

THE CINCINNATI GAS & ELECTRIC COMPANY  
ZIMMER POWER STATION, P. O. BOX 201, MOSCOW, OH 45153



CINCINNATI OHIO 45201  
May 6, 1982  
QA-1702

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 80-05 - DOCKET NO.  
50-358 CONSTRUCTION PERMIT NO. CPPR 88-  
W.O. #57300 JOB E-5590 FILE NO. NRC-1 80-05

Gentlemen:

This letter constitutes a supplementary response to our letter, QA-1292, dated May 6, 1980, regarding the subject Inspection Report.

Item 3 of the original response indicated that instructions had been issued which stated that Design Document Changes (DDCs) are not permitted to be written to reflect an "as-built" condition and that all "as-built" conditions found in deviation of design drawings would be handled in the form of a Nonconformance Report. In addition, the response stated that the QA Department would review future DDCs to assure that they do not reflect "as-built" conditions that deviate from design drawings.

Since this response was issued, conditions have been noted when DDCs are required to:

- 1) Resolve interferences or deficiencies resulting from field conditions;
- 2) Expedite the performance of physical work on appropriately approved Engineering Change Requests (ECRs);
- 3) Disposition an in-process deficiency when a document change is considered to be the appropriate disposition of the deficiency identified during an in-process inspection.

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Under conditions 1) and 3) DDCs will be initiated to notify the Architect/Engineer of a required drawing change to reflect the "as-built" condition. For example, conditions have been found where anchor bolt location must be modified in the field to avoid interference with concrete reinforcement steel. In such cases Design Document Changes (DDCs) have been and will continue to be initiated to notify the Architect/Engineer of a required drawing change to reflect the "as-built" condition.


All DDCs will receive the S&L Engineering site approval required under existing procedures prior to final acceptance of the work. Secondly, since DDCs may reflect "as-built" conditions as described in 1) and 3) above, QA Department review of DDCs to assure they do not reflect "as-built" conditions is no longer required. This policy is consistent with the design requirements of Criteria III and XV of 10CFR50, Appendix B.

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

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By

  
E. A. BORGMANN  
SENIOR VICE PRESIDENT

FKP:plc

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