

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201  
August 24, 1982  
QA-1929

E. A. BORGMANN  
SENIOR VICE PRESIDENT

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

Attention: Mr. J. G. Keppler  
Regional Administrator

RE: WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1  
I.E. INSPECTION REPORT 81-27, DOCKET NO.  
50-358, CONSTRUCTION PERMIT CPPR-88  
W.O. #57300, JOB E-5550, FILE NO. NRC-1

Gentlemen:

This letter constitutes an amended response to our July 23, 1982 letter in response to your June 21, 1982 review and comments to our initial response of February 23, 1982.

We have reviewed the commitments in our July 23, 1982 letter. Our response to Items 1, 2 and 6 are revised as follows:

Item 1

NRC Comment

"A sample inspection of 18% of one system, the RHR system, is not sufficient to indicate an adverse trend in weld reinforcement in excess of ASME Code allowables. Additional sample inspections in other safety related systems are required."

CG&E Amended Response

CG&E agrees that the sampling program in only the RHR system is not adequate.

A. Corrective Action To Be Taken

In accordance with HJK procedure MIP-1, prior to turnover all piping systems will receive an inspection walkdown which will include visual examination of reinforcement for most welds. In addition, welds involved in the PSI/ISI program shall be ground smooth in accordance with S&L Specification H-2256.

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B. Corrective Action to Prevent Recurrence

Since full walkdowns will be made with the referenced criteria in mind, no further corrective action is required. However, in the interest of expedition and good workmanship HJK will be advised of this concern for current and ongoing inspections by receipt of this letter.

C. Date When Full Compliance Will Be Achieved

Full compliance with specification and Code applicable reinforcement requirements will be achieved prior to fuel load.

Item 2

NRC Comment

"The Nonconformance Reports referenced in your response documented linear surface indications. The NRC liquid penetrant examination identified these same linear indications. In addition, our examination identified what appeared to be lack of full penetration at the root of the double bevel groove weld inside the 1/2" x 3" relief cut in the lug. It is our view that the Nonconformance Report mentioned in your response did not identify this lack of penetration, that this could be a generic problem and further investigation is required on your part."

CG&E Comment

Upon review of the above condition, CG&E agrees that the identification of the root condition in the CG&E and the HJK NRs was either questionable or not well documented. A subsequent visual inspection by the CG&E NDE III, the NRC, and a representative of the CG&E Generation Construction Department verified that a surface condition was evident in the area of question. Light grinding followed by a final PT verified that the indication was considered nonrelevant.

A. Corrective Action Taken

It is CG&E's intention to identify all similar pipe lugs and to perform a complete liquid penetrant examination of these lugs. If no questionable indications are noted, it will be assumed that a generic problem does not exist. Should additional indications be noted, appropriate additional inspections

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will be performed and corrective actions taken. The NRC will be advised of these inspections, the results, and other actions, if any.

B. Corrective Action Taken to Prevent Recurrence

All liquid penetrant inspectors will be instructed on the proper methods of penetrant examinations of pipe lugs, particularly regarding relief areas.

C. Date When Full Compliance Will Be Achieved

Full compliance with this commitment insofar as reinstruction of liquid penetrant inspection personnel and compliance regarding reinspection of pipe lugs will be accomplished by October 1, 1982. A report will be issued to the NRC at that time.

Item 6

NRC Comment

"The NRC cannot accept the position that CG&E will not specifically identify piping alignment mismatch by radiography. It is the NRC view that the 'straight-line' condition on a radiograph could be detrimental to the intended piping system service. As a result, an evaluation of the existing piping should be included in your Quality Confirmation Program, more stringent fit-up practices should be employed to reduce the possibility of mismatch, and when a condition that appears as a 'straight-line' is observed on the radiographic film it must be identified, documented and evaluated."

A. Corrective Action To Be Taken

CG&E has previously committed to review radiographs of approximately 2400 field welds as stated in 10CFR50.55(e) Report M-22. The balance of field welds requiring radiography, approximately 2000, will be reviewed by a random selection of 200 welds, comprising approximately 1000 films from essential piping systems.

This review will include criteria for mismatch and masking of indications due to surface condition, identified in 10CFR50.55(e) Report M-50, as well as a general acceptance review of the weld. The purpose of this review will be to prove the effectiveness of the radiographic review process in effect at the Wm. H. Zimmer Nuclear Power Station. An evaluation of the results of this review will be performed and further corrective action will be determined based on this evaluation.

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B. Corrective Action Taken to Prevent Recurrence

In response to the April 8, 1981 Immediate Action Letter, both CG&E and H. J. Kaiser Company have strengthened their respective quality assurance programs with additional competence in the area of radiographic review. By copy of this letter, all piping construction organizations are alerted to this specific concern when reviewing film.

C. Date When Full Compliance Will Be Achieved

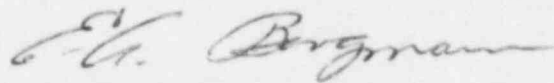
CG&E will complete the radiographic review prior to January 31, 1983, at which time a report will be submitted.

We trust that the above will be found acceptable as an ammended response to the subject Report.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By



E. A. BORGMANN  
SENIOR VICE PRESIDENT

JRV:plc

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