THE CINCINNATI GAS & ELECTRIC COMPANY



November 10, 1982 QA-2109

E. A. BORGMANN

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

Attention: Mr. J. G. Keppler

Regional Administrator

RE: WM. H. ZIMMER NUCLEAR POWER STATION UNIT 1 CARBON STEEL IN STAINLESS WELDS DOCKET NO. 50-358, CONSTRUCTION PERMIT NO. CPPR-88, W.O. #57300, JOB E-5590 FILE NO. NRC-8, M-38

Gentlemen:

This letter constitutes a final report concerning the subject condition, initially reported to the Commission on May 3, 1982 as a potentially reportable deficiency under 10CFR50.55(e).

As stated in our previous report, QA-2008, dated September 22, 1982, weld documentation indicated the possibility of carbon steel inclusions in stainless steel Reactor Recirculation (RR) system pipe welds. KE-2 forms, used for requesting issuance of filler materials, indicated that the proper filler material for these welds (ER-308 for GTAW and E 308-16 for SMAW process) was requested. The heat numbers recorded on the KE-2 form upon issuance of the material by the weld rod issue clerk were, however, traceable to carbon steel filler material (E 70-S2 for GTAW and E-7018 for SMAW). This condition involves a total of five (5) RR system welds.

CG&E has concluded that this condition is not a reportable deficiency, but rather a clerical error for the following reasons:

 The possibility of carbon steel inclusion is highly unlikely based on depositions of three experienced welders, the weld rod issue clerk, and a QC inspector involved with these welds.

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2) Metcut Inc. transverse sectioned one weld, RR A-22, into one-half inch segments and performed an acid etch test. Weld RR A-22 was chosen because if carbon steel were present in any of the five welds, this should have had the highest per weight content of carbon steel. The results of the report indicate that no carbon steel was present in the weld.

Based on the above, conclusive evidence exists that no carbon steel was used in any of the five suspected welds and this condition is not reportable.

We trust the above will be found acceptable as a final report under 10CFR50.55(e).

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

E. A. BORGMANN

SENIOR VICE PRESIDENT

FKP:plc

cc: NRC Office of Inspection & Enforcement
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Region III