

September 24, 1976

Distribution

Docket Nos. 50-329
and 50-330

Consumers Power Company
ATTN: Mr. S. H. Howell
Vice President
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STAFF EVALUATION OF PROPOSED IMPLEMENTATION OF REGULATORY GUIDES (MIDLAND PLANT, UNITS 1 AND 2)

This letter is in partial response to your request for a review of the implementation of regulatory guides on the Midland Plant. Specifically, it addresses Regulatory Guides 1.28, 1.30, 1.37, 1.38, 1.39, 1.58, 1.64, 1.74, 1.88 and 1.94 relating to quality assurance. Your proposed implementation of these guides initially was covered by your letter of October 15, 1975. In addition, this letter also provides comments on Regulatory Guides 1.54 and 1.55 addressed in your letters of November 7, 1975 and August 19, 1975, respectively.

As a result of discussions between the staff and your representatives at a meeting on November 14, 1975, it was determined that Consumers Power Company would revise its quality assurance submittal to incorporate the Consumers Power, Bechtel, and Babcock and Wilcox QA topical reports with some alternatives and clarifications. The revised quality assurance program description was submitted by your letter of March 29, 1976.

The staff has reviewed this revised quality assurance program description, which incorporates the Consumers Power Company Topical Report CPC-1, the Bechtel Topical Report BQ-TOP-1, Revision 1A, dated May 1, 1975 and the Babcock and Wilcox Topical Report BAW-10096A, Revision 1, dated March 1975. We find that we cannot conclude as to the acceptability of the revised program description until the following items are resolved:

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- 1) CPC has not identified their Topical Report No. CPC-1 by a revision number or date (note page 1 of submittal). This topical report was approved by NRC on April 21, 1976 and specific identification regarding this report is needed prior to completing our review.
- 2) The submittal indicates that quality assurance information on Regulatory Guide 1.54 (item I.G., page 5) and Regulatory Guide 1.94 (item I.K., page 7) will be provided after resolution of the implementation of these guides in the "Miscellaneous" category. Implementation of these guides as described in your letters of February 3, 1976 (R.G. 1.54) and February 10, 1976 (R.G. 1.94) is technically acceptable to the staff, but we need the quality assurance information.
- 3) The effectivity dates for implementing the quality assurance commitments, as listed in item III of the submittal, are to be provided later. We need these dates before we can complete our review.
- 4) Exceptions based on the need for modification of the plant design, environment, fabrication or construction, item IV of the submittal, are to be provided later. We require that you provide this information before we can complete our review.
- 5) Item I.F. on page 4 of the submittal lists Regulatory Guide 1.39 as endorsing ANSI N45.2 - 1973. This appears to be a typographical error. If appropriate, please confirm that the endorsement is of ANSI N45.2.3 - 1973.

Implementation of Regulatory Guide 1.55, "Concrete Placement in Category I Structures" (June 1973) was described in your letter of December 1, 1975. In that letter, you indicated that the design engineering office generates and transmits design drawings to the field engineering office. The field engineering office sends the design drawings to the rebar fabricator for detailing and also performs the checking of the detail drawings when received from the fabricator. The field engineering office may also prepare rebar shop drawings from the design drawings. In either instance, the detail drawings are checked by the field engineering office instead of the design engineering office. The design engineering office receives copies of rebar shop drawings only for information and not for review or concurrence. The exception taken for Midland is not in accordance with the requirements of Section C.2.a of Regulatory Guide 1.55, which states in part that, "That designer should check the design and shop drawings for practicality of:..." Even though the shop drawings may be prepared by the field engineering office, these drawings should be submitted to the designer who has the ultimate responsibility and therefore, the designer should review shop drawings for adequacy. It is the staff position that Midland must meet the requirements of Section C.2.a of Regulatory Guide 1.55 or describe acceptable alternatives for the specific exceptions taken.

It is requested that you provide the information as noted such that we can complete our review of the quality assurance program description as soon as practicable. If you have any questions regarding these matters, please contact us.

Sincerely,

SV

S. A. Varga, Chief

Light Water Reactors

Branch No. 4

Division of Project Management

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