## THE CINCINNATI GAS & ELECTRIC COMPANY



November 9, 1982 OA-2103

F A BORGMANN SELVIOR VICE PRESIDENT

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

Attention: Mr. J. G. Keppler Regional Administrator

> WM. H. ZIMMER NUCLEAR POWER STATION UNIT I 10CFR50.55(e) - ITEM M-61, FIRE PROTECTION SYSTEM PIPING SUSPENDED FROM ESSENTIAL HANGERS WITHOUT ADEQUATE DESIGN REVIEW. DOCKET NO. 50-358, CONSTRUCTION PERMIT NO. CPPR-88, W.O. #57300 JOB E-5590 FILE NO.

NRC-8, M-61

Gentlemen:

This letter constitutes an interim report concerning the subject condition, initially reported to the Commission as a potentially reportable deficiency on October 13, 1982 under the requirements of 10CFR50.55(e).

Grinnell Fire Protection Systems Company of Providence, RI, contractor for Fire Protection (FP) system piping, originally installed the FP piping in the Cable Spreading Room as non-essential components. Work on this piping began in August 1977. In September, 1977, CG&E reached the conclusion that the piping should be seismically supported with appropriate quality controls applied to the installation.

System modifications included rerouting of piping to accommodate seismic supports from essential cable tray hangers. The scope of the original Grinnell contract did not require a quality assurance program, therefore, Grinnell installed the rerouted piping with temporary supports. Meanwhile, several Design Document Changes (DDCs) were generated to require the principal constructor, H. J. Kaiser Company (HJK) to add the necessary additional supports. Since these supports were classified "non-essential," the modifications were not subject to design review by the architect-engineer, Sargent & Lundy (S&L).

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The applicable seismic design drawings for this system were not issued until late 1981 and early 1982. Furthermore, DDC# SLE-532, has been subsequently issued to make additional changes to the cable tray supports used to support the FP piping.

CG&E has issued Corrective Action Report (CAR) #82-80 to resolve this issue. Further evaluation of this concern and resolution is required before an analysis can be made of the safety implications and corrective actions necessary. This is expected to be completed by January 15, 1983, at which time a report will be submitted.

We trust the above will be found acceptable as an interim report under 10 CFR 50.55(e).

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

E. A. BORGMANN

SENIOR VICE-PRESIDENT

FKP:as

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