

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

September 15, 1983
LOZ-83-0138

J. WILLIAMS, JR
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

Docket No. 50-358

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

Attention: Mr. J.G. Keppler
Regional Administrator

Gentlemen:

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT 1
I.E. INSPECTION REPORT NO. 83-07
W.O. 57300, JOB E-5590, FILE NO. 956C, IR 83-07

This letter constitutes our response to the subject Inspection Report and Notice of Violation. It is our opinion that nothing in this report is of a proprietary nature. Based on a telephone conversation between E.R. Schweibinz (NRC) and G.C. Ficke (CG&E), it was agreed that an extension would be granted for the submittal of this report from September 12, 1983 to September 15, 1983.

NOTICE OF VIOLATION - INSPECTION REPORT ITEMS 358/83-07-01(A)&(B)

The following is an excerpt from the Appendix to the NRC Letter dated June 28, 1983:

"Criterion X of Appendix B to 10 CFR states that a program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activities to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. Such inspections shall be performed by individuals other than those who performed the activity being inspected."

Section 1.9.6, QA Performance, of the Wm. H. Zimmer QA Manual states "KEI is responsible for providing QA to assure that performance of construction personnel, procedures, qualifications, or similar operations comply with specifications, codes, and other directives or requirements."

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Contrary to the above, in 1977 and 1978 the installation and testing of the HPCS and RHR-B pumps and motors were performed without adequate quality assurance involvement including review and inspection. No objective evidence of QA/QC involvement was found. Chapter 10 of the CG&E QA Manual in effect at the time of installation and testing did not require QA/QC involvement and written instructions were not provided covering these activities.

- a. RHR-B and HPCS pumps and motors installations.
- b. RHR-B and HPCS pumps and motors testing.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

CG&E has reviewed the circumstances described in Inspection Report 83-07 with respect to the apparent lack of QA/QC involvement during the installation and testing of the RHR-B and HPCS pumps.

CG&E recognizes that similar concerns have been identified in Inspection Report 83-08 with respect to the installation of the HVAC filter box and the SLCS tank and that the items of noncompliance from Inspection Report 83-07 have been upgraded to a generic item of noncompliance as identified in Inspection Report 83-10. The historical considerations and actions taken by CG&E to date are discussed in the following.

Although Section 10 of the CG&E QA Manual in effect at the time of installation and testing did not specifically require QA/QC involvement, HJK did have specific procedures in effect which were intended to:

1. "establish a uniform Quality Assurance - Construction coordinated system for installation of essential equipment", QACMI M-7, dated November 26, 1975, "Essential Equipment Installation Procedure" and;
2. "define the procedure for assuring that KEI

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inspection activities ... are performed to planned systematic written instructions", QAP-7 (Rev. 2), dated May 6, 1976, titled "Inspection Planning".

These procedures provided for pre-installation verification and installation inspection requirements.

HJK issued Field Construction Procedure (FCP) 2-121, "Installation Procedure of Residual Heat Removal Pumps, Low Pressure Core Spray Pumps, and High Pressure Core Spray Pump", dated 4/8/77 and FCP 2-118, "Mechanical Equipment - Rotating Equipment", dated 2/23/77. These FCPs were intended to provide guidance to construction on the method of installation and the method for documenting the construction erection and testing of Mechanical Equipment. The HJK QA procedural requirements were separate from these FCPs. The "QA Status" section identified on the FCP addresses the requirement for additional QA procedural requirements as a result of the FCP. The existing HJK-QA program provided for QA verification and documentation to ANSI N45.2.8 through QACM1 M-7, and QAP-7, which were the guidance in performing and preparing the necessary documentation required for verifying proper installation.

CG&E recognizes the apparent lack of evidence of QA/QC involvement during the installation of the subject pumps. However, considering the information provided above, CG&E feels that the documents providing objective proof of QA/QC involvement may exist. In order to resolve the issues identified in Inspection Report 83-07, as well as address the generic implications of this finding, CG&E will review the documentation for all safety related equipment installation and testing to determine where documentation deficiencies exist and perform a reinspection program for those areas identified. The reinspection will establish the adequacy of the original installation, or necessary corrective action will be initiated.

CG&E will keep NRC Region III apprised of this effort and will supplement this letter with a final response.

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CORRECTIVE ACTION TO AVOID FURTHER NONCOMPLIANCE

In addition, Chapter 10 of the CG&E QA Manual has been revised to require HJK to perform the Quality Control inspection function for safety related construction activities. HJK has implemented GCP-3 which describes the methods and activities to assure timely QA/QC inspection and proper documentation. HJK QAP-7 (Rev. 12) requires specific construction inspection plans (CIP) be prepared for activities performed on a one time or interim basis (such as pump installations). The CIP is required to be submitted to CG&E QAD for review and approval prior to the initiation of work. Construction procedure, GCDP-2.1, "Mechanical Rotating Equipment Installation Checklist and Construction Phase Initial Operation", provides for CG&E QA review of the construction and testing documentation during field erection and initial construction start-up.

Any further corrective action will be addressed in the supplementary response based upon the results of the documentation review.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

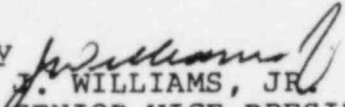
The date when full compliance will be achieved will be provided in the supplementary response to this letter. CG&E considers the current QA program for the ZPS to be adequate for full compliance to 10 CFR 50, Appendix B in this area.

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We trust that the above will be found acceptable as an interim response pending completion of the ongoing efforts which have been implemented to address the subject Inspection Report items of non-compliance.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
J. WILLIAMS, JR.
SENIOR VICE PRESIDENT

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cc: NRC Office of Inspection & Enforcement
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