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THE CINCINNATI GAS & ELECTRIC COMPANY

CINCINNATI, OHIO 45201

E. A. BORGMANN
VICE PRESIDENT - ENGINEERING

October 17, 1978
QA-1021

U. S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Attention: Mr. R. F. Heishman, Chief
Reactor Construction & Engineering
Support Branch

RE: WM. H. ZIMMER NUCLEAR POWER STATION - UNIT I
IE INSPECTION REPORT 78-16, DOCKET NO. 50-358,
CONSTRUCTION PERMIT NO. CPPR-88, W.O. #57300-
957, JOB E-5590

Gentlemen:

This letter constitutes our formal reply to the subject Inspection Report. It is our opinion that nothing in your report or in this reply is of a proprietary nature.

Our response to the infractions and deficiency identified in Appendix "A" is as follows:

Item A (1) Required Evidence that ESF Motors are Capable of Certain Starting Voltages and Torque Characteristics

The ESF motors and supporting auxiliary system pump motors were specified, designed and purchased with a minimum starting voltage of 80 percent. Motors from 10 to 200 horsepower when operating at normal voltage are capable of developing a breakdown torque of not less than 200 percent of their normal full load running torque. Their requirements were in the purchase specifications, and in the case of General Electric Company supplied motors, the outline drawings certify that these design requirements were incorporated in their motors.

(1) Corrective Action Taken and Results Achieved

We are in the process of obtaining certifications from the motor manufacturers of the Reactor Building Closed Cooling Water Pump Motors and the Service Water Pump Motors to the effect that motors supplied by them have been designed and manufactured with the minimum starting voltage and torque

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requirements of the purchase documents. The Wm. H. Zimmer Nuclear Power Station, Unit I, FSAR Question 221.94 (8.3.1.1) and Answers 1 and 2 will be modified in Revision 47 of the FSAR to state that certification will be obtained from the motor manufacturers.

(1) Full Compliance will be achieved prior to December 31, 1978.

(2) No Evidence at Site that 53 Differential Pressure Switches Meet the Requirement of IEEE 323-1971

Purchase Specification H-2866 stated the required temperature, humidity and radiation requirements for the 53 Differential Pressure Switches. The switches were environmentally tested; however, test reports were not furnished to Sargent & Lundy or to Cincinnati Gas & Electric Company.

(2) Corrective Action Taken and Results Achieved

The manufacturer of the Differential Pressure Switches has supplied Sargent & Lundy with copies of their Test Report RI-288A-11 indicating that the switches successfully passed a test where the environment had a maximum temperature of 212 degrees F, 100 percent humidity and $2X10^8$ Rads. These conditions satisfy the requirements of Specification H-2866.

Full compliance will be achieved within 60 days when Sargent & Lundy complete the review of Report RI-288A-11 and forward their approval to the Construction Site.

Item B - Clearance Requirements Between Redundant Circuit Conduits

The Wm. H. Zimmer Nuclear Power Station, Unit I, FSAR stated that conduit containing redundant circuits were to have a separation of 3 feet by 5 feet. This was a conservative distance based on cable tray fire criterion. The installation Specification H-2173, as originally issued, reflected the requirement. Fire tests were later conducted with cables in conduit and it was found that conduits with a one-inch separation met the new criterion and this was reflected in Supplement 5 of Specification H-2173, dated May, 1978. The change was not made in the FSAR.

(B) Corrective Action Taken and Results Achieved

Revision 47 to the Wm. H. Zimmer Nuclear Power Station, Unit I, FSAR will state conduit separation of one-inch for conduits of

different divisions when run in proximity to each other.

Full compliance will be achieved with issuance of Revision 47 to the FSAR. This will be done within 30 days.

Item C - Inspection Personnel to be in Full Compliance with ANSI N45.2.6-1973

(1) The Cincinnati Gas & Electric Company Electrical Operating Test Department personnel are certified to their qualifications for inspection and testing electrical equipment. The Certificate of Qualification did not state the effective period of certification.

Annual physical examinations with natural and color vision tests was not a requirement for certification.

(1) Corrective Action Taken and Results Achieved

The Certificate of Certification will be revised to indicate the effective period of certification.

A program to have each Test Technician examined for natural or corrected near distance acuity and color vision on an annual basis will be initiated within 60 days. We feel that the physical demands in performing the required test and inspection do not require annual physical examinations and that Cincinnati Gas & Electric Company's present policy of passing a physical examination as a condition of employment and the need to have approval of Cincinnati Gas & Electric Company's physician before returning to work after an illness of five working days duration or after an industrial accident is sufficient.

(2) HVAC Contractor Failed to Prescribe in Written Procedures How They Comply with ANSI N45.2.6-1973, Sections 2, 3, 4, and 5.

(2) Corrective Action Taken and Results Achieved

The HVAC Contractor has prepared and submitted to Sargent & Lundy, their Procedure FQCP 2.1-1 "Qualification of Inspection, Examination and Testing Personnel". This written procedure complies with the intent of ANSI N45.2.6-1973.

Full compliance will be achieved within 60 days upon

receipt of approval from Sargent & Lundy.

We trust that the contents of this letter will serve as an adequate response to your IE Inspection Report #78-16.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By

E. A. BORGMANN
Vice President, Engineering Services
and Electric Production

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