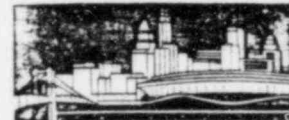


THE CINCINNATI GAS & ELECTRIC COMPANY



CINCINNATI, OHIO 45201

December 22, 1983
LOZ-83-0254

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
CONTINUATION OF CONSTRUCTION PLAN (CCP)
W.O. 57300, JOB E-5590, FILE NO. 956C

Attached in accordance with Section IV.B(2)(b) of the Commission's November 12, 1982, "Order to Show Cause and Order Immediately Suspending Construction," is the CG&E Construction Completion Plan (CCP) for the Zimmer Facility. The CCP contains responses to questions contained in your letters dated October 28, 1983 and November 15, 1983, as they pertain to this program. These responses reference the section within the CCP which provides a more detailed response.

As indicated in my letter dated November 23, 1983, the scope of the independent audit of the PVQC required by the Commission's order has been expanded to cover the QA/QC aspects of the CCP so that all QA/QC activities through completion of the plant are subject to independent audit.

Should you have any questions, please let me know.

Very truly yours,

THE CINCINNATI GAS & ELECTRIC COMPANY

By *J. Williams, Jr.*
J. WILLIAMS, JR.
SENIOR VICE PRESIDENT

GCF/sfr

Mr. J.G. Keppler
Regional Administrator
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cc: NRC Office of Inspection & Enforcement
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12/22/83

RESPONSES TO NRC QUESTIONS ON COA
ROUND 1

(Reference NRC Letter J.G. Keppler to J. Williams, Jr. Dated 10/28/83,
Enclosure 3)

Question 1. Does CG&E propose to resume work in an area or on a system for which the PVQC has not been completed and unacceptable conditions resolved? If yes, how will the licensee insure that any work performed under this condition by the CCP will not have to be redone based on findings by the PVQC?

Response: Yes it is CG&E's intent to perform CCP work in an area or on a system prior to PVQC being completed. The Continuation of Construction Plan (CCP) specifies that the initiation of construction work will not commence until the specific element of work (system, subsystem, component, etc.) has been released by PVQC. In this manner CG&E can ensure that the construction work will not pre-empt the PVQC effort. Reference CCP, Sections 1.4 and 7.2. Also, see answer to Question 8 of Round 2 attached.

Question 2. Under any situation, will the group responsible for identifying a nonconformance also be responsible for disposition of the nonconformance?

Response: Yes. The cognizant field engineers or QA/QC personnel may initiate an NCR. The field engineering group may identify the disposition to correct the condition to comply with the engineering requirements (i.e. rework or reject). Other dispositions (i.e. use-as-is or repair) will be approved by Engineering. The disposition and the resultant work will be approved by QA/QC personnel. Reference CCP Section 5.4 and Appendix 10.

Question 3. Will all nonconformances be verified, and who will conduct this verification?

Response: Nonconformance reports will be validated by the cognizant QA/QC activity. Upon completion of the actions identified in the disposition instructions, reinspections will be performed as specified and recorded on the nonconformance reports. Reference CCP Section 5.4 and Appendix 10.

Question 4. For each draft nonconformance which is not verified to be a nonconforming condition, will a copy of the draft be returned to the initiator with an explanation detailing the reason for lack of verification?

Response: Yes. After each Nonconformance Report (NCR) is written it will be signed by the initiator, logged, and forwarded to the applicable QA/QC activity for review and validation. Once an NCR has been logged, it cannot be voided. Should it become necessary to discontinue processing the NCR for reasons of redundancy, erroneous reporting, or other similar conditions, the cognizant QA/QC activity will document the basis for the action and sign-off the appropriate block. NCRs that have been logged, but not validated, shall be maintained as a quality record with a qualifying statement as to why the NCR was not processed. If the NCR originator disagrees with the decision not to validate the NCR, he has the right of recourse to as high a level of management as necessary for resolution. Reference CCP Appendix 10.

Question 5. If a design review is not performed on a particular system, how will the project director assure that the drawings provided to the constructor are acceptable for construction and include sufficient detail for that activity to be performed in an acceptable manner?

Response: Bechtel has the responsibility for managing work of those performing construction-related design, under the CCP and PVQC programs. In addition, there will be special design engineering assignments which Bechtel may be assigned to either manage or perform. The greatest part of all remaining construction will be performed directly by Bechtel.

Where Bechtel manages others performing design engineering, Bechtel will effect continuing surveillance of the work of the responsible design engineering organizations through Bechtel's on-site engineering group. This will include monitoring the adequacy of design techniques, design calculations and design drawings for construction and will be assisted by direct feedback from Bechtel's construction and QC groups. In addition, Bechtel's quality groups will audit and otherwise monitor work of the responsible design engineering organizations under the Bechtel quality program. Reference CCP Section 5.5.

Question 6. Will the Project Director generate any drawings to supplement S&L drawings? What is the nature of these drawings?

Response: At present, it is not planned that Bechtel will generate any design drawings for construction, to supplement the S&L drawings. However, Bechtel will have the capability of discharging special design engineering assignments which could involve drawings, but the nature of these is not now known. In addition, the Bechtel construction groups which will be directly performing construction, will develop sketches and other construction aids, but these will not be used to establish basic design requirements to which inspections may be made under the Bechtel quality program. Bechtel field engineers (part of the construction group) will probably develop designs within a limited scope, for installation of such items as small pipe and instrumentation tubing. These field engineering drawings will be prepared in accordance with criteria provided by the responsible design engineering organizations and will be checked or approved in accordance with accepted procedures.

Question 7. Why is Bechtel being made responsible for the review of CG&E's QA program?

Response: As part of the continuing effort to upgrade the Zimmer QA Program, CG&E has requested Bechtel as part of their Project Director's role to make a comprehensive review of the CG&E QA Program and make recommendations regarding any required improvements to the program. This review will take advantage of Bechtel's experience in the Nuclear Quality Assurance field and ensure compliance with Appendix B to 10CFR 50 and the QA commitments in the Safety Analysis Report.

Question 8. Will work packages include QA/QC documents/records? If yes, who will control these packages prior to completion. Construction or Quality Assurance Department?

Response: The work packages will include or reference all documents necessary to accomplish and verify work covered by the package including inspection documents. Prior to completion these packages will be controlled by Construction Document Control in accordance with Quality Program requirements. QA/QC surveillance and monitoring will be performed to ensure the documents are controlled in accordance with the Quality Program requirements. Reference CCP Sections 3.7 and 7.3.

Question 9. Will all records be reviewed for completeness and technical adequacy prior to transmittal to the records vault?

Response: During PVQC existing records will be reviewed for completeness and accuracy and PVQC documents will be generated to give evidence of those reviews and their results. The PVQC generated records will be reviewed and countersigned by QA/QC personnel.

During CCP, all Bechtel generated records will be reviewed for completeness and accuracy with a "bottom-line" signature applied. Other CCP records, S&L, GE and contractors, will be reviewed on a sampling basis by Bechtel QA/QC personnel. Reference CCP Section 3.7.2.

Question 10. Will a record be maintained by signature of the person conducting this review? How will records currently in the vault be controlled during the PVQC?

Response: Records reviewed will be signed or initialed by the reviewer on the record or on records traceable to the reviewed record. (Ref. signature log). A PVQC records control group is being established with appropriate procedures to support PVQC. This group will receive records to be reviewed by PVQC by transmittal from the central records control group. Procedures for their operation which will include all control elements necessary, comply with the Project QA program, and be reviewed and approved by Bechtel QC records management prior to implementation.

Question 11. During the PVQC, will the QC records/documents be reviewed by QC personnel in the same discipline as the document? If not, who will conduct a review of these records?

Response: Yes, the PVQC organization is established on a system or area discipline team concept. All field engineering and QA/QC reviews will be performed on a discipline oriented basis by personnel experienced in that discipline.

Question 12. Does control of interference between CCP on a system, subsystem, or area and PVQC, require identification of all outstanding issues relative to PVQC prior to permitting construction to resume? Must the outstanding items be dispositioned prior to resumption of construction?

Response:

In order to ensure that construction does not interfere with or preempt the conduct of PVQC or implementation of potential rework on systems or areas for which PVQC has not been completed controls are established as outlined in the CCP. Prior to commencing any construction work on a safety-related system, structure, or component, PVQC will release the work only if they are satisfied it will not interfere with the verification process. Outstanding issues relative to a system, structure or component will be identified and they will be dispositioned prior to physical work if the PVQC interface criteria would otherwise be violated.

RESPONSES TO NRC QUESTIONS
ROUND 2

(Reference NRC Letter J.G. Keppler to J. Williams, Jr. Dated 11/15/83,
Enclosure 2)

Question 8. CG&E plans to submit the CCP shortly after the submittal of the PVQC. The Bechtel Project Director plans to have the organization unit conducting the PVQC be separate from the organization unit conducting the CCP in recognition of the need to ensure that the completion of construction does not interfere with or p.e-empt the verification of quality. The proposed CCP is designed to proceed with construction of a safety-related system or area after it has been determined that such construction will not affect the verification of the quality of that system or area. Describe the planned method for resolving interferences between the simultaneous processes of verifying quality and completing construction. (Page 39, Volume I)

Response: Construction of a system, subsystem, or area will be controlled to assure that construction does not interfere with or preempt the conduct of the PVQC or implementation of potential rework on systems or areas for which verification has not been completed. These controls, detailed in the Continuation of Construction Plan include measures such as:

- o Specific training of construction personnel regarding PVQC interface restrictions.
- o Surveillance of construction personnel to assure compliance with the PVQC interface restrictions.
- o Frequent schedule meetings to coordinate interface activities of PVQC and CCP personnel.
- o Releases by PVQC based on evaluation and conclusion that a particular portion of CCP work will not interfere with PVQC activities.