Docket No. 50-358

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 6, 1982, which supplements your response letter, QA-1292, dated May 6, 1980, to our Inspection Report No. 50-358/80-05.

After further consideration during a number of site inspections and management discussions, we maintain our position that: (1) deficiencies identified prior to acutal in-process installation can be processed with Design Document Changes (DDC's), and (2) deficiencies identified during or after actual in-process installation should be documented and resolved with Nonconformance Reports (NR's). We considered your use of DDC's to document "As-Built" conditions for updating design drawings to be acceptable; however, if a DDC is used to document "As-Built" conditions, all required QC inspections and engineering evaluations/dispositions must be completed prior to initiating the DDC. Otherwise, any as-built deviations

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or deficiencies should be transmitted to the A-E through your NR system for resolution and disposition.

Your cooperation with us is appreciated.

Sincerely,

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C. E. Norelius, Director Division of Engineering and Technical Programs

cc: J. R. Schott, Plant Superintendent J. D. Flynn, Manager, Licensing Environmental Affairs Department

cc w/ltr dtd 5/6/82: DMB/Document Control Desk (RIDS) Resident Inspector, RIII Harold W. Kohn, Power Siting Commission Citizens Against a Radioactive Environment Helen W. Evans, State of Ohio Robert M. Quillin, Ohio Department of Health Thomas Applegate Thomas Devine, Associate Director, Institute for Policy Studies Dave Martin, Office of Attorney General Mark Wetterhahn, Esq. Jerome A. Vennemann, Esq. Gretchen Hummel, Ohio Consumers' Counsel James R. Williams, State Liaison Officer, Ohio Disaster Services Agency

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