



Consumers
Power
Company

Regulatory Docket File

General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

March 23, 1977

Director of Nuclear Reactor Regulation
Attn: Mr Roger Boyd, Director
Division of Project Management
US Nuclear Regulatory Commission
Washington, DC 20555



MIDLAND PROJECT
DOCKET NOS 50-329, 50-330
QA REGULATORY GUIDE RESPONSES
FILE: 0505.2 SERIAL: 3349

On November 9, 1976 we submitted a proposed "Quality Assurance Program" description to the Director of Nuclear Reactor Regulation with the request that it be evaluated as to acceptability. In a November 26, 1976 letter from S A Varga to S H Howell the NRC indicated that the information provided by the November 9 letter represented an acceptable program for the design and construction of the Midland Plant Units 1 and 2. Subsequent to issuance of the November 9 letter, Consumers Power has had cause to modify and clarify certain positions taken in the Quality Assurance Program description. Therefore, attached to this letter is a revised Quality Assurance Program description which is submitted for NRC review as to the acceptability. Following is a listing of the changes made to the program description contained in the November 9, 1976 letter:

1. Page 1, Item 1 has been changed to indicate that the revision of the Consumers Power Topical Report to be implemented is Revision 5 in lieu of Revision 4. The reason for this change is that Consumers Power has received approval for implementation of its Topical Report No. CPC-LA, Revision 5.
2. The titles of Sections I - D, E, F, G, H, I, J and K have been revised to identify the date or revision number of the Regulatory Guide which will be implemented (subject to interpretations and alternates) for the Midland Project. The reason for this change is that when this program was originally developed very few of the Regulatory Guides involved has been revised. Since many of these Regulatory Guides have now been revised, it is believed necessary to indicate which Regulatory Guide revision is applicable in each case.
3. Page 12 of the program description has been revised to include the information submitted to the NRC on November 10, 1976 in response to NRC Staff questions.

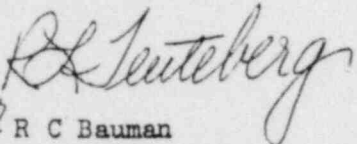
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4. On pages 14 and 15, a new Section I - L has been added to: a) explicitly describe commitments to revisions of Regulatory Guides or ANSI Standards which deviate from those contained in the "WASH" documents, and b) describe which drafts of the Draft ANSI N45.2.12 and ANSI N45.2.13 Standards will be implemented. These drafts are different from the "WASH" documents. They are, however, the drafts which Bechtel plans to implement. It should be noted that these versions are identical to those contained in Consumers Power Quality Assurance Topical Report - Policy No 2, Section 3.1 d, and, therefore, Consumers Power presumes the acceptability of these draft standards by the NRC Staff.
5. Page 15, No III has been revised to change the effectivity date for the Consumers Power Topical Report to December 2, 1976. This revision is based on the change from Revision 4 to Revision 5 as described in Item No 1 above.

The commitment for Bechtel activities has been changed from April 1, 1977 to May 15, 1977. While considerable effort has been expended attempting to meet the April 1, 1977 date we find that implementation of all the Bechtel commitments by that date is not feasible.

Please review the attached revised "Quality Assurance Program" description and provide an evaluation as to its acceptability with the same understanding as that provided for the November 9, 1976 submittal, ie, the effectivity date for implementation of the Babcock & Wilcox commitments will be provided after Revision 3 to the Babcock & Wilcox Topical Report has been approved by the NRC.


For R C Bauman
Project Engineer

RCB/HWS/fw