes*
D. W. Hayes, Chief
Projects Section

3/25/77
(Date)

SUMMARY OF FINDINGS

Inspection Summary

Inspection on January 25-28, 1977, (77-02): Review of quality assurance program implementation relating to construction activities of the licensee and construction manager, and also of selected construction contractors. Six examples of a noncompliance were identified related to failure to follow procedures and instructions.

Enforcement Items

The following item of noncompliance was identified during the inspection:

- A. 10 CFR 50, Appendix B, Criterion V states in part: "Activities effecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with the instructions, procedures or drawings."

Cincinnati Gas & Electric FSAR, Chapter 17, Section 17.1.5, which implements Criterion V states in part that, "Activities effecting the quality of the facility are accomplished in accordance with written instructions, procedures or drawings which prescribe acceptable methods of carrying out the activities, make reference to appropriate inspections and tests and include acceptance criteria against which the performance of the activities are judged."

Contrary to the above:

- A.1 On January 26, 1977, it was observed that a large number of Design Document Changes had not been designated "essential" or "non-essential" as required by internal letter KEO-73 dated October 29, 1976. (Paragraph 2.b, Report Details)
- A.2 Surveillance and reports of subcontractors activities are not being performed in accordance with KEI's QAMCI, G-14, Quality Assurance Surveillance Procedure. (Paragraph 2.c, Report Details)
- A.3 Physical requirements and certification of certain KEI quality control NDE inspectors were not reverified in accordance with KEI's QAP No. 20, Revision 0, and ANSI N45.2.6. (Paragraph 3, Report Details)

- A.4 Stainless steel and low hydrogen electrodes were not placed in separate holding ovens as required by KEI's SPPM-3.3 Revision 4. (Paragraph 3, Report Details)
- A.5 Class I anchor bolts were not purchased from a supplier listed on the approved suppliers list as required by KEI's QAP No. 5 and 6. (Paragraph 3, Report Details)
- A.6 The site constructor failed to perform follow-up audits to determine the adequacy and effectiveness of action taken to correct deficiencies and preclude recurrence as required by QAP 19 Section 3.8. (Paragraph 1.c, Report Details)

Licensee Action on Previously Identified Enforcement Items

Reactor Control, Incorporated (RCI) QA Manual (IE Inspection Report No. 050-358/76-07)

The inspector reviewed a new procedure, number QATP-1, providing for the training and training records for site personnel. This procedure was considered to be adequate for the identified concern and responsive to the licensee commitment contained in their letter of response dated September 23, 1976. This matter is resolved.

Other Significant Items

- A. Systems and Components

None.

- B. Facility Items (Plans and Procedures)

Unresolved Matter

Final approved documents of a current revision of the CG&E Quality Assurance manual of quality assurance procedures under development, or of an overall schedule of audit activities being prepared, were unavailable for review during this inspection. These matters will be reviewed further during a subsequent inspection.

- C. Managerial Items

None.

D. Deviations

None.

E. Status of Previously Reported Unresolved Items

Chloride Content In Asbestos Blanket (IE Inspection Report
No. 050-358/76-10)

A letter certifying that the asbestos blanket was tested for chemicals was provided by Singer Safety Products. The results of the test demonstrated that the chloride content was within acceptable limits. This matter is considered to be resolved.

Management Interview

- A. The following persons attended a management interview held at the CG&E offices at the conclusion of the inspection.

Cincinnati Gas & Electric Company (CG&E)

E. A. Borgmann, Vice President Engineering
B. K. Culver, Principal Construction Engineer
W. W. Schwiers, Principal Quality Assurance & Standards Engineer
R. P. Ehas, QA&S Engineer
J. H. Hoffman, QA&S Engineer
J. F. Weissenberg, QA&S Engineer
R. L. Wood, QA&S Engineer

Kaiser Engineers Incorporated (KEI)

W. J. Friedrich, QA Manager

- B. Matters discussed and comments on the part of management, were as follows:

1. The inspector stated that this inspection is referred to as the mid QA inspection and is a review of the implemented QA program by CG&E personnel, KEI personnel and site contractors, primarily of mechanical and electrical activities.
2. The inspector indicated that the review of the CG&E program activities identified deficiencies regarding necessary procedures, as well as scheduling and performance of audits. It was noted that recent management assessment audits included

essentially the same problems as well as others. Corrective action to resolve these identified concerns has been instigated and some are in progress at the present time. It was understood that corrective action for the following had been completed or was in progress:

- a. Revision of the CG&E QA manual and development of Quality Assurance implementing procedures, presently in rough draft status.
- b. Preparation of auditing schedules for both vendor and site activities in an overall mode including CG&E, KEI and Conam, are presently in preparation.
- c. Consideration of additional personnel to be added to the CG&E QA&S branch.
- d. Relocation of the QA&S branch to the site. This move has been completed and was considered by the inspector to be a positive step.

These activities will continue to be of interest to NRC and will be reviewed further in the future. (Paragraph 4, Report Details)

3. The inspector stated that a review of the site constructor's, (Kaiser Engineers, Incorporated) quality assurance manual was performed relative to continued development and implementation including audit responsibilities of site contractors.

The inspector added that the site constructor failed to follow established procedures to verify effectiveness and adequacy of corrective action recommended as a result of audit findings. This matter is considered to be an Infraction. (Enforcement Items, Summary)

4. The inspector stated that he had reviewed KEI's Quality Assurance procedures and Reactor Controls, Incorporated (RCI) Quality Assurance procedures and in addition had reviewed records and observed implementation of procedures.

The inspector added that during his evaluation of procedure implementation he identified the following items of noncompliance:

- a. Review of records of the implementation of QAMCI G-14 Revision 4 indicated that KEI's surveillance of RCI activities have not been in accordance with procedure requirements.

- b. Review of records indicated that KEI has purchased material for Class 1 construction from a supplier not listed on the approved suppliers list.

The constructors representative stated that he was only required to list the equipment or material manufacturer on the suppliers list. The inspector stated that if a supplier stored, handled, or did any fabrication, he should have a Quality Assurance program to cover his activities, and that QAP 5 and 6 required suppliers to be evaluated by QA engineering and designated on the approved suppliers list.

- c. Stainless steel electrodes and low hydrogen electrodes were observed in the same holding oven. No answer is required relative to this infraction since corrective action was completed prior to completion of this inspection.

- d. Visual (eye) examination for four KEI QC inspectors had expired, and that one inspector's (PT) certifications had also expired.

The contractors representative stated that his inspectors were not performing inspections, that all first line non-destructive testing was performed by a subcontractor. The inspector indicated that accepting the subcontractors work for the licensee, as stated in ANSI N45.2.6, requires personnel verifying conformance of work activities to quality requirements be equally certified by his employer as are personnel who perform the assigned inspection work.

5. The inspector stated that implementing QA procedures of KEI and the electrical contractor were reviewed. In addition, installation procedures were reviewed for cable pulling, termination, and identification along with observation of an actual safety related cable pull. An infraction was identified regarding failure to identify design document changes as being either "essential" or "non-essential" as provided by CG&E letter of instructions KEQ-73.

6. The Reactor Construction and Engineering Support Branch Chief discussed the following subjects with those individuals present at the management interview:

- a. Construction Deficiency Reports and recent changes to 10 CFR 50.55(e).
- b. Communications between NRC RIII and the Utility including the requirements of 10 CFR 2.201.
- c. NRC regional organization changes.
- d. Status of the recent GAO site audit.

REPORT DETAILS

Persons Contacted

The following personnel, in addition to those listed in the Management Interview section of this report, were contacted during the inspection:

Kaiser Engineers, Incorporated (KEI)

W. A. Ferree, Warehouse Manager
M. Franchuck, Mechanical QA Engineer
W. J. Kacer, Assistant QA Manager/Chief Inspector
F. Oltz, Document Supervisor
C. R. Schroeder, Electrical QA Engineer
W. Woodruff, Senior Inspector, Electrical

Reactor Controls, Incorporated (RCI)

J. Milleff, Engineering & Construction Manager
R. Kananeu, QA Supervisor

Foothill Electric Company (FEC)

G. Moynahan, Head Engineer
J. Jones, Associate Engineer

Results of Inspection

1. QA Program Implementation Electrical

a. QA Manual Review - Constructor/Contractor

KEI is designated as the site constructor.

The KEI Site Quality Assurance Manager is delegated to perform the construction quality assurance activities.

Foothill Electric Corporation (FEC) is designated as the electrical contractor.

Foothill Electric Corporation, as a wholly owned subsidiary of Kaiser Industries Corporation under management of KEI is governed, and its procedures and methods are controlled by the KEI Quality Assurance Manual (Manual).

- (1) The inspector reviewed two changes made to the Manual by the constructor to correct program deficiencies. The deficiencies were identified by Regulatory personnel,

in reports dated February, 1972 and June, 1976. The changes were relative to complete revisions to the Manual including the addition of Quality Assurance Procedure (QAP) 20, "Indoctrination and Training." The inspector determined that the changes had been fully implemented.

- (2) The inspector reviewed structural changes relative to the QA/QC organization and determined that no structural changes had taken place. The organization has been dynamic, i.e. growing, however, the growth has been commensurate with ongoing activities. QC inspectors from one discipline have been transferred to other disciplines, i.e. civil to electrical, however, an indoctrination and training program is in effect.
- (3) The constructor has initiated changes to the Manual for purposes of eliminating repetitive deficiencies or to otherwise increase the effectiveness of the QA program. This was determined by the inspector's review of KEI Corporate audits and Quality Assurance Construction Methods Instructions (QACMI). As a result of adverse audit findings, Quality Assurance Procedures (QAP) had been appropriately revised.

QACMI's had been developed commensurate with activities. Approximately 50% of the QACMI's had been revised to increase effectiveness.

- (4) The inspector determined that changes to the Manual require review and approval of the licensee. Although no evidence of approval was included in the Manual, the KEI Review/Approval forms provided for licensee approval of Manual changes.

b. QA Manual Implementation - Constructor

The inspector determined that KEI has assigned individuals for development of QA/QC procedures and instructions, inspections, audits, and management of program implementation.

- (1) The site QA Manager has primary responsibility for the preparation, issuance, maintenance and control of the Manual. QA Engineers have responsibility for revising the Manual and preparing QACMI's.

- (2) An Inspection Supervisor is responsible for the supervision of all KEI inspection activity.
- (3) An Analysis and Procedures Supervisor is responsible for coordination of system audits. Audits are performed by QA Engineers in accordance with schedules prepared by the QA Manager.
- (4) The contractor also provides for offsite KEI management personnel, i.e., Vice President or Corporate QA Manager to periodically assign personnel to conduct program assesment audits of the site QA program in order to verify adequacy of the program.

c. Audits

- (1) The inspector determined that KEI had fulfilled all audit commitments, i.e. performed periodic corporate audits and site audits in 1976 in accordance with the audit schedule included as part of QAP 19. Between 1972 and 1976, nine corporate and 298 site audits had been performed as follows:

	<u>Corporate</u>	<u>Site</u>
1972	0	12
1973	4	65
1974	2	77
1975	2	88
1976	1	56

Audited activities included QAP's, QACMI's, and specifications, including QA program implementation of site subcontractors.

- (2) The inspector reviewed three audits for specific content or action. The audits included were No. 200, No. 242, and No. 261. The following was determined:
 - (a) Audits were performed for identification of electrical components (not instrumentation); inspection of cable tray hangers, and maintenance of physical protection of stored equipment. Audits relative to Control of Purchased material or equipment and cable installation had not been performed. KEI does not purchase major electrical equipment.

- (b) The scope and depth of the audits was consistent with the purpose stated for the audit.
- (c) Appropriate standards were referenced for measuring performance.
- (d) Auditors had been selected in accordance with provisions of QAP 19 section 3.2.
- (e) Organizations which were audited received an audit report only if deficiencies were identified.
- (f) Based upon a review of several KEI audits which indicated adverse findings and specifically audit No. 261, evidence of follow-up audit activity by KEI to determine the adequacy and effectiveness of actions taken to correct the adversity was not apparent. Through discussions with the KEI QA Manager, the inspector was informed that audit reports which had adverse findings were placed into a "tickler" file until the Manager was notified that action had been taken. Once action was taken, the action was documented on the audit form and the Manager signed off. No specific reaudit was considered to be necessary.

QAP 19, section 3.8 states in part that "The auditor conducts a follow-up audit within 30 days from the initial audit in order to determine the effectiveness of the corrective action. He prepares a follow-up report....."

10 CFR 50, Appendix B, Criterion V, states, in part, that "activities affecting quality shall be.....accomplished in accordance with.....instructions....."

Paragraph 17.1.5.1 of the Wm. H. Zimmer Nuclear Power Station Unit No. 1 FSAR states, in part, that "Activities affecting the quality of the facility are accomplished in accordance with written instructions, procedures....."

Contrary to the above, the matter described is considered to be an Infraction. Cognizant licensee personnel were so advised.

- (g) No immediate action was required.
- (h) No substantive design or hardware deficiencies had been identified.

2. QC/Work Procedure Implementation Electrical

a. Scope of Inspection

This inspection included a review of the procedures controlling site-originated designs, Kaiser Engineers (KEI) audit procedure and audit records of Foothill Electric Company (FEC), the general electrical installation specification, the specific instructions for pulling, terminating and identifying cable, and the calibrating of termination tools.

b. Review of Site-Originated Design Procedures

(1) Inspection Scope

The system for the control of site-originated design was reviewed with respect to the following:

- The procedure was current.
- The changes were within the authority of the originator.
- The design was checked and the required approval was received.
- The separation or physical protection criteria were affected.
- The activities were performed as described in the QA Manual.
- The controlling procedure, QACMI, G-5, four Design Document Changes (DDC) and the KEI audit reports were reviewed.

(2) Inspection Findings

The Design Document Change procedure, QACMI, G-5, DDC's No. E-492, E-480, E-476 and E-465 and KEI Audit Report No. 280 of September 28, 1976, were selected for review by the inspector. QACMI, G-5 was found to be the latest revision. The procedure is the controlling procedure for all site-originated design changes and may be used by any organization on site. The above mentioned DDC's were reviewed and found to be within the authority of the originator, the required design checks and approvals were received. The separation criteria and physical protection were not adversely affected and the activities were carried out in accordance with the approved QA Manual. The inspector did, however, note that the above DDC's were not identified as being "Essential" or "Non-essential".

Audit Report No. 280 was also reviewed by the inspector. The audit was conducted by KEI QA Engineers. The KEI audit revealed a procedural deficiency in that "DDC's" are not specifically designated or stamped as to QA classification, QA status or category -- essential or non-essential." The findings of the audit were forwarded to the licensee. The licensee's response in letter KEQ-73 of October 29, 1976, stated in part that "Future DDC's will be designated essential or non-essential by the QA&S section." The QA&S section is the licensee's Quality Assurance & Standards section.

The inspector reviewed the electrical DDC's from October 29, 1976, to January 1, 1977, to verify the DDC's in this period were actually being identified "essential" or "non-essential" by the licensee's QA&S section. It was observed that a large number of the DDC's in question were not so identified as required by the licensee's corrective action response to the September, 1976 audit.

Criterion V of Appendix B to 10 CFR 50 states in part that "activities effecting quality shall be prescribed by documented instructions, procedures or drawings, and shall be accomplished in accordance with these instructions, procedures or drawings." This requirement is amplified in Section 17.1 of the licensee's FSAR which states in part that "Activities effecting the quality of the facility are accomplished in accordance with written instructions, procedures or drawings which prescribe acceptable methods for carrying out the activities, . . . and include acceptance criteria against which the performance of the activities are judged."

Contrary to the above, the licensee failed to identify a large number of DDC's "essential" or "non-essential" as stated in the licensee's letter KEQ-73 of October 29, 1976. This is considered an Infraction.

c. General Electrical Installation Specification and Installation Procedure Review

(1) Inspection Scope

This portion of the inspection included a review of the following:

- Electrical Installation Specification, Phase II, R.1 (June 10, 1974)

- QACMI, E-7 "Electrical Installation Procedure, Cable Pulling"
- QACMI, E-8 "Wire Termination Procedure"
- QACMI, E-10 "Cable Termination Calibration"
- QACMI, E-13 "Cable Identification Procedure"

The above documents were reviewed to verify that the latest revision was available to the KEI and FEC, that any training had been accomplished, that calibration procedures were being followed, that records were current and that installation procedures were being followed in the field.

(2) Inspection Findings

The inspection revealed that since its issue, the Electrical Installation Specification, Phase II, has had three supplements issued to it. The latest change was dated December 6, 1976. These supplements were issued to bring the specification up to date with respect to newer standards for nuclear power plants. The specification is due to be revised by Sargent & Lundy to incorporate all supplements to date, but it has not arrived at the site.

The QACMI's identified above were reviewed and found to be of the latest revision. These procedures were new issues and were found to originally be electrical installation instructions issued by FEC, the electrical contractor. A review of FEC QACMI's revealed that the working copies of QACMI's No. E-7, E-8, E-10 and E-13 were also of the latest revision. The inspector also reviewed FEC Training records to see if installation personnel had received the training required by Cable Termination Procedure E-8. The records showed the first group was trained by the factory field representative and qualified to instruct the remaining installation personnel. All personnel involved with termination of cable have been instructed in the use of the necessary tools.

The calibration records and storage area were inspected. The records were found to be up to date and the proper procedures were being followed. The storage area was clean and the tools properly stored.

No discrepancies were noted during this portion of the inspection.

Observation of Work

(1) Inspection Scope

A cable pull was scheduled during the inspection. The inspector monitored the pull to verify QACMI, E-7 "Electrical Installation Procedure, Cable Pulling," was being properly implemented. The procedure requires that the cable trays be inspected, the latest information is available on the pull card to the foreman and that the proper QA checks are made.

(2) Inspection Findings

The inspector met with the QA inspector for FEC and the foreman in charge of the pull. The cable pull card was verified, the cable tray was inspected and the cable reel number was verified.

When all personnel were in place along the cable route the cable was pulled. A record of the actual pull length was recorded. The QA inspector then verified that the proper identifying number and color code were in place on each end of the cable and at each wall penetration. The cable end on the reel was retaped and the reel removed to storage.

No discrepancies were noted during this portion of the inspection.

QA Program Implementation Mechanical

a. Infractions

- (1) 10 CFR Part 50, Appendix B, Criterion V states, that "Activities effecting quality shall be presented by documented instructions, procedures, or drawings . . ." Kaisers (KEI) QACMI, G-14 states, "A report each month shall be performed for each site subcontractor."

Contrary to the above, Quality Assurance did not perform a surveillance of RCI between October 14, 1975 and April 2, 1976 and between April 2, 1976 and December 21, 1976. The following reports were conducted:

Report Number

Date

18	September 3, 1975
22	September 12, 1975
24	September 24, 1975
30	October 14, 1975
71	April 2, 1976
119	December 21, 1976

- (2) KEI QAP 20, Revision 0 Section 5.3.5.2 states, "The visual and medical requirements shall be verified annually by reexamination . . ." section 5.3.4 states, "personnel shall be reevaluated at periodic intervals not to exceed two years."

ANSI N45.2.6 Section 2.2 states, "Each person who verifies conformance of work activities to quality requirements shall be certified by his employer as being qualified to perform his assigned work."

Contrary to Criterion V and the above, visual requirements of (4) four KEI Quality Control inspectors had expired, one inspector's PT certification had also expired, his last recorded certification having been on August 12, 1974.

- (3) KEI SPPM 3.3, Revision 4, Section 3.5.3.2 states each holding oven shall contain only one single classification of electrode segregated by lot and heat number.

Contrary to Criterion V and the above, stainless steel and low hydrogen electrodes were being maintained in one RCI holding oven. No answer is required for this infraction since corrective action had been completed during the inspection.

- (4) KEI QAP No. 5, Section 3.1.7, and No. 6, Section 3.4 state that purchasing awards only to suppliers who have been approved by Quality Assurance Engineering as designated on an approved suppliers list.

Contrary to Criterion V and KEI procedures QAP 5 and 6, purchased material for the service water pump structure (anchor bolts) were obtained from a supplier not qualified and listed on the approved suppliers list.

Material Requestion No. 11391
Purchase Order No. 7070-10663
Heat No. 18723
Receipt Inspection plant G-3, 1-10-D

b. Review of KEI Quality Assurance Construction Methods Instructions (QACMI)

The following KEI QACMI's were reviewed and determined to be acceptable:

- G-14, QA Surveillance Reports
- G-8, Material Identification Color Code.
- G-11, Instructions for the execution of Radiographic Report form - 206.
- G-1, Configuration Document Control.

c. Control of Site-Originated Procurement

The following requisitions and purchase orders, and material certifications, were reviewed and determined to be acceptable.

- (1) Material Requisition No. 7070-6417
Purchase Order No. 7070-11477
Material Receipt No. 15163
Physical Test Report No. 75-94
Laboratory Report No. 75-189
- (2) Material Requisition No. 7070-5932
Purchase Order No. 7070-10663
Material Receiving Report No. 11391
Physical Test Report No. 5483
Material Test Report No. 6444

d. Control of Site-Originated Design

The following KEI requests for design document changes, were reviewed and determined to meet procedure requirements:

- (1) DDC No. M-1190, per Dwg. M-489 sht. 2, Revision B, Potable Water.
- (2) Fuel pool cooling and clean-up system. DDC No. M-1193 cut spool pc. No. 1FC09AA8-22 two welds added. Dwg. No. M-437, sht. 2, Revision F.
- (3) Reactor building closed cooling water, DDC No. M-1194, Dwg. No. M-437, sht. 10, Revision F.

(4) Audits

The following audits of RCI by Kaiser were reviewed, and determined to be in accordance with NRC and procedure requirements:

(a) <u>Audit Report No.</u>	<u>Date</u>
227	September 12, 1975
231	October 14, 1975
238	December 10, 1975
249	March 8, 1976
271	August 23, 1976

e. Reactor Controls Incorporated (RCI) Nonconformance Reports

The following nonconformance reports were reviewed and determined to be in accordance with NRC and procedure requirements.

- (1) NCR No. 14, Damaged J/P instrumentation tube, bent during handling. Pc. 117C4338P-005, Pc. 117C4338P-007, both replaced.
- (2) NCR No. 17, 135^o LPCI nozzle to thermal sleeve weld repair. GE FDDR No. KN-1-51 repaired per approved procedure.
- (3) NCR No. 21, weld repair, dispositioned by repair after grind out, per GE FDDR No. KN-1-58.

f. Manufactures data report form N-2 for nuclear parts and appurtenances were reviewed. RCI Authorization Certificate No. N-755 expired on January 7, 1977. RCI requested an extension and received one until May, 1977, an ASME survey is scheduled for March, 1977.

4. QA Program Implementation Licensee

a. QA Program Review

The inspector was informed during discussions with licensee representatives that the CG&E QA Manual is in the process of being totally revised. This corrective action was decided as a result of recent management audit adverse findings. In addition, the inspector was informed that a set of QA&S procedures were in the process of being developed to formalize procedures of activities being performed by the QA&S branch. In response to questioning, the inspector was informed that the procedures development was also a result of the recent management audits.

The inspector reviewed rough drafts of the proposed manual revisions and most of the rough drafts of the procedures planned to be prepared. In addition, the inspector was informed that a schedule has been prepared for the completion of development and the approval of these procedures and manual revision.

The inspector considered these additions to be beneficial and expressed an interest in further review upon completion.

b. QA Program Implementation

(1) Records and Documents Control

The inspector observed the site records center, the storage of documents in the center as well as the control of documents (drawings) utilized by the QA/QC personnel at the site. In addition, the inspector observed microfilming of records. No problem areas were identified.

(2) Qualification/Certification of Auditors

Records of qualification were available at the site for each QA&S QA Engineer. ANSI Standards N45.2-12 and -23 were used as guides for the basis of qualification and certification of each auditor. A points rating system was utilized to assess the education, experience, job training and to justify the certification established.

(3) Audits of Vendors and Program Assessment

The inspector reviewed the QA&S log of vendor audits for 1975 and 1976 and selected several examples of audits for review (three 1975 audits and five 1976 audits.) In addition, the inspector reviewed the last two semi-annual management QA program assessment audits. It was determined that the audits were performed utilizing an inspection plan and check list and that results of inspection reports were prepared and issued to management, including management of the area audited. In addition, follow-up action was performed as required. It was noted however that the frequency of auditing was not as committed in the program nor was there any overall plan and schedule of audits to be performed (also committed by the program). The inspector identified three shortcomings previously identified in the management QA program assessment audits. In addition,

the inspector was informed during discussions with licensee representatives that an overall inspection plan and schedule is presently under preparation. Conam (an inspection agency contractor) is developing the overall vendor schedule of vendor audits. Effective auditing of vendors in accordance with the overall schedule is to begin in February, 1977. The inspector commented that the NRC would have a continuing interest in the auditing effort and would review it again at a later time.

(4) Auditing of Site Activities

The history of site audits performed by the QA&S section was reviewed by the inspector. It was observed that if the number of audits (6) performed during January, 1977, were extended at that pace for the year of 1977 it would result in as many audits being performed in 1977 as were performed for the years 1973 through 1976. The inspector recognized that to be a significant improvement in the CG&E site activity audit and control. In addition, in response to questioning, the inspector was informed that the site auditing activity is now planned on a two-month schedule with monthly updating and that the scheduling of site audits is a coordinated schedule including both KEI and CG&E QA&S personnel. The inspector commented that further review in this area would be conducted in the future.

MAR 12 1979

19-07

Cincinnati Gas and Electric Company
ATTN: Mr. Earl A. Borgmann
Vice President Engineering
139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

Please replace page two of the transmittal letter and report cover sheet numbered 50-358/79-01; from NRC Region III, Reactor Construction and Engineering Support Branch with the attached replacements numbered 50-358/79-07.

The originals were incorrectly numbered. Thank you.

Sincerely,

G. Fiorelli, Chief
Reactor Construction and
Engineering Support Branch

Enclosure: As stated

cc w/encls:
Mr. J. R. Schott, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
U. Young Park, Power
Siting Commission

7903200192

OFFICE	RIII <i>HV</i>	RIII <i>HB</i>	RIII <i>HV</i>	RIII <i>HB</i>	RIII <i>HB</i>	RIII <i>HB</i>
SURNAME	Wescott/ar	Herb	Barrett	Hayes	Fiorelli	Vander
DATE	Knop <i>Talk for</i>	Danielson <i>WAL</i>	Hughes <i>WAL</i>	3/7/79		

Cincinnati Gas and
Electric Company

- 2 -

MAR 12 1979

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room, except as follows. If the enclosures contain information that you or your contractors believe to be proprietary, you must apply in writing to this office, within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

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

Sincerely,

G. Fiorelli, Chief
Reactor Construction and
Engineering Support Branch

Enclosures:

1. Appendix A, Notice
of Violation
2. IE Inspection Report
No. 50-358/79-07

cc w/encls:

Mr. J. R. Schott, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
U. Young Park, Power
Siting Commission

OFFICE	RIII	RIII	RIII	RIII	RIII	RIII
SURNAME	Wescott <i>Wescott</i>	Erb <i>Erb</i>	Barrett <i>Barrett</i>	Hayes	Fiorelli	Vandel <i>Vandel</i>
DATE	Knop <i>Knop</i>	Danielson <i>Danielson</i>	Hughes <i>Hughes</i>	3/7/79		

APR 25 1979

Docket No. 50-358 7907

Cincinnati Gas and Electric Company
ATTN: Mr. Earl A. Borgmann
Vice President
Engineering Services and
Electric Production
139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

Thank you for your letter dated April 11, 1979, informing us of the steps you have taken to correct the noncompliance identified in our letter dated March 5, 1979. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

Gaston Fiorelli, Chief
Reactor Construction and
Engineering Support Branch

cc: J. R. Schott, Plant
Superintendent

cc w/ltr dtd 4/11/79:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Ohio
Power Siting Commission

7905140107

OFFICE ▶	RIII	RIII	RIII	RIII		
SURNAME ▶	Wescott <i>W</i>	Knop <i>RCK</i>	Fiorelli <i>G</i>	Vandel <i>V</i>		
DATE ▶	4/20/79					

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

E. A. BORGMANN
VICE PRESIDENT - ENGINEERING

April 11, 1979
QA-1122

U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. G. Fiorelli, Chief
Reactor Construction and Engineering
Support Branch

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
IE INSPECTION REPORT 50-358/79-07, CONSTRUCTION
PERMIT NO. CPPR-88, DOCKET NO. 50-358, W.O. #
57300-957, JOB E-5590

Gentlemen:

This letter constitutes our formal reply to the subject Inspection Report. It is our opinion that nothing in the report or in this reply is proprietary in nature.

Our response to the items of noncompliance identified in Appendix "A" of the report follows.

Item 1 - Unapproved Calibration Procedure

Corrective Action Taken and Results Achieved

Instrument 1PTCM010 was immediately recalibrated with satisfactory results using the approved procedure 1C.GCP.P102. Unapproved procedure No. 1C.GCP.P101 was withdrawn from the I&C approved instrument procedure file.

Corrective Action to be Taken to Avoid Further Noncompliance

The files of working I&C procedures in the Instrument Shop have been inspected and all non-approved procedures withdrawn and retained in a separate file.

Date When Full Compliance will be Achieved

Full compliance was achieved March 30, 1979.

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Item 2a and 2b - Damaged and Unused Weld Rod and Stubs Not Cleared from Work Area

Corrective Action Taken and Results Achieved

A thorough inspection was conducted of the site to determine if there were any weld rod stubs or unused weld rod that welders may have inadvertently left uncontrolled in various areas. Unused weld rods and stubs that were found were dispositioned as appropriate.

Corrective Action to be Taken to Avoid Further Noncompliance

A letter was issued by Henry J. Kaiser to all superintendents and welders, emphasizing the established procedure for use of weld rod stub buckets to control and collect weld rod stubs and returning all unused weld rod to the Weld Rod Shack at the end of each day. Training sessions will be held with superintendents and foremen to again review the weld rod control procedures. Subcontractors have been informed of the necessity of increasing their surveillance of weld rod control.

Date When Full Compliance will be Achieved

Full compliance will be achieved April 30, 1979.

Item 3 - Calibration Due Dates for Test Instruments had Expired

Corrective Action Taken and Results Achieved

An investigation was conducted which revealed that the test instrument TDV-054 and TGA-193 calibration due dates had been incorrectly transcribed from standard laboratory data sheets. The correct calibration due dates for TDV-054 and TGV-193 are May 17, 1979 and March 22, 1979, respectively. The deviations to accuracy standards on the test data sheet for instrument 1E22-D004 are correct and therefore in compliance.

Corrective Action to be Taken to Avoid Further Noncompliance

All I&C Foremen have been instructed that prior to signing the data sheet, they must verify that the values in the "as-left" column are within the range of values stated in the "allowable error" column. The test equipment used must be listed, and future calibration due dates for the equipment entered on the data sheets.

Date When Full Compliance will be Achieved

Full compliance was achieved March 30, 1979.

Item 4a - No Direct Method Existed to Measure Oven Temperature

Corrective Action Taken and Results Achieved

The three weld rod storage ovens in question were immediately taken out of service in the weld rod shack. Three other weld rod ovens with thermometers mounted in the doors were installed to replace the three taken out of service.

Corrective Action to be Taken to Avoid Further Noncompliance

Surveillances will be conducted to assure that all weld rod ovens which are calibrated at specified intervals are in calibration.

Date When Full Compliance will be Achieved

Full compliance was achieved February 5, 1979.

We trust that this letter is an adequate response to your IE Inspection Report No. 79-07.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN
Vice President, Engineering
Services & Electric Production

RPE:pa