



Consumers  
Power  
Company

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May 15, 1980

Mr J G Keppler, Regional Director  
Office of Inspection and Enforcement  
US Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

MIDLAND PROJECT  
NRC ITEM OF DEVIATION  
INSPECTION REPORT NO 50-329/80-01 AND 50-330/80-01  
FILE: 0.4.2 UFI: 73\*60\*13 SERIAL: 8968

- References: 1) S H Howell letter to J G Keppler; Midland Nuclear  
Plant - NRC Item of Noncompliance; Inspection Report  
No 50-329/80-01 and No 50-330/80-01; Serial Howe-60-80;  
dated March 21, 1980
- 2) G Fiorelli letter to S H Howell; dated April 18, 1980

Reference 1 transmitted our response to the Inspection Report No 50-329/80-01  
and No 50-330/80-01. Subsequent discussions with your staff identified the  
need for more information on the deviation concerned with handling of design  
changes on completed work. Reference 2 documents the understanding that  
Consumers Power Company would supply a supplemental response on the deviation.  
The attachment to this letter fulfills that commitment.

WRB/lr

Attachment

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SUPPLEMENTAL RESPONSE TO NRC DEVIATION 329/80-01-02; 330/80-01-03

A. Description of Deviation

Appendix B of Report 50-329/80-01 and 50-330/80-01 provides the following:

"Based on the inspection conducted on October 10-12, 1979 and January 8-11, 1980, it appears that certain of your activities were not in accordance with commitments, codes, standards, guides, or acceptable practices, as noted below.

Consumers Power Company letter dated June 18, 1976 to Mr J G Keppler, Item 11.B, states, 'Bechtel will change its program so that in the future, nonconformance reports need not be written when design is changed after the activity is complete. In lieu of this (using the NCR), Bechtel Field Engineering will either implement the design change or prepare a Field Change Request. In addition, the plan of action described for Topic 1 will be useful in preventing further instances of changes to design after completion of construction.

Consumers Power will review the procedural change resulting from this plan of action prior to the implementation.'

Contrary to the above, on October 11, 1979, the inspector established that a design change was made to Unit 2 Make-Up and Purification System, line No 4"-2CCB-1 from the Make-Up Pump, 2P-58B to Valve No 404-2-007 on April 19, 1978. This design change was neither implemented nor was a Field Change Request prepared. Furthermore, it was established that procedure for handling design change of completed work does not exist."

B. Response

The original response to this item stated that Bechtel was revising Bechtel Field Procedure FPD-1.000(Q), "Design Document and Correspondence Control," in order to resolve concerns on implementation of design changes to completed work. This change was to be effected by completing a New Drawing Sign-off Sheet for the required drawing per procedure FPD-1.000(Q) with an estimated date of completion being May 1, 1980. Subsequent to that response, there were a number of questions from Region III relative to that response. After analyzing those questions and our original response, it is no longer our intent to change FPD-1.000(Q). The following is submitted as the method by which such changes will be controlled:

As a part of the normal activities, Quality Control reviews quality control inspection records (QCIRs) and reconciles any differences in design document revision numbers. Specifically, a freeze will be placed on implementing design changes 90 days prior to scheduled turnover. Bechtel Engineering Department Project Instruction (EDPI) 4.47.1 will be issued by May 31, 1980 with an implementation date of June 30, 1980 to cover this. As a part of the quality verification, preparatory to turnover, Quality Control will identify the differences between the design document revision that was used for acceptance inspection on the applicable QCIRs and the revision that is in effect when the design

freeze is initiated. The differences between the revisions will be evaluated and the appropriate action taken to reconcile the differences. This will consist of either verifying that the revisions to the design document have not affected the work inspected on the applicable QCIRs or by conducting a reinspection to the revised design requirements. Quality Control will issue a procedure by the week of May 19, 1980 giving the mechanics of the design revision reconciliation process.

This system will track changes to insure that they are made and not lost and will be applied to all disciplines except where an equivalent closed loop system is in effect (eg, electrical cable pull and raceway cards).

This program resolves the question of design changes which have been made over the life of the project since by definition they exist at time of turnover. In addition to the Bechtel Program, Consumers Power Company's overinspection program has provided a check in the past and will continue to provide a check that completed work meets the latest design drawings and specifications.

JLC/lr  
5/14/80