

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

July 21, 1982

QA-1884

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 82-05 - DOCKET NO.
50-358, CONSTRUCTION PERMIT NO. JPPR-88
W.O. #57300 JOB E-5590 FILE NO. NRC-1

Gentlemen:

This letter constitutes our response to the subject Report regarding Item 2 of the July 1, 1982 Notice of Violation. No response was requested for Item 1. It is our opinion that nothing in this letter is of a proprietary nature.

ITEM 2

NRC Finding:

". . . personnel responsible for administering the Cincinnati Gas & Electric Company Owners Project Procedure (OPP) 7.1, "NRC 10CFR21 and 50.55(e) Reports" failed to follow the procedure in that the results of prompt reviews for reportability were not documented, the forms (Attachments 7-3 to OPP-7.1) were not properly filled out, and the log of activities under OPP-7.1 was not maintained as described in the procedure flow chart (Attachment 7.5 to OPP-7.1). This failure to follow procedure resulted in the lack of documentary evidence of activities affecting quality, as required by 10CFR50, Appendix B, Criterion XVII (record of reviews), and could potentially have resulted in the failure to report under 10CFR21 or 10CFR50.55(e)."

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

All "Notification of Potentially Reportable Items" forms (Attachment 7.3 of OPP-7.1) received by the Applicant's Quality Assurance Department prior to the Commission's verbal announcement of Noncompliance have been reviewed and evaluations appropriately documented.

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CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE:

The Applicant has revised OPP-7.1 to require evaluations of all notification forms received by the Quality Assurance Department. A revised tracking system requires sequential alphanumeric identification of each notification form received and a space on the form to document each evaluation. In addition, a provision has been incorporated into the revision to control the reporting process and assure that no reportable conditions will inadvertently go unreported. If a condition is evaluated to require a review of less than fourteen (14) days to determine reportability, this fact is documented on the notification form. In the event that a determination cannot be made within this period, the item is procedurally required to be identified to the Commission as a "potentially reportable deficiency." If in the event an item is promptly reviewed and estimated to require extensive evaluation (i.e. greater than fourteen days), the Commission is promptly notified of the item as a "potentially reportable deficiency." Zimmer site contractors have been notified of their obligation to report significant deficiencies to the Applicant in a timely manner. CG&E Corrective Action Request (CAR) #82-36 has been issued to the principal constructor to require a program for reporting significant events to the Applicant. The constructor has incorporated its General Quality Procedure (GQP) #21 into its procedures manual to delineate report processing and evaluation requirements.


Messrs. Schweibinz, Hunter, Christianson, and Gwynn of the Commission have commented on the most recent revision to OPP-7.1 (Revision 2). These comments have been incorporated into Revision 3. Implementing Quality Assurance Procedures are being revised to further delineate evaluation requirements.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved when the appropriate Quality Assurance procedures are revised. This will be accomplished by August 31, 1982.

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

Very truly yours,
THE CINCINNATI GAS & ELECTRIC COMPANY

By 
E. A. BORGMANN
SENIOR VICE PRESIDENT

FKP:as
cc: NRC Office of Inspection & Enforcement
Washington, D.C. 20555
NRC Senior Resident Inspector
Attn: W. F. Christianson