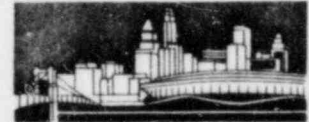


THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

J. WILLIAMS, JR.
SENIOR VICE PRESIDENT
NUCLEAR OPERATIONS

50-358

Mr. A. J. Neylan
Project Manager
Torrey Pines Technology
P.O. Box 85608
San Diego, California 92138

9-12-83
Received NRC
V.C.
P.G. ✓
E.N.

August 30, 1983
JW-SC-0085

PRINCIPAL STAFF	
✓ RA	ENF
D/RA	SCS ✓ orig + 3
A/RA	PAO
DPRP	SLO
DRMA	RC ✓
DRMSP	
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ML	
OL	FILE ✓

Dear Mr. Neylan:

We are in receipt of your letter dated August 19, 1983 forwarding copies of TPT's final report No. GA-C17173 entitled "Independent Review of Zimmer Project Management" dated August 1983.

In the process of reviewing your report and preparing our comments to the NRC, a question has arisen on the interpretation of one of the report's recommendations.

In Volume I, page 22, Section 4.1.1 it states:

"The QVP should include: (1) an independent design review to determine if the design for Zimmer has been properly executed and documented."

Likewise, in Volume II, page 11-14, Section 11.11.2 it states that TPT sees that the steps leading to the satisfactory completion of the QVP are as follows:

"2. Determination of Quality Status. Verification of design validity. Verification of "as is" construction configuration. Determinations of record document status."

On page 11-15 of Volume II, in Step 2 it states:

"Verify the validity of the design by systematic review of the design of plant systems..."

These three statements outlining the recommendation could be interpreted to require an independent design verification of the entire plant, and that this design verification be an integral part of the QVP preceding the actual verification of quality construction. They could also be interpreted to mean that an independent design verification be performed in a manner consistent with current NRC approved practice wherein one selected safety-related system is thoroughly reviewed and a multi-discipline review of the entire design process is conducted in order to confirm proper design, and

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Certified By L. E. Spiden

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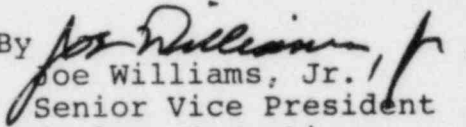
Mr. A. J. Neylan
Page 2
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that this verification be conducted in parallel with the verification of quality construction. It is Zimmer's feeling that the latter interpretations are appropriate to our situation and it is our intention to follow that course.

In my telephone conversation with you on August 26, 1983, you indicated agreement with our interpretation as stated above. I would appreciate your confirming my understanding.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
Joe Williams, Jr.
Senior Vice President
Nuclear Operations

JW/WW/tc

cc: NRC Office of Inspection & Enforcement
Washington, DC 20555
NRC Senior Resident Inspector
ATTN: W.F. Christianson
NRC Zimmer Project Inspector, Region III
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