

THE CINCINNATI GAS & ELECTRIC COMPANY



E. A. BORGMANN  
SENIOR VICE PRESIDENT

October 15, 1982  
QA-2056

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

Attention: Mr. J. G. Keppler  
Attn: Mr. D. Hunter

RE: WM. H. ZIMMER NUCLEAR POWER STATION UNIT I  
CHAPTER 17.1 (ORGANIZATION) SECTION DRAFT  
REVISION - W.O. #57300, JOB E-5590  
FILE NO. NRC-17

Gentlemen:

In a phone conversation held on the afternoon of October 8, 1982, between CG&E's Messers: B. R. Sylvia, H. R. Sager, J. D. Flynn, G. Ficke, and G. Pemberton; and the NRC's Messers: G. Dick, L. Kintner, D. Gilray, W. Haass, D. Hunter, E. Schweibinz and P. Barrett, it was agreed that a draft revision of the Organization (Criterion I) Section of Chapter 17.1 "Quality Assurance Program for the Design and Construction Phase" to the FSAR, reflecting our current commitments and written under the guidance of the Standard Review Plan (Revision 2), would be submitted by October 15, 1982, to your office. This draft revision was to reflect the organizational functions, duties and responsibilities of our key positions in regard to their temporary assignments for the remainder of the Construction and Preoperational Testing Phase of ZPS-1.

Attached please find a copy of the draft revision. This is not a formal submittal of that revision at this time, but is merely a submittal for review purposes.

OCT 18 1982

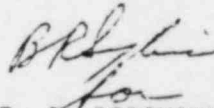
Mr. J. G. Keppler  
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If you have any questions regarding this matter, please do not hesitate to call me.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By

  
E. A. BORGMANN  
SENIOR VICE PRESIDENT

MCT:ec

Attachment

cc: Nuclear Reactor Regulation

Attn: G. Dick  
L. Kintner  
D. Gilray  
W. Haass

NRC - Region III

Attn: E. Schweibinz  
P. Barrett

NRC Senior Resident Inspector

Attn: W. F. Christianson

## 17.1 Quality Assurance Program For The Design And Construction Phase

The CG&E Quality Assurance Program for the Design and Construction Phase of ZPS-1 provides for the coordination of QA/QC in design, manufacturing and fabrication, field construction and acceptance testing. The entire QA program is formulated to comply with "The Quality Assurance Criteria for Nuclear Power Plants", Appendix B of Title 10 - CFR Part 50, published in the "Federal Register" on June 27, 1970. The format of this Program has been arranged so that each section number corresponds to the same criterion number of the eighteen criteria of 10CFR50, Appendix B.

It is acknowledged that QA/QC may be conducted by many procedures and people, but that the final responsibility for the overall quality of the project rests solely with the Owner.

As used in this Program, "quality assurance" comprises all those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service. Quality assurance includes quality control, which comprises those quality assurance actions related to the physical characteristics of a material, structure, component, or system which provide a means to control the quality of the material, structure, component, or system to predetermined requirements.

The Wm. H. Zimmer Construction Quality Assurance Manual contains a detailed description of the policies, program element requirements, procedures and implementing responsibilities of the ZPS-1 Design and Construction Phase QA program.

### 17.1.1 Organization (Criterion I)

#### 17.1.1.1 General

ZPS-1 is owned by the Cincinnati Gas & Electric Company (CG&E), Columbus and Southern Ohio Electric Company (C&SOE), and Dayton Power and Light Company (DP&L). CG&E, on its own behalf as to its own interest, and as agent for C&SOE and DP&L as to theirs, respectively, is responsible for the establishment and execution of the Quality Assurance Program for the Design and Construction of ZPS-1. In certain activities, portions of the QA program may be implemented by other organizations, but Cincinnati Gas and Electric Company shall retain the ultimate responsibility

for the QA program and shall provide QA verification and audits of safety-related activities of these organizations to assure that the requirements of the QA program are satisfied.

#### 17.1.1.2 Corporate Organization

##### 17.1.1.2.1 President & Chief Executive Officer

The CG&E President and Chief Executive Officer is the Senior Company Executive and has issued the CG&E corporate directives to design, construct and operate ZPS-1 under a corporate QA program.

Reporting to the CG&E President and Chief Executive Officer:

- a. Senior Vice President, Engineering Services and Electric Production
- b. Senior Vice President, Administrative Services
- c. Vice President, Electric Operations

##### 17.1.1.2.2 Senior Vice President-Engineering Services & Electric Production (Project Manager)

The CG&E Senior Vice President-Engineering Services and Electric Production, as the ZPS-1 Project Manager is the CG&E administrative individual with overall responsibility for design, engineering, procurement technical specification, construction, nuclear services, licensing, electric production, station operation and quality assurance of ZPS-1.

17.1.1.2.2.1 Reporting to the CG&E Senior Vice President-Engineering Services and Electric Production for completion of construction and assurance of plant quality for turnover to the Startup Group are:

- a. Manager-Quality Assurance Department
- b. Director-Quality Confirmation Program
- c. Manager-Generation Construction Department
- d. Manager-Nuclear Engineering Department

17.1.1.2.2.2 Reporting to the Senior Vice President-Engineering Services and Electric Production for the completion of testing and turnover to operations is the Startup Group under the overall administrative responsibility of the Vice President-Nuclear Operations and consisting of:

- a. Manager-Nuclear Production Department
- b. Manager-Startup
- c. Manager-Licensing and Environmental Affairs Department
- d. Manager-Nuclear Services Department
- e. Director-Startup QA/QC
- f. Contract Administrator/Scheduler
- g. Startup Contractor Site Project Manager

17.1.1.2.2.3 Certain consultants report to the Senior Vice President as the Project Manager in the following manner:

- a. The Consultant Architect/Engineer reports through the Manager-NED
- b. The supplier of the BWR Nuclear Steam Supply System, reports through the Manager-NED
- c. The Site Construction Contractor for ZPS-1, reports through the Manager-Generation Construction Department
- d. The Startup Construction Contractor, reports directly to the Vice President-Nuclear Operations with functional control provided by the Contract Administrator/Scheduler.
- e. Other appropriate ZPS-1 Project Consultant, Contractor and Service Organizations report through the Manager of the CG&E Department acting as their contracting authority and within the scope of their qualifications as delineated in their specifications.



17.1.1.2.2.4 Also reporting to the Senior Vice President-Engineering Services and Electric Production are:

- a. The Planning and Scheduling Group
- b. Director-Project Controls
- c. The Management Advisory Committee
- d. The Technical Coordinator (Secretary of the Advisory Committee)
- e. A Nuclear Operations Member of the Legal Department

17.1.1.2.3 Manager-Quality Assurance Department

The CG&E Manager-Quality Assurance Department is responsible for the establishment and execution of the ZPS-1 QA Program, and for assuring that the CG&E QA Program commitments are implemented, maintained and controlled in appropriate QA Manuals and supporting procedures, developed for the ZPS-1 project.

The CG&E Manager-Quality Assurance Department is responsible for assuring, through review, surveillance and audit activities, the adequacy and implementation of the approved QA Programs of CG&E, its agents and suppliers/contractors for ZPS-1.

The CG&E Manager-Quality Assurance Department has the authority and responsibility to stop nonconforming activities or the processing of nonconforming materials or items, and has been assigned the authority with organizational freedom necessary to fulfill his responsibilities.

CG&E QA/QC Directors reporting to the Manager-Quality Assurance Department are as follows:

- a. Director-Quality Engineering
- b. Director-Quality Audits
- c. Director-Program Development & Administration

- d. Director-Quality Control reports administratively to the Manager-Quality Assurance Department but receives inspection and surveillance interface functional direction through the Manager-Generation Construction Department.

#### 17.1.1.2.4 Director-Quality Confirmation Program:

The CG&E Director of the Quality Confirmation Program in response to the NRC Immediate Action Letter of April 8, 1981, is responsible to demonstrate through review of documentation and physical inspection, that construction performed prior to April 8, 1981, at ZPS-1 is in accordance with FSAR commitments, approved design documents, and specifications to the applicable quality requirements in effect at the time of construction.

In addition, deficiencies identified during the QCP effort are to be resolved by placing those deficiencies into a trackable corrective action system (i.e., CER's, NR's). Procedures shall be developed, reviewed and approved that address each QCP Task and that are consistent with the Quality Assurance Program for construction. However, existing approved procedures may be utilized where appropriate.

Reporting to the Director-Quality Confirmation Program are:

- a. Assistant Director-QCP
- b. Two Administrative Assistants-QCP
- c. Task #1 Coordinator
- d. Task #2 & #4 Coordinator
- e. Task #3 & #5 Coordinator
- f. Task #6 Coordinator
- g. Task #7 Coordinator
- \* h. Task #9 Coordinator
- i. The Quality Assurance Department-Director of Audits is the acting Task #10/11 Coordinator and receives

functional control for these actions through the Director-Quality Confirmation Program, while reporting administratively to the Manager-Quality Assurance Department.

17.1.1.2.5 Manager-Generation Construction Department

The Manager-Generation Construction Department is responsible for ZPS-1 Site Constuction completion, overall administration of the punchlist and turnover to startup activities while providing input to the Integrated Project Target Schedule.

Reporting to the Manager, Generation Construction are:

- a. Lead Electrical Engineer
- b. Lead Mechanical Engineer, NSSS
- c. Lead Pipe Support Engineer
- d. Lead Scheduling Engineer
- e. Lead Structural Engineer
- f. Systems Support Group Supervisor
- g. Staff Administration
- h. Safety/Security Supervisor
- i. Second Shift Senior Construction Engineer
- j. Various Contractor Site Project Managers

GCD provides the necessary decisions concerning various contractors operating at the ZPS-1 Site under CG&E Generation Construction Administrative and Coordinating Control.

The Manager-Generation Construction Department is responsible for the performance of construction activities and for providing any required GCD implementing procedures/instructions needed to fulfill the construction requirements of the CG&E QA Program for the ZPS-1 Construction Phase to attain the required design and quality objectives.



17.1.1.2.6 Manager-Nuclear Engineering Department:

The CG&E Manager-Nuclear Engineering Department is responsible for the station design activities during the design and construction phase of the project. The Manager, Nuclear Engineering, shall provide and utilize appropriately qualified engineering disciplines and procedures or instructions to document safety related and/or Code design engineering functions, whether performed by CG&E, its agents or suppliers/contractors.

The Manager-Nuclear Engineering Department shall assure adequate interfacing coordination between design, construction, operation and QA activity areas within each engineering discipline, whether performed by CG&E, its agents or suppliers/contractors.

The Manager-Nuclear Engineering Department is responsible for review, approval and coordination of any proposed design modification in the Construction Phase.

The Manager-Nuclear Engineering Department is responsible for providing technical support for licensing including both written and oral responses to NRC questions and is also responsible for providing suggested FSAR revisions which might be required as the results of implementing design modifications.

The Manager-Nuclear Engineering Department is responsible for the performance of construction design activities and for providing any required NED implementing procedures/instructions needed to fulfill the design requirements of the CG&E QA Program for the Construction Phase to attain the required design and quality objectives.

Reporting to the Manager-Nuclear Engineering Department are the following:

- a. Director-Nuclear Steam Supply System
- b. Director-Balance of Plant
- c. Director-Special Processes
- d. Director-Process Instrumentation and Control

- e. Administrative Assistant
- f. Consultant A/E
- g. NSSS Vendor

17.1.1.2.7 Vice President-Nuclear Operations (Startup Group Administrator):

The Vice President-Nuclear Operations reports to the Senior Vice President Engineering Service and Electric Production and is directly responsible for Design Freeze Implementation, Preoperational Testing, Final Turnover and Overall Startup Group Activities.

Reporting to the Vice President-Nuclear Operations are the following:

- a. Manager-Nuclear Production Department
- b. Manager-Startup
- c. Manager-Licensing and Environmental Affairs for all Nuclear Licensing Activities
- d. Manager-Nuclear Services Department
- e. Director-Startup QA/QC
- f. Contract Administrator/Scheduler
- g. Startup Contractor Site Project Manager

17.1.1.2.8 Manager-Nuclear Production Department:

The CG&E Manager-Nuclear Production Department is the responsible CG&E management representative for station operations and maintenance related activities during the plant Construction Phase. This responsibility includes supporting testing activities by providing all instrument calibration services, equipment operation, valve manipulation, safety and caution tagging, chemistry evaluations, preoperational test review and approval, etc. Additionally the Manager-Nuclear Production Department accepts turnover of systems from the Startup Group after final approval of the preoperational/acceptance tests and assures that

preventative and corrective maintenance, surveillance testing, QA/QC and equipment/systems operations are conducted as appropriate, in accordance with approved procedures.

During the Construction Phase the Nuclear Production Department interface activities are controlled in accordance with the Construction QA Manual using approved written implementing procedures. During the preoperational testing phase, Nuclear Production Department interface activities are controlled in accordance with the Startup Manual using approved written implementing procedures. After final system acceptance, Nuclear Production Department activities are controlled using approved written directives and implementing procedures in accordance with the Nuclear Operations Plan.

The Manager-Nuclear Production Department is responsible for providing any required NPD implementing procedures/instructions needed to fulfill the requirements of the CG&E QA Program for the Construction Phase to attain the required design and quality objectives.

Reporting to the CG&E Manager-Nuclear Production Department are the following:

- a. Superintendent-Operations Division
- b. Superintendent-Maintenance Division
- c. Superintendent-Technical Support Division
- d. Superintendent-Radcontrol and Chemistry Division
- e. Administrative Section
- f. The Director-Operations QA receives functional direction from the Manager-Nuclear Production Department and administrative direction from the Manager-Quality Assurance Department.

#### 17.1.1.2.9 Manager-Startup

The CG&E Manager-Startup is responsible for identifying punchlist items, recommending changes to the Integrated Project Target Schedule sequence, and for assigned construction completion.

The Manager-Startup is also responsible for assuring that scoping documents agree with the test, that systems are walked down to verify that testing may be performed, for overall coordination of the preoperational phase of testing and for turning systems over to the Nuclear Production Department.

Reporting to the Manager-Startup are the following:

- a. System Test Coordinators
- b. System Engineers

The Manager-Startup is responsible for the performance of Startup activities and for providing any required Startup implementing procedures/instructions needed to fulfill the Startup requirements of the CG&E QA Program for the Construction Phase to attain the required design and quality objectives.

#### 17.1.1.2.10 Manager-Licensing & Environmental Affairs Department

The CG&E Manager-Licensing & Environmental Affairs Department is responsible for coordinating input from CG&E ZPS-1 project participants in obtaining, maintaining and reporting requirements of federal, Ohio or local permits and licenses needed for the Design and Construction Phase of ZPS-1.

The Manager-Licensing & Environmental Affairs Department, provides assistance in CG&E determination that compliance to license and permit conditions are maintained, and appraises CG&E ZPS-1 participants of new or revised requirements pertaining to ZPS-1 permits or licenses.

The Manager-Licensing & Environmental Affairs Department shall provide appropriate procedural requirements to implement the CG&E commitment to semi-annual revisions to the ZPS-1 FSAR, incorporating identified, reported and

resolved deviations or changes regarding Code and FSAR statements.

The Manager-Licensing and Environmental Affairs Department shall provide a distribution and communication system to those CG&E ZPS-1 participants deemed necessary to be kept aware of federal, Ohio or local governmental activities, such as those requiring CG&E responses, comments, evaluations or postings of special notices.

Reporting to the Manager-Licensing & Environmental Affairs Department is the Director-Nuclear Licensing who is responsible for Operating Review Committee (ORC) activities and commitment tracking during the construction phase.

NOTE: After the operating license is issued, the Director-Nuclear Licensing shall become responsible for Emergency Planning, all nuclear licensing, radiological discharges, and meteorology associated with ZPS-1.

The Manager-Licensing & Environmental Affairs Department is responsible for the performance of licensing activities and for providing any required LEAD implementing procedures/instructions needed to fulfill the requirements of the CG&E QA Program for the Construction Phase to attain the required design and quality objectives.

#### 17.1.1.2.11 Manager-Nuclear Services Department

The CG&E Manager-Nuclear Services Department is responsible for operations related support activities in the construction phase, including Independent Safety Review, Nuclear Fuel Management, Nuclear Systems Support, Reliability Analysis, and Training.

Reporting to the Manager-Nuclear Services Department are the following:

- a. Supervisor-Independent Safety Review Group (ISRG)
- b. Director-Nuclear Fuel Division
- c. Director-Nuclear Systems and Reliability Analysis Division



d. Director-Training Division

The Manager-Nuclear Services Department is responsible for the performance of related support activities and for providing any NSD implementing procedures/instructions needed to fulfill the requirements of the CG&E QA Program for the Construction Phase to attain the required design and quality objectives.

17.1.1.2.12 Director-Startup QA/QC

The CG&E Director-Startup QA/QC is responsible for QA documentation turnover, compilation review and acceptance; providing QA/QC coverage for the work and tests performed by Startup, as appropriate, and QA/QC activities associated with Catalytic Inc.

Reporting to the Director-Startup QA/QC are the following:

- a. Supervisor-Startup Quality Documentation
- b. Supervisor-Startup QA/QC

The Director-Startup QA/QC is responsible for the performance of Startup QA/QC activities and for providing any required Startup QA/QC implementing procedures/instructions needed to fulfill the requirements of the CG&E QA Program for the Construction Phase to attain the required design and quality objectives.

17.1.1.2.13 Contract Administrator/Scheduler

The CG&E Contract Administrator/Scheduler is responsible through the Vice President-Nuclear Operations for the overall day-to-day administration of the Startup Contractor including budgeting and assignment of all work activities.

The following Department Managers may request work to be performed by the Startup Contractor:

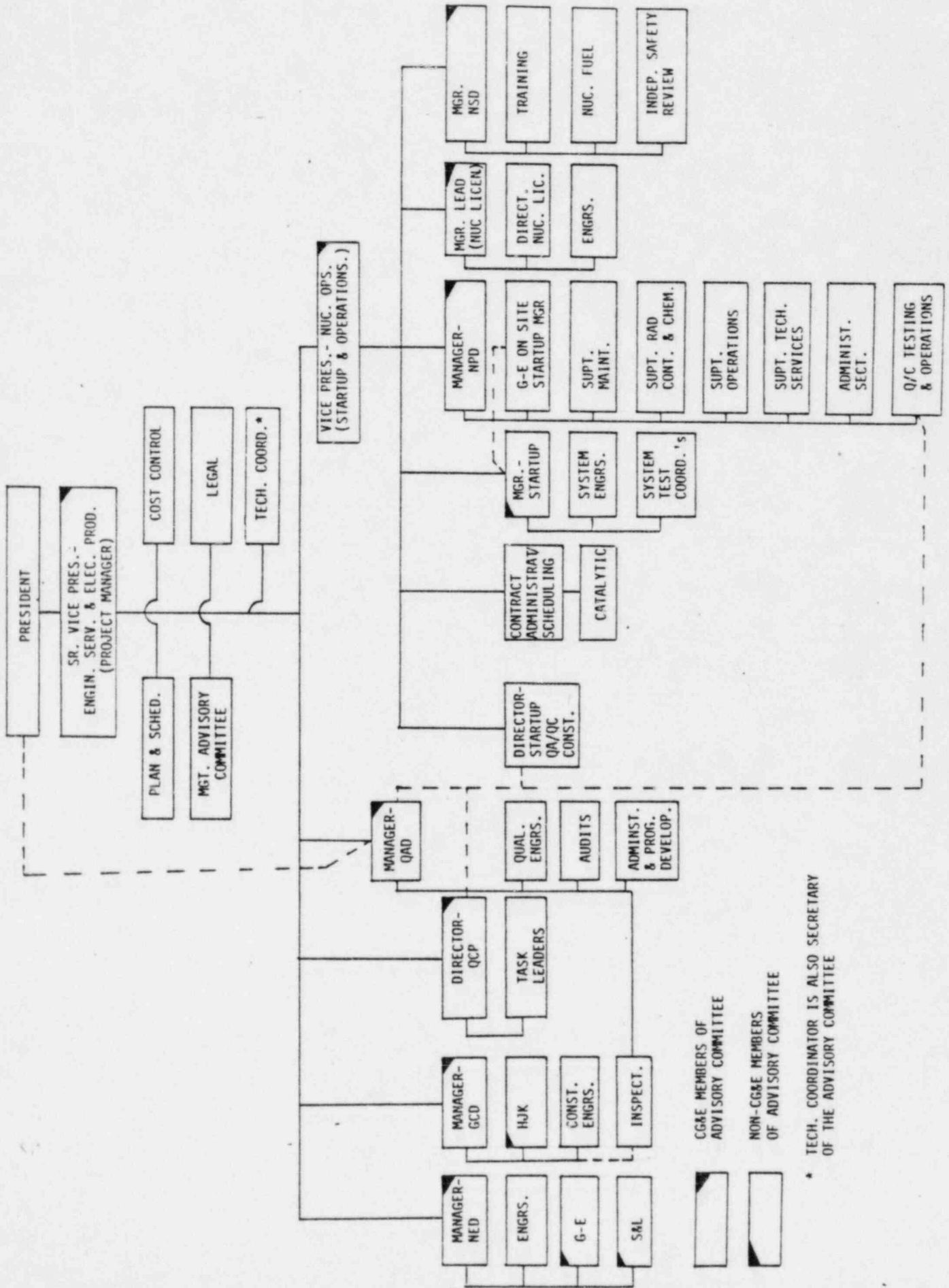
- a. Manager-Startup
- b. Manager-Generation Construction Department

- c. Manager-Nuclear Engineering Department
- d. Manager-Nuclear Production Department
- e. Director-Quality Confirmation Program

The Contract Administrator/Scheduler is responsible for providing any required implementing procedures/instructions needed to fulfill the startup construction requirements of the CG&E QA Program for the Construction Phase.

17.1.1.2.14 The personnel listed above performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems, to initiate, recommend or provide solutions; and to verify implementation of solutions. (See the attached Organization Chart 17.1-1).

WM. H. ZIMMER NUCLEAR POWER STATION - UNIT 1  
ORGANIZATION CHART



CG&E MEMBERS OF  
ADVISORY COMMITTEE

NON-CG&E MEMBERS  
OF ADVISORY COMMITTEE

\* TECH. COORDINATOR IS ALSO SECRETARY  
OF THE ADVISORY COMMITTEE

DISTRIBUTION FOR BOARD NOTIFICATION #82-137 CONCERNING ZIMMER NUCLEAR  
POWER STATION (ORGANIZATION) DATED: JAN 4 1983

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