

DMB

July 25, 1984

Docket No. 50-358

Cincinnati Gas and Electric  
Company  
ATTN: J. R. Schott  
Site Manager  
139 East 4th Street  
Cincinnati, OH 45201

Gentlemen:

Thank you for your letter of September 23, 1983, informing us of additional steps you have taken to correct the noncompliance which we brought to your attention in Inspection Report 50-358/82-10 forwarded by our letter dated March 25, 1983. In view of your closing work on the Zimmer Station as a nuclear plant, the layoff of personnel and your Motion for Withdrawal of Application filed with the Atomic Safety and Licensing Board (ASLB), Region III does not plan any further action regarding this matter.

Sincerely,

"Original Signed By J. J. Harrison" for

R. F. Warnick, Chief  
Reactor Projects Branch 1

cc: G. C. Ficke, Manager, Nuclear  
Licensing Department

See Distribution Next Page

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Cincinnati Gas and Electric  
Company

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July 25, 1984

cc w/ltr dtd 9/23/83:  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
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MVPP/CASE  
James W. Harris, State of Ohio  
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Zimmer Area Citizens

THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

September 23, 1983  
LOZ-83-0146

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 82-10  
W.O. 57300, JOB E-5590, FILE NO. 956C, IR-82-10

This letter supercedes our previous response to the subject Inspection Report. The information contained herein provides additional details regarding implementation activities associated with the corrective actions proposed. It is our opinion that nothing in this report is of a proprietary nature.

NRC ITEM OF NONCOMPLIANCE 358/82-10-01(A)

The following documents provide guidance concerning the maintenance of welder qualification:

- \* 10 CFR 50, Appendix B, Criterion IX
- \* Wm. H. Zimmer Quality Assurance Manual, Paragraph 9.3
- \* ASME Code, Section III, Paragraph NA-4220
- \* ASME Code, Section IX, Paragraph Q-26
- \* AWS Code D1.1-1972, Section 5.30

Contrary to these requirements, the method employed by the H.J. Kaiser Project Weld Engineer for verifying that a welder used a specific process to maintain current qualification status was not comensurate with the applicable code requirements. The KE Weld-2 form by itself did not provide objective evidence that the welder had actually used the specific process.

A. Corrective Action Taken And Results Achieved

The method used for verifying that a welder had used a specific process was described in WCP-2, Rev. 0, TCN #2-3

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(dated 6-7-82), and subsequently WCP-2, Rev. 1, Section 4.1.27, which states in part:

"For previously qualified welders holding valid 'Welder Qualification Cards', a new card will be prepared (in ink) which will show (on backside) all procedures to which the welder is certified as qualified. The card, when completed, will be dated and laminated. The 'Welder Qualification Card' will automatically void at 90 days after issue. By review of the rod withdrawal log before the card is reissued to the welder, the welders recent (within the 90-day period) welding activities will be critiqued for performance of welds to the indicated procedures/processes. If an indicated process has not been used during the allotted (90 day) time period, it will be deleted from the welders qualification listing and a requalification will be mandatory."

The example cited of this noncompliance describes the issuance of a welders qualification card which was not in compliance with the established welder's qualification maintenance system delineated in WCP-2. Personnel changes have been made and procedures revised for the update of welder qualification cards. The Qualification Card for Welder MGG was recalled by Welding Engineering and returned on July 20, 1982. Subsequently, a new (updated) card was issued to Welder MGG in accordance with the process for Welder Qualification Maintenance.

The above described incident cannot be determined to be an isolated incident. The Computerized Welding Information System (CWIS) program has been established for welder qualification maintenance prior to November 12, 1982. This program will identify welder qualification maintenance by quality documentation or by supporting documentation in those cases where qualification maintenance cannot be established by a quality document. If Welder Qualification Maintenance cannot be established for a particular welder and had the welder welded during the time when he was not qualified, a

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deficiency document shall be generated and appropriately dispositioned.

HJK is revising procedures used to maintain welder qualifications to require objective evidence that a welder had actually used a specific process. The procedures will be available for NRC review by November 30, 1983.

B. Corrective Action To Avoid Further Noncompliance

CG&E will assure that programs for welder qualification will be audited semi-annually to verify compliance with revised procedures.

C. Date Full Compliance Will Be Achieved

Full compliance will be achieved upon issue of the revised procedures.

NRC ITEM OF NONCOMPLIANCE 358/82-10-01(B)

The following documents provide guidance concerning the maintenance of welder qualification:

- \* 10 CFR 50, Appendix B, Criterion IX
- \* Wm. H. Zimmer Quality Assurance Manual, Paragraph 9.3
- \* ASME Code, Section III, Paragraph NA-4220
- \* ASME Code, Section IX, Paragraph Q-26
- \* AWS Code D1.1 - 1972, Section 5.30

More specifically, the HJKaiser Quality Assurance Procedure, QAP-10, and Weld Construction Procedure, WCP-2, identified the requirement to establish and accurately maintain a computerized welder qualification listing.

Contrary to these requirements, the computerized printout of qualified welders was not being maintained, and the HJ Kaiser list of Active Welders, dated July 9, 1982, did not accurately reflect the qualifications of welder, (e.g. symbol LMF) as indicated on the welder's qualification card.

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A. Corrective Action Taken And Results Achieved

Since the time of the inspection, the need for welder listings and subsequent use of the listings has been investigated and clarified. The "Welder Qualification Listing" referenced in QAP-10, Paragraph 3.2.3.7, is a separate "welder listing" and has a different function than the "Active Welders List" reflected in WCP-2, Paragraph 3.2.1 (now referred to as the "Current Welders List", per WCP-2, Rev. 2, Paragraph 3.3.3.).

The "Welder Qualification Listing" per QAP-10 is intended to be a listing of all welders who have qualified at the Wm. H. Zimmer Nuclear Power Station-Unit 1, for the Henry J. Kaiser Company during the entire duration of the construction work.

The purpose of the "Current Welders List" reflected in WCP-2 is to provide construction supervision (i.e., Superintendents, General Foreman, Foreman) and Engineers a "tool" for purposes of planning by which welders can be matched with known or upcoming construction activities/applications, thus promoting the most efficient utilization of the welding force. This list is also used to determine upcoming expiration dates in association with qualification maintenance. This list is not used as a basis for determining the qualification status of a welder or for issuance of weld rod. The welder's card has been and currently is the controlling factor in determination of a welder's current qualifications. The information entered on the Welder Qualification Card has been and currently is compiled from welder qualification documentation and logs utilized for qualification maintenance.

Commencing in August, 1982, a joint effort between HJK Quality Records Management (QRM), Weld Engineering and CG&E to produce an accurate computerized listing of Active Welders began, with the first "list" subsequently issued October 18, 1982. Although discrepancies were identified, an effort by HJK Weld Engineering and CG&E is underway to correct and modify the Active Welders List to accurately reflect the welders qualifications in accordance with quality documentation and the Welder Qualification Cards.

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B. Corrective Action Taken To Avoid Further Noncompliance

QAP-10 does state in part that "The Welding Engineering Manager shall be responsible for the accuracy and continual and timely updating of the Welder Qualification Listing". This responsibility can only be performed by the organization which controls and stores the original "Welder Qualification Test Records" which is the Quality Records Management (QRM) organization of the HJK Quality Assurance Department.

Therefore, QAP-10 will be revised to reflect the responsibility for producing the "Welder Qualification Listing" including the accuracy, continual and timely updating of the same be assigned to the QRM organization of the Quality Assurance Department.

An ongoing effort by the QRM organization to compile the "Welder Qualification Listing", per QAP-10, has been in progress since August, 1983.

C. Date Full Compliance Will Be Achieved

Full compliance in regard to the "Current Welders List", referenced in WCP-2, paragraph 3.3.3, has been achieved.

Revision to QAP-10 is scheduled to be completed by December 31, 1983. Production of the Welder Qualification List is contingent upon completion of the welder qualification reviews currently being conducted by HJK QRM and CG&E QCP Task II. These review programs are scheduled to be completed by December 31, 1983.

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NRC ITEM OF NONCOMPLIANCE 358/82-10-02(A)

The following documents provide guidance concerning the documentation of evaluation for reportability under 10CFR21 and 10CFR50.55(e).

- \* 10CFR50, Appendix B, Criterion V
- \* Wm. H. Zimmer Quality Assurance Manual  
Paragraph 5.1
- \* 10CFR50.55(e)
- \* 10CFR21.21(a)

Contrary to the above requirements, the licensee failed to impose the reporting requirements of 10CFR21 and 10CFR50.55(e) on contractors in that the H.J. Kaiser Company had neither procedural controls in place to require the evaluation and documentation of reportable or potentially reportable deficiencies, nor procedures in place to require informing the licensee of reportable or potentially reportable deficiencies.

A. Corrective Action Taken And Results Achieved

CG&E has performed a review of 10CFR21, NUREG-0302, Rev. 1 and 10CFR50.55(e) in preparing the response to this item.

HJK was notified per letter KEQ-184 on January 4, 1978, of the then recently published 10CFR21 requirements. NUREG-0302, Rev. 1, Section 21.31, question 6 states "The licensee's responsibility for insuring compliance with the provisions of Part 21 by its contractors, suppliers and consultants is limited to the requirement that each procurement document for a facility or basic component specifies that the provisions of 10CFR21 apply, when applicable."

CG&E has reviewed procurement procedures OPP 4.1, 4.2 and 4.3 and finds that they impose this requirement. A review is underway to ensure applicable CG&E procurement documents issued after January 6, 1978, made appropriate references to the applicability of 10CFR21.



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Corrective Action Request (CAR) #82-36 was issued April 26, 1982, requiring the principal constructor to establish a documented program to control reviews of potentially reportable deficiencies. In response to the CAR, HJK developed an implementing procedure GQP-21, "Reporting of 10CFR21 or 10CFR50.55(e) conditions". This procedure requires HJK to review potentially reportable conditions and submit the documented results of these reviews to CG&E.

B. CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

CG&E has conducted an extensive training program for personnel assigned the responsibility for the review of Nonconformance Reports, Audit Reports, Corrective Action Requests, Condition Evaluation Requests, and Engineering Change Requests. This training indoctrinated personnel in both the identification of potentially reportable conditions, and the method (OPP 7.1) for alerting appropriate management of such conditions.

The CG&E Quality Assurance Department (QAD) audits contractor compliance with OPP 7.1 requirements. This is evidenced by Corrective Action Requests which identify the lack of contractor identification of potentially reportable conditions.

C. Date Corrective Action Will Be Achieved

Corrective Action will be achieved upon completion of the above mentioned purchase document review, scheduled to be completed by November 30, 1983.

NRC ITEM OF NONCOMPLIANCE 358/82-10-02(B)

The following documents provide guidance concerning the activities affecting quality and their associated procedural provisions.

- \* 10CFR50, Appendix B, Criterion V
- \* Wm. H. Zimmer Quality Assurance Manual, Paragraph 5.1
- \* H.J. Kaiser Procedure, GQP-9, Rev. 0,

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paragraph 4.1.3

Contrary to the above, H.J. Kaiser Procedure GQP-9 for control of requests for information/evaluation (RFI/E) was not followed by the Welding Task Force (WTF) Chairman in that he failed to log reports forwarded by site personnel to the Welding Task Force for response as required.

A. Corrective Action Taken And Results Achieved

GQP-9 was revised to expand and clarify RFI/E logging and review requirements. A memo was sent to all inspection supervisors informing them of the requirement. Also, a memo was transmitted to all managers requesting return of all RFI/E's to the Lead Reports Coordinator so that they could be assigned a Log number for response.

B. Corrective Action Taken to Avoid Further Noncompliance

The WTF Chairman has been made aware by memo from his supervisor, dated 4/7/83, that procedures must be strictly adhered to, and has received additional training in GQP-9, Rev. 2.

C. Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

NRC ITEM OF NONCOMPLIANCE 358/82-10-02(C)

The following documents provide guidance concerning the activities affecting quality and their associated procedural provisions.

- \* 10CFR50, Appendix B, Criterion V
- \* Wm. H. Zimmer Quality Assurance Manual, Paragraph 5.1
- \* Weld Construction Procedure, WCP-2, Rev.0 paragraph 4.1

Contrary to the above, the review of activities in the weld test shop indicated that the HJK Kaiser Co. Procedure, WCP-3 for

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control of weld filler metal was not being fully implemented in the test shop in that the weld rod was issued by weight and returned by weight rather than by actual count of rods issued and stubs returned.

A. Corrective Action Taken and Results Achieved

In July, 1982, the issuance of weld filler material by count versus weight was implemented in the Weld Test Facility to meet the existing requirements contained within Welding Construction Procedures (WCP) 3 "Filler Material Control". The applicability of WCP-3's requirements for filler material control to the Weld Test Shop were not explicit. WCP-3 addressed control of filler material for the fabrication and installation process but requirements for control of filler material in the Weld Test Facility were not explicitly clear. Subsequently, in August 1982, WCP-2 titled "Welder Performance Qualification" was revised to encompass the filler material control requirements in the Weld Test Facility.

B. Corrective Action Taken to Avoid Further Noncompliance

Based on the above corrective action, we feel that no additional corrective action is required.

C. Date when Full Compliance will be Achieved

Full compliance has been achieved.

NRC ITEM OF NONCOMPLIANCE 358/82-10-03

The following documents provide guidance concerning welder qualification documentation requirements.

- \* 10CFR50, Appendix B, Criterion XVII
- \* ASME Code, Section III, Paragraph NA-4800
- \* Wm. H. Zimmer Quality Assurance Manual, paragraph 16.1

Contrary to above requirements, The Cincinnati Gas & Electric Company QA Division and the H.J. Kaiser Company QA Organization

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failed to take corrective action regarding the lack of evidence of radiographic acceptability for welder qualifications identified on H.J. Kaiser Corrective Action Report No. 84. The corrective action statement proposed by H.J. Kaiser weld engineering and subscribed to by H.J. Kaiser and CG&E Quality Assurance was inadequate to assure that all welders onsite currently performing quality-affecting activities were properly qualified in accordance with the applicable codes and standards.

A. Corrective Action Taken and Results Achieved

The requirements for the retention of radiographic reader sheets for welder qualification were not clearly stated in the ASME Sections III and IX, 1971 editions through the Winter 1973 addendum. The H.J. Kaiser QA Program did not require radiographic reader sheet retention for welder qualification records. Recent code interpretations, editions, and addenda have provided additional clarification as to the intent of the code with regard to the retention of radiographic reader sheets for welder qualifications. These clarifications were not available until March 1980. ASME III and IX are clear on the requirement for certificate holders to maintain a record signed by an authorized individual. Conformance with this requirement has been through the use of the Q1-G Form recommended by ASME Section IX.

The response by H.J. Kaiser to CG&E Field Audit Report 126 dated August 2, 1977 committed H.J. Kaiser to retain radiographic reader sheets for welder qualification. This commitment was restated by H.J. Kaiser in response to CG&E's establishment of a site requirement for the retention of radiographic reader sheets related to welder qualification. (See CG&E letter to HJK KEQ-1011 dated 5/11/82). This commitment was reiterated in HJK's response to CG&E CAR 82-51.

It is, therefore, CG&E's position that prior to August 2, 1977, the lack of radiographic reader sheets supporting otherwise acceptable welder qualification records is not a basis for the rejection of the welder's qualification. For welder qualifications certified by radiography dated after

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August 2, 1977 and prior to May 11, 1982, either an acceptable radiographic reader sheet or an RT level II's acceptance signature for the radiographic examination documented on the Q1-G form in the space provided for the recording of the radiographic test results, or the stamp of the RT Level II on the applicable KE-1 form in the space provided for acceptance of the radiographic results, shall acceptably document the results of the radiographic examination. Welder qualification records certified by radiography dated after May 11, 1982 must be accompanied by an acceptable radiographic reader sheet. Deviations from these requirements will be documented on deficiency documents and appropriately dispositioned.

B. Corrective Action to Prevent Further Noncompliance

At this time, further noncompliance is precluded in that CG&E requires H.J. Kaiser to maintain in the welder qualification file the appropriate radiographic reader sheet. This practice has been in effect since May 1982.

C. Date When Full Compliance Will Be Achieved

To ensure compliance with this position, all HJK welder qualification records are being evaluated by QCP Task II and appropriate deficiency documents are being initiated when required. It is estimated that this action will be completed by December 31, 1983.

NRC ITEM OF NONCOMPLIANCE 358/82-10-05(A)

The following documents provide guidance concerning welder qualification records.

- \* 10 CFR 50, Appendix B, Criterion XVII
- \* ANSI N45.2.9 - 1974, paragraph 3.2.6

Contrary to the above, changes were made to welder qualification records without adequate procedures or controls.

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A. Corrective Action Taken and Results Achieved

The alteration or supplementation to quality documentation in welder qualification packages has been addressed in the Welder Qualification Review Program developed by HJK QA. As a part of this program, review of welder qualification packages provides for the documentation of deviations with regard to alterations to the quality documents as outlined below.

Where Welder qualification documentation alterations or supplementation which cannot be substantiated per QRM-1, "Review and Control of Quality Assurance Documentation", deficiency documents have been generated. A special Material Review Board has been established to document the acceptance and/or method to be used to establish the acceptability of installed hardware by those welders.

B. Corrective Action Taken to Avoid Further Noncompliance

Site Communique #28 was issued January 24, 1983, to emphasize the requirements of ANSI N45.2.9 concerning the supplementation of quality documentation. To augment this action, site wide training was conducted to stress the significance of ANSI N45.2.9. This training now constitutes a portion of the overall site indoctrination program. QRM-1 is utilized to verify that supplementation of HJK generated QA documentation is clearly identified and justified prior to turnover as QA records.

C. Date Full Compliance Will Be Achieved

Full compliance will be achieved at such time as all deficiency documents generated have been appropriately dispositioned.

NRC ITEM OF NONCOMPLIANCE 358/82-10-05(B)

The following documents provide guidance concerning welder qualification records.

\* 10 CFR 50, Appendix B, Criterion XVII

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\* ANSI N45.2.9-1974, paragraph 3.2.6

Contrary to the above, qualification records for approximately 32 welders had been rewritten. The KE Q-1G forms for two welders were selected for detailed review. These records had been completely rewritten. The new records were not signed by the record originator or equivalent. (The changes made included clarification-type data changes such as coupon thickness, bend test, travel speed, etc.)

There were no procedural controls which allowed such changes and there were no annotations on the rewritten records indicating the changes made or providing justification for the changes. The original records were retained in the H.J. Kaiser Weld Engineering files and were not transmitted to the site QA Records Management system. Only the rewritten records were transmitted to the site QA Records Management system.

A. Corrective Action Taken to Avoid Further Noncompliance

All available welder qualification related documentation has been retrieved from H.J. Kaiser Co. Welding Engineering by means of the Site Document Retrieval program. These documents were subsequently transmitted to Quality Records Management for review. Quality Records Management is reviewing all welder qualification related documents transmitted to their organization. This review will be conducted in accordance with CG&E procedure QCPP-9.21, and all deficiencies will be documented.

B. Corrective Action Taken to Avoid Further Noncompliance

Site Communique #28 was issued January 24, 1983, to emphasize the requirements of ANSI N45.2.9 concerning the supplementation of quality documentation. To augment this action, site wide training was conducted to stress the significance of ANSI N45.2.9. This training now constitutes a portion of the overall site indoctrination program. QRM-1 "Review and Control of Quality Assurance Documentation" is utilized to verify that supplementation of HJK generated QA documentation is clearly identified and justified prior to turnover as QA records.

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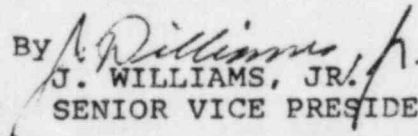
C. Date Full Compliance Will Be Achieved

Full compliance will be achieved at such time as all deficiency documents have been appropriately dispositioned.

We trust this supplement provides clarification as to the CG&E efforts which have been implemented to address the items of noncompliance identified in Inspection Report 82-10.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By   
J. WILLIAMS, JR.  
SENIOR VICE PRESIDENT

GAB/sfr

cc: NRC Office of Inspection & Enforcement  
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NRC Senior Resident Inspector  
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