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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 11 1979

Docket Nos.: 50-329/330

Mr. S. H. Howell
Vice President
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Dear Mr. Howell:

SUBJECT: REQUEST FOR ADDITIONAL QUALITY ASSURANCE INFORMATION

We have reviewed your response to question 1 of NRC's March 21, 1979 letter, "10 CFR 50.54 Request Regarding Plant Fill," and have some more questions regarding the QA program for the Midland project. These requests are contained in Enclosure 1. An earlier draft of Enclosure 1 provided the agenda for our meeting on September 5, 1979, with members of your staff and Bechtel. We request that you supplement your written responses to our letter of March 21, 1979, to include this additional information.

Also, our continuing review of the quality assurance program described in the FSAR for Midland Plant, Units 1 & 2 indicates the need for additional information in other areas. These are requested by Enclosure 2.

We would appreciate your responses to Enclosures 1 and 2 at your earliest opportunity. Should you desire clarification of these requests, please contact us.

Sincerely,

L. S. Rubenstein

L. S. Rubenstein, Acting Chief
Light Water Reactors Branch No. 4
Division of Project Management

Enclosures:
1. Supplemental Requests for Soils Settlement QA Information
2. Requests Regarding Other QA Matters

cc w/enclosures:
See next page

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Enclosure 1

SUPPLEMENTAL REQUEST FOR ADDITIONAL SOILS SETTLEMENT INFORMATION

23. We have reviewed your response to question 1 of our March 21, 1979 letter, "10 CFR 50.54 Request Regarding Plant Fill," including related amendments or supplements in your letters dated May 31, July 9, and August 10, 1979. We find that the information provided is not sufficient for completion of our review. Accordingly, provide the following additional information:

(1) Your response to question 1a does not provide sufficient information relative to the root causes of the 13 deficiencies. In order to determine the acceptability of the corrective actions for the 13 deficiencies considering the possibility that these deficiencies are of a generic nature that could affect other areas of the facility, a more complete understanding of the root cause of each deficiency is necessary. Accordingly, provide a clearer description of the root causes of each of the 13 deficiencies, including a detailed discussion of the conditions that existed to allow these deficiencies and the changes that have been made to preclude the recurrence of such deficiencies. In this regard, if contributing causes are inadequate procedures, inspections, specification call outs, design reviews, audits, and/or technical direction, a clear and detailed description is necessary as to what allowed these conditions to exist and why.

(2) Regarding your response to question 1b:

a. The first seven paragraphs do not provide sufficient information to assure that contradictions do not continue to exist in the PSAR, FSAR, design documents, implementing procedures, and as-built conditions since the controls described in these seven paragraphs were in effect prior to the I&E findings reported in J. Keppler's letter of March 15, 1979. Modify your response to clearly describe the control revisions you have instituted to preclude design contradictions.

b. Items 1, 2, and 3 of the eighth paragraph describe the review and update of the PSAR commitment list, the review of the inactive sections of the FSAR, and the review of procedure EDP 4.22, "Preparation and Control of Safety Analysis Reports," without describing the extent of the review process or the qualifications of personnel involved in the review. Accordingly, describe what each of these reviews entails, including the extent to which these reviews are verified, approved, and documented. Identify the organizational unit that is, or will be, involved in these reviews and the qualifications of the involved personnel.

c. Item 2 of the eighth paragraph states that a review of the remaining sections of the FSAR is not necessary,"... because of the ongoing review process described above." Describe your rationale for not reviewing these remaining sections of the FSAR when it appears that the original review of the FSAR was performed prior to issuance of the March 15, 1979 letter providing the I&E findings and prior to any corrective actions resulting therefrom.

d. Describe the extent of the audit to which you have committed in item 4 of the eighth paragraph.

(3) Question 1c requested that other activities be investigated to determine whether programmatic quality assurance deficiencies exist in view of the apparent breakdown of certain quality assurance controls, and that the activities investigated and the results be identified. Your response addressed certain specifications and instructions that received a review of 1977; providing for more in-depth verification; increasing management audits from one to two per year; increasing the staff of Bechtel's QA engineers at the site from five to eight instituting an overinspection program on certain Q-listed construction activities; assigning resident engineers at the site to aid in the interpretation of drawings and increasing their number from one to twenty-two; and initiating a trend analysis program.

a. According to your response, most of these actions were initiated in 1977. Describe your rationale for assuming that these actions provide confidence that quality assurance deficiencies do not exist in other areas. In order to determine if other areas have deficiencies, work already accomplished in these areas should be investigated. This includes the review of completed documentation, including inspection results, to verify consistency with design and SAR requirements. Also, representative sample inspections of completed work would seem appropriate to determine the acceptability of this work. Accordingly, describe a program in detail to accomplish the above or provide rationale as to why it is not necessary.

b. Your use of generalized statements such as "the review of", "increased audits," "overinspection," "identifying trends," and "increase of staff" does not provide sufficient specificity regarding the detail and extent these actions will take place and the effect they will have in assuring other areas are not deficient. Accordingly, in each of these areas provide a clearer description of these actions relative to the full impact they will have in assuring an effective QA program and in sufficient detail to assure that other areas are not deficient. In those cases where credit is taken for actions already accomplished (such as reviews, inspections, and audits), provide a summary of the results of these actions such that the success or failure of the actions can be determined.

(4) Considering the results of your investigation requested in our question 1c, question 1d asked that you describe your position as to the overall effectiveness of the QA program for the Midland Plant. Your overall assessment of the effectiveness of your program should be based on your revised response to our question 1c (see above question 23(3)). The results of this assessment, including a description of the scope and extent of the assessment effort and the identification and qualifications of the individuals involved in this assessment, should be reported to us.

Enclosure 2

421.0 QUALITY ASSURANCE BRANCH

421.5 (17.1) The Bechtel alternatives for ANSI N45.2.12 Draft 4, Revision 1, November 1974, which are described in FSAR Section 17.1.1.16, do not provide a clear commitment of your intent to comply with this standard. We are unable to determine whether these alternatives are in lieu of compliance to ANSI N45.2.12 or are intended to supplement the guidance provided by ANSI N45.2.12. Although these alternatives have been accepted in Bechtel Topical Report, BQ-TOP-1, Revision 2-A, 7/77, they alone do not constitute measures for full compliance with ANSI N45.2.12. Therefore, provide a specific description clearly indicating your commitment to ANSI N45.2.12. Any exceptions, alternatives, or clarifications should be specifically identified and justified with sufficient supporting detail.

421.6 (17.1, 3A) We have reviewed your exceptions in FSAR Section 17.1.1.13 for Revision 0 of Regulatory Guide 1.94, April 1975, which endorses ANSI N45.2.5-1974. Your position notes that the final mixing point for concrete may be at the batch plant stationary mixer or at the discharge chute of the truck mixer. While we generally agree that in-process strength testing may be conducted at the final mixing point, this position is contingent upon the establishment of an appropriate correlation test program. The 1974 version of ANSI N45.2.5 contained no guidance regarding correlation criteria and your FSAR does not discuss this item. Paragraph 6.11 of the 1978 version of the standard provides this guidance. Accordingly, we require that you address the extent of conformance to paragraph 6.11 criteria, both in terms of concrete construction completed to date and for ongoing or future concrete work.