

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-358/79-07

Docket No. 50-358

License No. CPR-88

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

Facility Name: Wm. H. Zimmer Nuclear Power Plant

Inspection At: Wm. H. Zimmer Site, Moscow, OH

Inspection Conducted: January 23-26, 1979

Inspectors: H. M. Wescott

C. Erb
C. Erb

F.G. Barrett For
J. Hughes

F.G. Barrett
P. Barrett

3/2/79

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Observer: T. H. Daniels

Approved By: R. C. Knop, Chief
Projects Section

3/1/79

Inspection Summary

Inspection on January 23-26, 1979 (Report No. 50-358/79-07)

Areas Inspected: Review of quality records for Class 1 and 2 valves, NDE records for feedwater nozzle modification, observation of work activities and QA records for instrumentation, calibration records, electrical testing, design change control, NDE implementing procedures, piping QA records and nonconformance reports, weld material control, RHR system, and 50.55(e) steam jet air ejector. The inspection involved a total of 112 inspector-hours onsite by four NRC inspectors.

Results: Four items of noncompliance were identified in four of ten areas inspected. (Infractions - use of unapproved procedures, Section II, Paragraph 5 and Section III, Paragraph 5.b; Deficiencies - inadequate review of test procedures, Section II, Paragraph 3.b, and thermometers not installed in weld rod ovens. Section III, Paragraph 4c.

DETAILS

Persons Contacted

Cincinnati Gas and Electric Company (CG&E)

R. Cooper, Service Engineer, System Turnover
J. Crowe, Startup Engineer
*B. K. Culver, Project Manager
R. P. Ehas, QA&S Engineer
H. B. Gear, General Engineer Department
*J. W. Haff, QA&S Engineer
A. Pallon, Weld and NDE Engineer
I. Plavsik, Test Superintendent
*J. R. Schott, Station Superintendent
*W. W. Schwiers, Principle QA&S Engineer
J. F. Weissenberg, QA&S Engineer

General Electric, Nuclear Engineering Division (GE-NED)

T. Bloom, Site Manager

Kaiser Engineers, Inc. (K&I)

S. D. Tulk, QA Engineer, Electrical
*R. F. Turner, QA Manager

Reactor Controls, Inc. (RCI)

W. Mays, Supervisor Internals Installation

*Denotes those present at the exit interview.

Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (358/78-08-02) (updated 358/78-31): Procedures for construction testing of instrumentation. The inspector reviewed procedure IM.SAD.01 Revision 00 dated January 26, 1979, titled Instrument and Control Program.

(Closed) Noncompliance (358/78-16-04): Sargent and Lundy specifications require that the manufacturers supply motors which are capable of starting and accelerating load at 80% applied voltage and are capable of developing breakdown torque of not less than 200% of their normal full load running torque. The inspector reviewed associated data curves for the Electric Machinery supplied service water motors and Westinghouse reactor building closed cooling water pump motors. The records indicated that the torque values were in accordance with S&L specifications.

(Closed) Noncompliance (358/78-16-05): Cables routed through flexible conduit were located within three inches of each other. The inspector observed that the valves that are supplied by the above mention cables were relocated. The cables were rerouted to meet the minimum separation criteria.

(Closed) Noncompliance (358/78-16-06): Requirements for qualification and training of inspection and test personnel. The inspector reviewed CG&E Audit Report No. 218 which documents the results of audits conducted on CG&E Electrical Operating and Test Department (EOTD). The audit indicated that certifications for CG&E employees meet the requirements of ANSI-N45.2.6-1973.

(Open) Unresolved Item (358/78-29-02): Tech-Sil, Inc. Quality Assurance Program. The inspector reviewed Tech-Sil, Inc. qualification and training program, against the requirements of ANSI N45.2.6-1973. Also, the inspector reviewed, calibration of test equipment. This item remains open pending CG&E's QA conducting an audit on Tech-Sil, Inc. for scheduling and performance of audits conducted by Tech-Sil, Inc. They stated that they would evaluate these audits prior to Tech-Sil performing safety-related work.

(Open) Noncompliance (358/78-09-05): Electric cable No. VY-710 was not installed in accordance with instruction KEI QACMI No. E-7, Revision 7. Per CG&E letter dated November 1, 1978 from W. W. Schweirs to B. K. Culver concerning sample testing of instrument cables, the scope of the noncompliance includes 157 cables (both Raychem and Samuel Moore). Twenty-five percent of those cables will be tested in accordance with the Samuel Moore letter dated January 9, 1979, from A. P. Clements to J. Seibert to verify shield integrity. 100% of the cables will be tested in accordance with the Megger/Hi Pot Testing Procedure EC-1, Revision 2.

(Open) Unresolved Item (358/78-16-01): Nonseismically supported pipe installed over Class 1E cable tray. Sargent and Lundy is performing a review to determine where nonseismic installations effect safety related equipment. Where necessary the nonseismic installations will be upgraded to seismic.

(Open) Noncompliance (358/78-16-02): No documented evidence could be provided to assure that 53 differential pressure switches met the requirements of the purchase specification. During this inspection, the RIII inspector reviewed partial documentation supplied to CG&E (site) for the cited instrumentation. The documentation appeared to be inadequate and incomplete in that in some cases there was no direct tie between the supplied instrumentation and in some cases the documentation. The documentation did not indicate testing in accordance with design parameters specified.

The licensee has also started receiving documentation from other instrument suppliers (three of at least nine suppliers).

The CG&E Audit of Sargent and Lundy dated November 27-30, 1978 Report No. 78/10, Section II, Paragraph 3 indicates that checklists based on purchase specification submittal requirements for all safety related equipment at Zimmer are being prepared to assure, by S&L engineering verification, that all necessary documentation is received and complies to the purchase specifications. The licensee stated that these actions will be reaffirmed and that an additional audit will be performed by CG&E to assure the effectiveness of the actions. The questionable equipment will be controlled in accordance with the licensee's QA program.

(Closed) Unresolved Item (358/78-19-01): Quality Documentation - Feedwater Safe End Modification. There are two Class 1 welds, for each vessel nozzle to safe end and safe end to safe end extension associated with this modification. Twelve radiographs for the following welds were examined and found to be acceptable:

<u>Weld No.</u>	<u>Description</u>	<u>Size</u>	<u>Materials</u>	<u>ASME</u>
N4A1R4	Nozzle-safe end	15"x1 1/8"	C.Steel-C.Steel	Sect III 1971.S1973
N4B1R1	Nozzle-safe end	15"x1 1/8"	C.Steel-C.Steel	Sect III 1971.S1973
N4D1	Nozzle-safe end	15"x1 1/8"	C.Steel-C.Steel	Sect III 1971.S1973
N4C1	Nozzle-safe end	15"x1 1/8"	C.Steel-C.Steel	Sect III 1971.S1973
N4A-45	Safe end - ext	12"x1'	Inconel-Inconel	Sect III 1971.S1973
N4C-225	Safe end - ext	12"x1'	Inconel-Inconel	Sect III 1971.S1973
N4D-315	Safe end - ext	12"x1'	Inconel-Inconel	Sect III 1971.S1973

Weld procedure qualification record PQR-3 indicating both GTAW and SMAW processes were used for the above welds was in the files, NDE personnel were qualified to procedure VT 2R2 for visual examination, 1R2 for Penetrant Test and 3R1 for the radiographic examination.

Radiographic results were available and accepted by CG&E so this item is closed.

Section I

Prepared by C. M. Erb

Reviewed by D. H. Danielson, Chief
Engineering Support
Section 2

1. Quality Record Review - ITT Hammel Dahl Flow Control Valve

The ITT Hammel Dahl Flow Control Valve, MPL B33F060, S/N 00/2000/002A, a Class 1 valve was selected for review. Material certifications and Deviation Requests applicable to the following items were examined.

<u>Part</u>	<u>Material Specification</u>	<u>Manufacturer</u>	<u>Shop Inspection Certificate</u>
Body	SA351/CF8M	Quaker Alloy	Lumberman's Mutual
20" Seat ring	CF3A, #6 Stellite	Quaker Alloy	Lumberman's Mutual
Plug	CG3A, #6 Stellite	Quaker Alloy	Lumberman's Mutual
Bonnet	SA351/CF8M	Quaker Alloy	Lumberman's Mutual

This valve was built to the requirements of ASME Section III, 1971 Edition, and the body was cast by Quaker Alloy to ASME Section III, 1971 Edition, Summer 1972 Addenda.

The stainless body and valve plug were solution annealed at 2020^oF to 2040^oF and water quenched. Autographic records of this heat treatment were in the quality files. Visual examination of welds indicated acceptable conditions for preservice examination.

Quality records for an 18" globe check valve in the Feedwater System and a 20" Darling discharge motor operated valve in the Recirculation System were also examined.

No items of noncompliance or deviations were identified.

2. Observation of Work and Quality Record Review

Welds on the Low Pressure Core Spray (LPCS) and High Pressure Core Spray (HPCS) pump casings were examined and found to be well prepared for pre- and in-service inspection. These pumps were manufactured by Ingersoll

and are made of carbon steel to GE Specification 21A9243, Revision O. The LPCS pump is MPL1E21CO01A and the HPCS is MPL1E22CO01, SN/0872-133. A PQC check list was in the record which indicated certain tests had been witnessed by GECO in the vendor's plant. Certifications for materials, welds, NDE and personnel were included in the files as were nonconformances.

No items of noncompliance or deviations were identified.

3. Suppression Pool, Safety Relief Valve Quenchers

Quenchers for the Safety Relief Valves (SRV) are on order from Sargent Company. There will be extensive reinforcement for the SRV piping, but the complete design was not available. No particulars were available for further reinforcement of the downcomers to the suppression pool.

4. Records Storage

When securing the radiographs for examination, the inspector observed a large number of X-ray film packages stacked on the floor inside the records room.

This is an undesirable condition and the licensee agreed to correct the matter. This matter is unresolved and will be reviewed at a subsequent inspection. (358/79-01-01)

5. Observation of Installed Pumps, Piping and the Installation Area

Piping welds to the Residual Heat Removal System (RHR) pumps, the LPCS pumps and the HPCS pumps were examined and found to be in the ground condition and suitable for preservice and inservice inspection.

A number of electrode stubs and unused electrode E7018 and E6012 were found at the 475' and 508' level. This condition is a noncompliance with Kaiser procedures which have been accepted by CG&E as controlling welding at their site. This is item of noncompliance No. 2 in Appendix A. (358/79-07-02)

Except as noted, no items of noncompliance or deviations were identified.

Section II

Prepared by P. Barrett
J. Hughes

Reviewed by D. W. Hayes, Chief
Engineering Support
Section 1

1. Instrumentation - Observation Of Work Activities

- a. The RIII inspector observed work performed relative to instrumentation used for engineered safety features system and primary containment atmosphere monitoring system (including instruments identified as E31-NO12A, E12-NO22A, E12NO10A, E12-NO15A, E22-NO04, E21-NO05, E12-NO10C, E12 NO15C, 1PT-CMO10, 1TRCM011, and 1LIRCM009). Proper instruments had been installed, i.e., range, rating, material, etc., in conformance with the General Electric applicable drawings. Plywood covers protected the instruments from construction activities after installation. Instruments which had been calibrated were identified with a calibration sticker. No components had been identified by the license as nonconforming.
- b. The RIII inspector selected cables associated with several of the above instruments in order to verify proper termination, i.e., correct lugs used, minimum bending radius not exceeded, cable identification tags installed, and separation criteria maintained. The following drawings, cables and instruments were inspected:

<u>Instrument</u>	<u>Cable</u>	<u>Drawings</u>
E31-NO12A	NB381	E2844 Rev. F
E12-NO22A	RH109	E2844 Rev. B
E12-NO10A	RH106	E2844 Rev. B
E12-NO15A	RH712	E2844 Rev. E
E22-NO04	HP710	E2857 Rev. E
E21-NO05	LPO40	E2802 Rev. B
E21-NO10C	RH355	E2847 Rev. D
	RH387	E2847 Rev. E
E12-NO15C	RH711	E2847 Rev. D

No items of noncompliance were identified.

2. Instrumentation - Review of Quality Records for Cable Termination

a. The RIII inspector reviewed cable termination records for the cables mentioned in Paragraph 2(b). The following was determined:

- (1) Termination drawings were current revisions;
- (2) Calibration records for crimping tools were up to date;
- (3) Correct materials were being used.

b. Termination inspection records (CIP) included provisions as evidenced by KEI QA stamp, to verify that:

- (1) Current drawing revisions are used;
- (2) Component name and location;
- (3) Cable number and number of conductors;
- (4) Crimping tool calibrated and number of tool used;
- (5) Stripping of cable and correct lugs being used;
- (6) Separation and bundles secured properly;
- (7) Cable color codes current;
- (8) Inspector stamp and date of inspection.

c. Records and other documents reviewed include:

(1) Cable Terminated (Cable Number)

RH106	RH387	NB381
RH109	RH711	HP710
RH355	RH712	LPO40

(2) Construction Inspection Plans

1H22PO18	1H22PO01
1H22PO21	1H22PO24

No items of noncompliance were identified.

3. Instrumentation - Review of Quality Records for Calibration

The RIII inspector reviewed calibration data sheets for the instruments mentioned in paragraph 1.a of this section. Results of this review are as follows:

- a. On January 24, 1979, in CG&E's calibration lab the inspector observed the scale from test gauge TGA-024 being used as an aid, i.e. pressure conversion, to calibrate IPT-CM010. TGA-024 was scheduled for calibration 2 1/2 years previously and had a sticker applied "DO NOT USE UNTIL CALIBRATED." Use of TGA-024 would not effect calibration of IPT-CM010, however, the licensee could not determine if TAG-024 had been used to calibrate other Class IE instruments.

(NOTE: Procedure IM.SAD.01 to control nonqualified test equipment had been approved on January 26, 1979.) This matter is unresolved and will be reviewed during a subsequent inspection. (358/79-07-03)

- b. Instrument calibration procedure IC-GCP-P101 was used while calibrating IPT-CM010. The procedure was not approved for use. It was stamped "Information Only."

This condition is contrary to 10 CFR 50, Appendix B, Criterion VI; Wm. H. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.2.11. This is an item of noncompliance identified in Appendix A of the report transmittal letter. (358/79-07-04)

- c. Instrument IE 22-N004 was calibrated January 8, 1979, using test instruments TGA-193 and TDV-054. Calibration sheet for IE 22-N004 indicated calibration for TGA-193 expired December, 1978; TDV-024 expired October, 1978. Actually, expiration dates were March and May, 1979, respectively as indicated on TGA-193 and TDV-034 calibration records. NOTE: The test data sheet for IE 22-N004 had been reviewed and accepted by the I&C supervisor.

Failure to evaluate test results is contrary to 10 CFR 50, Appendix B, Criterion XI; Wm. H. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.2.11. This is an item of noncompliance identified in Appendix A of the report transmittal letter. (358/79-07-05)

Except as noted, no other items of noncompliance were identified.

4. Instrumentation - Record Review of Electrical Testing

The RIII inspector reviewed testing data sheets for 29 cables including those identified in subparagraph 2.c, that had been tested previously, i.e., continuity and insulation resistance. Records established that the testing had been accomplished in

accordance with approved procedure No. EC-1, Revision 2, dated December 7, 1976. The inspector determined that the results met requirements.

No items of noncompliance were identified.

5. Design Change Control

The RIII inspector selected four Design Document Changes (Nos. SLE-295 dated January 4, 1977, SLE-466 dated June 16, 1978, SLS-322 dated October 30, 1978; and SLM-461 dated November 7, 1978) to verify implementation. The DDCs were either posted on or incorporated in the applicable drawings.

The change identified in SLE-295 was accomplished as indicated on the appropriate record, during the initial installation activities. Thus, there was no need for rework or reinspection.

The changes identified on SLE-466 included jumper wires which were to be removed from Panel 1PL10JC. SLE-466 had been incorporated into S&L drawings E-3572, Revision F and E-3571, Revision A. Electrical Construction Test Procedure EC-12 record indicated requirements of SLE-466 had been accomplished. The RIII inspector checked 10 of the 27 jumpers. The jumpers had been properly removed.

The activities required by SLS-322 and SLM-461 had not been accomplished but were controlled.

The RIII inspector reviewed and discussed the measures established to assure that all design changes would be accomplished. The Construction Coordination of System Turnover for Preoperation Testing Procedure, No. Admin 2, Revision 1 identified design change reviews (i.e., Design Document changes, drawings, specifications, etc.) which would be performed to assure control of the implementation and inspection activities necessitated by all design changes.

No items of noncompliance were identified.

Section III

Prepared by H. M. Wescott

Reviewed by R. C. Knop, Chief
Projects Section

1. Review of NDE Implementing Procedures

The inspector reviewed Kaiser Engineers, Incorporated, "Special Process Procedure Manual" (SPPM), to ascertain that quality assurance plans, instructions and procedures have been established, as follows:

- a. SPPM No. 4.0, dated January 25, 1973, Revision 0, "Nondestructive Examination - General."
- b. SPPM No. 4.1, dated June 10, 1974, Revision 1, "Procedure Specification - Radiographic Examination."
- c. SPPM No. 4.2, dated June 10, 1974, Revision 1, "Procedure Specification - Liquid Penetrant Examination."
- d. SPPM No. 4.3, dated June 10, 1974, Revision 1, "Ultrasonic Examination."
- e. SPPM No. 4.4, dated June 10, 1974, Revision 1, "Magnetic Particle Examination."
- f. SPPM No. 4.5, dated March 18, 1975, Revision "Nondestructive Examination - Personnel Qualification."
- g. SPPM No. 4.6, dated May 23, 1978, Revision 3, "Visual Examination (Welding)."

No items of noncompliance or deviations were identified.

2. Review of Safety Related Procedures and QA Records (Piping)

The inspector reviewed Kaiser Engineers, Inc. safety related procedures and QA records for piping as follows:

- a. SPPM 5.0, dated October 17, 1977, Revision 2, "Heat Treatment Document, Equipment Calibration and personnel responsibilities."
- b. SPPM 5.1, dated October 17, 1977, Revision 3, "General Code Welding - Field Welding Post Weld Heat Treatment."

c. SPPM 5.2, dated October 17, 1977, Revision 3, "Nuclear - ASME Section III Heat Treatment Field Welding Post Weld Heat Treatment."

d. Review of Post Weld Heat Treatment (PWHT) strip charts for main steam line field welds as follows:

- (1) 43MS-1MS01CA36-33
- (2) 44MS-1MS01CA36-34
- (3) 45MS-1MS01CA36-34-35
- (4) 50MS-1MS01CA36-38

e. Review of the manufacturers welding and QA records for the Residual Heat Removal System (RHR) pipe spools as follows:

- (1) 1RH-10AB4-242
- (2) 1RH-10AA4-248
- (3) 1RH-10AA4-249
- (4) 1RH-10B4-250
- (5) 1RH-10B4-256

These records included certificate of Shop Inspection, Weld History Records, Final Inspection, Radiograph Inspection Reports, Code Data Reports, and Nameplate Rubbings.

f. Review of Kaiser Engineers, Inc. Weld data sheets for field welds as follows:

- (1) RH 404A
- (2) RH 404B
- (3) RH 414
- (4) RH 415
- (5) RH 423
- (6) RHK 29

These records established the weld procedure to be used, filler material type and sizes, heat treatment requirements, hold points, and NDE requirements.

No items of noncompliance or deviations were identified.

3. Review of Nonconformance Report Records

The inspector reviewed the Kaiser Engineers, Inc., Nonconformance Report Record dated January 19, 1979 and established that:

- a. 3 NCR's remain open for 1976
- b. 22 NCR's remain open for 1977

- c. 289 NCR's remain open for 1978
- d. 36 NCR's remain open for 1979

No items of noncompliance or deviations were identified.

4. Review of Weld Material Controls

The inspector reviewed the KEI system for weld material control as follows:

- a. Observation of weld material storage at the central receiving and storage warehouse.
- b. Observation of weld material issue at the two issue points.
- c. Inspection of the weld rod hold ovens established that two (2) of the eleven ovens were past due calibration, Oven No. W-11 by approximately four (4) months and W-51 approximately three (3) months.

The two (2) ovens were calibrated prior to the termination of this inspection.

This item is considered closed.

In addition the calibration stickers on oven Nos. W-12, W-49, and W-52 indicated that these ovens had been calibrated on September 20, 1978. These ovens had no provisions for, and were not provided with thermometers for direct temperature readout. The licensee stated that they did not have thermometers for directly measuring oven temperatures.

This condition is contrary to 10 CFR 50, Appendix B, Criterion XII and the ZPS, Unit 1, FSAR Paragraph 17.1.12.2. This is an item of noncompliance identified in Appendix A of the transmittal letter. (358/79-07-06)

5. Walkdown of The Residual Heat Removal (RHR) System

- a. The inspector accompanied by a member of the systems turnover group, started a walkdown of the RHR system. Due to the number of open items (i.e., pipe hangers, supports, snubbers, and restraints on the punch list this item of inspection was terminated and will be inspected at a subsequent NRC inspection.
- b. During this walkdown the inspector observed many weld electrode stubs and unused coated rods, 6010 and 7018 rod, throughout the plant. See Appendix A, Item B.

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

79-15

Report No. 50-358/79-15

Docket No. 50-358

License No. CPPR-88

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

Facility Name: Wm H. Zimmer Nuclear Power Station

Inspection At: Wm H. Zimmer Site, Moscow, Ohio

Inspection Conducted: May 8-11 and 17-18, 1979

Inspectors: *C.C. Williams*
C. C. Williams 6/6/79

C.C. Williams
for J. J. Harrison 6/6/79

Approved By: *D.H. Danielson*
D. H. Danielson, Chief 6/6/79
Engineering Support Section 2

Inspection Summary

Inspection on May 8-11 and 17-18, 1979 (Reference Report No. 50-358/79-12)

Areas Inspected: Suppression pool modification fabrication activity associated with the second actuation of main steam relief valves in response to 50.55(e) report dated January 23, 1978, and Section I.5.0 of the closure report "Plant Modification and Resultant Improvements." The inspection involved a total of 28 inspector-hours onsite by one inspector (May 8-11) and a total of 38 inspector hours (May 17-18) onsite by two inspectors.

Results: Six items of noncompliance involving 12 examples were identified in the area inspected, relative to control of special processes, material qualifications, procedural requirements, and documentation. As a result of these findings, an Immediate Action Letter was issued on May 11, 1979, by the NRC, directing the licensee to stop work, perform a QA audit, resolve identified deficiencies and secure NRC concurrence prior to further suppression pool modification. (See Details, Sections 2.d.(1)-(15).)

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DETAILS

Persons Contacted

Cincinnati Gas and Electric Company (CG&E)

- *E. A. Borgmann, Senior Vice President (May 11, 1979)
- *W. W. Schwiars, Principal QA&C Engineer
- *B. K. Culver, Project Manager
 - B. A. Gott, General Construction
- *D. C. Kramer, Engineer QA&S
 - R. L. Wood, Auditor QA&S
 - J. F. Weissenberg, Auditor QA&S
 - H. Brinkman, Engineer
 - J. Herman, Engineer
- *E. P. Ehas, Auditor QA&S
 - L. D. Lundstrom, Auditor QA&S
 - J. W. Haff, Auditor QA&S
 - P. G. Davies, Auditor QA&S

Kaiser Engineers, Incorporated (K&I)

- *R. Marshall, Construction Manager
- *E. V. Knox, Corporate QA Manager
- *R. E. Turner, QA Manager
 - A. C. Pallon, QA Engineer
 - E. Gaertner, Welding Engineer
 - D. Dondovan, QA Inspector
 - K. Renfro, Foreman
 - G. Adams, Superintendent
 - G. Jodrey, QA Inspector
 - A. Winslow, Weldor
 - J. Douglas, Weldor
 - D. Rose, Superintendent
 - E. Lehan, Boiler Maker

Sargent and Lundy

- T. Botolini, Engineer

Hartford Steam Boiler Inspection and Insurance Company (HSBI)

- *A. H. Clark, ANI
- L. R. Burton, ANI
- *B. A. Jeffery, ANI

*Denotes those present at the exit interview.

Functional or Program Areas Inspected

1. Suppression Pool Modification Construction Activity (May 8-11, 1979)
(Reference IE III Report No. 50-358/79-12, Section I)

As previously reported, the licensee has initiated structural modifications to the suppression pool and associated piping, to accommodate engineering concerns relative to the second actuation of the main steam safety valves. This matter and the licensee's commitments relative to its resolution are as documented on "Potential 50.55(e) Report" dated September 19, 1971, and other related documents.

The modifications in process at this time include (1) replacement of the downcomer "bull heads" with "T" Quenchers, (2) increasing the pipe diameter from 10" to 12", and (3) installation of quencher base plates on the floor of the suppression pool. During this NRC inspection, those fabrication and QA/QC activities associated with the installation of the "T" quencher base plates were examined.

2. Installation of Suppression Pool Embedments - "T" Quencher Base Plates (May 8-11, 1979)

- a. Kaiser is the principal constructor for this modification and Sargent and Lundy is the architect engineer. In addition to Kaiser's QA/QC activity, CGE QA&S group has responsibility to audit the quality of this work. This modification is directed by S&L specification H-2174 and associated design documents. A Sargent and Lundy engineer is stationed at the site to facilitate the implementation of these requirements.

This specific activity encompassed removal of the existing suppression pool liner plate, core boring to install anchor bolts for the 13 "T" quencher base plates, and required grouting and welding activity. The base plates are 4" thick, approximately, 6' x 6' carbon steel plates, and the existing liner plate is 1/2" thick carbon steel with stainless steel cladding. The base plates are located in two concentric circles around the reactor pedestal.

- b. On May 8 and 9, 1979, the inspector examined the S&L specification No. H-2174, Engineering Change Request No. 1088 governing this work. No adversities were noted.

The inspector examined the principal drawing (S&L No. S-460) and 16 Design Document Changes (DDCs) to this drawing. All had been properly approved. The inspector examined the welding procedures Nos. 3.1.57, 3.1.59 and 3.1.80. The material purchase orders for plate; anchors and grout were also examined. The content of these documents was discussed with the cognizant QA engineer relative to their review control and implementation.

On May 9, 1979, the inspector reviewed all existing Nonconformance Reports and Design Document Changes associated with this activity. The content of those documents was discussed with the cognizant CG&E and Kaiser personnel. Subsequently, the inspector examined Material Certification and other document requirements for the material used in this modification.

The inspector made a topical review of the Kaiser QA program and the applicable QA and Special Process procedures which govern this work. The contents and implementation methods and responsibilities were discussed with the licensee and Kaiser personnel.

- c. After reviewing the design documents, special process procedures, and QA/QC requirements and responsibilities with CG&E and Kaiser QA personnel, the inspector contacted Kaiser Construction forces (Superintendent, Foreman, QC Inspectors, Weldors, and the S&L Engineer). During these contacts, all work in progress and related records within the suppression pool on both day and night shifts was observed and examined by the NRC inspector. The Filler Material Disbursement Center and associated records were also examined. Generally, the workmanship relative to welding and grouting appeared to be commensurate with industrial standards. However, certain noncompliances with QA/QC requirements were identified as follows; next paragraph.
- d. As a result of the above inspection activities on May 8-11, 1979, the inspector identified a significant number of unresolved issues and noncompliances to specifications and QA/QC commitments as identified in the following paragraphs:
 - (1) During the inspector's examination of work in progress within the suppression pool, on May 8-11, 1979, it was observed that none of the grinding and other

tools were positively identified as required by Kaiser QACMI procedures (No. 9) to preclude contamination of certain stainless steels as directed by "suppression pool" welding procedures No. 3.1.57 among others. This is an item of noncompliance. (See Appendix A, Paragraph 1.a.) (358/79-15-01)

- (2) During discussion with the CG&E cognizant engineer, the inspector questioned the adequacy of the anchor bolt tensioning instructions on drawing No. S-406 relative to the need for more comprehensive procedures. A manufacturer's instructions for the tensioning device used was presented. However, various of the personnel involved (Kaiser superintendent foreman and S&L engineer) indicated that the subject manufacturer's instruction had not been used for this work and its approval status could not be established (May 8-11, 1979). The contractor committed to immediate corrective action.

The inspector concludes that adequate and documented procedures were not available for tensioning. This conclusion is based on the confusion among site personnel as to the status of this manufacturer's instruction, the inspectors examination of the content of the manufacturer's instruction provided by S&L drawing No. S-406 including Design Document Changes. This item is considered an item of noncompliance. The licensee and constructor committed to immediate corrective action. (See Appendix A, Item 1.b.). (358/79-15-02)

- (3) During the inspectors examination and observation of weld filler metal disbursement center (rod-shack) it was observed that the operability status identification and control of portable weld rod heater boxes was in apparent complete disarray and not in accordance with procedures. The boxes had multiple identities, verification status dated back to 1974, and inoperable heaters were not identified as such. The licensee initiated immediate corrective action. This is an item of noncompliance. (See Appendix A, Item 1.c.) (358/79-15-03)
- (4) During the inspectors examination of the documentation required by purchase order No. 3336 for the "T"

quencher base plate material (4" thick ASTM A-588) it was determined from the available records that the requirement for 100% ultrasonic examination was not accomplished for 11 of the 13 plates. The available UT reports indicated that the inspection for these places was done on a 24" grid which could mean that as little as 5% of the plate was UT examined. This material has been installed. This is an item of noncompliance. (See Appendix A, Paragraph 2.a.) (358/79-15-04)

- (5) S&L specification and drawings (S-406) requires that EMBECO-636 grout be used to anchor the base plate anchor bolts. Although this material has been purchased and used at this site for several years, a Material Certification or other competent document constituting documentary evidence of quality was not and has never been available at the site. The licensee initiated corrective action. This is an item of noncompliance. See Appendix A, Item 2.b. (358/79-15-05)
- (6) During the inspectors examination of the weld filler material disbursement center (rod shack) it was observed on three consecutive days that filler material and consumable inserts were maintained in heater ovens and shelves without benefit of documented traceability to heat/lot numbers or other controlling identification. Discussion with attendants resulted in differing information between night and day shifts. "Oven Maps" that were available were either in error or otherwise not useful. This is an item of noncompliance. See Appendix A, Item 3.a. (358/79-15-06)
- (7) During the inspectors examination of liquid penetrant materials within the suppression pool, an untraceable container of liquid penetrant dye material whose contents appeared contaminated with foreign substances was identified. The lot of other identifying number for this container of LP material was not available. This is an item of noncompliance. See Appendix A, Paragraph 3.b. (358/79-15-07)
- (8) During the inspectors observations and examination of the filler material disbursement center (rod shack) on May 10, 1979, a filler material heating oven (No. 57) was observed to contain the lunches (food) of the

rod shack attendant. Such practices increase the risk of contaminated filler material and are prohibited by standard industrial practices. Recent audits by Kaiser QA demonstrated that this rod oven is used for Class 1 materials. The Kaiser management took immediate corrective action. This is an item of noncompliance. See Appendix A, Paragraph 4.a. (358/79-15-08)

- (9) During the NRC inspectors observation of welding activity within the suppression pool, several weldors were observed to possess gas fired "heating" torches. When the weldors and their foremen and superintendent were questioned as to the use of these torches, they reported, in summary, that the torches were used for preheat or moisture control when needed. However, the Kaiser welding procedures (i.e. 3.1.57) specified that only electrical heat sources shall be used for these purposes. The Kaiser welding engineer concurred in that the WPS required the use of electrical heating to preclude contamination of stainless steels and for better control. This matter is an item of nonconformance to weld procedure requirements. See Appendix A, Item No. 4.b. (358/79-15-09)
- (10) During the inspectors periodic observations over a three day period within the suppression pool and review of the available KEI forms (weld data sheets), it was observed that neither the weldors, their foreman nor the weld inspector verified the welding interpass temperature requirements of the procedure. In fact, the production personnel appeared unaware of the temperature requirements. Neither the inspectors nor the weldors were equipped to make such determinations. This is considered an item of nonconformance to special process procedural and QA requirements. See Appendix A, Paragraph 4.c (358/79-15-10)
- (11) During the inspectors examination of the weld filler material disbursement center (rod shack) on May 9-10, 1979, day and night shifts, approximately 50 containers of apparently nonconforming weld rod were observed to be stored among reportedly conforming materials without benefit of nonconforming identification or identified segregation. Discussion with rod shack personnel on both day and night shifts disclosed discrepancies in the "understood" acceptance status of these materials. This is an item of noncompliance. See Appendix A, Item 5.a. (358/79-15-11)

(12) During the inspectors examination of the work activity within the suppression pool, the welding fabrication records (weld data sheets - KE-1 forms) posted in the immediate vicinity of the "T" quencher base plate installations were examined. It was observed that records for base plates 1F, 1M and 1D did not appear to be commensurate with the status of the work. Moreover, such surveillances reflecting interpass temperature control and "preheat" had not been filled out. During discussion with licensee and Kaiser personnel, it was established that other copies of these records exist and that "the hard" copy of KE-1 form was maintained at the inspector's and foreman's office area. In fact, the Kaiser inspectors maintained "notebooks" on this work and the accurate fabrication records are transferred from these personnel notebooks to the hard copy of the KE-1 form. This practice is not in accordance with the governing Kaiser procedure (Special Process Procedure Manual No. 8) and instruction on the KE-1 form. The licensee committed to take immediate corrective action and is considering a procedure change to include the described practice. This is an item of noncompliance. See Appendix A, Item 6.a. (358/79-15-12)

(13) Training and Indoctrination of Craft Personnel

During this inspection, the NRC inspector found that certain craft superintendents, foreman, and filler material control attendants appeared to be less than comprehensively knowledgable in the areas of the assigned responsibility. This matter was brought to the attention of Kaiser and CG&E management and will be further examined during a subsequent inspection. This is an unresolved issue. (358/79-15-13)

(14) Design Review

Examination of the principal S&L drawing (No. S-406, Rev. M) showed that approximately 16 Design Document Changes (DDCs) have been issued against this drawing. The inspectors concern is that the number of changes in areas that immediately impact the current fabrication activity could possibly indicate inadequate design review. The licensee is to pursue this concern with the architect engineer. This matter will be further examined during subsequent inspections. This issue is unresolved. (358/79-15-14)

(15) Disposition of Nonconformances

The inspector examined all nonconformances and Design Change Documents. All of the nonconformances had been properly reviewed. However, several dispositions did not appear adequately based. Specifically: (a) Nonconformance Report No. E-1762, documenting the identification of "nicked" rebar, and the resolution of this matter, does not report the final depth of the grinding necessary for repair; the licensee is to provide additional documentation; (b) Several nonconformance reports (i.e. Nos. E-1765, E-1768 and E-1778) identify material machining discrepancies. However, it is not clear what the cause of these discrepancies were, nor is it clear that adequate corrective action to prevent recurrence was taken. The licensee is to pursue this concern. This matter will be reviewed during subsequent inspections. This issue is unresolved. (357/79-15-15)

- e. As is outlined in Paragraph d above, a significant number of noncompliances and concerns were identified relative to this suppression pool modification work. It was established on May 11, 1979, that the licensee had scheduled, but had not performed a formal audit of this activity.

On May 11, 1979, the NRC inspector concluded that all suppression pool construction activity should be stopped until such time that the licensee has (1) performed a comprehensive audit of all areas of this work, and (2) taken corrective action on all identified nonconformances and problem areas including those identified by this inspection. The inspector concluded further that the licensee should perform no further work until NRC has reviewed and concurred with their audit effort and corrective action.

During the NRC exit interview, dated May 11, 1979, the licensee's senior vice president concurred with the above "stop work and audit" conclusions, and the necessary arrangements were discussed by the licensee's and NRC III management personnel.

Subsequently, the licensee issued stop work order No. 79-05 on May 12, 1979, which required that all work related to the MSR/V modifications was to be stopped immediately. The stop work order is attached to this report as Exhibit A.

The NRC Region III staff issued an Immediate Action Letter transmitting NRC understanding that (1) all such work would be stopped, (2) the licensee would audit all modification fabrication activities, (3) take corrective action on all noncompliances, and (4) continue the work suspension until NRC has evaluated and concurred with the results. This document is attached to this report as Exhibit B.

f. NRC Evaluation of Licensees Response to Immediate Action Letter (IAL) Dated May 15, 1979

- (1) On May 16, 1979, the licensee informed NRC III that their actions in response to NRC IAL dated May 15, 1979, were complete and certain corrective actions relative to their findings had been initiated.
- (2) On May 17 and 18, 1979, two NRC inspectors were dispatched to the site to evaluate the licensee's audits findings and corrective actions.
- (3) During this inspection, the NRC inspectors examined nine separate audit reports (Nos. 234-242) covering work associated with the suppression pool modification. Seven of these audits identified noncompliances other than those previously identified by the NRC on May 8-11, 1979. Corrective actions were either complete or were in process at the time of this inspection.
- (4) Discussion with each of the auditors and principal production and QA personnel demonstrated, in addition to the documentation, that the licensee's corrective action efforts had been comprehensive and responsive to the NRC concern. Several of the documented audits required addenda as a result of NRC examination. However, acceptable addenda were completed and issued during this NRC inspection.
- (5) Observation of the suppression pool fabrication area demonstrated that only maintenance activity had proceeded since the issuance of the stop work order.

Examination of the weld filler material disbursement center showed that all areas now conform to the requirements.

- (6) NRC reviewed each of the nonconformances identified by the licensee and by the previous NRC inspection. In each instance, the corrective action taken or in process, appeared appropriate. Retraining and indoctrination of certain personnel had been accomplished.
- (7) As a result of the licensee's audit of the suppression pool modification, the following QA/QC and special process procedural revisions have been made or are in process:
 - (a) Anchor Bolt Tensioning Procedures
 - (b) Tool Control Procedure No. QACMI-9
 - (c) Weld Procedure No. SPPM-3.1.57
 - (d) Weld Procedure No. SPPM-3.1.59
 - (e) Weld Procedure No. SPPM-3.1.80
 - (f) Electrode Control Procedure No. SPPM-3.3 Rev. 5
 - (g) Weld Data Form (KE-1) Control Procedure No. SPPM-8.0, Appendix B and F
 - (h) Design Document Control Procedure No. FCP-2.6
- (8) At the conclusion of this NRC inspection on May 18, 1979, the NRC determined that the CG&E stop work order issued on May 12, 1979, relative to the suppression pool modification work, could be conditionally rescinded. The condition is that no work may proceed in any area or with any material where procedural revision is incomplete or unresolved issues exist.

The licensee concurred with this requirement and issued a conditional suspension of stop work order No. 79-05 on May 21, 1979, which is attached here as Exhibit C.

Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during the inspection are discussed in Paragraphs 2.d(13), 2.d(14) and 2.d(15).

Exit Interview

At the close of each portion of this inspection, the NRC inspectors discussed results with the licensee's representatives as documented under Persons Contacted. The licensee was informed that special inspections of this modification work will continue until complete.

Attachments: Exhibits A-C

STOP WORK ORDER

TO: B. K. Culver
R. Marshall

Number: 79-05Date: 5-11-79

This is notification that work is to be suspended immediately (5-11-79 Second Shift) on all construction activities related to the MSR/V modifications in the suppression pool on the Zimmer Site. This Stop Work Order applies to all work activities in the suppression chamber and related activities in fabrication shops on site, but does not apply to work performed by suppliers and vendors in their shops which are covered by their QA Program. Quencher and other suppression pool related material may be received on site, but must be placed in quarantine. Activities which affect the future quality of work performed in the past, such as curing grout or grinding welds to remove contaminants, tool removal, safety, security, maintenance, and similar activities may continue to be performed.

This Stop Work Order will remain in effect until all elements of the NRC audit conducted from 5-8 to 5-11-79 are resolved and acceptable to the NRC.

Reason: NRC Inspection conducted from 5-8-79 to 5-11-79 identified nonconforming and unresolved items with regard to suppression pool work at the Zimmer Site.

Prepared By:

D. C. Kramer

Approved By:

W. W. Schwick

cc: E. A. Borgmann
W. D. Waymire
J. R. Schott
Henry J. Kaiser Co.
Attn: R. E. Turner

007 1 1979

Docket No. 50-358

79-15

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 September 10, 1979, providing us with additional information concerning the apparent noncompliance item 2b of Appendix A in our letter dated June 11, 1979. We have reviewed your action taken and have no further questions.

Your cooperation with us is appreciated.

Sincerely,

Gaston Fiorelli, Chief
Reactor Construction and
Engineering Support Branch

cc: Mr. J. R. Schott,
Plant Superintendent

cc w/ltr dtd 9/10/79:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Power Siting
Commission
Citizens Against a Radioactive
Environment
Helen W. Evans, State of Ohio

RIII
Harrison/bk
9/26/79

RIII
Danielson
9/27/79

RIII
Fiorelli

RIII
Vandel

~~RIII
Harpster~~

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THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN
VICE PRESIDENT

September 10, 1979
QA-1199

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

Attention: Mr. J. G. Keppler,
Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
IE INSPECTION REPORT #79-15, DOCKET NO. 50-358,
CONSTRUCTION PERMIT CPPR-88, W.O. #57300-957,
JOB E-5590

Gentlemen:

This letter is a supplement to our formal reply to the subject inspection report which was sent to you in our letter, QA-1159, dated July 2, 1979. It is our opinion that nothing in this reply is proprietary in nature.

Mr. J. J. Harrison indicated during his inspection at the Zimmer Site on August 21-23, 1979, that our response to noncompliance Item 2b of Appendix "A" of the subject inspection report, as stated in letter QA-1159, was unacceptable. The following is our revised response to Item of Noncompliance 2b in Appendix "A" of the subject inspection report:

Certification of Embeco 636 Grout

Corrective Action Taken and Results Achieved

Action has been taken to procure the following:

- 1) Certifications referencing batch or lot numbers for past shipments of Embeco 636 Grout used in the Suppression Pool modification work, and
- 2) A general certification from Master Builders covering all Embeco 636 Grout supplied to Henry J. Kaiser Company to date, plus the results of compressive tests performed on cube samples representing each day's grout use in the

SEP 17 1979

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September 10, 1979 - QA-1199
Page 2

Suppression Pool. If alternative 1) cannot be secured,
then alternative 2) will be supplied.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company receiving inspection personnel have been instructed by the Henry J. Kaiser Company QA Manager to obtain certification that Embeco 636 Grout meets specification requirements. Verification of this instruction is documented. This requirement is also stated in the Henry J. Kaiser Company procedure covering the Installation of Suppression Pool Wall Plates and Embedments.

Date When Full Compliance Will Be Achieved

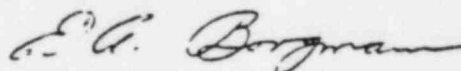
Full compliance will be achieved October 15, 1979.

We trust that this letter is an adequate response to Item 2b, Appendix "A" of IE Inspection Report No. 79-15.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By


E. A. BORGMANN
SENIOR VICE PRESIDENT

DCK:pa

YELLOW FILE COPY

JUL 31 1979

Docket No. 50-358

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 July 2, 1979, informing us of the steps you have taken to correct the noncompliance identified in our letter dated June 11, 1979. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

G. Fiorelli, Chief
Reactor Construction and
Engineering Support Branch

cc: J. R. Schott, Plant
Superintendent

cc w/ltr dtd 7/2/79:
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Ohio Power
Siting Commission
Citizens Against a
Radioactive Environment
Helen W. Evans, Director,
Division of Power Generation

RIII *rcf*
Williams

RIII *Jed*
Vandell

RIII *rcf*
Knop

RIII *rcf*
Fiorelli

7/27/79

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THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN
VICE PRESIDENT

July 2, 1979
QA-1159

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

Attention: Mr. J. G. Keppler, Director

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
IE INSPECTION REPORT 50-353/79-15, CONSTRUCTION
PERMIT NO. CPPR-88, DOCKET NO. 59-358, 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 is as follows:

Item 1a - Tool Control

Corrective Action Taken and Results Achieved

Tools, which will be used on stainless steel, have been positively identified by marking with white paint and controlled to preclude possible contamination from carbon steel.

Corrective Action to be Taken to Avoid Further Noncompliance

Supplement 6 of SP-100, issued to provide positive instruction regarding tool identification and control.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 1b - Anchor Bolt Tensioning Procedure

Corrective Action Taken and Results Achieved

A Henry J. Kaiser Company procedure entitled, "Operating Procedures

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for Stud Tensioner and Pump" was reviewed by Sargent & Lundy and issued for construction use.

Corrective Action to be Taken to Avoid Further Noncompliance

Field Construction Procedure 2-137 which controls the installation of Suppression Pool wall plates and embedments, and which includes installing and tensioning anchor bolts, contains a statement indicating that the tensioning shall be done in accordance with the "Operating Procedures for Stud Tensioner and Pump".

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 1c - Control of Portable Weld Rod Warmers

Corrective Action Taken and Results Achieved

All Henry J. Kaiser Company portable weld rod warmers have been clearly numbered and checked for proper temperature. Those complying with the requirements have been recorded on a master list which is issued to rod shack personnel for their use in issuing warmers. Non-complying warmers have been removed from the rod shack to a repair area.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company Procedure SPPM 3.3, Revision 5, has been revised to clearly identify the control requirements for portable rod warmers.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 2a - Ultrasonic Examination Test Report

Corrective Action Taken and Results Achieved

Written clarification has been obtained from the quencher base plate material supplier. This clarification states that all plates requiring a 100% ultrasonic search are examined by laying out 24" grids on the

plate surface. Each grid serves as a map and is searched 100% (with appropriate overlap). Each square is reviewed for acceptance as the test progresses.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company receiving inspection personnel have been instructed by the Henry J. Kaiser Company QA Manager to obtain clarification of documentation which is ambiguous before accepting such documents. This instruction session has been documented.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 22, 1979.

Item 2b - Certification of Embeco-636 Grout

Corrective Action Taken and Results Achieved

Henry J. Kaiser Company QA considered the manufacturer's marking of product formulation on each bag of Embeco-636 to be equivalent to a certification, since false labeling of contents is a breach of civil statutes and grounds for civil suit. However, further objective evidence has been obtained from our supplier, Master Builders, in the form of certification covering all Embeco-636 supplied to Henry J. Kaiser Company to date.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company receiving inspection personnel have been instructed by the Henry J. Kaiser Company QA Manager to obtain certification that Embeco-636 grout meets specification requirements. Verification of this instruction is documented. This requirement is also stated in the Henry J. Kaiser Company procedure covering the Installation of Suppression Pool Wall Plates and Embedments.

Date When Full Compliance Will Be Achieved

Full compliance was achieved June 26, 1979.

Item 3a - Traceability of Weld Filler Metal

Corrective Action Taken and Results Achieved

Each weld rod holding oven now has an accurate rod location map attached designating the size, type, and heat number of the weld rod.

Corrective Action to be Taken to Avoid Further Noncompliance

Weld rod shack attendants were instructed to maintain the weld rod location maps and to locate rod in the oven according to the map. Future audits will be made to assure compliance.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 3b - Traceability of Liquid Penetrant "Dye" Material

Corrective Action Taken and Results Achieved

Material lot number identification is being applied to each transfer container of penetrant materials. Additionally, inspectors are verifying that penetrant kits are free of visible contaminants.

Corrective Action to be Taken to Avoid Further Noncompliance

Henry J. Kaiser Company Procedure SPPM 4.2 has been revised to require that traceability of penetrant materials is maintained. Also, this procedure makes the inspector responsible to verify that the penetrant container is not contaminated.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 4a - Food in Weld Rod Holding Oven

Corrective Action Taken and Results Achieved

Food products which were heated in Weld Rod Holding Oven #57 were removed immediately and Oven #57 was removed from service.

Corrective Action to be Taken to Avoid Further Noncompliance

Craft personnel were given strict instructions that the practice of cooking food in any field location will not be tolerated and violators will be subject to termination. This is a mandatory item of instruction given during the indoctrination and training of craft personnel as per Field Construction Procedure 1-19.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 4b - Gas-Fired Torches Used for Preheat

Corrective Action Taken and Results Achieved

Weld Procedures 3.1.59 and 3.1.80 were revised to permit preheat by gas-fired torches. Electric Preheaters are being used as required in Weld Procedure 3.1.57.

Corrective Action to be Taken to Avoid Further Noncompliance

Welders were instructed that Procedure 3.1.57 does not permit gas-fired preheat.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 4c - Verification of Weld Interpass Temperature

Corrective Action Taken and Results Achieved

"Tempilstiks" with a 350⁰F maximum range were issued to construction personnel for use on detecting welding interpass temperatures.

Corrective Action to be Taken to Avoid Further Noncompliance

Welders were instructed to use "tempilstiks" to verify the interpass temperature requirements of welding procedures.

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 5a - Nonconforming Weld Filler Metal Material

Corrective Action Taken and Results Achieved

A separate, locked bin was built in the weld rod disbursement room to serve as a quarantine area. The 50 nonconforming weld rod containers were placed in this bin and will be returned to the storeroom for reprocessing.

Corrective Action to be Taken to Avoid Further Noncompliance

Weld rod disbursement room attendants were instructed to place nonconforming weld rod in the quarantine bin. This has been documented in a

training report conducted by the Henry J. Kaiser Company Site Welding Engineer. Henry J. Kaiser Company Procedure SPPM 3.3, "Welding Filler Material Control", requires that nonconforming weld rod be returned to the rod room for rebaking. The bin in the rod room is labeled "Rod to be Rebaked - Do not issue".

Date When Full Compliance Will Be Achieved

Full compliance was achieved May 29, 1979.

Item 6a - Records Reflecting the Status of Work

Corrective Action Taken and Results Achieved

Appendices "B" and "F" to SPPM 8.0 have been revised to authorize the use of 'work sheet' copies of field welding checklists (KE-1 forms) in the field. The inspectors may use these as a means of maintaining inprocess inspection status prior to formally stamping the permanent inspection records which are located near the work station.

Corrective Action to be Taken to Avoid Further Noncompliance

This item will be audited in the future to verify compliance with this requirement.

Date When Full Compliance Will Be Achieved

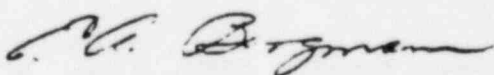
Full compliance was achieved May 29, 1979.

We trust that this letter is an adequate response to your IE Inspection Report No. 79-15.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN
Vice President

DCK:pa

JUN 11 1979

Docket No. 50-358-7115

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:

This refers to the inspection conducted by Messrs. C. C. Williams and J. J. Harrison of this office on May 8-11, and 17-18, 1979, of activities at Wm. H. Zimmer Nuclear Power Station authorized by Construction Permit No. CPPR-88 and to the discussion of our findings with you, and Messrs. Schwiers and Marshal at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

The findings of our inspection during the early stages of your modification of the suppression pool were of sufficient concern to warrant temporary termination of related work activities. We will continue to pursue this matter during future inspections to confirm the effectiveness of your corrective actions.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within twenty days of your receipt of this notice a written statement or explanation in reply, including for each item of non-compliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

Handwritten initials

7908150358

Cincinnati Gas and Electric
Company

- 2 -

JUN 11 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,

James G. Keppler
Director

Enclosures:

1. Appendix A, Notice of Violation
2. IE Inspection Report No. 50-358/79-15

cc w/encls:

J. R. Schott, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Ohio Power
Siting Commission
Citizens Against a Radioactive
Environment

RIII

CCW 6/11/79
Williams/sr

CCW for 6/11/79
Harrison 6/16/79

RIII

CCW for 6/11/79
Danielson

RIII

[Signature]
Fiorelli

RIII

[Signature]
Vandel

RIII

[Signature]
Norel
6/11/79

RIII

[Signature]
Keppler
6/8/79

Appendix A

NOTICE OF VIOLATION

Cincinnati Gas and Electric
Company

Docket No. 50-358

Based on the results of an NRC inspection conducted on May 8-11, and 17-18, 1979, it appears that certain of your activities were in noncompliance with NRC requirements as noted below. Items 1 through 5 are infractions and item 6 is a deficiency.

- 1. 10 CFR Part 50, Appendix B, Criteria V, states, in part that "Activities affecting quality shall be prescribed by documented instructions, procedures . . . of a type appropriate to the circumstances and accomplished in accordance with these instructions, procedures, or drawings.

Wm. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.1.5, states, in part that "Activities affecting quality of the facility are accomplished in accordance with written instructions, procedures, . . . which prescribe acceptable methods"

The CG&E Quality Assurance Manual, Section 5, states in context that written and approved procedures shall control quality related activities.

The Kaiser Engineers, Incorporated quality assurance procedure No. 8, Revision 4, Paragraph 2.0, states, in part that "When more detailed procedures are required, or . . . a construction methods instruction (QACMI) will be prepared . . . to assure compliance with requirements".

- a. Contrary to the above, on May 8-11, 1979, it was observed that metal grinding tools and other such devices used in the suppression pool modifications were not positively identified and controlled to preclude possible contamination as is prescribed by Kaiser Procedure QACMI M-9, Revision 6 and applicable welding procedures.
- b. Contrary to the above, on May 10, 1979, an adequate documented and approved anchor bolt tensioning procedure including the operation of the modified tensioning device (Biach Model No. 130) was not available, although anchor bolt tensioning had been initiated.

- c. Contrary to the above, during May 9-11, 1979, it was determined that portable weld rod heater boxes were not being adequately controlled, identified, and verified relative to their operability. That is, heater boxes had multiple identifying symbols, "expired" dates of temperature verification. Operability status was not adequately traceable and documented relative to these devices. Adequate procedures to control this activity were apparently not available.
2. 10 CFR Part 50, Appendix B, Criteria VII, states, in part that "Measures shall be established to assure that purchased material . . . conform to procurement documents. These measures shall include provisions as appropriate for . . . objective evidence of quality. . . . and examination upon delivery.

Wm. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.1.8.3, states, in part that "Objective evidence of quality is established by inspection" Further paragraph 17.1.7.5.2 states, in part that "The KEI QA/QC program contains procedures for source inspection and receiving inspection" and Paragraph 17.1.7.6 states, in part that "Documentary evidence of an item's conformance to procurement requirements is required to be available at the construction site prior to installation or use of that item"

The Wm. Zimmer Nuclear Power Station Quality Assurance Manual Paragraph 7.7 (Documentary Evidence) states, in part that "Documentary evidence that material . . . conform to procurement requirements is required to be at the site prior to use."

- a. Contrary to the above, on May 10, 1979, it was determined that Purchase Order (PO No. 33336) requirements for 100% ultrasonic examination for the quencher base plate material, was not complied with, in that the certified NDE reports provided, show that apparently the base plate material was examined only in areas outlined by the intersections of a 24-inch grid. This discrepancy was not identified prior to use of this material.
- b. Contrary to the above, documented evidence to certify that special grout material (EMBEKO-636) met the requirements of S&L Specification No. H2174 and manufacturer formulation

requirements, was unavailable at the site. Material receipt inspection did not identify this omission prior to use of this material.

- 3. 10 CFR Part 50, Appendix B, Criteria VIII, states, in part that "Measures shall be established for the identification and control of materials" and "These measures shall assure that identification is maintained by . . . appropriate means . . . throughout fabrication and use of the item."

Wm. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.1.8, states, in part that "Essential materials, parts and components . . . bear identification as to heat number, . . . serial number, etc." "Identification is maintained . . . throughout fabrication"

The CG&E Wm. H. Zimmer Nuclear Power Station Quality Assurance Manual Section 8.2, states, in part that ". . . The identification of items will be maintained" "This identification may be on the item or on records traceable to the item." "The identification is maintained throughout fabrication"

- a. Contrary to the above, on May 9, 1979, it was observed that weld filler material maintained in the disbursement center (rod shack), was being placed in holding ovens without benefit of the required material heat number traceability system; in that, weld rod location maps were not maintained. It was apparent from discussion, that the attendants were relying on memory to identify these materials.
- b. Contrary to the above, on May 9, 1979, NRC examination of the liquid penetrant "dye" material used on the suppression pool welds and materials, disclosed that the dye material was not identified, and documented traceability to quality records could not be established. Moreover, the liquid penetrant dye container appeared contaminated with foreign matter.

- 4. 10 CFR Part 50, Appendix B, Criteria IX, states, in part that "Measures shall be established to assure that special processes, including welding, heat treating . . . are controlled and accomplished . . . in accordance with . . . specification and other special requirements."

Wm. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.1.9.2, states, in part that "Special processes are accomplished . . . in accordance with applicable codes, standards, specifications, criteria, or other special requirements."

The Wm. Zimmer Nuclear Power Station Quality Assurance Manual, Section 9, Paragraph 9.2, states, in part ". . . assure that implementation of special processes is in accordance with approved procedures."

- a. Contrary to the above, and in context, the Special Process Procedures Manual, Section 3.3, Revision 4; on May 10, 1979, the NRC inspector observed that filler material holding oven No. 57 (within the primary rod shack) was being used to cook food products (rod attendant lunches).
 - b. Contrary to the above, and in context to weld procedure specification Nos. 3.1.57, 3.1.59, and 3.1.80, it was determined through observation and discussion, that gas fired torches were being used for pre-heat and "moisture" control, whereas only electrical heating is specified.
 - c. Contrary to the above, and in context to weld procedure specification Nos. 3.1.57, 3.1.59, and 3.1.80, on May 8 and 9, 1979, NRC inspection determined that welding inter-pass temperature requirements were not being verified. Tools needed for such verification were not immediately available to personnel performing and verifying acceptability of the welding.
5. 10 CFR Part 50, Appendix B, Criteria XV, states, in part that "Measures shall be established to control materials . . . which do not conform to requirements . . ." "These measures shall include . . . procedures for identification, documentation, segregation, disposition . . ."

The Wm. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.1.15.7, states, in part that "Nonconforming items are conspicuously marked and whenever practical are physically segregated to prevent their inadvertent use or installation."

The CG&E, Quality Assurance Manual, Section 15, Paragraph 15.4, requires in context that nonconforming items be identified and segregated.

The Kaiser Engineers Quality Assurance Manual, Procedure 16, Revision 3, Paragraph 2.2, states, in part that "All nonconforming items will be segregated, where possible from acceptable items, clearly identified with applicable hold or deficiency tag"

- a. Contrary to the above, in excess of 50 containers of acknowledged nonconforming weld filler material were observed for several days (May 8, 9, and 10, 1979) within the primary weld rod disbursement room, without benefit of nonconformance identifying tags or controlled segregation.
6. 10 CFR Part 50, Appendix B, Criteria XVII, states in part that "sufficient records shall be maintained to furnish evidence of activities affecting quality."

Wm. Zimmer Nuclear Power Station, Unit 1, FSAR, Chapter 17, Paragraph 17.1.17.1, states that "Sufficient records to furnish evidence of activities affecting quality are maintained at the site" Paragraph 17.1.17.2, states, in part that "The records to be retained include . . . monitoring of work performance,"

The CG&E Quality Assurance Manual, Section 17.1, states, in part that ". . . the QA records will document that every practical effort to assure a safe and reliable nuclear installation has been considered and performed during fabrication"

- a. Contrary to the above, on May 8, 9, and 10, 1979, field welding checklist (KE-1 forms) located in the suppression pool for documenting modification welding activity, did not adequately reflect the status of fabrication as is required by Special Process Procedures Manual, Section 8. Records are in part maintained in inspectors' note books.

DANIELS A-37

JUN 12 1980

Docket No. 50-358

50-07

The 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:

Thank you for your letter dated May 28, 1980, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Report No. 50-358/80-07 forwarded by our letter dated April 23, 1980. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely,

G. Fiorelli

G. Fiorelli, Chief
Reactor Construction and
Engineering Support Branch

cc w/ltr dtd 5/28/80:
Mr. J. R. Schott, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Power Siting
Commission
Citizens Against a Radioactive
Environment
Helen W. Evans, State of Ohio

RIII	<i>Ref</i>	RIII	RIII	RIII	RIII	RIII
Barrett/np	<i>for</i>	Hughes	Vandel	Knop	Hayes	Daniels
6/9/80						6/10/80

8006260288

THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN
VICE PRESIDENT

May 28, 1980
QA-1301

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

Attention: Mr. Gaston Fiorelli

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
NRC INSPECTION REPORT NO. 80-07 - DOCKET NO.
50-358, CONSTRUCTION PERMIT CPPR-88, 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 responses to the items of noncompliance cited in Appendix "A" of the report are as follows:

Item 1 - Weld Rod Control

(a) Corrective Action Taken and Results Achieved

Henry J. Kaiser Company Special Process Procedures Manual, Section 3.3, R7, dated March 11, 1980, does require the portable rod warmers to be electrically plugged in at all times except during transport to and from the rod shack.

All weldors are instructed to follow this procedure when they are employed and it is the superintendent's responsibility to make sure the weldors are doing so. It is also the job responsibility of the rod shack designee to make random field checks to make sure the weldors are following this requirement.

A sign has been posted on the rod shack window instructing the weldors to plug in their portable rod warmers as soon as they reach their designated work area.

(b) Corrective Action to be Taken to Avoid Further Noncompliance

Effective May 8, 1980, stickers are being placed on each

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Mr. Gaston Fiorelli
U. S. Nuclear Regulatory Commission
Region III
May 28, 1980 - QA-1301
Page 2

portable rod warmer (as a reminder), stating the portable rod warmer should be plugged in at all times.

(c) Date When Full Compliance Will Be Achieved

This item is considered to be in compliance as of the date of this letter.

Item 2 - Electrical Component Supports on Block Walls

(a) Corrective Action and Results Achieved

The procedure, QACMI E-16, does not contain the recommended manufacturer instruction. However, the through bolts in question were installed per Design Document Change E-3563 dated September 12, 1978 and this document does include the torquing requirements. Other design instructions for block wall attachments are as follows: DDC's SLS-330, 338, 348-Rev. 2, 335 and S-1692.

The above cited procedures will be revised to reflect the required information and also to incorporate the later information from Sargent & Lundy as outlined in DDC SLS-516.

(b) Corrective Action to be Taken to Avoid Further Noncompliance

The revised procedure will be issued and training classes will be conducted in the field to familiarize the workers with the latest through bolt requirements.

(c) Date When Full Compliance Will Be Achieved

The revised procedure will be issued and the training classes will be completed by May 30, 1980.

We trust that the above will constitute an acceptable response to the subject inspection report.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By

E.A. Borgmann
E. A. BORGMANN
SENIOR VICE PRESIDENT

ATT'N	NOTED
	<i>JF</i>
RETURN TO: JF:pa	

cc: B. K. Culver NRC Resident Inspector
J. R. Schott Attn: F. T. Daniels ✓
W. W. Schwiers



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

APR 23 1980

Docket No. 50-385

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

80-07

Gentlemen:

This refers to the inspection conducted by Messrs. T. Vandell, J. Hughes, Z. Cordero, E. Gallagher, and H. Wescott, of this office on March 19-21, 1980, of activities at Wm. H. Zimmer Nuclear Power Plant authorized by NRC Construction Permit No. CPPR-88 and to the discussion of our findings with you, Messrs. B. Culver, W. Schwiers and others of the Zimmer staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as described in the enclosed Appendix A.

This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office within thirty days of your receipt of this notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

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.

~~8006200109~~

Cincinnati Gas and Electric
Company

- 2 -

APR 23 1980

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. 50-358/80-07

cc w/encl:

J. R. Schott, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Power
Siting Commission
Citizens Against a
Radioactive Environment
Helen W. Evans, State
of Ohio

RIII
S.L.V.
Vandel/jp
5/24/80
Danielson
4/11/80

RIII
1/24/80
Cordero
1/for
Hayes

RIII
1/for
Gallagher
1/for
Fiorelli

RIII
1/for
Hughes
1/for
Daniels
4/17/80

RIII
1/for
Wescott
RIII
Knop
RCK

Appendix A

NOTICE OF VIOLATION

Cincinnati Gas & Electric Company

Docket No. 50-358

Based on the results of the NRC inspection conducted on March 19, 20, and 21, 1980, it appears that certain of your activities were in noncompliance with NRC requirements, as noted below. These items are infractions.

1. 10 CFR 50, Appendix B, Criterion IX, states in part, "Measures shall be established to assure that special process, including welding . . . are accomplished . . . using qualified procedures . . . and other special requirements."

KEI, SPPM, Section 3.3R7 dated March 11, 1980, requires in part that the portable rod warmers are to be electrically plugged in at all times except during transport to and from the rod shack.

Contrary to the above, the licensee failed to provide measures to control the welding process in that two (2) portable rod warmers were not plugged in while in use.

2. 10 CFR 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances. .

The Wm. H. Zimmer FSAR Chapter 17, Section 17.1.5 states in part that, "Activities affecting the quality of the facility are accomplished in accordance with written instructions, procedures, or drawings which prescribe acceptable methods for carrying out the activities. . ."

Contrary to the above, Quality Assurance Construction Methods Instruction QACMI-E-16 for the installation of thru bolts used for seismic Category electrical mounted supports on blockwalls did not include criteria for torquing, bolt size, bolt location, etc.

~~800620011~~

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-358/80-07

Docket No. 50-358

License No. CPPR-88

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

Facility Name: Wm. H. Zimmer Nuclear Power Station

Inspection At: Zimmer Site, Moscow, Ohio

Inspection Conducted: March 19-21, 1980

Inspectors: T. E. Vandel

T. E. Vandel

4-14-80

Z. Cordero

Z. Cordero

4/14/80

E. J. Gallagher

E. J. Gallagher

4/16/80

J. Hughes

J. Hughes

4/16/80

H. M. Wescott

H. M. Wescott

4-15-80

Approved By: R. C. Knop, Chief
Projects Section No. 1

R. C. Knop

4-15-80

Inspection Summary

Inspection on March 19-21, 1980 (Report No. 50-358/80-07)

Areas Inspected: Review of previously identified unresolved and noncompliance matters, instrument components records review, fire protection of instrument and electrical cables, suppression pool modification activities, followup of IE Bulletins and Circulars and of 50.55(e) and Part 21 reportable deficiencies. The inspection involved a total of 104 inspector-hours on site by five NRC inspectors.

Results: Of the ten areas reviewed, noncompliances were identified in two areas of review.

8006200113

DETAILS

Persons Contacted

Cincinnati Gas and Electric Company (CG&E)

- *E. A. Borgmann, Senior Vice President Engineering Services and Electric Production
- *B. K. Culver, Project Manager
- *W. W. Schwieters, Quality Assurance Manager
- *W. D. Waymire, General Engineering Manager
- H. C. Brinkman, Principal Engineer Nuclear Projects
- G. A. Minges, Engineer GED

Principal Contractors

- *K. R. Baumgarten, Site QA Manager, Henry J. Kaiser Company
- M. Kopp, Lead Electrical QC, Henry J. Kaiser Company

U.S. Nuclear Regulatory Commission

- *F. T. Daniels, Resident Inspector
- *T. N. Tambling, Acting Projects Section Chief, RONS

*Denotes those present at the exit interview.

Licensee Action on Previous Inspection Findings

(Closed) Noncompliance (358/79-39-01) - Electrical penetration terminal block assemblies had an excessive accumulation of dust, dirt, etc. The RIII inspector visually inspected the penetration assemblies and reviewed nonconformance report number E-2423 dated January 15, 1980 and closed out on February 28, 1980. The inspector had no further question on this matter.

(Open) Noncompliance (358/79-39-02) - Modifications are being installed/supervised by the electrical test group, these modifications are not being re-inspected by individuals (QC) other than those who perform or supervise the activity. The RIII inspector interviewed various personnel in this area and determined that the licensee action dated February 20, 1980 was being carried out, except that Henry J. Kaiser QC inspection personnel have not commenced their inspection at this time. Upon questioning the Kaiser site QA Manager, the RIII inspector was presented an inter-office memorandum to the Kaiser lead electrical QC inspector. The memo stated in part, "that a change to existing procedures, QACMI E-8 is required. The program shall be implemented by April 1, 1980." During the exit meeting, the inspector asked the licensee if they intended to conduct an audit on previous modifications already installed. The licensee stated that they would look into this area.

(Closed) Unresolved Item (358/79-12-04) - Seismic qualification of the RHR pump motors. The RIII inspector reviewed revised certification statements from General Electric (GE) to meet IEEE standards 323-1974 and IEEE 344-1975 based on comparison of the Zimmer motors with the Environmental Qualification Test Report 22A4722 for the BWR/6 ECES motors. The RIII inspector also reviewed GE's field deviation disposition request (FDDR) No. KN-1-376 for increasing the air gap in stator/retor from .040 to .050 inches. The FDDR was signed on June 18, 1979 as being completed. During NRR's Seismic Qualification Review Team (SQRT) inspection dated May 15-17, 1979, of NSSS supplied equipment, the team identified an open item on the Zimmer RHR pump motors. This item remains open on their review and will be followed up on by them. The RIII inspector has no further questions at this time.

(Closed) Unresolved Item (358/79-14-22) - Documentation unavailable to establish that the reactor recirculating system ringheaders had met the ovality requirements of the ASME Code. The inspector reviewed measurement data taken on site. The data established that both A and B ringheaders were less than the maximum 8% ovality tolerance. This item is considered closed.

(Open) Unresolved Item (358/79-14-20) - Heat treatment strip chart No. 58, of the recirculation loop piping, is incomplete in that it can not be established the length of time parts were held in the furnace. The inspector reviewed General Electric's letter to Cincinnati Gas and Electric, CGE-1214, dated October 17, 1979 w/attachment D.

The subject strip chart remains incomplete. Apparently the cut off portion cannot be located. The inspector also reviewed a laboratory test from Metcut Research Associates, Inc. No. 64-28904-1, dated November 29, 1979. This report indicates that the samples were evaluated transverse to the pipe length. This item remains open pending further review.

(Closed) Unresolved Item (358/79-33-01) - No regular periodic surveillance of the fuel stored in the dry fuel pool. The inspector reviewed Audit Report No. 297 dated January 16-23, 1980, w/attachments. The audit was of the adequacy of controls which assures that correct settings are maintained for valves that prevent water addition to the fuel pool. The attachments (E.C. S.A.D. 02) "Safety Tagging Procedure" to verify proper valves are closed to prevent water from entering the fuel pool. In addition, the Radiation Chemistry Group performed a periodic surveillance. This item is considered closed.

(Open) Noncompliance (358/79-32-01) - Reinforcement steel plate being used was not as specified on drawing No. 5-398. The inspector discussed this item with the licensee and established that approximately 70% inspection verification remains to be completed.

(Closed) Noncompliance (358/79-14-14) - Kaiser Corporate Audit findings were not followed up in subsequent audits. It was established in a Kaiser letter (KC-12712-Q February 15, 1980) to the CG&E QA Manager that audit findings 1.3 and 1.5 from audit 17 had not been followed up and that in addition other audit findings, from 1977 audits, (2.1, 3.2, 3.3, 3.4, 4.1.1, 4.1.2, 5.2, 5.3, and 6.2) also had not been followed up or closed in subsequent audit reports. The letter contended these items had been closed and the corrective action verified as implemented in other Kaiser correspondence however, no follow up had been done during subsequent audits. The letter committed to such a follow up during the next Kaiser corporate audit scheduled for July, 1980. The NRC inspector indicated that he had no further questions regarding this item.

Licensee Action on Other Items

50.55(e) Reportable Deficiencies

(Open) 10 CFR 50.55(e) Report, Subject: Limit switches on Limatorque valve actuators improperly set by manufacturer. The inspector reviewed two letters from CG&E to Sargent and Lundy dated March 15, 1979, SLQ-254 and SLQ-287, dated October 3, 1979. These letters requires requested assistance from Sargent and Lundy in getting corrective action from the manufacturer of Limatorque actuators. To date Limatorque has not responded. This item remains open pending the licensee's corrective action.

IE Bulletin 79-25

Failure of Westinghouse BFD relays. The licensee's response to this bulletin dated December 20, 1979 stated that this type of relay is not employed nor planned to be used in safety related systems. The inspector observed components on the switchgear rooms and did not find any BFD relays in this area. This item is considered closed.

NOTE: The licensee had previously responded to IE Bulletin 76-05 and IE Circular 76-02 concerning BFD relays.

Part 21 Report

Problem with Ruskin HVAC fire dampers (spring slipping out of slot). This item remains open pending further review by the licensee.

IE Circular 79-17

Contact problem in SB-12 switches on General Electric Company metal clad circuit breakers.

The inspector reviewed nonconformance Report No. E7080 which identified 44 SB-12 switches as having been replaced. Rework was complete and accepted on May 22, 1978.

Section I

Prepared by Z. C. Cordero

Reviewed by D. H. Danielson, Chief
Engineering Support Section No. 2

1. Suppression Pool Modification

The inspector observed the welding activities conducted to modify the suppression pool and its associated pipings. On March 19, 1980 two (2) portable rod warmers were noted to be not electrically plugged in. One portable rod warmer No. BM-4 had no electrical plug connector and contained E308-16 S/S coated electrodes. The caddy felt slightly warm. The caddy's normal operating temperature is from 175° F to 400° F. The other portable rod warmer No. BM-14 contained E309-16 S/S coated electrodes and appears to have been unplugged for quite a while. The caddy was relatively cold. The Kaiser Engineering Incorporated Special Procedure Manual 3.3 Revision 7 dated March 11, 1980 - Section, 6.0 Procedure for Issuing Filler Materials requires the portable rod warmer to be plugged in at all times except during transport to and from the rod shack. This is considered an item of noncompliance with 10 CFR 50, Appendix B, Criterion IX. (See Appendix A, Item 1). (358/80-07-01)

On level "C" of the suppression pool areas, the inspector noted two (2) 12 inch diameter, 90° C/S elbows. One of the elbows had a Kaiser Material Identification MR No. 55857; the other had no tag. Both elbows were rusted and had water inside. The ends were uncapped and the weld end preps indicated the materials had not been used. The licensee intends to trace the status of these materials further. This is an unresolved item. (358/80-07-02)

2. Review of QA Manual

The inspector reviewed the Kaiser Engineers Incorporated Manual No. 49., Special Process Procedure Manual, Section 5.0R2 dated October 17, 1977, Procedure for Heat Treatment, Documentation, Equipment Calibration and Personnel Responsibility. The approval section for the Materials and Fabrication Technical Services was signed for A. F. Billy by R. Turner per telecon of August 24, 1977.

Review of the said telecon (interoffice memo) leaves a question as to whether A. F. Billy is in concurrence with the revision. Licensee agreed to have the matter resolved by having the procedure "re-approved". This item is considered unresolved and will be examined during a subsequent inspection. (358/80-07-03)

The inspector reviewed the Kaiser Engineers Incorporated Manual No. 49, Special Process Procedure Manual. It was noted that a new revision (Revision 7) to Section 3.3, Revision 6, for welding filler material control procedure had been issued, however, this new procedure revision had not been incorporated in the manual. Licensee agreed to look into the matter and update the said manual. This is considered an unresolved item and will be examined during a subsequent inspection. (358/80-07-04)

3. Review of Receipt Inspection Records for T-Quencher

The inspector observed the modification of the SRV downcomers "Bull-Heads to T-Quencher" design. The T-Quencher assembly is composed of three (3) sections: the sliding joint, the support base, and the quencher body. The sliding joint is made of SA106 GR.B pipe with S/S collar. The joint allows a vertical sliding movement between the SRV piping and the quencher, downward from the installed cold position. The support base of 316L S/S material acts as an anchor and is welded to the base plate and the quencher body on the other end. The inspector reviewed two (2) of the 13 quencher's documentation, quencher SN.006 and SN.001. Except for all the RT films which were not on site, the documentation appears to be in order.

The inspector was informed by licensee that they were not in concurrence with the manufacturers interpretation of the RT films. The films were sent back for further review by the manufacturer. The licensee also found some linear indication through PT examination of the SRV sliding joint, on SH (6) of the 13 joints. With these findings, licensee temporarily halted the installation of the T-quencher until disposition of the RT and PT findings. This is an unresolved matter that will be followed up at a later date. (50-358/80-07-05)

Section II

Prepared by E. J. Gallagher

Reviewed by D. W. Hayes, Chief
Engineering Support Section No. 1

1. Structural Integrity Test Procedure

The inspector followed up on previous identified item of noncompliance No. 358/80-03-01 regarding the structural integrity test (SIT) procedure which had not incorporated applicable design requirements. FSAR Section 3.8.1.7.2.1 and S&L Procedure NFSD 4210-PC-3 requires the SIT to be performed in accordance with ASME B&PV Code Section III, Division 2, Article CC-6000, 1977 Edition.

Since the previous inspection, CG&E has required S&L to respond to the specific design requirements not incorporated in the procedure. S&L letter No. 14730 dated February 6, 1980 details the corrective measures to be taken. The specific actions are as follows:

- a. Pressure gauge to be used to measure the test pressure for the SIT will be a digital pressure gauge accurate throughout the full range with an accuracy of 0.001 percent.
- b. Procedure CT-PC-01 would be revised to include a statement that predictions at intermediate pressure increments are based on linear elastic analysis, i.e. directly proportional to the values determined at 52 psi. This addition to the procedure was discussed with licensee representatives and was not included in the above referenced S&L response.
- c. Test Procedure CT-PC-01 is revised to require minimum temperature of 70°F to be maintained inside the containment during the SIT. The procedure will then meet the FSAR Section 3.8.1.7.2.1 statement.
- d. FSAR Section 3.8.1.7.2.1 has been revised in Revision 6 and dated February 1980 to require crack patterns for all cracks larger than 0.01 in. as required in Code Article CC-6233 and Regulatory Guide 1.18.
- d. FSAR Section 3.8.1.7.2.1 has been revised in Revision 64 to require deflection recovery to be within 80% after 24 hours. This is now consistent with Code Article CC-6213.
- f. During the SIT, crack patterns are to be monitored as required in Code Article CC-6233.

This item will remain open pending final implementation of the above details being incorporated in SIT Procedure CT-PC-01 and Specification NFSD 4210-PC-3.

2. Service Water Intake Flume Sedimentation

In April 1979 soundings were taken in the service water intake flume that indicated sedimentation varying from five to twelve feet. This sedimentation was identified due to service water pump cavitation causing pump motor failure during preoperational testing. Further investigation revealed that silt has accumulated around the pump inlet. The cause of the excessive sedimentation was determined to be due to long duration flood stages of the river and no flow velocity in the flume during construction.

On June 18, 1979, CG&E reported the condition to the NRC RIII as a potentially reportable occurrence pursuant with 10 CFR 50.55(e). On July 23, 1979 CG&E notified RIII office that the sedimentation problem was not reportable under 50.55(e) since the silting condition could not have remained uncorrected and that corrective cleaning was implemented.

On June 29, 1979, the S&L nuclear safety review committee met to evaluate the siltation of the intake flume as a reportable occurrence under 10 CFR Part 21. The committee finding was that the item was not a defect or noncompliance in the S&L design and not reportable under Part 21. The committee indicated that sedimentation in the flume was expected to occur and concerns had been documented previously.

The inspector reviewed correspondence dated August 7, and 20, 1974, September 4, and 7, 1974, October 28, 1974 and January 31, 1975 which indicated possible siltation of the intake channel. These letters indicated that measurements of the sedimentation and maintenance of the flume was needed during plant operations.

CG&E notified NRC RIII on December 28, 1979 (QA 1237) of a potential 10 CFR Part 21 and that a river sedimentation study is being conducted to estimate sedimentation rates and that removal systems are being evaluated for use in the intake structure.

The inspector reviewed a report entitled, Intake Plume Sedimentation Study, dated July 6, 1979 which indicated the following:

- a. Under average conditions, about 27 cubic yards of sediment will enter the intake flume during normal operations. Of this amount 27% will deposit in the flume and the remainder will remain in suspension and be pumped into the plant water system.

- b. The study indicates that the maximum depth of sediment that can be permitted in the flume is three feet (Elevation 440) to assure reliable supply of water to the service water pumps under postulated low flow conditions.
- c. Continuous monitoring of the depth of sediment and periodic dredging of the flume will be required when the deposit reaches three feet.
- d. Various dredging methods are being evaluated including a continuous monitoring system with indication in the control room.
- e. Four to six dredgings are estimated to be required in an average year with three of four dredgings during high river flow periods during December through May.

The licensee indicated to the inspector that CG&E did not consider the item to be reportable under Part 21 and that a letter to that effect would be sent to the NRC RIII office indicated the reasons for this position.

This item is considered unresolved pending CG&E response and proposed corrective measure to preclude excess sedimentation deposit in the intake flume. (358/80-07-06).

3. Followup on IE Bulletin 79-02

The inspector followed up on unresolved items 80-03-02 through 80-03-06 regarding CG&E response to IE Bulletin 79-02 on base plate supports using concrete expansion anchors.

The licensee indicated that unresolved items 80-03-02, 80-03-03, and 80-03-04 are under review by S&L for a revised response.

Item 80-03-05 regarding the field verification of support installations is in progress. A revised reinspection program to reinspect 100% of the supports is being developed to assure all installations are correct per design drawings.

Item 80-03-06 regarding a revised response to IE Bulletin item 5 on block walls is in progress and is to be submitted to the NRC in a revised response.

No items of noncompliance or deviations were identified in the above areas during this inspection.

Section III

Prepared by J. Hughes

Reviewed by D. W. Hayes, Chief,
Engineering Support Section No. 1

1. Observation of Completed Electrical Installations

- a. During site inspection of support installations for seismic Category I electrical components, it was noted that the through wall support anchor bolts on the masonry block walls had been installed without adequate procedures or instructions. The procedure, QACMI-E-16, "QA Construction Methods Instructions", for such installations did not specifically describe the necessary required measures and provisions, including recommendations from the bolt manufacturers such as torquing on bolts, nuts, etc. The lack of sufficient instructions for the workers to install the through wall bolts and the lack of established perimeter criteria for QC to perform their inspections are considered in noncompliance with the requirements of 10 CFR 50, Appendix B, Criterion V as described in Appendix A of report transmittal letter. (358/80-07-07)
- b. ASCO solenoid valves, model number HTX8323 for the Main Steam Isolation Valves (MSIV) were not environmentally qualified for service inside the containment. The inspector was informed by the licensee that they would look into this matter. This matter is unresolved pending completion of the licensee's review. (358/80-07-08)

No items of noncompliance were identified in the areas described above except as noted in paragraph 1.a.

2. Quality Records

- a. The RIII inspector reviewed R. E. Kramig and Company, Inc. Quality Assurance Manual against the requirements of 10 CFR 50, Appendix B and ANSI N45.2 as applicable. R. E. Kramig and Company, Inc. is the subcontractor installing Kawool insulation for cable tray fire barriers at the Zimmer Plant. The inspector has no questions concerning the insulation installation contractor QA Manual at this time. The licensee informed the inspector that all installation and inspection procedures would be reviewed and accepted by the licensee prior to commencing insulation installation.

- b. During review of the NSSS draft summary of environmental qualification tables, the inspector could not determine how traceability of the test reports would be possible by either the licensee or the NRC inspectors. Type test method, report numbers (vendor) or General Electric's documented test number and file numbers were not referenced on the summary tables. The licensee stated that they would discuss the matter with the NSSS supplier.
- c. Review of Sargent & Lundy's Environmental Status Report indicates that acceptable vendor reports are complete. However, the RIII inspector could not determine test method, vendor test report numbers, etc. from these status reports. This matter will remain open pending followup inspection by the NRC staff. (358/80-07-09)

No items of noncompliance were identified.

Unresolved Matters

Unresolved matters are items about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. Unresolved items disclosed during this inspection are discussed in Sections I, II and III of this report.

Exit Interview

An exit interview was held at the licensee corporate office with CG&E management and staff (denoted in the Persons Contacted paragraph) at the conclusion of the inspection on March 21, 1980. The inspectors summarized the scope of the inspection and outlined their findings including the apparent items of noncompliance and unresolved matters outlined elsewhere in this report. The licensee acknowledged these findings.

Further discussion was held regarding the character of construction inspections in the future and it was requested that the NRC Resident Inspector be contacted regarding future 50.55(e) reports, status of items, future scheduling and other items appropriate for contacting the NRC Region III office. The NRC again reiterated previous requests to be notified in a timely fashion of:

- a. Preservice or Inservice activity.
- b. Suppression pool work regarding start of installation of quencher and downcomer piping.
- c. RPV rehydro test.
- d. The containment structural integrity test.

UNITED STATES NUCLEAR REGULATORY COMMISSION
INSPECTION & ENFORCEMENT - STATISTICAL DATA

FACILITY NAME Wm. H. Zimmer NPS INSPECTOR(S) Vandell, Hughes PRINCIPAL INSPECTOR Vandell
LICENSEE/VENDOR Cincinnati Gas & Elec. Charles W. Smith REVIEWER Knee

TRANS-ACTION TYPE 1 (CHECK ONE)
DOCKET NUMBER (A) 05000358 REPORT NO. 6007 (B)
OR LICENSE NO. (BY PRODUCT) 2 (14)
19 FROM 24 (C) 031980
M M D D Y Y TO 30 (D) 032180
M M D D Y Y (E) 3

INSPECTION PERFORMED BY
1 REGIONAL OFFICE STAFF 2 RESIDENT INSPECTOR
3 PERFORMANCE APPRAISAL TEAM

TYPE OF ACTIVITY CONDUCTED (CHECK ONE BOX ONLY)
33 34 INSPECTION OTHER
02 SAFETY 05 MANAGEMENT AUDIT 09 MATL ACCT. 13 IMPORT 14 INQUIRY
03 INCIDENT 06 MANAGEMENT VISIT 10 PLANT SEC. 15 INVESTIGATION
04 ENFORCEMENT 07 SPECIAL 11 INVENT VERIF. 16 INVEST. ALSO CHECK BLOCK 51
08 VENDOR 12 SHIPMENT/EXPORT

INSPECTION OR INVESTIGATION WARNING 1 ANNOUNCED 2 UNANNOUNCED

INSPECTION SHIFT 1 DAY SHIFT 2 OFF-SHIFT 3 WEEKEND/HOLIDAY

INSPECTION/INVESTIGATION NOTIFICATION (CHECK ONE BOX ONLY)
1 591 2 REGIONAL OFFICE LETTER 3 REFERRED TO HQS FOR ACTION 4 REGION LETTER & HQS FOR ACTION

INSPECTION/INVESTIGATION FINDINGS (CHECK ONE BOX ONLY)
1 CLEAR 2 NONCOMPLIANCE 3 DEVIATION 4 NONCOMPLIANCE & DEVIATION

ENFORCEMENT CONFERENCE HELD 1 39

NUMBER OF NONCOMPLIANCE ITEMS IN LETTER TO LICENSEE: 00 (40 41)
NUMBER OF DEVIATION ITEMS IN LETTER TO LICENSEE: 00 (42 43)
NOTE: CHANGE MUST BE SUBMITTED ON 766 WHENEVER PREVIOUSLY CITED ITEM OF NONCOMPLIANCE IS OFFICIALLY DELETED FROM THE RECORD.

NUMBER OF LICENSEE EVENTS 00 (44 45)

46 INSPECTION FEE
1 NON-ROUTINE/VENDOR (No Fee) 2 ROUTINE (No Fee) 3 ROUTINE (Fee) 4 ROUTINE (Fee Reduced)

47 CONTENTS 2.790D INFORMATION YES

REGIONAL OFFICE LETTER OR REPORT TRANSMITTAL DATE FOR INSPECTION OR INVESTIGATION
591 OR LETTER ISSUED TO LICENSEE (48) 012380 (53) M M D D Y Y
REPORT SENT TO HQS FOR ACTION (54) (59) M M D D Y Y
IMMEDIATE ACTION LETTER (60) DATE (65) (65) M M D D Y Y

SUBJECT OF INVESTIGATION (CHECK ONE BOX ONLY) 66-67
TYPE A 10 CFR 20.403 TYPE B 10 CFR 20.405 MISC.
01 INTERNAL OVEREXPOSURE 06 11 INT. OVEREXPOSURE 15 CRITICALITY 21 EQUIP. FAILURE
02 EXTERNAL OVEREXPOSURE 07 12 EXT. OVEREXPOSURE 16 LOSS/THEFT 22 ALLEGATION/ COMPLAINT
03 RELEASE TO UNREST. AREA 08 13 EXCESS RAD. LEVELS 17 MUF 23 PUBLIC INTEREST
04 LOSS OF FACILITY 09 14 EXCESS CONC. LEVELS 18 TRANSPORTATION 24 SABOTAGE
05 PROPERTY DAMAGE 10 20 ENVIRONMENTAL EVENT 25 ABNORMAL OCCUR.
26 OTHER

HEADQUARTERS ENTRIES
HQS ACTION ON INSP/INVEST REFERRED BY REGION: (68 69) (See Reference Let & Code)

DATE HQS ENFORCEMENT LETTER, NOTICE, ORDER ISSUED: (70) (75) M M D D Y Y

CIVIL PENALTY ISSUED: 1 (78)

DATE 766 ENTERED INTO COMPUTER FILE (MO/YR): (77) (80) M M Y Y

NOTE: BLOCKS K TO N MUST BE VERIFIED BY IE: HQS WHENEVER ENTRIES ARE MADE IN BLOCKS T, U AND V

AIIS REFERENCE:

Zimmer

USNRC - INSPECTION & ENFORCEMENT STATISTICAL DATA

(NOTE: % COMPLETE AND STATUS:
LEAVE BLANK FOR MC 92, 93 & 94
PROCEDURES AND 30-702, 30-703 &
30-800)

(NOTE: STATUS CODING:
BLANK - TO REMAIN OPEN
C - CLOSED
L - REOPEN & LEAVE OPEN
P - REOPEN THIS TRANSACTION
ONLY)

(NOTE: MODULE REQUIRING
FOLLOWUP:
USE ONLY WHEN MODULE
INSPECTED IS 92 701B)

LINE NO.	MODULE TRACKING INFORMATION						NONCOMPLIANCE					LINE NO.										
	PHASE	MANUAL	CHAP	PROG	NO.	LEVEL	STATUS	% COM- PLETE TO DATE	MODULE REQ FOLLOWUP	PHASE	MANUAL		CHAP	PROG	NO.	LEVEL	N/C CODE	N/C CODE	N/C CODE	N/C CODE	N/C CODE	N/C CODE
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01	3	30703B																				
02	3	92706B																				
03	3	92701B																				
04	3	92702B																				
05	3	92703B																				
06	3	92716B																				
07	3	52066B																				
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LINE COLUMN NUMBER SHOWN IN BOTTOM LINE.

CONTINUES ON SUBSEQUENT SHEET



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

A-38

October 8, 1980

Docket No. 50-358

80-14

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 acknowledges your letter dated August 19, 1980, and your supplemental response dated September 19, 1980, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Report No. 50-358/80-14, forwarded by our letter dated July 31, 1980. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

R. F. Heishman
R. F. Heishman, Chief
Reactor Operations and
Nuclear Support Branch

cc: Mr. J. R. Schott, Plant
Superintendent

cc w/ltr dtd 8/19/80:
Central Files
Reproduction Unit NRC 20b
AEOD
Resident Inspector, RIII
PDR
Local PDR
NSIC
TIC
Harold W. Kohn, Power
Siting Commission
Citizens Against a Radioactive
Environment
Helen W. Evans, State of Ohio

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