

THE CINCINNATI GAS & ELECTRIC COMPANY



W. H. DICKHONER  
PRESIDENT

February 28, 1983

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

Attention: Mr. James G. Keppler  
Regional Administrator

Gentlemen:

Re: Wm. H. Zimmer Nuclear Power Station, Unit 1,  
Order to Show Cause and Order Immediately  
Suspending Construction, Docket No. 50-358

On November 12, 1982 an Order to Show Cause was issued which suspended all safety-related activities on the Zimmer project. The order directed us to obtain an independent management review of the project and to submit a comprehensive plan to complete the project. As you know, we had proposed that the Bechtel Power Corporation perform both the independent management review function and the project management function. We have reviewed the opinions of the Commission as contained in the February 18, 1983 memoranda on this subject as well as your letter of February 23, 1983. Based on these memoranda, it is our understanding that the Commission will not permit Bechtel to perform both tasks for the Zimmer project.

For your information, it is our desire to proceed with that part of the project for which we are permitted to do under the Order to Show Cause and the February 18 memoranda. Accordingly, we intend to effectuate the following:

1. Bechtel will not undertake the independent management review. CG&E will transmit to you shortly for the NRC staff's consideration a revised proposal for the independent management reviewer.
2. In the interim, we intend to retain Bechtel as a consultant to assist with current activities that are not restricted by the November 12 Order to Show Cause; no activities will be undertaken which are safety-related construction activities.

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3. All activities undertaken by Bechtel will be at our risk, and subject to the outcome of the independent management review to be performed by another party. CG&E recognizes that some of the activities undertaken during this interim period may require amendment or elaboration when the independent management review results are known.

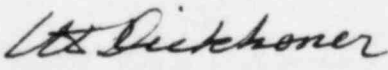
Our interim activities include the following:

1. Review or develop a Project Procedures Manual.
2. Review documentation programs.
3. Review the existing training programs and initiate additional programs if required.
4. Establish programs to organize the data available on:
  - a. Welder qualifications
  - b. Material qualifications
  - c. Heat logs
  - d. Vendor qualifications
  - e. Others as identified
5. Review status of FSAR.
6. Walkdown to determine the physical "as built" condition of the plant.
7. Analyze existing computer programs and develop new ones as required.

In our view, these interim measures provide a workable and efficient means of accomplishing the goal of the Commission, the Regional Administrator, and CG&E which is assuring that construction, when resumed, will proceed in an orderly manner in accordance with the requirements of the Commission's regulations.

Yours very truly,

THE CINCINNATI GAS & ELECTRIC COMPANY

By   
W. H. Dickhoner