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5/29/81

50-358

TO: A. Schnebelen

FROM: D. Gamble *DJG*

RE: ZIMMER INVESTIGATION

The following is a list of the major issues that A. Puglia and I see in this case:

1. The 739 voided NR's. I discussed with Bert Davis today that it would be helpful both to the civil and criminal enforcement actions if NRC required CG&E to identify to IE those NR's which were correct (i.e., those that should not have been voided) before CG&E allowed any corrections of the hardware. This would allow IE & QIA to determine how many and which pieces of hardware we wished to "eyeball" in their defective state. Davis agreed that this would be a good requirement and said he would factor it into the CG&E Quality Confirmation Program they were now reviewing.

In the meantime next week Jim McCarten intends (time permitting) to have Inspector Jerry Schaptker look at the hardware on a couple of the more flagrant NR's that were voided.

2. NR's not in the system. These are the NR's that were never entered into the system at all. We can only get these from people (e.g., QC inspectors) who have retained "bootleg" copies. I believe McCarten also hopes to check the validity of a couple of these next week. Puglia is attempting to compile a list of NR's in this category by reviewing IE's statements.
3. Heat numbers on pipes that do not match heat numbers on the KEI-1 forms. This situation indicates that the QC inspector completed the KEI-1 form without conducting the inspections he was certifying. So far this situation has been conclusively demonstrated in the diesel generator system (small bore pipe) by Inspector Fred Maura. Schaptker's principal activity next week is compare KEI-1 forms to hardware on a large bore system which allegedly has the same discrepancies. Finally, unless IE management's reported small sampling approach prevails over the IE inspectors' wishes, CG&E's Quality Confirmation program will undoubtedly identify more examples of this (here again it would create a problem if CG&E corrected the hardware before informing NRC that there discrepancies).
4. Other discrepancies between the hardware and QC documentation. One example that has been developed in this category (by Schaptker) is the Bristol QC document indicating good welds in an entire area--but IE has found gross deficiencies in the welds themselves. Although additional examples probably exist, I do not believe they will be addressed by either IE or the CG&E Quality Confirmation program. We thought that the defective cable tray hanger welds would fit into this category, but Inspector Paul Barrett informed us that the defects are not that great and only a small percentage of these welds are defective--thus tending to negate wilfulness (his words).

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cc: J. Sinclair  
A. Puglia

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