March 16, 1983

Docket No. 50-358

Cincinnati Gas and Electric Company ATTN: Mr. W. H. Dickhoner President 139 East 4th Street

139 East 4th Street Cincinnati, OH 45201

Dear Mr. Dickhoner:

The NRC staff has made a preliminary review of the proposal by Torrey Pines Technology (TPT) to conduct the independent management review of the Zimmer project. Enclosed is a Request for Additional Information on that proposal. Please provide responses to these questions (including the responses of TPT and GA Technologies, Inc.). If we identify any further information which is required as part of our review of the proposal, we will send a further request to you. If you need any clarification of the request, please contact Stephen Lewis, Region III Counsel, at (312) 932-2732.

To the extent possible, it would expedite the NRC review and public comment process if your response could be provided in advance of the March 28, 1983 public meeting in Cincinnati.

Sincerely,
Original signed by
James G. Keppler
James G. Keppler
Regional Administrator

Enclosure: Request for Additional Information

cc w/enclosure:

J. R. Schott, Plant Superintendent

J. D. Flynn, Manager Licensing Environmental Affairs Department

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. Jennemann, Esq.

Gretchen Hummel, Ohio Consumers' Counsel

James R. Williams, State Liaison Officer,

Ohio Disaster Services Agency

Lewis/jp

Davis

Keppler 3/16/83

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REQUEST FOR ADDITIONAL INFORMATION

- 1. On page 1, TPT refers to its experience in QA/QC matters and in nuclear plant construction, including its recent independent design and construction reviews of four nuclear plants (San Onofre, Palo Verde, Shoreham and Waterford). Please describe TPT's experience in analysis of nuclear power plant construction management, either as a result of the above-identified reviews or other jobs which TPT has performed.
- Please describe the "documented QA program prepared specifically for this project ..." (page 2), including a description of the "internal audits to assess compliance with the independent verification project requirements."
- 3. On page 5, TPT states that less than \$100,000 in annual revenues have been received by GA Technologies Inc. (including TPT), and its predecessor, General Atomic, from the three utility owners of Zimmer, Sargent & Lundy, Kaiser, and General Electric in the last two years. Please specify the nature of the work performed for these companies, identifying the company for which each job was performed. Please identify and briefly describe any other contacts (not limited to the last two years) GA Technologies Inc., or its predecessor, has had with any company regarding the Zimmer project.
- 4. On pages 5 and 6, TPT states five criteria for determining the independence of individuals who will be involved in the Zimmer management review. TPT states that the individuals will file statements attesting to their independence. These statements should be filed under oath or affirmation and: (a) should respond as to the other five companies listed on page 5, as well as CG&E, and b) should include information on any previous work experience or association with any of the six companies, not limited to the last three years.
- 5. TPT's independence criterion 3 states that for additional professional personnel used on the management review who have worked on Zimmer or for CG&E in the past three years, TPT's independence will be assured by limiting such personnel to half-time on the Zimmer management review and limiting the cumulative level of effort of all such personnel to 10% of the Zimmer project effort. Figure 2 refers to additional "Independent Reviewers" who will be used on the Zimmer review. If any such personnel have had previous work experience or association with CG&E or the Zimmer project (not limited to the past three years), please identify: (a) the nature of their previous work for CG&E or on Zimmer, and (b) their proposed responsibilities in the Zimmer management review.
- 6. On page 7, TPT states:

"Close communication will be maintained between the Project Manager and the Cincinnati Gas and Electric representative to facilitate

transfer of data and to keep Cincinnati Gas and Electric aware of the contractual aspects of the review."

The "Protocol Governing Communications Between CG&E and Independent Organizations Conducting Reviews or Audits Under the Commission's Order," which was transmitted to CG&E by letter dated March 2, 1983, provides that such communications shall be documented and the documentation maintained in a location accessible for NRC examination. A copy of the Protocol has been separately provided to TPT. Please review the Protocol and provide a statement that you will comply with its provisions.

7. Has CG&E requested TPT to perform any services on the Zimmer project in addition to the independent management review, or have there been any discussions between TPT and CG&E regarding that possibility?