

JUN 20 1984

Docket No. 50-358

The Cincinnati Gas and Electric
Company

ATTN: Mr. Edwin J. Wagner
Assistant Vice President
Nuclear Engineering
139 East 4th Street
Cincinnati, OH 45201

Gentlemen:

On November 16, 1983, you submitted, for our review, the latest revision of The Cincinnati Gas and Electric Company Quality Assurance Program that is included in the Wm. H. Zimmer Nuclear Power Station-Unit 1 FSAR, Revision 98, dated October 28, 1983.

The initial review has been completed. The NRC Summary of Review and Information Needs, provided herewith as an enclosure to this letter, has been entered into the Region III files of the Wm. H. Zimmer Nuclear Power Station-Unit 1. At this time, no additional action by The Cincinnati Gas and Electric Company regarding this matter will be required. If in the future, the Wm. H. Zimmer Nuclear Power Station-Unit 1 is reinstated, the items in the enclosure will require a satisfactory response from The Cincinnati Gas and Electric Company so that the review can be completed.

If you have any questions concerning this matter, please contact Ray N. Sutphin (312-790-5500) who has been assigned as Lead Reviewer for your submittal.

Sincerely,

Original signed by C. E. Norelius
C. E. Norelius, Director
Division of Project and
and Resident Programs

Enclosure: Summary of Review
and NRC Information Needs-Zimmer
QA Program for Design and Construction

cc w/encl: See attached list

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The Cincinnati Gas and Electric
Company

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cc w/encl:

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G. C. Ficke, Manager, Nuclear
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DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Ohio EPA
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James W. Harris, State of Ohio
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Zimmer Area Citizens

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Summary of Review
and
NRC Information Needs

Zimmer QA Program for Design and Construction

1. CG&E Commitment Section 17.1.1.2.2 "Zimmer Oversight Committee (ZOC)"

CG&E Statement:

"This committee is assisted by an advisory staff of professional technical advisors and a community leader."

NRC Concern:

To be consistent with NUREG-0800, more detail would be useful regarding; location, qualifications and criteria for determining the number of personnel performing this function. Also it is not clear how this committee and its advisory staff interface.

2. CG&E Commitment Section 17.1.1.2.8 "The Assistant Vice President for Quality Assurance" and Figure 17.1.1-1 "Zimmer Integrated Project Organization For PVQC & CCP"

GC&E Statement:

The Assistant Vice President for Quality Assurance is also responsible for assuring effective interfacing for quality matters between CG&E organizations and managers of the primary contractors.

NRC Concern:

Figure 17.1.1-1 only shows interfacing communications line between the manager, Quality Assurance Department for CG&E and the Bechtel Power Corporation Quality Assurance head. Clean interface communications with the other principal contractors, (i.e., Sargent & Lundy Engineers, General Electric Company, and Henry J. Kaiser Company) must be assured.

3. CG&E Commitment Figure 17.1.1-1 and -2

CG&E Statement:

Figure 17.1.1-1 Zimmer Integrated Project Organization for PVQC and CCP.

NRC Concern:

To be consistent with NUREG-0800, the "onsite" and "offsite" organizational elements need to be clearly identified.

4. CG&E Commitment, Section 17.1.2.1 "QA Program Requirements"

CG&E Statement:

The CG&E QA program provides for program controls to be in effect for the design, procurement, and construction activities and for formal turnover of those structures, systems, and components to ZPS-1 operations organizations.

NRC Concern:

To be consistent with NUREG-0800, a summary description should be provided on how responsibilities and control of quality-related activities are transferred from the principal contractors to the applicant during the phaseout of design and construction and during preoperational testing and plant turnover.

5. CG&E Commitment Section 17.1.3.1.2.6 "Design Control Requirements"

CG&E Statement:

Methods for reviewing design documents to assure those documents are prepared, reviewed, and approved in accordance with procedures and that they contain the necessary quality assurance requirements---

NRC Concern:

It is not clear that drawings and specifications, etc. are reviewed by the QA Organization as outlined in NUREG-0800.

6. CG&E Commitment Section 17.1.7.1.5 "Control of Purchased Material Requirements"

CG&E Statement:

Commercial grade items or materials---may be ordered from the manufacturer/supplier on the basis of specifications set forth in the manufacturer's published product description or as set forth in a nationally recognized non-nuclear standard, and whose acceptability can be readily determined during inspection and/or construction test or inspection.

NRC Concern:

It is not clear that special quality verification requirements shall be established and described to provide the necessary assurance of the acceptable item by the purchaser of commercial "off-the-shelf" items as outlined in NUREG-0800.

7. CG&E Commitment Section 17.1.10.1.3 "Inspection Requirements"

CG&E Statement:

The inspection equipment required to be calibrated is verified to be in current calibration prior to performing inspections. Inspection documentation identifies the calibrated equipment employed during inspection activities.

NRC Concern:

It is not apparent that criteria for determining the accuracy, requirements of inspection equipment will be included in the program procedures. Also, it is not clear in 17.1.10.1.11 that the accuracy requirements of the measuring and test equipment are to be specified on records related to the inspection.

8. CG&E Commitment Section 17.1.17 "Quality Assurance Records"

CG&E Statement

When single storage facilities are utilized, they are constructed, located, and secured to prevent destruction of the records by fire, flooding, theft and deterioration by environmental conditions such as temperature or humidity.

NRC Concern:

It is not clear that suitable facilities for the storage of records satisfy the regulatory position given in Regulatory Guide 1.88 (endoring ANSI N45.2.9), or that as an alternate that the storage facilities conform to NFPA No. 232 Class 1.