

Docket

NOV 20 1973

Docket Nos. 50-329
and 50-330

Consumers Power Company
ATTN: Mr. S. H. Howell
Vice President
212 West Michigan Avenue
Jackson, Michigan 49201

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

Gentlemen:

The Atomic Safety and Licensing Appeal Board has been reviewing certain aspects of Quality Assurance for your Midland Plant, Units 1 and 2. On October 5, 1973, the board issued Memorandum and Order ALAB-152 that orders the Regulatory staff to:

- a. determine the extent to which, as presently constituted, the Bechtel QA organization is in conformity with the requirements of Section I of Appendix B to 10 CFR Part 50, as construed in ALAB-147 and herein;
- b. require such revision of that organization, if any, as may be necessary to effect promptly such conformity; and
- c. require such revision of the relevant Bechtel organizational charts and manuals as may be necessary to ensure that they fully and accurately delineate the authority and duties of all Bechtel personnel and organizations performing QA functions.

Pursuant to that order, the Regulatory staff has determined that certain changes in the presentation of the Field Quality Control Program are required in order to make clear the independence of Project Field Quality Control activities from the Project Superintendent. Your staff met with the Regulatory staff on October 31, 1973, and discussed the necessary changes. The enclosures to your letter of November 9, 1973, included a revised Field Quality Control organization chart dated November 1, 1973, and supplementary requirements to the Field Inspection Manual Procedure G-1.

APP 1

LB

OFFICE					
SURNAME	8006230743		A		
DATE					

The Regulatory staff has reviewed your letter of November 9 and the enclosures. The staff has found as follows:

1. The November 1 edition of the Field Quality Control organization chart is acceptable to the staff and in conformance with the staff's interpretation of the Board's order.
2. The description of the administration of the Field Quality Control Program given in item 3c of the supplementary procedures to the Field Inspection Manual Procedure G-1 is unacceptable. This procedure states that some undefined "project construction organization" assures that "any salary increases recommended by the Project Field Quality Control Engineer are within the limits established by Bechtel's personnel policy --- and within governmental wage guidelines." This description leaves some doubt regarding the independence of Project Field Quality Control personnel from the Project Superintendent.
3. Item 5 of Field Inspection Manual G-1 is not clear. It states that Field Engineers are being assigned by the Project Field Engineer" --- to perform in process, production control, inspection activities." It must be made clear that independent inspection operations that constitute quality acceptance of safety related structures, systems and components, shall not be assigned to the Field Engineers but shall be performed by Quality Control Engineers.

Pursuant to Memorandum and Order ALAB-152, you are hereby directed to immediately implement the revised Project Field Quality Control organization chart dated November 1, 1973, and the supplementary requirements to Field Inspection Manual Procedure G-1 (Project Special Provisions Notice SP/PSP #3, Rev. 2, 7220) except that these supplementary requirements shall be further revised to remove all salary review functions from the purview of the project construction organization and to specify that all independent inspection operations that constitute quality acceptance of safety related structures, systems and components shall be performed by Quality Control Engineers. Furthermore, within 15 days of the date of this letter, you shall revise accordingly all pertinent Quality Assurance manuals and charts and advise us of your compliance with this decision.

Sincerely,

Original Signed

A. Giambusso, Deputy Director
for Reactor Projects

Directorate of Licensing

OFFICE →					
BU/KA/DAE →	cc: See next page				
DATE →					

The Regulatory staff has reviewed your letter of November 9 and the enclosures. The staff has found as follows:

1. The November 1 edition of the Field Quality Control organization chart is acceptable to the staff and in conformance with the staff's interpretation of the Board's order.
2. The description of the administration of the field quality control program given in item 3c of the supplementary procedures to the Field Inspection Manual Procedure G-1 is unacceptable. This procedure states that some undefined "project construction organization" assures that "any salary increases recommended by the Project Field Quality Control Engineer are within the limits established by Bechtel's personnel policy --- and within governmental wage guidelines." This description leaves some doubt regarding the independence of Project Field Quality Control personnel from the Project Superintendent.
3. Item 5 of Field Inspection Manual G-1 is not clear. It states that Field Engineers are being assigned by the Project Field Engineer " --- to perform in process, production control, inspection activities." It must be made clear that inspection operations that constitute quality acceptance of safety related structures, systems and components, shall not be assigned to the Field Engineers but shall be performed by Quality Control Engineers.

Pursuant to Memorandum and Order ALAB-152, you are hereby directed to immediately implement the revised Project Field Quality Control organization chart dated November 1, 1973, and the supplementary requirements to Field Inspection Manual Procedure G-1 (Project Special Provisions Notice SP/PSP #3, Rev. 2, 7220) except that these supplementary requirements shall be further revised to remove all salary review functions from the purview of the project construction organization and to specify that all inspection operations that constitute quality acceptance of safety related structures, systems and components shall be performed by Quality Control Engineers. Furthermore, within 15 days of the date of this letter, you shall revise accordingly all pertinent Quality Assurance manuals and charts and submit an appropriate amendment to your Application for Reactor Construction Permit and Operating License.

Sincerely,

A. Giambusso, Deputy Director
 for Reactor Projects
 Directorate of Licensing

OFFICE →					
SURNAMES →	cc: See next	page			
DATE →					

S. H. Howell

- 3 -

NOV 20 1973

cc: Harold Reis, Esquire
Newman, Reis and Axelrad
1100 Connecticut Avenue, NW
Washington, D. C. 20036

DISTRIBUTION:
AEC PDR
Local PDR
Dockets
PWR-4 Rdg
RP Rdg
RCDeYoung
JHendrie
AKenneke
RWKlecker
ASchwencer
SDMacKay
EIGoulbourne
DKartalia
RO (3)
ACRS (16)
JPanzarella
5 extra
AGiambusso
RSBoyd

OGC
G. STAPLES
AGS 11/16

on technical aspects
only - long way
of approach
B

OFFICE	PWR-4	L:C/PW R-4	L:AD PWRs	L:DD/RP	L:C/GAB	L:TR/CS
SURNAME	SDMacKay:kmf	ASchwencer	RCDeYoung	AGiambusso	R. VOLLMER	R. D. TESESCO
DATE	11/16 173	11/16 173	11/18 173	11/20 173	11/16 173	11/23 173