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DRAFT

INVESTIGATION

RE: APPARENT FALSE STATEMENTS

CINCINNATI GAS & ELECTRIC CO.

INVESTIGATOR PETER E. BACI

HQS/IE

DN: 50-358

DRAFT

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Predication:

On 2/27/79, representatives of CG&E management appeared before an ACRS¹ subcommittee in connection with the utility's application for a license to operate the William H. Zimmer Nuclear Power Station. During the course of the meeting, the subject of plant staffing was addressed, particularly with regard to the adequacy and availability of back-ups for key supervisory personnel. CG&E's response to ACRS questions on staffing was made by James R. Schott who is the Superintendent of the Zimmer Station. Responding to the questions of the subcommittee chairman, Mr. Schott indicated that CG&E was developing a back-up capability within the staff on a "one-to-one relationship as more or less second-line assistants to the principals."

When asked if these individuals would have another job as well as being the back-up, Mr. Schott replied:

"No sir. Not necessarily, no sir. That isn't what we had in mind. In other words, if there is a staff member who is assigned as assistant to the maintenance supervisor, that is his function, and he would act as an assistant maintenance supervisor."

Region III inspectors present at the subcommittee meeting felt that Mr. Schott's statements concerning staffing were misleading and at variance with the situation as they knew it to be. This concern was brought to the attention of regional management and the decision was made to discuss the matter with Mr. Schott and request clarification of his statements. On 3/5-6/78, the inspectors visited the Zimmer site and met with Mr. Schott. After having the

FOOTNOTES

1. The Advisory Committee on Reactor Safeguards (ACRS) reviews safety studies, and applications for construction permits and operating licenses for production and utilization facilities, and makes reports thereon; advises the Commission with regards to the hazards of proposed or existing nuclear facilities and the adequacy of proposed reactor safety standards; and reviews matters specifically referred to it by the Commission, including generic issues and proposed amendments or changes to facility construction permits or operating licenses. The ACRS was established by Section 29 of the Atomic Energy Act of 1954, as amended, and transferred to the NRC pursuant to the Energy Reorganization Act of 1974, as amended. While transcripts of ACRS meetings are made, the meetings do not involve sworn or notarized testimony.

questioned portions of the transcript read to him, Mr. Schott stated that he could see where they might be misleading and would discuss their clarification with CG&E management prior to the full ACRS meeting on 3/9/79.

At the ACRS meeting on 3/9/79, the matter of staffing was brought up; however, the inspectors, who were present as observers, felt that the matter of the back-up capability previously described by Mr. Schott_x was not properly clarified.

Since the matter had already been discussed with Mr. Schott and since the inspectors felt that the misleading statements had been allowed to stand uncorrected, both Region III and IE Headquarters decided that an official investigation into the apparent false statements was warranted.

Details:

Interviews with Region III Inspectors

Interview with Terry Harpster

On 5/21-23/79, IE Investigator Peter E. Baci interviewed Reactor Inspector Terry L. Harpster in the Region III Office in Glen Ellyn, Illinois. Harpster explained that since being assigned to the Zimmer Station in October 1977, he had developed an increasing concern over the adequacy of station staffing. This concern had been discussed with CG&E management on several occasions and was documented in inspection reports during March, August and November of 1978 (DN: 50-358, Report Nos. 78-06, 78-11 and 78-20). Particular concerns were the ability of the existing staff to adequately conduct the preoperational test and start-up programs and the extensive use by CG&E of contract personnel

for technical support. The latter created a problem in that much of the experience and knowledge learned during the start-up and test program would be lost with the departure of the contract personnel. Another concern voiced by Harpster was the minimal involvement of the corporate staff in the pre-operational test program. This continued until the formation of a mechanical engineering/nuclear section within the CG&E corporate structure formed to support site operations and which was subsequently moved to the site.

According to Harpster, a meeting was held on 7/13/78 in Bethesda, Maryland, to discuss weaknesses in the utility's staffing as it related to the Zimmer Plant. CG&E was represented by Messrs. Earl Borgmann, Vice-President/ Engineering Services & Electric Production, Steve Salay, Manager, Electric Production, James Flynn, Licensing Manager, and Superintendent Schott. NRC was represented by Inspector Harpster of Region III and Messrs. Donald Skovholt, Walter Haass and Irving Peltier of NRR. A subsequent meeting was held on 9/21/78 at the CG&E corporate offices in Cincinnati with Messrs. Harpster and Robert Warnick representing NRC and Messrs Schott and Salay representing CG&E. At this meeting, the lack of progress in augmenting the existing station staff was discussed as well as its impact on the preoperational test program, the operational preparedness of the station and the fuel loading date. According to Harpster, particular concerns were the lack of a maintenance supervisor, a reactor engineer who met the requirements of ^{ANSI 18.1, the size of the station} ~~the corporate~~ technical support staff and the involvement of the corporate technical staff in the preoperational test program.

Harpster stated that on 2/27/79, he and Inspector John Menning attended the ACRS subcommittee meeting on Zimmer as observers. He stated that the Chairman, Mr. Bender, raised the question of the station's ability to provide adequate

back-up support in the event of the loss of key personnel. Superintendent Schott's reply indicated that alternate members of the station staff were being designed to act as backup to key supervisory positions and that these people would not have other jobs. Harpster stated that he understood that to mean these individuals would function as full-time assistants to the supervisors they were backing up. He felt that Mr. Schott's statements were contrary to his knowledge of the staffing situation gained through inspections and discussions with corporate management, including Mr. Schott. At the close of the meeting, Harpster informed Irving Peltier (licensing project manager, NRR) that he felt Schott's testimony did not reflect the true staffing situation at Zimmer.

Upon his return to Region III, Harpster informed regional management of his concerns re Schott's testimony and the decision was made to have him travel to Zimmer and discuss the matter with Mr. Schott. On March 5/6, 1979, Inspectors Menning and Harpster met with Mr. Schott and discussed their respective interpretations of Schott's testimony. Harpster informed Schott that he felt his testimony mislead the ACRS subcommittee since he was unaware that any formal contingency plan existed or was being developed such as Schott had described to the panel. Harpster further told Schott that it was his opinion that adequate technical staff was not available to provide fulltime back-ups as described. He asked Schott if perhaps there was information concerning this capability that he was not aware of.

According to Harpster, Schott said he had not intended to give the impression that such a plan had been implemented or that they had the personnel to provide full time back-ups for all key positions. On the morning of 3/6/79, Harpster

was present while the relevant portions of the testimony were read to Schott over the phone by Robert Warnick (Chief, Reactor Projects, Section 2, Region III). After hearing his testimony, Schott indicated to Harpster that he could see how it might be misleading but that this was because he hadn't been prepared to address those questions in depth. Schott then told Harpster that he would discuss clarification of his testimony with CG&E management prior to the full ACRS meeting scheduled for 3/9/79.

Harpster and Menning both attended the ACRS meeting on 3/9/79. Harpster stated that although the matter of staffing was discussed in depth, he felt that CG&E offered no clarification of its earlier misleading statements. He advised regional management of his continued concerns and these were further reflected in a memorandum and statement of facts provided to IE/HQS on 4/10/79.

Harpster stated that his primary concern was that while the Zimmer station staff might meet the minimum requirements of ANSI 18.1, the ability to provide adequate back-up for key supervisory personnel was questionable. Harpster's opinion is based on his inspection experience at Zimmer and on the minimal prior nuclear experience of the staff. A copy of Inspector Harpster's written statement is appended to this report.

Interview with John Menning

On 5/21/79, IE Investigator Peter E. Baci interviewed Reactor Inspector John Menning in the Region III Office in Glen Ellyn, Illinois. Menning described his knowledge of the Zimmer Plant staff situation as gained through periodic inspections of the facility from October 1978 to the present. Menning's

description of the staffing situation basically agrees with that of Inspector Harpster. With Harpster, he attended the 2/27/79 ACRS subcommittee meeting and heard the testimony of Station Superintendent James Schott relative to the utility's back-up capability for key supervisory personnel. Menning felt that Schott's description of CG&E's back-up plan was not consistent with the utility's planned or existing capability as he knew it to exist. He indicated that he and Harpster made this concern known to Region III management after their return and also discussed the matter with Mr. Schott on 3/5-6/79.

According to Menning, Schott indicated that he had not intended to give the ACRS subcommittee the impression that the plant had established or was planning to establish a formal structured program for the development and training of fulltime back-ups for key personnel. He told Menning that he had only intended to communicate that individuals existed on his staff who could function as backups to key staff members and that if the transcript of the subcommittee meeting reflected otherwise, then a clarification might be in order.

At the meeting of the ACRS on 3/9/79, the capabilities of the plant staff were discussed, but Menning, who was present as an observer, felt that the matter of the misleading statements remained unresolved. Along with Inspector Harpster, Menning expressed his continued concern to Region III management upon his return from the ACRS meeting. A copy of Inspector Menning's written statement is appended to this report.

Other Interviews with NRC Personnel

The following NRC personnel were also interviewed with regard to the matter under investigation:

James G. Keppler, Director, Region III

Gen W. Roy, Deputy Director, Region III

Charles E. Norelius, Assistant to the Director, Region III

Robert Warnick, Chief, Reactor Projects, Section 2, Region III

Robert F. Heishman, Chief, Reactor Construction & Engineering

Support Branch, Region III

Those interviewed are all Region III management personnel who were familiar with the staffing situation at the Zimmer Station and who were aware of the problem with the apparent misleading statements at the ACRS subcommittee meeting. The concern of Inspectors Harpster and Menning was shared by Region III management and resulted in the instant investigation.

Interview with James R. Schott

On 5/24/79, Zimmer Station Superintendent James R. Schott was interviewed by IE Investigator Peter E. Baci at the plant site in Clermont, Ohio. Also present during the interview were Thomas Vandell, Project Inspection^{or}, USNRC, Region III and W. W. Schwiers, Principal Quality Assurance and Standards Engineer, CG&E. Mr. Schott was advised of the nature of the NRC investigation and provided a signed statement, a copy of which is appended to this report.

Mr. Schott discussed his testimony before the ACRS subcommittee and was aware of the fact that NRC had regarded some of his statements as misleading. He stated that Inspector Harpster had advised him of NRC's concerns when he met with him at the plant site subsequent to the ACRS subcommittee meeting on 2/27/79. Schott stated that after having the transcript of his testimony read to him by Robert Warnick (USNRC, RIII), he had initially agreed with Inspector Harpster that his testimony could be misinterpreted and had agreed to discuss its clarification with his management. He further stated that after reviewing the testimony and discussing it with management, that they had concluded that his original statements were correct.

When asked to clarify his earlier statements to the ACRS, Schott stated that CG&E was providing backup capability to key positions by designating alternate members of the technical staff to serve as backups for second-line supervisors. He stated that this backup capability would be on a one-to-one basis, with backups serving as "more-or-less second-line assistants to the principals."

Schott's testimony, in response to questioning from Subcommittee Chairman Bender, indicated that the backup would not have another job in addition to being backup; further, that "if there is a staff member who is assigned to as assistant to the maintenance supervisor, that is his function; and he would act as an assistant maintenance supervisor." This was the aspect of Schott's testimony which the inspectors regarded as misleading, namely, that a fulltime backup did not exist and was not planned who would function solely as an assistant to the principal. Schott explained that what he meant was that the backup would be a fulltime employee, working for the principal in the same area (i.e. maintenance, operations, rad-chem, etc.). When queried about his

statement that the individual would not have another job, his explanation was that he would not be working or have any responsibilities in another area.

Mr. Schott stated that he presented ²₁ staffing chart to the full ACRS meeting on 3/9/79 which he briefly reviewed with the aid of an overhead projector. He said that he felt his presentation satisfied all concerns and expressed surprise and ire when he learned that NRC was conducting an investigation into the matter.

Schott felt that E. A. Borgmann's letter to Director Keppler, dated 5/18/79,* clarified the situation; but nevertheless provided ⁱⁿ₁ his statement a detailed account of the CG&E plan for ensuring backup for key supervisory personnel. It should be noted that Mr. Schott does not intend to formalize the backup plan he describes in writing.

Review of Records, Documents etc.

The following records/documents were reviewed by Investigator Baci during the course of the investigation:

Inspection Report 50-358/78-06 3/22/78

Inspection Report 50-358/78-11 8/2/78

* A copy is appended to this report.

Inspection Report 50-358/78-20 11/17/78

Safety Evaluation Report - NRR 1/79

Final Safety Analysis Report - Revision 41 - 3/78

American National Standards Institute Selection and Training
of Nuclear Power Plant Personnel - N18.11971

A review of the Inspection Reports cited above revealed a continuing concern on the part of NRC as to the adequacy of Zimmer Station staffing. Comments from the inspection reports include:

"...the qualifications of the personnel selected for review will meet the minimum regulatory requirements prior to fuel load, however, the cumulative prior nuclear experience is minimal..." (#78-06)

"...the corporate technical staff needs to gain a baseline familiarity with the facility systems to be able to adequately augment the site personnel's expertise..." (#78-11)

"The size and limited experience of the plant staff would ^{n.I} be adequate to cope with the additional staffing problems created as a result of normal attrition of personnel during the startup and test programs." (#78-11)

"Because of the heavy reliance on contracted technical support, much of the baseline knowledge and experience gained as a result of participation in the startup and test program would leave with the contracted support personnel." (#78-11)

"We do wish to point out a potential staffing problem as it relates to the support of the preoperational testing program, which if not resolved in a timely manner could have a negative impact on the operational preparedness of the plant as equipment and management control systems are turned over from contractors." (#78-11)

"We do wish to emphasize our concerns regarding station staffing and the status of the station, administrative, maintenance and procurement programs."
(#78-20)

The NRR Safety Evaluation Report (SER) dated January 1979 states:

"We reviewed the qualification requirements for station personnel described in Section 13.1 of the Final Safety Analysis Report (FSAR) and find they meet those qualifications described in ANSI-N18.1-1971."

① CONCLUSIONS DELETED
FROM FINAL

② PARAGRAPH ABOVE WAS REVISED

③ P.14 missing.

Lack of depth of the Zimmer organization are also apparent in the cited inspection reports as well as in the bio-data appended to the Final Safety Analysis Report (FSAR).

Given the foregoing as background, it is not difficult to understand why Superintendent Schott's statements to the ACRS subcommittee were of concern to the Region III inspectors. His statement that alternate members of the technical staff were being designated as backups to key supervisory positions was at variance with the situation as it was known to the project inspectors.

Similarly, his reply to Chairman Schott's questions concerning these backup personnel clearly indicated that these individuals would not have responsibilities other than serving as backups or assistants to key supervisory personnel.

When questioned by Inspectors Harpster and Menning regarding his statements, Schott indicated that if the transcript of the meeting indeed reflected their understanding of his testimony, then a clarification of the record might be in order. He also stated that it was not his intention to give the ACRS the impression that CG&E had either established or was establishing a formal program for the development and training of backup personnel.

Similarly, his description of those backup personnel as "second-line assistants," having no other job aside from serving as assistants to the principals, also conflicted with the inspectors' knowledge of existing or proposed CG&E staffing plans.

When the inspectors discussed the apparent inconsistencies with Mr. Schott, he stated to both of them that he had not intended to convey the meaning they had inferred from his statements; further, that if that was the impression he had given, then he would have to discuss its clarification at the full ACRS meeting.

Mr. Schott told Investigator Baci essentially the same thing. He said that he believed he had clarified the matter by way of his presentation at the full ACRS meeting on 3/9/79, and further, that he was unaware until recently that NRC still had concerns over his earlier statements. Schott indicated that he wished to resolve any remaining NRC concerns related to staffing and provided the attached statement. Basically, Schott restated that CG&E intended to provide a full-time backup for each second-line supervisor and that they would have no other job. He explained that this meant a full-time CG&E employee, serving in the ^{some} organizational line as the primary (i.e., someone working in maintenance, would backup the maintenance supervisor, in operations, the operating supervisor, etc.). The individuals serving as backups would receive training and practical experience so that they could take over for the principals if they were sick, had left or were otherwise unavailable.

Schott stated that CG&E would not formally designate an individual as the assistant or backup, either in his position description or by memorandum since this posed internal ^{personnel} problems for CG&E involving pay-scales, employee relations, etc. His statement explains in detail, however, CG&E's intentions for six key departments at Zimmer. Scott's explanation agrees with the 5/18/79 letter from CG&E Vice President Earl Borgmann sent to RIII Director Keppler.

I, James R. Schott, Station Superintendent, CG&E Zimmer Station, P.O. Box 960, Cincinnati, Ohio, 45201, was contacted on 5/24/79 by Peter E. Baci, Investigator, USNRC and Tom Vandell, Project Inspector, USNRC at 0815 at the Zimmer Station site. I was advised of the nature of this inquiry and made the following voluntary statement _____

Following the ACRS Subcommittee Meeting held on Tuesday, February 27, 1979, I reviewed a copy of the Subcommittee transcript, specifically pages 120 thru 123, concerning station staffing. This review resulted because Mr. Harpster, Region III Inspector, indicated that my testimony was misleading in regard to our staffing plans, especially as the plans related to providing adequate backup personnel for key supervisory positions.

I reviewed and discussed this testimony with senior members of CG&E management and we concluded the statements were correct. I further indicated to Mr. Harpster on separate occasions that due to the apparent problems, I would clarify the issue at the full ACRS meeting.

During the full ACRS committee meeting held on March 9, 1979, I presented a staffing chart and briefly reviewed it with the aid of an overhead projector. Copies of the chart were also provided for each committee member. I felt this presentation satisfied all concerns. *JS*

I became aware that confusion and misunderstanding still existed early last week (May 15, 1979, or thereabouts) regarding the meaning of several of my statements. I was informed that an interview and statement may be required to close this matter out to the satisfaction of all concerned. I was concerned and rather appalled at this approach, but we agree that all misunderstandings should be adequately addressed.

Mr. Borgmann's letter of May 18, 1979, to Mr. Keppler, Director of Region III, in my opinion, clarified the situation, but Mr. Baci, the I&E Investigator, indicated the subject letter added confusion to what CG&E actually meant.

The following specific plans and intentions in the areas of operation, maintenance, I&C, rad-chem, technical and training should explain our position.

1. Operations - To provide a dedicated backup to the operations engineer, we intend to designate one of our senior shift supervisors as a daytime "assistant". This individual will not have concurrent shift or watch responsibilities, but will aide, assist, or perform other jobs as assigned by the Operations Engineer. This man will function as the principal in his absence.
2. Maintenance - A dedicated individual titled Maintenance Staff Engineer, has been assigned full time to the Maintenance Engineer. In this area of responsibility, the principal assigns work activities such as engineering, advice, review, and assistance. The Maintenance Staff


2. Maintenanc (cont'd.) - Engineer assumes the duties of the Maintenance Engineer in his absence and thus is the "dedicated backup".
3. I&C - Similar to maintenance, except the position has not been filled.
4. Rad-Chem - Similar to maintenance except two engineering specialists have been assigned to the principal. These individuals will receive experience and cross-training in the involved disciplines. At this time, the senior individual would function as the dedicated backup.
5. Technical - The technical staff is being expanded and present capability exists within this group to adequately back up the Technical Engineer.
6. Training - A training Supervisor has been appointed. This man is the dedicated backup to the Training Coordinator.

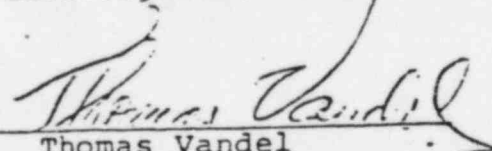
It is not my intent to indicate in writing, or include in individual job descriptions, that the above named individuals are "designated backups".

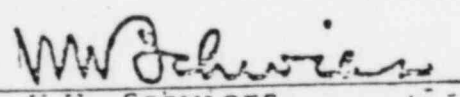
James R. Schott, have read the above statement, consisting of 2 1/2 typewritten pages. It is true and correct to the best of my knowledge. I have initialled any corrections or changes. Furthermore, I am aware that this statement may be used in a judicial proceeding.


 James R. Schott
 Date 5/29/79

Witnesses


 Peter E. Baci
 Investigator, USNRC
 Date 5-29-79


 Thomas Vandell
 Project Inspector, USNRC
 Date 5-24-79


 W.W. Schwiers
 Principal Quality Assurance
 & Standards Engineer
 Date 5-24-79



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

AS

AUG 2 1978

Docket No. 50-358

Cincinnati Gas and Electric
Company
ATTN: Mr. Earl A. Borgmann
Vice President Engineering
139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

This refers to the inspection conducted by Mr. T. L. Harpster of this office on May 23-26 and June 22-23, 1978, of activities at Wm. H. Zimmer Nuclear Power Station authorized by NRC Construction Permit No. CPPR-88 and to the discussion of our findings with you and Messrs. S. Salay, J. Schott and others of your staff during the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection. We do wish to point out a potential staffing problem as it relates to the support of the preoperational testing program, which if not resolved in a timely manner could have a negative impact on the operational preparedness of the plant as equipment and management control systems are turned over from contractors. Our concerns are summarized in the Report Details, Paragraph 2. Additional effort will be devoted to these areas in subsequent inspections to ensure that your organization can adequately conduct the preoperational testing and startup programs, and subsequent plant operations.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room, except as follows. If this report

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PDR

A/g

Cincinnati Gas and
Electric Company

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AUG 2 1978

contains information that you or your contractors believe to be proprietary, you must apply in writing, to this office within twenty days of your receipt of this letter, to withhold such information from public disclosure. The application must include a full statement of the reasons for which the information is considered proprietary, and should be prepared so that proprietary information identified in the application is contained in an enclosure to the application.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

James G. Keppler
Director

Enclosure: IX Inspection
Report No. 50-358/78-11

cc w/encl:
Mr. J. R. Schott, Plant
Superintendent
Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
U. Young Park, Power
Siting Commission

OFFICE	RIII <i>RFW</i>	RIII <i>RFW</i>	RIII <i>S</i>	RIII <i>RFW</i>	RIII <i>RFW</i>	RIII <i>RFW</i>
SURNAME	Harpster/bk	Warnick	Fiorelli	Vandell	Nordelius	Keppler
DATE	7/31/78				8/1/78	8/1

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report No. 50-358/78-11

Docket No. 50-358

License No. CPPR-88

Licensee: Cincinnati Gas and Electric Company
138 E. 4th Street
Cincinnati, Ohio 45201

Facility Name: William A. Zimmer Nuclear Power Station

Inspected At: William A. Zimmer Site

Inspection Conducted: May 23-26 and June 22-23, 1978

Inspector: *RFW for*
T. L. Harpster

7-31-78

Approved by: *RFWarnick*
R. F. Warnick, Chief
Reactor Projects Section 2

7-31-78

Inspection Summary

Inspection on May 23-26 and June 22-23, 1978 (Report No. 50-358/78-11)

Areas Inspected: Routine, unannounced inspection of plant procedures, operational and corporate staffing. The inspection involved 36 inspector-hours onsite by one NRC inspector.

Results: No items of noncompliance or deviations were identified. One unresolved item identified regarding staffing.

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DETAILS

1. Personnel Contacted

E. Borgmann, Vice President Engineering
S. Salay, Manager Electric Production
J. Flynn, Manager Licensing and Environmental Affairs
R. Dirr, Principal Mechanical Engineer
H. Brinkmann, Lead Project Engineer
C. Beringhaus, Principal Electrical Engineer
K. Chitkara, Principal Nuclear Fuel Group Engineer
J. Schott, Station Superintendent
W. Schwiers, Principal QA and Standards Engineer

The inspector also interviewed other licensee employees, including members of the General Engineering Department and the Reactor Operations staff.

2. Staffing

a. Operational Staffing

The inspector reviewed qualifications of personnel assigned to selected positions within the operating organization to ensure that: the organizational structure is in accordance with the Final Safety Analysis Report (FSAR); key staff positions are filled or will be filled prior to operating license issuance; and the qualifications of personnel assigned to these positions meet the minimum requirements established in the FSAR and ANSI 18.7-1971.

- (1) The reactor engineer does not meet the minimum requirements for this position as stated in the FSAR and ANSI 18.7. The reactor engineer is currently augmenting his experience by participating in startup activities at the Hatch Nuclear Station.

This item is considered to be unresolved.

- (2) The position of maintenance supervisor is vacant as a result of a staff resignation. The licensee is presently attempting to fill this position.
- (3) The licensee is increasing the size of the station engineering staff. Two engineers have been hired; one has resigned; additional engineers are being sought.

- (4) Presently, the QA/QC staff consists of one station quality engineer whose responsibilities include development of the QA program and implementing procedures for preoperational testing, startup and operations. Three additional positions have been proposed, but are unfilled for this area.

The inspector discussed selected inspection findings with Mr. E. Borgmann, Vice President Engineering and other corporate and station management personnel. The inspector emphasized that while minimum regulatory staffing requirements were satisfied (with the exception of the reactor engineer), the following observations were potential problem areas which could affect the licensee's ability to adequately conduct the preoperational and startup test programs, and which would influence subsequent power operations.

- (1) The size and limited experience of the plant staff would not be adequate to cope with the additional staffing problems created as a result of the normal attrition of personnel during the startup and test programs.
- (2) Because of the heavy reliance on contracted technical support, much of the base line knowledge and experience gained as a result of participation in the startup and test program would leave with the contracted support personnel.
- (3) Operational QA/QC controls would not be developed, implemented, and refined in time to be effective during the test and startup programs.

b. Corporate Staffing

The inspector interviewed selected management personnel at the corporate office to ascertain whether adequate technical support was available to support startup and test program activities and subsequent power operations at the Zimmer site.

The inspector discussed the following observations with both corporate and station management.

- (1) Personnel from the mechanical and electrical sections do not have the "plant system" knowledge that will be required to support subsequent plant operations.
- (2) There is presently no personnel in the electrical group with expertise in the plants complex instrumentation and control systems.

- (3) There is no corporate health physics expertise to backup the site.
- (4) The Nuclear Fuel Groups participation in the startup and test activities has not been resolved.

The inspector commented that the corporate technical staff needs to gain a baseline familiarity with the facility systems to be able to adequately augment the site personnel's expertise and to provide for the resolution of test deficiencies, analysis of transients and operational anomalies, design changes, etc., during the startup and test programs and subsequent plant operations.

c. Staffing Meeting

A meeting has been scheduled for July 13, 1978, in Bethesda, Maryland to discuss apparent weaknesses in the utilities organizational staffing. The meeting will be attended by Cincinnati Gas and Electric Company management, NRC Division of Project Management, and the Office of Inspection and Enforcement, Region III.

3. Plant Procedures

The inspector reviewed draft and approved administrative control procedures to determine the adequacy of management controls in implementing and maintaining a viable procedure system; and to confirm that the scope of the plant procedures system is adequate to control safety related operations within applicable regulatory requirements.

The inspector provided comments to the appropriate station staff members based on his review. Additional procedures will be reviewed as they become available.

4. Management Interviews

The inspector met with licensee representatives during the course of the inspection to summarize the scope and findings of the inspection.