

AUG 4 1975

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

DOCKET NOS: 50-329 AND 50-330

APPLICANT: CONSUMERS POWER COMPANY (CPC)

FACILITY: MIDLAND UNITS 1 AND 2

SUMMARY OF MEETING ON IMPLEMENTATION OF QA REGULATORY GUIDES

On July 30, 1975 members of the NRC staff met in Bethesda, Maryland with representatives of CPC, Bechtel Associates Professional Corporation (Bechtel) and Babcock & Wilcox (B&W) to discuss the implementation of QA Regulatory Guides at the Midland plant. The attendance list is attached as Enclosure No. 1.

We reviewed with the applicant the QA position of the July 22, 1975 meeting in which it was indicated that across-the-board conformance will generally be necessary for those guides pertaining to Quality Assurance. We further indicated that the staff would limit consideration of relief on QA guides to those instances where plant design, procurement, fabrication or construction would have to be modified to meet that guidance.

The staff then identified to CPC those Regulatory Guides that pertain to QA. Those guides are as follows: R. G. 1.26, 1.30, 1.37, 1.38, 1.39, 1.54, 1.58, 1.64, 1.74, 1.88 and 1.94. The staff also indicated that the following ANSI documents presently published in Reg Guides should be adhered to in the Midland facility: N45.2.8, N45.2.12, N45.2.13 (N45.2.5 and N45.2.9 are already covered in Reg Guides 1.94 and 1.88, also ANSI N101.4 is covered by Reg Guide 1.54). For information purposes, the licensee was told that the "Green Book" - WASH-1309 will be phased out in the near future when a revision, presently in the works to the Standard Review Plans gets issued.

CPC asked how they should interpret the verb "should" as used in the QA Reg Guides and the ANSI documents. They were told that "should" should be interpreted as "shall" unless CPC provides a justification to the contrary.

With regard to the current status of implementation of the QA Reg Guides by CPC, Bechtel and B&W, CPC indicated that based on the identification of the Reg Guides applicable to QA, as given in this meeting, they would examine the extent to which they have been implemented and that this would be the subject of further discussions.

With regard to implementation of modified CPC, B&W and Bechtel QA programs, the licensee is in the process of determining the extent and dates by which they would be able to commit to such implementations

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With regard to the imposition of additional QA requirements on the sub-contractors to Bechtel and B&W, the licensee stated that based on prior experience it will be a real problem to change anything once a contract has been let. The licensee is aware however, of the need to pursue this matter. With regard to a schedule for the licensee to present its positions on the above indicated QA Regulatory Guides, the staff requested that we be advised of the schedule by August 12, 1975.

Although not directly related to Reg Guide implementation (the subject of this meeting) the staff recommended that CPC take a look to see to what extent the QA, as presently contained in the application, is consistent with the staff's recently issued Standard Review Plans.

With regard to surveillance and reporting Reg Guides as mentioned in Item D of the staff position in implementation of Reg Guide for this plant, CPC was given a tentative listing as follows: R. G. 1.16, 1.21, 1.22, 1.23, 1.35, 1.51, 1.52 and 1.83. A copy of this staff position is attached as Enclosure No. 2.

Original Signed by
A. Schwencer

A. Schwencer, Chief
Light Water Reactors Branch 2-3
Division of Reactor Licensing

Enclosure No. 1:
Attendance List

Enclosure No. 2:
Staff Position

cc w/encl:
Mr. S. H. Howell
Howard J. Vogel, Esq.
Myron M. Cherry, Esq.
Harold F. Reis, Esq.
Honorable William H. Ward
Irving Like, Esq.
James A. Kendall, Esq.

OFFICE →	RL: LWR 2-3				
SURNAME →	ASchwencer:pga				
DATE →	8/6/75				

ENCLOSURE NO. 1

MIDLAND QA REGULATORY

GUIDES MEETING

JULY 30, 1975

ATTENDANCE LIST

BECHTEL

R. Baker, Engineering
W. Holub, QA

CONSUMERS POWER COMPANY

H. Slager, Midland QA Administrator

BABCOCK & WILCOX

J. Anderson, Licensing
D. Frerichs, Project Manager
E. Walder, QA Engineer

NRC - STAFF

A. Schwencer, DRL
J. Silder, DRL
J. Gilray, QA
R. Warnick, I&E
B. Belke, QA
H. George, QA
J. Spraul, QA
R. Vollmer, QA

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ENCLOSURE NO. 2STAFF POSITIONIMPLEMENTATION OF REGULATORY GUIDESFOR THEMIDLAND PLANT, UNITS 1 AND 2

1. The staff's review and evaluation of the operating license application for the Midland Plant will be performed using the staff's published Standard Review Plans, with due consideration being given to the status of the design, procurement, and construction of the plant at the time the acceptance criteria contained in those plans became available.
2. It is expected that the plant will conform to all Regulatory Guides, and revisions thereto, that were issued prior to the issuance of the staff's Safety Evaluation Report for the Midland Construction Permit (i.e., November 12, 1970), as well as commitments established in the application and the public hearing.
3. With respect to Regulatory Guides, and revisions thereto, issued since November 12, 1970, and with respect to staff positions contained in the Standard Review Plans, the staff will provide guidance to the applicant prior to submittal of the operating license application regarding the applicability of these Guides and positions to the Midland Plant operating license review. To provide this guidance, the staff will review information submitted by the applicant in accordance with the following guidelines:
 - A. The plant should conform to all Guides and positions considered necessary by the staff to provide substantial, additional protection which is required for the public health and safety. (Management will review these requirements to assure that they have been justified as absolutely essential for safety, i.e., that an unacceptable safety condition would result without compliance.
 - B. Guides and Positions issued since November 12, 1970, other than those in paragraph A above, need not be conformed to if the affected system and equipment designs have been completed, or if fabrication or construction is effectively underway.

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Enclosure No. 2

- 2 -

- C. The need for conformance with Guides and positions issued since November 12, 1970 other than those in paragraph A above and that affect systems and equipment designs still in progress and for which fabrication and construction are pending, will be evaluated by assessing and balancing safety significance and project schedule and cost. Management will also review this evaluation to assure that a proper balance has been achieved.

- D. The plant should conform to all Guides applicable to quality assurance, surveillance, and reporting procedures. The staff will consider exceptions from such guides only in instances where the plant design, procurement, fabrication or construction would have to be modified to conform to the Guides.

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