

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

October 21, 1983
LOZ-83-0195

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. 83-12
W.O. 57300, JOB E-5590, FILE NO. 956C,

This letter transmits our response to the Items of Noncompliance identified in the subject Inspection Report.

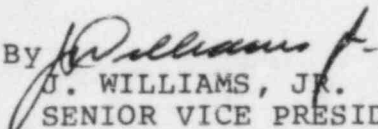
The following attachments are provided for your review.

Attachment 1 - Item of Noncompliance 358/83-12-02
Attachment 2 - Item of Noncompliance 358/83-12-03

We trust the attachments will be found acceptable as a final response to the Items of Noncompliance identified in Inspection Report 83-12.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
J. WILLIAMS, JR.
SENIOR VICE PRESIDENT

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Regional Administrator
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cc: NRC Office of Inspection & Enforcement
Washington, D.C. 20555
NRC Resident Site Supervisor
ATTN: W.M. Hill
NRC Zimmer Project Inspector, Region III
ATTN: E. R. Schweibinz

INSPECTION REPORT #83-12
(LOZ-83-0195)
ATTACHMENT 1

Inspection Report Item: 358/83-12-02, Item of Noncompliance

NRC Findings:

The following documents provide guidance concerning the processing of Corrective Action Requests (CARs), Condition Evaluation Requests (CERs) and Management Corrective Action Requests (MCARs).

- 10 CFR 50, Appendix B, Criterion V
- CG&E Quality Assurance Manual, Paragraph 5.1
- CG&E Quality Assurance Procedure, 16-QA-03, Revision 3.

Contrary to the above, CG&E Quality Engineering failed to follow the requirements of procedure 16-QA-03 in the processing of CAR 81-25 and numerous other corrective action documents as demonstrated by exhibits 1 and 2 of Inspection Report 50-358/83-12. These failures to follow procedure 16-QA-03 included the cancellation of CARs and MCARs which represents a repeat item of noncompliance (noncompliance item 358/82-05-01 related to unresolved item 358/81-32-06). These failures to follow procedure 16-QA-03 could have resulted in conditions evaluated as being adverse to quality (by CG&E quality engineers) remaining uncorrected.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

The cause of this condition has been determined to be a lack of sufficient training of QA engineers to the procedural requirements and the lack of procedural controls to encompass the entire range of conditions which may be identified. MCAR 83-13 has been issued to provide corrective action for this item.

A complete evaluation of every CG&E CER, CAR, MCAR issued prior to the implementation date of the preventive action described below, will be performed by the Corrective Action Reverification Group (RG) in accordance with the MCAR 83-13 procedure, "Reverification of the CG&E Corrective Action Program". This group is independent of the Quality Engineering organization and shall evaluate correctness in processing as well as the documented resolution, verification and close-out of the subject documents. Deficiencies will be appropriately documented for resolution.

The following steps are being taken as part of the corrective action to this Item of Noncompliance.

1.) Procedures

- Develop MCAR 83-13 procedure, "Reverification of the CG&E Corrective Action Program".

2.) Training of RG Personnel

Training shall be conducted on existing corrective action program and nonconformance program requirements and the "Reverification of the CG&E Corrective Action Program Procedure (MCAR 83-13)". The RG shall not commence work until training is complete.

3.) Organization

A new organization within the CG&E Quality Assurance Department has been established. This organization is headed by the QA Director - Corrective Action Controls and includes the corrective action RG. This organization is also responsible for tracking to assure timely close-out, trending of corrective action documents, and review of deficiency document packages to ensure procedure compliance.

CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

In addition to establishment of a new organization as discussed above, a new program is being developed under the FSAR, Chapter 17.1, (latest revision), and implemented for the handling CER's, CAR's and MCAR's.

The revised program and procedures will clarify the characteristics of problem description, disposition review for acceptability, review for reportability and verification of proper implementation.

In addition, to provide interim action to preclude recurrence, all appropriate CG&E Quality Assurance Department personnel involved in initiating, evaluating, approving dispositions, and verifying implementation of approved corrective and preventive action are being trained to ensure proper interpretation and implementation of the present OPP 7.3, and 16-QA-03. Preventive action on a long-term basis

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will also include training of all appropriate personnel after development, and prior to implementation, of the new revised program and procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The revised program and procedures are scheduled to be approved and fully implemented by January 1, 1984. The NRC will be informed of the results of the reviews and any completion schedule changes.

INSPECTION REPORT #83-12
(LOZ-83-0195)
ATTACHMENT 2

Inspection Report Item: 358/83-12-03, Item of Noncompliance

NRC Findings:

The following documents provide guidance concerning the processing of Corrective Action Requests (CARs), Condition Evaluation Requests (CERs) and Management Corrective Action Requests (MCARs).

- 10 CFR 50, Appendix B, Criterion XVI
- Wm. H. Zimmer Final Safety Analysis Report
Chapter 17

Contrary to the above, corrective actions taken to resolve deficiencies identified in MCAR 82-12 were not independently evaluated for adequacy and were not promptly carried out to assure that the cause of the condition identified in MCAR 82-12 was determined and corrected.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

As discussed in CG&E's response to Item of Noncompliance 358/83-12-02, a new organization within the CG&E Quality Assurance Department has been established. This organization is headed by the QA Director - Corrective Action Controls and is independent of the Quality Engineering Organization. This new organization is responsible for performing a complete evaluation of every CG&E CER, CAR, and MCAR issued prior to the implementation date of the preventive action described below.

In addition, the following actions have been initiated as part of the corrective action to this Item of Noncompliance.

1). Procedures

- Develop MCAR 83-13 procedure, "Reverification of the CG&E Corrective Action Program.

2). Training of RG Personnel

Training shall be conducted on existing corrective action program and nonconformance program requirements and the "Reverification of the CG&E Corrective Action Program Procedure (MCAR 83-13)". The RG shall not commence work until training is complete.

CORRECTIVE ACTION TAKEN TO PREVENT RECURRENCE

A new organization within the CG&E Quality Assurance Department has been established. This organization is headed by the QA Director - Corrective Action Controls and includes the corrective action RG. This organization is also responsible for tracking to assure timely close-out, trending of corrective action documents, and review of deficiency document packages to ensure procedure compliance.

In addition, a new program is being developed under the FSAR, Chapter 17.1, (latest revision), and will be implemented for the handling of CER's, CAR's and MCAR's.

The revised program and procedures will clarify the characteristics of problem description, disposition review for acceptability, review for reportability and verification of proper implementation.

This new program will provide for an independent evaluation of deficiency document disposition by an organization other than the one against whom the deficiency was addressed. An independent document package review will also be conducted for all corrective action documents being processed.

In addition, all appropriate CG&E Quality Assurance Department personnel involved in initiating, evaluating, approving dispositions, and verifying implementation of approved corrective and preventive action are being trained to ensure proper interpretation and implementation according to OPP 7.3, and 16-QA-03. Preventive action on a long-term basis will also include training of all appropriate personnel after development, and prior to implementation, of the new revised program and procedures.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The revised program and procedures are scheduled to be approved and fully implemented by January 1, 1984. The NRC will be informed of the results of the reviews and any completion schedule changes.