



Consumers Power

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personnel reporting to him, as follows:

(a) Vice President - General Services and reporting to him, to the:

Director - Purchasing

Director - Property Protection

Manager - Administrative Services (Graphic Services)

The organization relationship of these positions are shown in Figures 1, 2, 3 & 4.

2.0 BASIS DOCUMENTS

- a. NRC 10CFR50, Appendix B, Criterion 1, "Organization"
- b. ANSI N45.2, Criterion 3, "Organization"
- c. ANSI N18.7

3.0 POLICY

3.1 PROJECTS, ENGINEERING & CONSTRUCTION ORGANIZATIONAL RESPONSIBILITIES DURING THE DESIGN AND CONSTRUCTION PHASE

3.1.1 Environmental Services, Quality Assurance and Testing

Environmental Services, Quality Assurance and Testing (ES,QA&T) is responsible for establishing environmental compliance, quality assurance and preoperational testing standards for design and construction consistent with CP Co objectives, and for assuring the establishment and implementation of policies and procedures to meet these standards.

In performing their assurance-type responsibilities, ES,QA&T personnel have no responsibility for the cost scheduling effects of their findings; have the authority and organizational freedom to identify assurance-related problems, initiate, recommend or provide corrective action and verify implementation of corrective action; and are independent from the individuals or groups performing the activities being inspected, tested or audited. Additional assurance-related activities as given below, are



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assigned to ES,QA&T for work performed either by CP Co or by Principal Suppliers, major subcontractors and sub-tier suppliers, or the activities may be delegated to a Principal Supplier's corresponding organization. The decision as to whether or not these activities are to be delegated shall be made with the mutual concurrence of both the PMO and ES,QA&T. Nevertheless, ES,QA&T retains authority and responsibility for these activities and for assuring their adequate and timely accomplishment. The objective of the assignment of authorities and responsibilities to ES,QA&T is to yield a total assurance program resulting in the attainment of a facility which is designed in accordance with its design basis criteria and which is constructed in accordance with its drawings and specification requirements.

Figure 5 depicts the Environmental Services, Quality Assurance and Testing organization. Figures 8 & 9, depict the Section organizations.

Within Environmental Services, Quality Assurance and Testing, there are three Sections - namely: Quality Assurance Engineering & Inspection, Quality Assurance Audit & Administration and Testing. Following is a discussion of the responsibilities of each of these Sections.

3.1.1.1 Quality Assurance Engineering and Inspection Section

The Quality Assurance Engineering and Inspection Section is responsible for performing quality assurance engineering, inspection, examination, test and test verification. More specifically, for:

- a. During the design concept activity:
 - (1) Preparing the Project Quality Assurance Plan and assuring the Plan's timely issuance with the mutual concurrence of the organizations involved;
- b. During the design activity:
 - (1) Participating in the establishment of the Design Plan by establishing the quality assurance aspects of the Plan;
 - (2) Participating, as specified by the Design Plan;



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- (c) The adequacy of the data collection format and content relative to the needs of the Quality Assurance Program regarding quality records.
- (3) Preparing and implementing procedures for the inspection, nondestructive examination, tests (within the Section's test jurisdiction) and test verification for preventive and corrective maintenance activities;
- g. At any time, prior to or during the performance of the pre-operational, hot functional, major modification and Palisades SGRP tests, and other prerequisites, signifying the prerequisites actually audited by the application of a QAE&I signature for each such prerequisite.
- h. During the performance of the checkout, preoperational, hot functional, major modification and Palisades SGRP tests, and functional in-service baseline tests; evaluating compliance with test procedures on an audit and surveillance basis, signifying the test procedural steps actually audited and surveilled by the application of QAE&I signatures adjacent to those steps.
- i. Throughout all activities:
- (1) Evaluating the implementation of the Quality Assurance Program and recommending improvements;
 - (2) Issuing "Stop Work Order" at any time that Quality Assurance Program commitments are violated if necessary to preclude a safety risk;
 - (3) Performing quality audit, as requested.

3.1.1.2 Quality Assurance Audit and Administration Section

The Quality Assurance Audit and Administration Section is responsible for performing audits of activities which may impact design and construction quality. More specifically, for:

- a. Evaluating the adequacy of quality policies and procedures;
- b. Evaluating the degree of compliance with quality policies and procedures;
- c. Obtaining corrective action, as necessary, based on audit findings;



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NOTE: Items a, b, and c, above, apply to primary suppliers as well as to "in-house" activities.

- d. Performing departmental administrative functions, especially with regard to budgets, and other special assignments;
- e. Providing quality assurance education, training and indoctrination;
- f. Preparing, releasing and controlling inter and intra-departmental quality-related policies and procedures;
- g. Issuing "Stop Work Orders" at any time that Quality Assurance Program commitments are violated, if necessary to preclude a safety risk.

3.1.1.3 Testing Section

The Testing Section is responsible for providing preoperational testing and, upon request, trial operational testing and related technical services. More specifically, for:

- a. Preparing Project Testing Program Manuals for the Palisades SGRP and major modifications prior to the implementation phase;
- b. Providing for the preparation, review and approval of test procedures;
- c. Training and certifying qualified personnel and assembling other resources necessary to implement testing programs;
- d. Implementing the Palisades SGRP and major modification Testing Programs;
- e. Coordinating and providing the evaluation of test results.

3.1.2 Midland Project Management Organization

Consumers Power has established a Project Management Organization to provide effective management of the Midland Nuclear Plant Project. The Midland Project Management Organization is shown in Figure 6. The Project Management Organization is headed by a Project Management Office consisting of the Vice President - Midland Project assisted by the Midland Project Manager. The Midland Project Office has overall responsibility for all activities related to design, procurement and construction of the Midland Plant including design, obtaining appropriate licenses and permits, procurement, construction, preoperational and hot functional testing, quality assurance, cost, and schedule. These responsibilities include coordination



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3.3.6 Fuel Supply Department

The organization of the Fuel Supply Department is shown in Figure 3. The quality assurance responsibilities of the Vice President - Fuel Supply are delegated to the Director, Nuclear Fuel Supply, who is in charge of the specification, acquisition and delivery of nuclear fuel and related services, including uranium concentrates, uranium conversion, reconversion, enriching services, nuclear fuel assembly fabrication and reprocessing including storage and transportation. This includes the negotiation and administration of nuclear fuel purchase agreements. He obtains assistance from the Operating Services, Nuclear Activities, Plant Staff and QA-NO, as deemed necessary, in performing the above activities.

3.3.7 Graphic Services Section

The Graphic Services Section of the General Services Department is responsible for the microfilming of quality-related documents that are sent to them.

3.3.8 Management and Budget Department (Management System Section)

The Management System Section of the Management and Budget Department is responsible for the development and implementation of a records management system for quality related documents. The reporting relationship is shown in Figure 19.

3.4 RESOLUTION OF CONFLICTS

If a difference of opinion arises between Quality Assurance personnel and those of other departments, the dispute is resolved as follows: The Supervisor of the Quality Assurance unit involved first tries to resolve the matter with the organization responsible for conducting the activity. If a resolution cannot be obtained, the matter is referred up through the following management personnel until it is resolved:

- a. The appropriate Quality Assurance Director or Manager and the Executive Manager, Manager, Director or Plant Manager/Superintendent responsible for performing the activity;
- b. The Vice President responsible for conducting the activity;
- c. The Executive Vice President - Energy Supply (for operations phase items only);
- d. The Senior Vice President - Projects, Engineering and Construction (for design and construction items only);
- e. The President and Chief Executive Officer of Consumers Power Company.



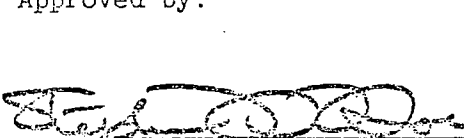
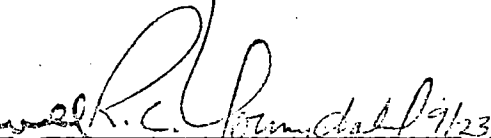
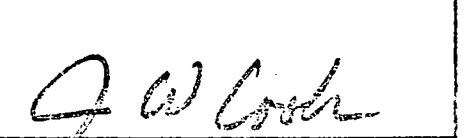
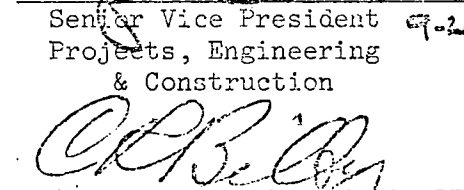
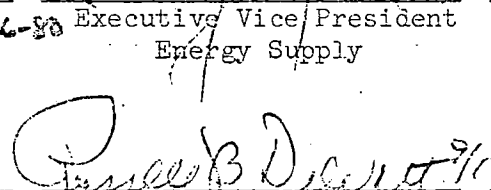
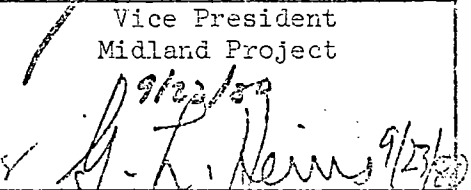
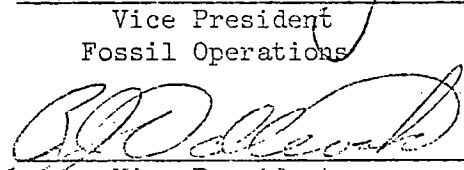
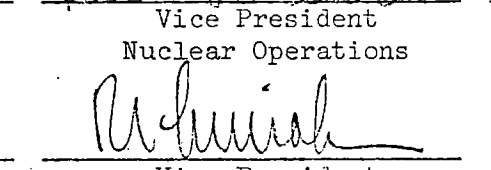
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Approved by:

 Senior Vice President Projects, Engineering & Construction 9-26-80	 Executive Vice President Energy Supply 9/23	 Vice President Midland Project 9/23/80
 Vice President Fossil Operations	 Vice President Nuclear Operations 9/14	 Vice President Systems Operations 9/23/80
 Vice President Fuel Supply	 Vice President General Services	



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1.0 GENERAL

During design and construction of the Midland Project, the Manager of Quality Assurance assigns personnel within his organization to review the Quality Assurance Programs of Consumers Power Company's Suppliers and lower-tier suppliers. During Midland design and construction, the Palisades SGRP and major modifications, the Director, Environmental Services, Quality Assurance and Testing assigns personnel within his organization to review the Quality Assurance Program of Consumers Power Company. During the Palisades SGRP and major modifications, Quality Assurance Engineering & Inspection assigns personnel within the organization to review the Quality Assurance Program of CP Co's Suppliers and lower-tier Suppliers. During operation, maintenance, repair and minor modifications, this responsibility is assigned to the Director, Quality Assurance-Nuclear Operations, and off-site and on-site committees established for that purpose. The results of these reviews are reported to Consumers Power Vice Presidents responsible for the respective activities.

2.0 BASIS DOCUMENTS

- a. NRC 10 CFR 50, Appendix B, Criterion 2, Quality Assurance Program
- b. ANSI N18.7
- c. ANSI N45.2, Criterion 2, Quality Assurance Program

3.0 POLICY

3.1 REVIEW DURING THE DESIGN AND CONSTRUCTION PHASE

During the Palisades SGRP and major modifications, the Director, Environmental Services, Quality Assurance & Testing monitors design and procurement activities and maintains surveillance over construction and installation activities. During design and construction of the Midland Project, the Midland Quality Assurance Manager monitors design and procurement activities and maintains surveillance over construction and installation. Quality Assurance personnel, or Quality Assurance personnel under Contract to Consumers Power perform the following functions:

- a. Review and approval of Consumers Power Principal Suppliers Quality Assurance Programs prior to commencement of activity.
- b. Quality Assurance audits and surveillance of Suppliers to assure that the requirements contained in design and procurement documents, specifications, and Quality Assurance Programs are met.



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- c. Review of specifications, drawings, procedures, inspection checklists and other pertinent documents for Quality Assurance requirements.
- d. Quality Assurance audits and surveillance at the nuclear plant site to evaluate the performance of contractors and subcontractors in implementing their Quality Assurance Programs.
- e. Witnessing the performance of work activities and of construction and installation tests and inspections to assure that specified requirements are met and that required records are maintained.
- f. Audits of the Consumers Power departments to assure that they are complying with the Quality Assurance Program for Nuclear Power Plants and Department or Plant Procedures.
- g. Review of nonconforming conditions to detect trends requiring corrective action.

These reviews, audits and surveillances are documented and reported to management personnel and to the responsible department heads in accordance with Quality Assurance Program Policy No 20, "Program Reporting."

3.2 REVIEW DURING THE OPERATIONS PHASE

In addition to audits conducted by the Quality Assurance Department - Nuclear Operations, Consumers Power has established the on-site Plant Review Committee (PRC) and the off-site Safety and Audit Review Board (SARB) for the purpose of reviewing safety-related aspects of plant operations, maintenance, modifications and technical matters involved in operating a nuclear power plant. Quality Assurance - Nuclear Operations, also performs audits in these areas and submits the results for review. Minutes and reports of the activities of these review groups are routinely sent to departments charged with implementing the Quality Assurance Program. The functions and responsibilities of these committees are as follows:

a. Safety and Audit Review Board (SARB)

SARB is responsible for maintaining a continuing critical examination of safety-related plant activities, including observation of plant operation, evaluations of procedures and certain contemplated actions, and investigations of abnormal conditions to verify that such activities do not constitute an unreviewed safety question.



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In cases where an issue, report or problem is reviewed, evaluated or investigated by SARB, its findings and recommendations are communicated in writing to the Vice President - Nuclear Operations and the appropriate working level of Management. A written charter is prepared and approved by the Vice President - Nuclear Operations which designates the membership, authority and rules for conducting the meetings. Board membership, qualifications, meeting frequency, quorum, responsibilities, authority and records are in accordance with the nuclear plant Technical Specifications.

b. Plant Review Committee (PRC)

The PRC is an advisory group composed of plant supervisory personnel, constituted for the purpose of reviewing day-to-day activities and determining the effect on operational safety. The PRC recommends to the Plant Manager/Superintendent approval or disapproval of proposals considered by the Committee and makes tentative determinations as to whether or not proposals involve unreviewed safety questions. Board membership, qualifications, meeting frequency, quorum, responsibilities, authority and records are in accordance with the nuclear plant Technical Specifications.

During operations, maintenance, repair and minor modifications, the Director, Quality Assurance - Nuclear Operations, monitors procurement activities and maintains surveillance over safety-related plant operating conditions. Nuclear Operations personnel, or Quality Assurance personnel under Contract to Consumers Power, conduct reviews, audits and surveillances similar to those previously identified in Paragraph 3.1 of this Policy. The results are documented and reported to the Vice President - Nuclear Operations, in accordance with Quality Assurance Program Policy No 20, "Program Reporting."

3.3 REVIEW OF CORPORATE QUALITY ASSURANCE PROGRAM

The review of the Consumers Power Corporate Nuclear Quality Assurance Program is performed at least once every 24 months by an audit as described in Section 3.1 of Quality Assurance Program Policy No 18, "Audits." The audit is documented and reported to the Senior Vice President - Projects, Engineering & Construction, the Director, Environmental Services, Quality Assurance & Testing, the Vice President - Midland Project, the Executive Manager of Transmission, Plant Modifications & Project Services, the



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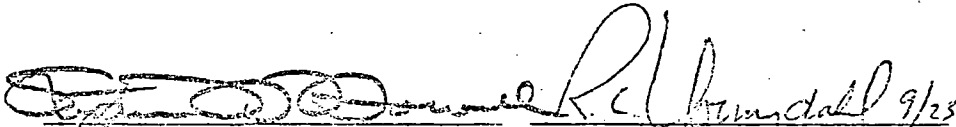
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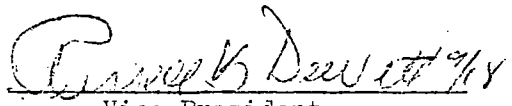
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Vice President - Nuclear Operations, and the Executive Vice President - Energy Supply for their responsibility areas. It is the responsibility of the Executive Vice President - Energy Supply and the Senior Vice President - Projects, Engineering & Construction to evaluate and approve recommendations there from and to inform the President and Chief Executive Office of the company in accordance with Quality Assurance Program Policy No 20, "Program Reporting."

Approved by:


 Senior Vice President, Projects, Engineering & Construction *9/26-80* Executive Vice President Energy Supply *9/25*


 Vice President Midland Project *9/27/80*


 Vice President Nuclear Operations



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1.0 GENERAL

Reports of nonconforming conditions, departures from normal operations, special nuclear material status and transfers, changes in facilities and procedures, and nuclear plant status are prepared by Consumers Power Company and submitted to the NRC and to the responsible departments according to the requirements set forth in Title 10 Code of Federal Regulations, applicable ANSI Standards, Regulatory Guides and the Plant Technical Specifications. Consumers Power Company requires suppliers: (a) to report potentially significant nonconformances to Consumers Power Company for determination of 10 CFR 50.55(e) reportability to the NRC; and (b) to comply with 10 CFR 21.

2.0 BASIS DOCUMENTS

- a. NRC 10 CFR 19, "Notices, Instructions and Reports to Workers; Inspections"
- b. NRC 10 CFR 20, "Standards for Protection Against Radiation"
- c. NRC 10 CFR 21, "Reporting of Defects and Noncompliance"
- d. NRC 10 CFR 50, Appendix B, Criterion 16, "Corrective Action"
- e. NRC 10 CFR 50.55, "Conditions of Construction Permits", Paragraph (e)
- f. NRC 10 CFR 59, "Authorization of Changes, Tests and Experiments"
- g. NRC 10 CFR 70.52, "Reports of Accidental Criticality or Loss of Special Nuclear Material"
- h. NRC 10 CFR 70.53, "Material Status Reports"
- i. NRC 10 CFR 70.54, "Nuclear Material Transfer Reports"
- j. NRC Regulatory Guide No. 1.16, "Reporting of Operating Information"
- k. ANSI N18.7, Section 4, "Review and Audit"
- l. Plant Technical Specifications
- m. ANSI N45.2, Criterion 17, "Corrective Action"

3.0 POLICY

3.1 REPORTING DURING THE DESIGN AND CONSTRUCTION PHASE FOR NEW FACILITIES, MAJOR MODIFICATIONS AND THE PALISADES SGRF

3.1.1 REPORTS BY ENVIRONMENTAL SERVICES, QUALITY ASSURANCE & TESTING

Environmental Services, Quality Assurance and Testing prepares and issues a monthly status report to the Senior Vice President - Projects, Engineering & Construction. Quality Assurance Audit & Administration performs audits of the Quality Assurance Program and reports the results of the audits to the Director, Environmental Services, Quality Assurance & Testing; to the



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to the Vice President - Midland Project (for Midland Project related activities), to the Executive Manager - Transmission, Plant Modifications and Project Services (for related activities) and to other members of management who have either functional or line responsibilities, or both, for the audited area or activity. These reports summarize quality-related problems and nonconformances and describe the status of their resolution.

The Director - Environmental Services, Quality Assurance & Testing conducts biannual status meetings with the officer in charge and with the heads of departments involved in implementing the Quality Assurance Program.

Each biennium, a major audit of the Quality Assurance Program is conducted and reported to the Senior Vice President - Projects, Engineering & Construction.

The Senior Vice President - Projects, Engineering & Construction is responsible for transmitting pertinent quality-related problems and nonconformances to the President and Chief Executive Officer.

3.1.2 REPORTS BY MIDLAND PROJECT QUALITY ASSURANCE

Midland Project Quality Assurance prepares and issues a monthly status report to the Vice President - Midland Project who in turn issues a monthly status report to the Senior Vice President - Projects, Engineering & Construction. Results of audits performed by Midland Project Quality Assurance are reported to the Vice President - Midland Project, Director - Environmental Services, Quality Assurance & Testing and to other members of management who have either functional or line responsibilities for the audited area or activity. These reports summarize quality-related problems and nonconformances and describe the status of their resolution. The Midland Project Quality Assurance Manager conducts quarterly status meetings with the officer in charge, the Midland Project Manager, the Director - Environmental Services, Quality Assurance & Testing, and other personnel as applicable.

3.1.3 REPORTING SIGNIFICANT CONDITIONS TO THE NRC

Significant nonconformances are recorded on nonconformance reports and are controlled in accordance with Quality Assurance Program Policies No 15, "Control of Nonconforming Items" and No 16, "Corrective Action." Each such nonconformance



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occurring during the design and construction of the Midland Project is promptly reviewed by the Midland Project Quality Assurance Department or, when occurring during preoperational testing, by Midland Project Testing to determine its reportability to the NRC under the requirements of 10 CFR 50.55(e) and 10 CFR 21. Each nonconformance report originated during the design and construction of a major modification, to an existing operating plant, or the Palisades SGRP is transmitted to the Plant Manager/Superintendent for review and evaluation as the NRC reportability in accordance with the requirements given in Paragraph 3.2.2 of this Policy.

As applicable, nonconformances which are reportable under 10 CFR 50.55(e) are orally reported to the NRC by Midland Project Quality Assurance within 24 hours after their occurrence. Each such oral report is followed within 30 days by a written report to the NRC from the officer in charge. Also, as applicable, nonconformances which are reportable under 10 CFR 21 are orally reported to the NRC by Midland Project Quality Assurance within 2 days after their evaluation. Each such oral report is followed within 5 days by a written report to the NRC from the officer in charge.

3.1.4 SUPPLIER RESPONSIBILITIES

Consumers Power Company requires suppliers to report each potentially significant nonconformance to the responsible Quality Assurance organization and to the organization having project management responsibility. Each such nonconformance is reviewed and evaluated for reportability to the NRC in accordance with the process described in Paragraph 3.1.3, above. In addition, Consumers Power Company requires suppliers to comply with 10 CFR 21 for all procurements issued by Consumers Power Company after January 6, 1978, in accordance with the provisions delineated in 10 CFR 21.

3.2 REPORTING DURING THE OPERATIONS PHASE

3.2.1 QUALITY PROGRAM STATUS REPORTS

The Director, Quality Assurance - Nuclear Operations, prepares and issues a monthly status report to the Vice President - Nuclear Operations, and



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he to the Executive Vice President - Energy Supply. The report summarizes quality-related problems and nonconformances, describes the status of resolution, and makes recommendations for required actions. In addition, the Quality Assurance - Nuclear Operations Department conducts quarterly status meetings with the Vice President - Nuclear Operations and the Consumers Power departments involved in implementing the Quality Assurance Program for Operations.

3.2.2 EVENT REPORTING

Reportable events occurring at the plant site as defined by the Technical Specifications, violations of or events defined as reportable in Title 10 Code of Federal Regulations, undesirable trends in performance or a radioactive release beyond specified limits are documented by the Supervisor of the area or activity involved. The condition or event is reviewed by the Plant Manager/Superintendent or his designated representative to assure that actions taken are in compliance with the Technical Specifications and Title 10 Code of Federal Regulations. Documentation of the event and actions taken are provided by the Plant Manager/Superintendent. He reports promptly to the Vice President - Nuclear Operations and to the NRC as required by the Technical Specifications or Title 10 Code of Federal Regulations. Appropriate corrective action is taken according to Policy 16, "Corrective Action." Resolution of these events, including corrective action, is reported to the Vice President - Nuclear Operations and the NRC as required by the Technical Specifications and Title 10 Code of Federal Regulations.

3.2.3 REPORTING CHANGES IN FACILITIES OR PROCEDURES, TESTS AND EXPERIMENTS

Safety-related changes to plant facilities or procedures during operations; i.e., plant modifications and the conduct of tests and experiments not covered by the Plant Safety Analysis Report, are reviewed by appropriate Management, Plant Review Committee (PRC) and the Safety and Audit Review Board (SARB) for safety implications according to the requirements set forth in 10 CFR 50.59 and the Technical Specifications. Results of these reviews are documented by the Plant Staff. The Plant Manager/Superintendent directs the preparation of a report describing the changes, tests and experiments and a summary of the evaluation of each case. Changes to the facility or procedures, as described in the FSAR, along with summaries of the safety evaluations are reported at least annually to the NRC or upon request.



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3.2.4 SPECIAL NUCLEAR MATERIAL (SNM) STATUS

The Plant Manager/Superintendent directs the preparation of NRC Form 742, in accordance with Plant Procedures and 10 CFR 70.53. This report identifies the SNM material received, produced, possessed, transferred, consumed, disposed of or lost and is filed in accordance with 10 CFR 70.53.

NRC Form 741 is the principal document supporting the transaction of receiving SNM by Consumers Power or shipping SNM by Consumers Power. The Plant Manager/Superintendent directs the preparation of Form 741 and, as the responsible Consumers Power Official, signs the form, both upon receipt and shipment off-site of SNM. Copies of the form are distributed, according to Plant Procedures and the requirements of 10 CFR 70.54.

3.2.5 ANNUAL OPERATING REPORTS, ENVIRONMENTAL MONITORING REPORTS AND SPECIAL REPORTS

Annual Operating Reports, Environmental Monitoring Reports and Special Reports are prepared according to the requirements of the Technical Specifications by the Plant or General Office Staff as directed by the Nuclear Licensing Administrator. These reports are approved by him for submittal to the NRC.

3.2.6 SUPPLIER RESPONSIBILITIES

Consumers Power Company requires suppliers of safety-related items and services during the operations phase to comply with 10 CFR 21.

3.2.7 REPORTING OF AUDITS OF CORPORATE QUALITY ASSURANCE PROGRAM

Every two years, a major audit of the Consumers Power Corporate Quality Assurance Program is conducted and reported to the Vice President - Nuclear Operations and Executive Vice President - Energy Supply. The report summarizes quality-related problems and nonconformances, describes resolutions, and makes recommendations of where Quality Assurance Program Policies or Procedures might be improved. It is the responsibility of the Executive Vice President - Energy Supply to evaluate and approve recommendations therefrom and to inform the President and Chief Executive Officer of Pertinent audit results.



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Approved by:

[Signature] *R.L. [unclear] 9/23*
 Senior Vice President *9-26-80* Executive Vice President
 Projects, Engineering & Construction Energy Supply

[Signature]
 Vice President
 Midland Project
9/23/80

[Signature] *9/18*
 Vice President
 Nuclear Operations