

CENTRAL FILES

AUG 15 1978

Docket No. 50-329/78-5
Docket No. 50-330

Consumers Power Company
ATTN: Mr. Stephen H. Howell
Vice President
1945 West Parnall Road
Jackson, MI 49201

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

Gentlemen:

Thank you for your letter dated August 4, 1978, informing us of the steps you have taken to correct the noncompliance identified in our letter dated July 7, 1978. We will examine your corrective action during a future inspection.

Your cooperation with us is appreciated.

Sincerely,

R. F. Heishman, Chief
Reactor Construction and
Engineering Support Branch

cc w/ltr dtd 8/4/78:
✓ Central Files
Reproduction Unit NRC 20b
PDR
Local PDR
NSIC
TIC
Ronald Callen, Michigan Public
Service Commission
Dr. Wayne E. North
Myron M. Cherry, Chicago

8006120 529 Q

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OFFICE ▶	RIII 50-329/5	RIII 50-330	RIII 50-330	RIII 50-330	RIII 50-330	RIII 50-330
SURNAME ▶	Cook/dal	Vander	Hayes	Chaw	Danielson	Heishman
DATE ▶	8/11/78			8/14/78	8/14/78	8/14/78



Consumers
Power
Company

Stephen H. Howell
Vice President

General Offices: 1945 West Parnall Road, Jackson, Michigan 49201 • Area Code 517 788-0453

August 4, 1978
Howe-138-78

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 NUCLEAR PLANT - NRC ITEMS OF NONCOMPLIANCE
INSPECTION REPORT NO 50-329/78-05 AND NO 50-330/78-05

This letter, with its enclosure, is in response to your letter of July 7, 1978 which transmitted the results of your inspection of the Midland construction site on May 17-19, 1978 and which requested our written response to the items of noncompliance.

Bill M... for SH Howell

Enclosure: Consumers Power Company Response to the Items of
Noncompliance Described in NRC Inspection Report
No 50-329/78-05 and No 50-330/78-05

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CONSUMERS POWER COMPANY RESPONSE
TO THE ITEMS OF NONCOMPLIANCE
DESCRIBED IN NRC INSPECTION REPORT
NO 50-329/78-05 AND NO 50-330/78-05

I. WELDER HOUSEKEEPING

A. Descriptions of Noncompliance

Item 1 of Appendix A, and item 5b of Section III, of Report No 50-329/78-05 and No 50-330/78-05 provide the following:

"Contrary to 10 CFR 50, Appendix B, Criterion V, and the Bechtel welding standard WFMC-1 titled "Welding Filler Material Control Procedure Paragraph 6.9 which states that, 'Individual welders shall keep their work areas clear of unauthorized or discarded weld filler materials and electrode stubs and damaged electrodes shall be placed in stub buckets,' six damaged coated electrodes and one stainless bare electrode were found at the 598 foot level in the Unit 2 Containment Building...."

"On May 18, 1978, while on a tour of the plant, the inspector saw several partially burned weld rod stubs. These were retrieved from the floor by a licensee representative and an infraction was given as outlined in Appendix A."

B. Corrective Action

Corrective action consisted of discarding the six damaged covered electrodes and one bare weld rod that were discovered at the 598 elevation in the Unit 2 Containment Building.

Corrective action to prevent recurrence consisted of the following:

1. All superintendents, general foremen, and foremen were notified of the welding filler material control requirements on site, including the requirement that damaged electrodes, stubs, and bare wire are to be placed in the stub buckets issued for that purpose, and are not to be dropped on the floor or the ground.
2. Welding QC engineers and field welding engineers have been instructed to check for electrode stubs and other welding filler material that has been discarded on the ground.
3. Each welder was instructed that prior to leaving the Weld Test Shop electrode stubs, damaged electrodes, and bare wire are to be placed in the stub buckets, and are not to be dropped on the ground. Each welder was instructed to return the stub

bucket with the electrode stubs, damaged electrodes, and bare wire to the rod room at the end of the shift.

4. Field welding engineers have reminded the welders to use the stub buckets, and not to drop electrode stubs and damaged welding filler materials on the ground.

The corrective action cited above to prevent recurrence has taken place, and will periodically take place, on a repetitive basis, until construction is complete.

Compliance with the welding filler material control requirements has been achieved. Since there are at present over 200 welders welding full time on two shifts and since 150 or more welders are expected to be added, there may be some random instances where electrode stubs and damaged welding filler material will be dropped on the ground by the welders, in violation of the welding filler material control program. In our opinion, these occurrences will be minimal. The stubs will, however, be removed as they are discovered.

II. UNPROTECTED SPOOL PIECES

A. Descriptions of Noncompliance

Item 2 of Appendix A, and item 1 of Section IV of Report No 50-329/78-05 and 50-330/78-05 provide the following:

"Contrary to 10 CFR 50, Appendix B, Criterion V, and the Bechtel technical specification for field fabrication of piping, procedure No 7220-M-204(Q), two separate spool pieces were identified that were not being protected in the manner specified. This item of noncompliance requires no response since corrective action was completed prior to completion of the inspection...."

"Prior to the inspection, the licensee had identified similar discrepancies and documented these findings on Nonconformance Report (NCR) No NCR-01-9-8-041, dated May 9, 1978. This NCR requested Bechtel to make a thorough inspection of the facility, correct and document discrepancies noted, and to instruct craft personnel. A response from Bechtel is expected by May 26, 1978.

Since the licensee corrected the discrepancies noted by the inspector and has taken responsible management action to correct similar discrepancies, no response to the apparent item of noncompliance is required."

B. Corrective Action

As noted above, appropriate corrective action has already been taken and documented, to the satisfaction of your inspector, so that "no response to the apparent item of noncompliance is required."