

A-8



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 12, 1982

50-350

MEMORANDUM FOR: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine

FROM: Carlton Kammerer, Director
Office of Congressional Affairs

SUBJECT: REQUEST FOR INTERVIEW REGARDING ZIMMER

Enclosed is a memorandum from Jim Cummings, OIA, containing interviews conducted during the Zimmer investigation. The staff of the Subcommittee on Energy and the Environment has requested a copy of the interviews. We plan to deliver the attached documents to the Subcommittee staff at close of business July 13, 1982, with the request that the documents be withheld from public disclosure.

Attachment:
As stated

cc: EDO
OGC
OIA
OI
Region III

File
Book

HENRY J. KAISER COMPANY

P. O. BOX 201
MOSCOW, OHIO 45153

B-1

August 15, 1980
KC-14083-Q

50-358

Mr. W.W. Schwiars
Principal Quality Assurance and Standards Engineer
The Cincinnati Gas and Electric Co.
P.O. Box 201
Moscow, Ohio 45153

Subject: NRC Audit Report 50-358/8-14-80.

Gentlemen:

With regard to your letter KEQ 445 dated 8 August 1980, the following responses are for the following audit findings:

- 1.) NRC Audit 80-14, Appendix A, item - 1A.
(Reference NES Audit N QA - 187 Item #11)
- 2.) NRC Audit 80-14, Appendix A, item - 1B.
(Reference CG&E Field Audit Report No. 261)
- 3.) NRC Audit 80-14, Appendix A, item - 2.

1.0 NRC Audit 80-14, Appendix A, item - 1A

1.1 Statement of Finding

NES Audit NQA - 187 item No. 11 findings 1 thru 6 concerning Constructor QA and Inspection activities had not been responded to as of June 3, 1980.

1.2 Corrective Action Taken and Results Achieved

Item number 11 of NES Audit contained findings 1 thru 6, with finding number 3 being closed out on Oct. 10, 1979. Due to an oversight, the complete item number 11 was inadvertently closed out and no further follow-up was provided to HJK by CG&E.

Current status of item number 11, findings 1 thru 6 is:

- 1.) A review of Drawing E-2417 Revision(s) G, H and J were reviewed and Cable RH719 was not effected by either revision.

- 2.) This is a function of the CG&E General Engineering Department prior to approval for release to HJK Documentation Control Center.
- 3.) By others.
- 4.) Item four (4) is not a QA responsibility. Item four (4) is the responsibility of Engineering. (See responsibilities per Auditor.)
- 5.) Contrary to this statement, a random review of both cable pull cards and termination inspection records indicated every inspection attribute had the inspector's stamp affixed to the inspection task that is acceptable. a reject stamp was placed next to an unacceptable attribute. This is all that is required per HJK QA Procedures QAP 11 Rev. 4 Paragraph 3.3.4.1 or 3.3.4.2. For acceptance for unacceptable attributes the inspector uses QACMI G4 or G14.
- 6.) Per G17, a review of AU cable pull cards are reviewed and signed in the lower left hand corner of the form, as required by the System Matrix at the time of Pre-operation Turnover.

2.0 NRC Audit 80-14, Appendix A, item - 1B

2.1 Statement of Finding

The deficiencies identified in CG&E Field Audit Report No. 261 have not been adequately responded to or corrected.

2.2 Corrective Action Taken and Results Achieved

QA&S Surveillance/Inspection Report No. 262 has closed out CG&E Field Audit Report No. 261. Field Audit Report No. 309 re-identified the area of deficiency and the corrective action taken by HJK Quality Assurance.

2.3 Corrective Action Taken to Avoid Recurrence

See HJK response to Field Audit Report No. 309.

2.4 Corrective Action Implementation

See HJK response to Field Audit Report No. 309.

3.0 NRC Audit 80-14, Appendix A, item - 2

3.1 Statement of Finding

On June 9, 1980, the NRC Inspector observed portable rod warmer 1 W-2 in use, but not plugged in and the top was open.

3.2 Corrective Action Taken and Results Achieved

Attached are copies of memoranda dated August 11, 1980 and June 17, 1980 which outline the specific actions taken for this item.

Should additional information concerning these items listed in NRC Audit Report 50-358/80-14 be needed, please advise us.


SITE QUALITY ASSURANCE MANAGER

PSG/bw

cc: E.V. Knox
R. Marshall

ATTACHMENT(S) 2

DEPARTMENT OF
Moscow, Ohio

DATE: August 11, 1980

FROM: W. O. Puckett

TO: AIL QA

AT: Moscow, Ohio

JOB NO. 7070

SUBJECT: PORTABLE WELD ROD ELECTRODE OVENS.

In the last five years Kaiser has been cited by IRO ten times, concerning portable weld rod electrode ovens. This might now seem like a lot, but considering the infrequency of IRO's inspection, it's quite a lot.

Signs have been posted at the Rod Shack, saying the ovens should be plugged in at all times, except when being transported to and from the Rod Shack, individual rod cans have a sign on them, that request they be plugged in, and still we get these infractions.

I am requesting the help of all superintendents and foremen to get all their welders together and explain the importance of keeping the portable electrode ovens plugged in.

I am also, requesting the support of QA in monitoring the welders in their prospective areas to see that the welders are complying.

It will take an effort of all concerned to assure that there are NO MORE noncompliances involving portable electrode ovens, not being plugged in.

Thank you,

W. O. Puckett
W. O. Puckett
Chief Welding Engineer

WOP/jrt

1000
1000

DATE: June 17, 1980
TO: G. R. [unclear]
FROM: W. C. [unclear]

TO: Gerry Adams
Jim Sandlin

AT: Ibseco, Ohio

JOB NO. 7070

SUBJECT: Reported rod can [redacted] unplugged.

Concerning the welder whose rod can was found unplugged in the Suppression Pool, rod can [redacted] Jim Sandlin and myself investigated this and here is what we came up with.

The welders name is [redacted] employee # [redacted], weld stamp [redacted], his hire date was [redacted] 1974.

We talked to [redacted] and it seems he had his rod can plugged in and they had a loss of electrical power in the Suppression Pool. During the power outage, [redacted] left the Suppression Pool and went to the Ironworkers shop to pick up some Structural Plates. He was held up in the Ironworkers shop longer than was expected and when he returned to the Suppression Pool, he found that his rod can was unplugged and that his electrical extension cord was missing. It was at this time, that he found out his can had been reported as unplugged.

In checking [redacted] work record, we found that he is a very conscientious craftsman that has been working here since [redacted] 1974 and this being his first report for violations of weld rod control.

Jim Sandlin, Gerry Adams and myself have talked to [redacted] and we have determined this to be an isolated case.

WOP/jrt

TO: Distribution
AT MOSCOW, OHIO

DATE: August 15, 1980

FROM: ~~W. O. Puckett~~
W. O. Puckett

COPIES TO

AT: Moscow, Ohio

JOB NO. 7070

SUBJECT: WELD ROD CONTROL

The following weld rod control procedures must be strictly adhered to by everyone if we are to keep welding rod under control.

1. When issued to welder, Low-Hydrogen E7018 and stainless steel E3XX-16 covered electrodes, must be kept in the welder's portable rod oven. The portable rod oven must be kept plugged in at all times (except during transportation to and from rod shack). The portable rod oven must be kept within sight of the welder at all times except when conditions do not allow the welder room to store his portable rod oven with him.
2. Each welder will be issued a weld rod stub bucket along with his portable rod oven and/or his bare weld wire tube each day. All weld rod stubs are to be put into these stub buckets during the day. The weld rod stub bucket along with the burnt stubs must be returned to the weld rod shack at the end of each day along with the welders portable rod oven and/or bare weld wire tube. There shall be no weld rod or weld rod stubs thrown on floor.
3. The welder shall also return all unused weld rod at the end of the day along with his portable rod oven and/or his bare weld wire tube.
4. The Craft Supervisor will complete and approve all KEI Weld 2 Forms using the KEI Weld 1 form information. The welders are not to fill in the KEI Weld 2 Form except for filling in his symbol, his name and received by.

It is mandatory that the above procedures be carried out so that there is effective weld rod control.

Thank you,

W. O. Puckett
Chief Welding Engineer

WOP/jrt

I have read the above and agree to follow the required Weld Rod Control.

Welder's Signature

Employee #

Date

TO W. W. Schriers
AT MOSCOW

File

DATE October 3, 1980

FROM R. Marshall

COPIES TO B. K. Culver
S. Swain

AT MOSCOW

JOB NO. 7070

SUBJECT PORTABLE WELD ROD WARMER NOT PLUGGED IN

To best answer this noncompliance I would like to outline our program.

- (1) All weldors have an indoctrination and training session prior to starting work on this project with periodic interval group training programs. We have on file a form which each weldor signs informing him that violation of our project rules holds the penalty of termination. Our Welding Engineering group performs audits daily and maintains a log.

We have terminated welding personnel from this project in the past and will do so in the future for the violation of our work rules.

In this particular instance mentioned where the inspector observed a portable weld rod warmer not plugged in with a 1/2 lb. of rod, is absolutely correct. However, the weldor had withdrawn the rod as it stated on the weld rod withdrawal form attached to the warmer for temporary supports which does not fall under requirements of the FSAR. This is no excuse for the rod oven not to have been plugged in since we do not distinguish in our procedure if it is essential, nonessential or temporary. Consequently, the weldor, badge no. [redacted] was terminated for cause. See attached termination slip.

It should also be noted that this site is one of the few that allow no other rod on the project except certified rod material, that we require constant heat on weld rod at all times, except in transit. However, there are instances such as this, and when they occur we take the severest corrective action allowed.

RM/bm

Write - Accounts
Copy - Personnel
Pick - Employee

KAISER ENGINEERS, INC.
Moscow, Ohio
TERMINATION SLIP

DATE 8-20

TIMEKEEPER: TERMINATE SERVICES OF BEARER

NAME _____ NO. _____

AT 11:45 A.M. _____ P.M. TODAY, AND HAS 62 HRS. TIME TODAY

NOTE: EMPLOYEE MUST TURN IN ALL EQUIPMENT BEFORE HE CAN RECEIVE TIME CARD.

QUIT REASON _____

DISCHARGED REASON _____

LAI D OFF REASON _____

OTHER REASON Violation of contract

Procedural

CRAFT SUPERINTENDENT

WAREHOUSE CLEARANCE
WAREHOUSE SUPERINTENDENT

INTER OFFICE MEMORANDUM

TO
AT

DATE: January 13, 1981

FROM: M. G. Puckett

COPIES TO

AT: Wbscont, Ohio

JOB NO. 7070

SUBJECT: WELD ROD CONTROL.

Weld rod is held in heated holding ovens, in the Weld Rod Issue Room. These ovens are calibrated every three (3) months by QA and the heat is checked daily by Weld Engineering. These ovens are marked with size, type, heat number and stock number of the electrode.

Weld rod is issued to individual welders on Weld-2 forms, (weld rod issue slip.)

The heated rod are taken from the holding ovens and placed in a portable weld rod oven to be transported to work area, where they are plugged into an electrical outlet. This rod is kept heated at all times. Kaiser's weld rod control procedure SPPM 3.3-Rev. 7, allots the welder one (1) hour to get to his work area and plug his portable rod oven in. The manufacturer of the portable ovens (Phoenix Manufacturer) state that the rod can be held in their ovens for a period of four (4) hours without the oven being plugged in and the rod would not drop below ambient temperature.

The portable ovens are numbered and assigned to the welder by this number and no number is repetitive. These ovens have a pouch on the side, with a copy of the weld rod issue form. This form, reflects date, oven number, system and component being welded, plus weld rod issued in size, type, amount, heat number and stock number. It, also, reflects the welders stamp, his name, the name of the person authorizing him to draw this rod and the initials of the attendant that issues the rod.

A daily check is made of all work areas by the QA Department and by the Weld Engineering Department. A daily log is maintained by the Weld Engineering Department of those checks which they make. Weld Engineering, also maintains a log of individual forms, signed by all the active welders on the Zimmer Project, stating that they have read our restrictions on the control of weld rod and that they fully understand it. They are, also, aware that those people found in violation are subject to termination. A sample is _____, who was terminated for weld rod control violation,

1980.

Random field Check - 10:00 - 11-7-80

Supp. Pool - Welders portable rod ovens were plugged in.

Prim Cont. All portable rod ovens were plugged in. No burnt electrodes were found on work area floor.

4th - OK

5th - OK

DG - A - OK

DG - B - found ^{#17} can not plugged in, but welder had just drawn rod and was trying to

DG - C - OK locate extension cord.

Drywell - OK.

Janet Tumbleson
Welding

11-7-80

1 ✓	30 ✓	59 ✓	88 ✓	117 ✓	146 ✓	175 ✓	240 ✓
2 ✓	31 ✓	60 ✓	89 ✓	118 ✓	147 ✓	176 ✓	243 ✓
3 ✓	32 ✓	61 ✓	90 ✓	119 ✓	148 ✓	177 ✓	247 ✓
4 ✓	33 ✓	62 ✓	91 ✓	120 ✓	149 ✓	178 ✓	248 ✓
5 ✓	34 ✓	63 ✓	92 ✓	121 ✓	150 ✓	179 ✓	249 ✓
6 ✓	35 ✓	64 ✓	93 ✓	122 ✓	151 ✓	180 ✓	350 ✓
7 ✓	36 ✓	65 ✓	94 ✓	123 ✓	152 ✓	181 ✓	351 ✓
8 ✓	37 ✓	66 ✓	95 ✓	124 ✓	153 ✓	182 ✓	352 ✓
9 ✓	38 ✓	67 ✓	96 ✓	125 ✓	154 ✓	183 ✓	354 ✓
10 ✓	39 ✓	68 ✓	97 ✓	126 ✓	155 ✓	184 ✓	356 ✓
11 ✓	40 ✓	69 ✓	98 ✓	127 ✓	156 ✓	185 ✓	357 ✓
12 ✓	41 ✓	70 ✓	99 ✓	128 ✓	157 ✓	186 ✓	358 ✓
13 ✓	42 ✓	71 ✓	100 ✓	129 ✓	158 ✓	187 ✓	359 ✓
14 ✓	43 ✓	72 ✓	101 ✓	130 ✓	159 ✓	188 ✓	360 ✓
15 ✓	44 ✓	73 ✓	102 ✓	131 ✓	160 ✓	189 ✓	361 ✓
16 ✓	45 ✓	74 ✓	103 ✓	132 ✓	161 ✓	190 ✓	362 ✓
17 ✓	46 ✓	75 ✓	104 ✓	133 ✓	162 ✓	191 ✓	363 ✓
18 ✓	47 ✓	76 ✓	105 ✓	134 ✓	163 ✓	192 ✓	364 ✓
19 ✓	48 ✓	77 ✓	106 ✓	135 ✓	164 ✓	193 ✓	
20 ✓	49 ✓	78 ✓	107 ✓	136 ✓	165 ✓	194 ✓	
21 ✓	50 ✓	79 ✓	108 ✓	137 ✓	166 ✓	195 ✓	
22 ✓	51 ✓	80 ✓	109 ✓	138 ✓	167 ✓	196 ✓	
23 ✓	52 ✓	81 ✓	110 ✓	139 ✓	168 ✓	197 ✓	
24 ✓	53 ✓	82 ✓	111 ✓	140 ✓	169 ✓	198 ✓	
25 ✓	54 ✓	83 ✓	112 ✓	141 ✓	170 ✓	199 ✓	
26 ✓	55 ✓	84 ✓	113 ✓	142 ✓	171 ✓	200 ✓	
27 ✓	56 ✓	85 ✓	114 ✓	143 ✓	172 ✓	201 ✓	
28 ✓	57 ✓	86 ✓	115 ✓	144 ✓	173 ✓		
29 ✓	58 ✓	87 ✓	116 ✓	145 ✓	174 ✓		

JANET R. TUMBLESON
WELDING DEPARTMENT
Ext. 230 or 291

Janet Tumbleson

PHOENIX PRODUCTS COMPANY, INC.

4715 NORTH 27th STREET / MILWAUKEE, WISCONSIN 53209 / (414) 445-4100

January 13, 1981

Henry J. Kaiser Company
P.O. Box 201
Moscow, Ohio 45153

Attn: Mrs. Tumbleson

Dear Mrs. Tumbleson:

This letter is written per your request of January 12, 1981 regarding Phoenix Products Company 10B DRYROD ovens.

You explained to me the procedure for handling welding rods on the job site is as follows.

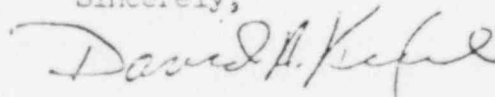
The welding rods are stored at the manufacturers specified temperature until distribution to the welding personnel. Each person has a Phoenix Products Company 10B oven which the warm welding rods are inserted into and the oven is then carried to their work area. Then the oven is plugged into an appropriate power supply for operation. The elapsed time from receiving the 10B oven filled with warm welding rods until the oven is in operation is approximately 1 hour.

~~The 10B oven will protect the welding rods against moisture on the job for up to 4 hours, providing the cover is securely closed after inserting the warm welding rods.~~

You will find enclosed a data sheet on our new Phoenix Thermal Electrode Dispenser (TED). The TED will protect electrodes from hydrogen producing moisture between removal from the DRYROD holding oven and actual use for 24 hours or more.

If you should require any other information, please do not hesitate to contact me or this office.

Sincerely,



David A. Kexel
Manager-OEM and New
Product Sales

DAK:tlb

Encl.

INTER-OFFICE MEMORANDUM

TO: B. Culver
 AT: Moscow, Ohio

DATE: April 30, 1980

FROM: Ray Dorr

COPIES TO: W. O. Puckett

AT: Moscow, Ohio

JOB NO: 7070

SUBJECT: ROD STORED IN THE ROD SHACK, AWAITING REBAKE.

A few weeks ago inventory was taken of the coated electrode stored in the rod shack, which was locked up for rebake.

We are no longer rebaking rod, due to the fact the rebake oven is not operative. The following is an estimate of above mentioned rod:

7018	91 pounds (approx.)	3/32" size
7018	180 pounds (approx.)	1/8" size
309-16	45 pounds (approx.)	3/32" size
309-16	50 pounds (approx.)	1/8" size
308-16	40 pounds (approx.)	1/8" size
<hr/>		
TOTAL	406 pounds (approx.)	

I would like to recommend that this rod be donated to U. S. Grant Vocational School in Bethel, Ohio.

I believe this would be very generous on CG&E's behalf and appreciated very much by the school.

The welding school needs the rod, several of our employees have young people attending this welding school, and I feel it would be a good idea to remove this rod from our job site, because it has been locked up for more than a year.

Please, let me know your opinion in this matter at your earliest convenience. Thank you.

HENRY J. KALTER COMPANY

MEMORANDUM
August 20, 1980
YC-14095-C

Mr. B. K. Culver
Manager, Construction
The Cincinnati Gas & Electric Company
Wm. H. Zimmer Project Site
Moscow, Ohio 45153

Subject: NRC Inspection Report No. 80-14

Reference: Letter from W. W. Schwiers to R. Marshall
Dated August 8, 1980, Regarding Control of
Weld Rod, by Ironworker Welder,
Badge #

Gentlemen:

The noncompliance reported by the NRC Inspector in subject report is valid. A complete investigation was made of the incident on June, 1980, my findings were somewhat unusual as the Ironworker Welders implicated has worked on this site for six years. In questioning the Field Superintendent, Craft General Foreman and Crew Foreman about qualifications, they all agree he has always been a very conscientious worker with no previous violations on his record, also one of our better welders.

All Field Supervisors understand the Special Process Procedure covering portable weld rod warmers, although we feel that these procedures are more stringent than similar procedures written to control same work in the overall Construction Industry. Contrary to this, we will continue educating our welders to follow all procedures and attempt to eliminate noncompliance in this area.

In the past we have depended on the individual welder and the Construction Welding Engineering personnel to assure that Rodwarmers are plugged in at all times. Due to the frequency of noncompliances involving portable electrode warmers, we have re-inforced our welder training program to assure that there will be no more non-compliances involving portable electrode warmers not being plugged in. The additional training we have implemented into our program are 1) Construction Welding Engineer assure that all new welders before qualification testing will personally read all procedures and directives pertaining to portable weld rod warmers.

August 20, 1980

Page 2

2) The Craft Foreman will also have the responsibility to assure that welders assigned to his crew have their warmers plugged in at all times. 3) Each Craft Foreman reiterate this problem to his crew each week after scheduled Safety Meetings. 4) A special meeting was called for all Craftsmen, their Foreman, General Foreman and Superintendents to discuss all problems and procedures concerning welding and welding rod control.

I feel assured with this additional effort of all concerned that this type of violations will case.

Very truly yours,

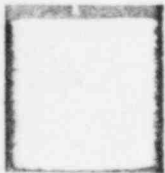
HENRY J. KAISER COMPANY



R. Marshall
Project Manager

RM/bm

summarized the scope and findings of the inspection. The inspector emphasized that noncompliance for weld rod control was due to the lack of adequate corrective action to eliminate the problem or at least reduce the number of violations against the procedural requirement for weld rod control.



Prepared by
T. Madala
& Gerry

A. ALLEGATION: There have been periods when there were no security surveillance cameras during nuclear fuel deliveries to the site.

RESPONSE: It was determined through an interview with Mr. Dale Kers, a plant protection analyst, representing the Physical Security Licensing Branch of NMSS and a review of the following documents that the licensee is not required to provide CCTV surveillance during either deliveries or storage of unirradiated fuel at the Zimmer site.

- a. NRC Material License No. SNM-1823, dated June 26, 1978.
- b. 10 CFR 73.67(f)
- c. Station Administrative Directive, Interim Access Control - New Fuel Storage Area, Procedure No. SE SAD.03, Revision 1, Dated August 10, 1979.
- d. Appendix F - Interim Access Control - New Fuel Storage Area, Revision 10, dated July 3, 1980. Appendix F became effective November 14, 1980.

It was also determined from reviewing two Region III security inspection reports that the licensee is not utilizing CCTV to provide surveillance to the new fuel storage area; but is utilizing watchmen and barriers to detect unauthorized penetration.

B. ALLEGATION: Perimeter (new fuel storage area) security consisted for an extended period of only a four foot¹⁰⁶⁴ chicken wire fence.

RESPONSE: This allegation was not substantiated. It was determined from an interview with Mr. T. Daniels, NRC Resident Inspector, Zimmer, that from approximately December 3, 1979 to the present, the licensee has utilized an eight foot plywood barrier on

*Security
Not to be
released* →

barrier was also verified during two security inspections (September 25, 1979 and January 22 and 23, 1981) by Region III personnel.

An interview with Mr. Dale Kers, a plant protection analyst, representing the Physical Security Licensing Branch of NMSS stated that the utilization of a four foot chicken wire fence to control access to the new fuel temporary storage area would not conflict with the requirements as stated in 10 CFR 73.67(f) and Part II, Section 1.1 of Regulatory Guide 5.59, dated January 1980, if monitoring of the area was^{2.40} conducted. The monitoring is conducted by a watchman who is continuously stationed at the access point to the new fuel storage area.