

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-358/83-26(OSC)

Docket No. 50-358

License No. CPP-88

Licensee: Cincinnati Gas and Electric Company  
139 East Fourth Street  
Cincinnati, Ohio 45201

Facility Name: Wm. H. Zimmer Nuclear Power Station

Inspection site: Wm. H. Zimmer Site, Moscow, Ohio

Inspection Conducted: December 6, 1983, through January 6, 1984

Inspectors: *W. L. Forney for*  
T. P. Gwynn 1/18/84  
Date

*W. L. Forney for*  
E. H. Nightingale 1/18/84  
Date

Reviewed By: *W. L. Forney for*  
W. M. Hill, Jr. 1/18/84  
Resident Site Supervisor Date

Approved By: *W. L. Forney*  
W. L. Forney, Chief 1/18/84  
Section 1, Office of Special Cases Date

Inspection Summary

Inspection during the period December 6, 1983, through January 6, 1984  
(Report No. 50-358/83-26(OSC))

Areas Inspected: Routine and reactive, unannounced inspection by the resident inspectors of licensee action on previous inspection findings, licensee action on I&E Circulars, Quality Confirmation Program nonconformance report review, and plant tours. This inspection involved a total of 111 inspector-hours onsite by two resident inspectors and a resident site supervisor including 18 inspector-hours onsite during offshifts.

Results: Of the four areas inspected, no items of noncompliance or deviations were identified.

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## DETAILS

### 1. Personnel Contacted

#### Cincinnati Gas and Electric Company

- J. Williams, Jr., Senior Vice President
- \*G. Cole, Assistant Vice President - Nuclear Projects
- \*D. Cruden, Assistant Vice President - Nuclear Operations
- \*E. Wagner, Assistant Vice President - Engineering
- \*G. Ficke, Manager, Nuclear Licensing Department (NLD)
  - D. Hyster, Manager, PVQC and Nuclear Support Services
- \*J. Pearson, Manager, Nuclear Construction Department
- \*J. Shaffer, Manager, Quality Assurance Department (QAD)
- \*D. Chamberlain, Director, Region III Interface, NLD
- \*G. Orlov, Director, Quality Confirmation Program (QCP)
  - D. Spence, Director, Quality Engineering, QAD
  - D. Wille, Assistant Director, QCP
- \*J. Espy, Training Coordinator, QAD
- \*J. Jones, Coordinator, QCP Task VII
- R. Rinderman, Auditor, QAD

The inspectors also interviewed other licensee and contractor personnel during the course of the inspection.

\*Denotes those attending the exit interview.

### 2. Licensee Action on Previously Identified Items

- a. (Closed) Open Item (358/83-09-04): During NRC review of QCP Tasks II, III, IV, and V, dispositioned nonconformance reports concerns were identified with the dispositioning of NR's, descriptions of the NR's, corrective action to prevent recurrence, and cause. Quality Engineering was to address NRC concerns regarding nonconformance reports which were not satisfactorily closed.

The inspector reviewed Quality Engineering actions taken to correct the concerns. Further discussions of these actions are identified in paragraph 4 below, in Inspection Report No. 50-358/83-09, Details II, paragraph 2 and in Inspection Report No. 50-358/83-24, paragraph 3.b. Additional concerns with regard to the disposition of NR's are being addressed in unresolved item 358/83-08-05. Based upon the action of the licensee, the inspector has no further concerns at this time.

- b. (Open) Open Item (358/82-11-05): The resident inspectors will follow the resolution of NR No. C-QAD-82-3483-E, Revision 0, August 24, 1982, which addresses multiple areas where the provisions for material storage in laydown areas were questionable.

The inspector verified that the deficiencies identified by the NRC in laydown areas had been corrected. Identification, segregation, and isolation meet the requirements of H. J. Kaiser procedures FWP-1 (Material Requisition and Warehousing) and FWP-2 (Steel and Piping Material Control). However, review of NR C-QAD-82-3483-E indicated that processing was incomplete. Discussion with licensee personnel revealed that the original disposition of the NR was rejected by the licensee. The NR disposition was being revised and submitted to the constructor for action. This item remains open pending the completion of all corrective actions and final processing.

No items of noncompliance or deviations were noted.

3. Licensee Action on I&E Circulars

(Open) Circular (358/80-22-CC): "Confirmation of Employee Qualifications"

The NRC inspector reviewed licensee files concerning this circular. The inspector determined that the final response contained therein was incomplete and did not address the utility's employment procedures and policies as recommended by the circular. The information provided by Sargent and Lundy was adequate.

The licensee stated that their employment policies were consistent with the information provided in the circular, but the documented response did not address those policies. The licensee stated that a revised response to this circular would be documented. This item remains open pending review of the revised response.

No items of noncompliance or deviations were noted.

4. QCP Nonconformance Report (NR) Review

a. QCP Tasks II, III, & V NR Review

A total of 77 nonconformance reports pertaining to QCP Tasks II, III, and V were reviewed during this report period. The attachment to this report lists the NRs reviewed.

The following NRs, which required further information and/or verification, have been addressed by the CG&E Quality Records Review Group to the NRC inspectors' satisfaction:

E-8828	C/N 9164	E-11,212	E-11,215	E-11,237
E-11,427	E-12,085			

Based upon the NRC inspector's comments, the CG&E Quality Records Review Group indicated that the following closed nonconformance reports required further action:

- (1) E-9672 "REOPEN NR - needs to identify corrective action and cause. HJK to be directed by letter to reopen NR."
- (2) E-10,994 QD "REOPEN NR - Disposition is correct except for the heat numbers used (421W3111). This should have been 402W3592, 1/8 rod, as identified on KE-1 form. 402W3592 is a good heat number and would be easy to transpose as 421W3592. KE-2 form shows rod size as 3/32. This should have been 1/8 as called out by KE-1 form. HJK to be directed by letter to reopen NR."
- (3) E-12,547 "REOPEN NR - Corrective action on this NR is incorrect. There are other NRs pertaining to the same thing, therefore not an isolated case. HJK to be directed by letter to reopen NR."
- (4) Draft NR (9243) dated 9/20/82 "REOPEN NR - Concerns are valid. QRM-1 is not the proper way to close this NR. HJK to be directed by letter to reopen NR."
- (5) E-12,764 Q "This was discussed with HJK NDE Level III and he also states that he does not agree with the disposition, cause and corrective action, and will redispotion during review cycle."

The NRC inspector reviewed this information and identified no unsatisfactory conditions.

b. QCP Task VII - Action Related to NRC Concerns

As discussed in Inspection Report 50-358/83-12, paragraph 6.c., the licensee stopped work on QCP Task VII review of voided nonconformance reports pending determination and implementation of necessary corrective action.

The licensee notified the NRC inspector that necessary corrective actions had been determined and implemented. Those actions included the following:

- (1) QCP Procedure 9.18, Review and Processing of Voided Nonconformance Reports, was issued December 1, 1983. This procedure replaced procedure 19-QA-18 of the same title.

- (2) Training was held for all QCP Task VII personnel and review committee members. This training discussed the problems which lead to the stop work, the corrective actions taken, and the specific requirements of the revised procedure. This training session was addressed by the CG&E Assistant Vice President, Nuclear Projects, concerning the importance of the voided NR review and other QCP activities, and was attended by the NRC Senior Resident Inspector.
- (3) The concerns identified by the NRC were documented on CG&E Condition Evaluation Request (CER) 83-473. The CG&E Director, QCP, stated that as a result of these concerns, QCP Task VII would review the past work of one individual, would assure that altered documents were not used to justify the closure of voided NRs, and that NRs not previously reviewed by the NRC would be rereviewed by QCP Task VII under the revised procedure prior to NRC review.

As a result of the above, QCP Task VII released the stop work and resumed review of previously voided H. J. Kaiser nonconformance reports.

The inspector will continue to monitor QCP Task VII activities.

c. QCP Task VII - Review of Previously Voided H. J. Kaiser NRs

The inspector continued to monitor the activities of QCP Task VII. The inspector reviewed three previously voided H. J. Kaiser nonconformance reports falling into two distinct categories:

- (1) Category 1 NRs consisted of those reports which were written against essential, safety-related items and which had been "voided" rather than "superseded". The review consisted of determining that the exact problem identified on the original (voided) NR had been copied on the superseding NR. This review was performed after each voided NR and superseding document had been submitted to and approved by a review committee per CG&E Quality Confirmation Program Procedure 9.18, "Review and Processing of Voided Nonconformance Reports." The following nonconformance reports were in category 1:

E-2916      E-682

- (2) Category 2 NRs consisted of those reports which were written against essential, safety-related items and which were dispositioned "Accept-As-Is" by the voided NR review committee.

Those items dispositioned "Accept-As-Is" were either written in error by the originator or were written against conditions which no longer exist. The following nonconformance report was in category 2:

E-2244

No items of noncompliance or deviations were identified.

5. Plant Tours

The inspector conducted frequent plant tours throughout the inspection period. These tours included verification of licensee action under the NRC Show Cause Order, dated November 12, 1982, observation of maintenance activities, verification of security controls, fire protection, cleanliness, postings, and observation of CG&E Quality Assurance Department training activities. The inspectors observed the following:

a. CG&E/Contractor Exit Interviews

The NRC resident inspectors requested to speak with all terminating QA/QC and records review personnel after their employment exit interviews and prior to leaving the site, in other than group exit situations. This request was made in order to provide an opportunity for each individual to discuss their views and concerns with an NRC inspector, if they so desire.

Prior to their leaving the site, 8 individuals were interviewed during this inspection period by the NRC resident inspectors. All concerns identified during these interviews will be evaluated by the NRC. This evaluation will consist of a review of the acceptability of the licensee's actions regarding concerns provided to them and an evaluation of those items that were only presented to the NRC.

b. CG&E Quality Assurance Department (QAD) Training - Project Quality Assurance Manual (PQAM)

The inspector reviewed the lesson plan and attended one training session presented by the QAD for the new PQAM. The objectives of the training were directed at a clear student understanding of the new site organizational structure, organizational responsibilities and relationships, and a general knowledge of the contents of the PQAM. The presentation by QAD training met the stated objectives. The inspector had no comments. The inspector noted that a previous comment related to glare from the overhead projector had been resolved.

6. Errata

a. Inspection Report 50-358/83-04

Page 3, paragraph 2.a.(ii), (Task VII) column 3; E-2256 should read E-2556.

b. Inspection Report 50-358/83-09

Page 8, paragraph 5.a.(iii), (Task VII) column 4; E-2581 should read C/N-2581.

7. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) throughout the month and at the conclusion of the inspection on January 6, 1984. The inspectors summarized the scope and findings of the inspection activities. The licensee acknowledged the inspectors' findings.

Attachment to Inspection Report 50-358/83-26

The following H. J. Kaiser Task II nonconformance reports (dispositioned) were reviewed during this report period:

E-4634 QD R1	E-8050 D	E-8411 D	E-8519 D
E-8527 QD R1	E-8573 D	E-8719 QD	E-8721 D
E-8724 D	E-8862 QD	E-9191 QD	E-9311 QD
E-9356 QD	E-9428 QD	E-9469 QD	E-9681 QD
E-9756 QD	E-9949 QD	E-9999 QD	E-10,205 QD
E-10,293 QD	E-11,280 QD	E-11,619 QD	E-12,725 Q

The following H. J. Kaiser Task II nonconformance reports (closed) were reviewed during this report period:

E-4284	E-4598 R1	E-4836	E-4837
E-4839	E-4840	E-8096 D	E-8275 D
E-8333 D R1	E-8461 D	E-8518 D	E-8525 D
E-8556 D	E-8663 QD	E-8725 D	E-8785 D
E-8786 D	E-8894 D	E-8896 D	E-9250 QD
E-9294 QD	E-9306 QD R1	E-9319 QD	E-9357 QD
E-9382 QD	E-9421 QD	E-9591 QD	E-9702 QD
E-9705 QD	E-9754 QD	E-11,392 QD	E-11,540 QD
E-11,543 QD	E-11,544 QD	E-12,582 Q	E-13,000 Q

The following H. J. Kaiser Task III nonconformance reports (dispositioned) were reviewed during this report period:

CN-12,001	E-3512 Q R1	E-3601 Q	E-3985 Q R1
E-11,048 QD	E-12,085 QD	E-12,547	

The following H. J. Kaiser Task III nonconformance reports (closed) were reviewed during this report period:

E-8828 QD	E-9112 QD	E-9502 R1	E-11,657 Q
E-11,658 Q	E-11,670 Q	C/N-9294	C/N-10,166
C/N-12,453			

The following H. J. Kaiser Task V nonconformance report (dispositioned) was reviewed during this report period:

E-11,430 Q

Definition of Symbols:

D = Identified by H. J. Kaiser document review  
Q = Related to the CG&E QCP  
R = Revision