

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Construction Inspection

IE Inspection Report No. 050-329/75-06
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Licensee: Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Midland Plant Construction Site
Units 1 and 2
Midland, Michigan

License No. CPPR-81
License No. CPPR-82
Category: A

Type of Licensee: PWR (B&W) Unit 1 - 650 MWe
Unit 2 - 818 MWe

Type of Inspection: Routine, Unannounced

Dates of Inspection: July 29-31, 1975

Principal Inspector: *D. W. Hayes*
I. T. Yin

8-18-75
(Date)

Accompanying Inspector: *E. W. K. Lee*
E. W. K. Lee

8/15/75
(Date)

Other Accompanying Personnel: None.

Reviewed By: *D. W. Hayes*
D. W. Hayes
Senior Reactor Inspector
Construction Projects

8-18-75
(Date)

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SUMMARY OF FINDINGS

Inspection Summary

Inspection on July 29 - 31, (75-06): Follow-up inspection on NSSS equipment onsite storage, field design sketch handling, linear plate RT film density deviation, and other previously identified unresolved matters.

Enforcement Items

None.

Licensee Action on Previously Identified Enforcement Items

None.

Other Significant Items

A. Systems and Components

None.

B. Facility Items (Plans and Procedures)

As a result of a number of rebar discrepancies during auxiliary building concrete pours, a new procedure for preparation of field sketches was prepared by the Bechtel Power Corporation.

C. Managerial Items

Effective August 1, 1975, Mr. F. Southworth is to become the new Consumers Power Company (CP) Project Quality Assurance Services Department (PQASD) Director, replacing Mr. G. Keeley. Mr. Keeley has been appointed Midland Project Manager effective the same day.

D. Noncompliance Identified and Corrected by Licensee

None.

E. Deviations

Contrary to the commitment in paragraph 5.1.4.1.1.c of the PSAR, containment liner plate radiographic film density fails to meet the proposed ASME Boiler and Pressure Vessel (B&PV) Code, Section III, Division 2, requirements. This matter was identified by the licensee. (Report Details, Section II, Paragraph 1)

F. Status of Previously Reported Unresolved Items

1. Unit 2 NSSS Equipment Onsite Storage (IE Inspection Reports No. 050-329/75-03 and No. 050-330/75-03)

- a. Removal of the Spraylat coating from the vessel coated areas and covering vessels with tarpaulins have been undertaken. This item remains open pending completion of the task. (Report Details, Section I, Paragraph 1)
- b. Inspection of NSSS internal "as received" conditions has been completed. The vessel internals were determined to be in good condition. (Report Details, Section I, Paragraph 2)

2. Work Interface Between Design and Construction Engineering Groups

The lack of adequate control of field sketches resulted in the auxiliary building rebar problem. A new procedure has been written and implemented to correct this condition, and this matter is considered resolved. (Report Details, Section I Paragraph 3)

3. Discrepancy Between PSAR and Specification 7220-C-231 (IE Inspection Reports No. 050-329/75-03 and No. 050-330/75-03)

The licensee stated that the PSAR will not be revised to include the inadvertency margin and/or the rejection limit, as stated in the specification. The inspector stated that this matter will be referred to IE Headquarters and Regulatory Licensing for final resolution.

Management Interview

- A. The following personnel attended the management interview at the conclusion of the inspection:

Consumers Power Company (CP)

H. W. Slager, Midland Quality Assurance Administrator
J. L. Corley, Midland Quality Assurance Superintendent
G. W. Somsel, Field Electrical Supervisor
P. K. Welling, Construction Control Supervisor

Bechtel Power Corporation (BPC)

T. C. Valenzano, Project Field Engineer
G. L. Richardson, Lead Quality Assurance Engineer
J. P. Connolly, Project Field Quality Control

B. Matters discussed and comments, on the part of management personnel, were as follows:

1. In regard to the two (2) previously identified unresolved items relative to the Unit 2 NSSS equipment onsite long-term storage requirements, Spraylat removal is still considered an open item upon work completion. Inspection of NSSS equipment interiors has been completed and no problem areas identified. The inspector stated that, although the technique and engineering judgement on inspecting the vessels are sound, certain procedural requirements had not been followed. The inspector added that were possible (as in this case) future justification for deviating from procedures should be made prior to the work being performed. The licensee representative agreed.
2. The inspector stated that the unresolved item previously identified on work interface control relative to field sketch handling is considered resolved, after reviewing the BPC's subject new e.
3. The inspector stated that the discrepancy between PSAR and specification, relative to concrete slump identified during an inspection on February 5 and 7, 1975, will be referred to IE Headquarters and Regulatory Licensing for final resolution.
4. The inspector stated that the linerplate RT film density matter will be reviewed during a subsequent inspection pending resolution between the licensee and his contractor. (Report Details, Section II, Paragraph 1)
5. The inspector stated that two (2) BPC nonconformance reports, one (1) CP nonconformance report, and one (1) BPC quality assurance discrepancy report were reviewed and appeared to be closed out properly. (Report Details, Section II, Paragraph 2)

REPORT DETAILS

SECTION I

Prepared By: I. T. Yin

Persons Contacted

The following persons, in addition to the individuals listed under the Management Interview Section of this report, were contacted during the inspection.

Consumers Power Company (CP)

R. E. Whitaker, Field Quality Assurance Engineer
D. R. Keating, Field Quality Assurance Engineer - Mechanical
D. E. Horn, Field Quality Assurance Engineer - Civil
D. J. Vokal, Mechanical Field Engineer

Bechtel Power Corporation (BPC)

K. F. Pulito, Field Engineer
W. P. Giehm, Senior Safety Representative

Results of Inspection

1. Unit 2 NSSS Equipment Spraylat Coating Damage

It was determined by the licensee that damaged Spraylat coating will not be repaired. Instead, all Spraylat coating will be removed from Unit 2 NSSS vessels and pipes stored outdoors and then, specially designed tarps will be utilized for the needed weather protection. The project status is shown in the table below:

Unit 2 NSSS Equipment	Tarps	Estimated Spraylat Removal Completion Date
Reactor Vessel	Onsite	July
Reactor Vessel Cover Head	Requisition Approved	Unknown
The Two Steam Generators	Onsite	September
Pressurizer	Onsite	September
Primary Piping	Requisition Approved	Unknown

2. Inspection of Unit 2 NSSS Vessels "As Received" Condition

Since the last NRC site inspection in April 1975, moisture indicators, in addition to desiccant and nitrogen, were installed for protecting the vessel interior. Prior to the programmed long-term onsite outdoor storage, the two (2) steam generators, the pressurizer, and the reactor vessel were inspected in June 1975, for interior surface deterioration. The engineering evaluation has determined that all areas inspected were in acceptable condition. The inspector concurred with BPC's finding, as well as technique and safety precaution given in carrying out such a task. However, certain approved work procedures had not been observed and followed. The inspector cautioned the licensee that future work procedures should be prepared, reviewed, and approved to reflect actual needs and deletion of any parts of a general type procedure should be justified and documented prior to start of the work activities. The licensee agreed. This matter is considered closed.

3. Procedure for Handling the Field Engineering Comments and Sketches

Insufficient procedures and controls of design and field engineering interface had been identified as contributing to a auxiliary building rebar placement nonconformance. Attempts to resolve this matter had been made by adding additional requirements into the existing BPC Procedure for Review of Vendor Drawings for Midland Units 1 and 2, FPC-3, Revision 3. During the previous NRC site inspection (IE Inspection Reports No. 050-329/75-03 and No. 050-330/75-03) the inspector commented on the draft and identified a number of deficiencies. Since then, BPC has abandoned such an attempt and prepared a new Procedure for Preparation of Field Sketches documented in Field Project General (FPG)-14, Revision 0, dated May 28, 1975. The inspector reviewed the new procedure content in the areas of: (1) preparation, (2) change control, and (3) distribution and considered it to be adequate and satisfactory. In regard to the lack of description of responsibilities of both Bechtel Associates Professional Corporation (BAPC) and BPC identified during the last NRC site inspection, the inspector stated he has no further questions based on reviewing the following documentation:

Midland Project Plant Units 1 and 2 Procedures Manual, Issued
By BPC and CP

Part II - Division Project Functions

Section 2 - Bechtel Power Corporation Division Project Function -
Engineering

Section 3 - Bechtel Power Corporation Division Projection
- Construction.

4. Effects of Carpenter Strike

The carpenters strike which lasted approximately two-and-a-half months (since May 1975) affected concrete pour schedules for the auxiliary building and the Unit 1 containment structure. The licensee project personnel indicated that they plan to catch up lost work activities by increasing the manual work force to about 300 from the present 100 plus level before November 1975.

REPORT DETAILS

SECTION II

Prepared By: E. W. K. Lee

Persons Contacted

The following persons in addition to the individuals listed under the Management Interview of this report, were contacted during the inspection.

Consumers Power Company (CP)

D. E. Horn, Field Quality Assurance Engineer - Civil
D. R. Keating, Field Quality Assurance Engineer - Mechanical

Results of Inspection

1. Containment Liner Plate Radiograph Film Density

At the end of June, the licensee informed IE:III that 15 of the 100 liner plate radiograph films reviewed did not meet the density requirements stated in the proposed ASME Boiler and Pressure Vessel Code, Section III, Division 2, which is committed by paragraph 5.1.4.1.1.c of the PSAR.

During this inspection, the inspector established that Nonconformance Report (NCR) No. QF-51, dated June 23, 1975, had been initiated by the licensee. The NCR recommended four (4) corrective actions. The inspector also reviewed the licensee's contractor's response dated July 21, 1975, to NCR No. QF-51. It was established that the contractor fulfilled the licensee's recommended corrective actions. Nonetheless, a CP's letter dated July 28, 1975, stated that corrective actions are considered adequate, except for the extrapolation of data to 1.49 film density. The licensee's contractor had not responded to CP's rejection. This matter remains unresolved pending further review during a subsequent inspection.

2. Review of NCR's

The inspector reviewed the following NCR's and determined that they appeared to be closed out properly.

- a. Bechtel Power Corporation NCR's No. 256 and No. 262.
- b. CP's NCR No. QF-37.
- c. Bechtel Power Corporation Quality Assurance Discrepancy Report No. 051.

3. Review of Storage Procedure

The inspector reviewed Bechtel Power Corporation Procedure No. FPG-3, Revision 3, dated July 15, 1975, "Procedure for Storage and Storage Maintenance of Q-listed Equipment and Material" and determined it to be acceptable.