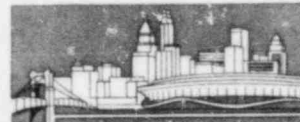


THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

October 21, 1983
LOZ-83-0188

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 NO. 83-17
W.O. 57300, JOB E-5590, FILE NO. 956C, IR 83-17

This letter transmits our response to the Item of Noncompliance identified in the subject Inspection Report, Notice of Violation.

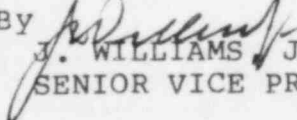
The following attachment, which contains the Corrective Action Taken and Results Achieved, Corrective Action Taken to Avoid Further Noncompliance, and Date When Full Compliance will be Achieved, is provided for your review.

Attachment 1 - Item of Noncompliance 358/83-17-01

We trust these actions will be found acceptable in response to the Item of Noncompliance identified in Inspection Report 83-17.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By 
J. WILLIAMS, JR.
SENIOR VICE PRESIDENT

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Mr. J.G. Keppler
Regional Administrator
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cc: NRC Office of Inspection & Enforcement
Washington, D.C. 20555
NRC Resident Site Supervisor
ATTN: W.M. Hill
NRC Zimmer Project Inspector, Region III
ATTN: E. R. Schweibinz

INSPECTION REPORT 83-17
(LOZ-83-0188)

ATTACHMENT 1

NRC ITEM OF NONCOMPLIANCE 358/83-17-01

"10CFR50.55(e)(3) states in part: 'The holder of a construction permit shall also submit a written report on a reportable deficiency within thirty (30) days to the appropriate NRC Regional Office shown in Appendix D of Part 20 of this chapter.....If sufficient information is not available for a definitive report to be submitted within 30 days, an interim report containing all available information shall be filed, together with a statement as to when a complete report will be filed.' Contrary to the above and the CG&E procedures referenced above, the licensee's failure to submit 31 written reports within the required 30 days is an item of noncompliance. (358/83-17-01)"

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

1. The policy for the reporting of 10CFR 50.55(e) deficiencies and preparation, review, and approval of the written report, as required by 10CFR 50.55(e)(3), was revised on October 1, 1983. The policy was revised to provide immediate corrective action to ensure that all initial written reports are submitted within 30 days of the NRC notification.
2. Corrective actions for the procedural inadequacies identified in the inspection report are being evaluated. A draft revision to Owners Project Procedure (OPP) 7.1, "NRC 10CFR21 and 50.55(e) Reports", Revision 4, March 16, 1983, is scheduled to be submitted to the responsible CG&E department managers and contractor organizations for review and comment by October 31, 1983.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

1. The revision of OPP 7.1 will ensure that potential 10CFR50.55(e) deficiencies found by all Zimmer project personnel are identified in a timely manner, that the evaluation of the significance of the deficiency to the safety of plant operations is promptly performed by a review board consisting of persons with adequate expertise in the subject, and that adequate management review is provided. The procedure will also include an adequate interface with the QA program corrective action system, documentation and records system, and the indoctrination and training program.

2. Upon approval of the revision to OPP 7.1, lower tiered departmental procedures will be either eliminated or revised as necessary to implement the requirements of OPP 7.1.
3. Contractor procedures will also be revised or initiated, as required, to ensure CG&E is promptly notified of potential 10CFR50.55(e) conditions.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Final approval and implementation of the OPP 7.1 revision is scheduled for December 15, 1983. Final approval and implementation of contractor implementing procedures is scheduled for December 31, 1983. Full compliance with these revised procedures will be achieved by January 31, 1984.