Consumers Power Company

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US Nuclear Regulatory Commission
Region III
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MIDLAND NUCLEAR PLANT - NRC ITEMS OF NONCOMPLIANCE -
INSPECTION REPORT NO 76-09 - DOCKETS 50-329 AND 50-330

This letter is in response to your letter of December 17, 1976 which transmitted the results of your inspection of the Midland construction site on November 16-19, 1976 and which requested our written response on two items of noncompliance.

CONSUMERS POWER COMPANY RESPONSE
TO ITEMS OF NONCOMPLIANCE
DESCRIBED IN NRC INSPECTION REPORT #76-09

I. Failure to Identify Broken Rebar as Nonconforming

A. Descriptions of the Noncompliance

1. From Page 2 of Report #76-09:

"Contrary to Criterion XVI of Appendix B to 10 CFR, Part 50, and Consumers Power Company Quality Assurance Policy No. 15, a Nonconformance Report was not written to identify the reinforcing steels that were broken due to bending for equipment installation access. This infraction applies to Units 1 and 2."

2. From Pages 7 and 8 (Item No. 1) of the report:

"10 CFR, Part 50, Appendix B, Criterion XVI, states, in part, 'Measures shall be established to assure that conditions adverse to quality such as ... nonconformances are promptly identified...'

The CP Quality Assurance Policy, No. 15, Rev. 3, dated December 1, 1975, 'Nonconforming Items,' states, in part, that 'Items, services, or activities which are deficient in characteristic, documentation, or procedure which renders the quality unacceptable or indeterminate and which is considered significant to safety, are identified as nonconformances. Nonconforming items (structures, systems components, parts, materials) are identified by marking, tagging, segregating, or by documentation. Nonconforming items are controlled to prevent their inadvertent installation or use.'

In addition, Bechtel Power Corporation QC Notices Manual, SF/PSP G-3.2, Rev. 1, dated June 28, 1976, titled 'Control of Nonconforming Items' Paragraph 3.2 Control of Nonconforming Items, Paragraph 3.2.4 (Partial)

I. Failure to Identify Broken Rebar as Nonconforming

A. Descriptions of the Noncompliance

2. (Contd)

'Nonconformances discovered after final verification inspection of completed work shall be reported, controlled and dispositioned by the use of a Nonconformance Report....'

Paragraph 3.4 Installation and Further Work on Nonconforming Items, 'Nonconforming items documented on a nonconformance report may be released for installation or further work subject to the following condition:

(1) .....

(2) Traceability and identification as a nonconforming item are maintained by tagging or other appropriate methods so that the item can be removed or corrected at a later date prior to use.'

Contrary to the above requirements, the inspector observed that two No. 11 rebars and one No. 8 rebar were broken because of bending for equipment installation access at east and west sides of the Engineering Safeguards rooms in the Auxiliary Building, Floor Elevation 586'-0". The identification and documentation were not available for review at the time of inspection. This is considered a noncompliance item that requires resolution by the licensee."

B. Pertinent Background Information

While the reinforcing steel had not been identified as nonconforming at the time of the NRC inspection, it would have been identified during the preplacement inspection made by Bechtel Quality Control prior to placing any concrete which would have embedded the bars in question.

I. Failure to Identify Broken Rebar as Nonconforming (Contd)

C. Corrective Action

1. Bechtel Quality Control has performed an inspection and has identified all existing broken rebar (dowels) as nonconforming in accordance with SF/PSP G-3.2, "Control of Nonconforming Items".

2. The Bechtel Project Field Engineer will revise field instruction FIC-7 by January 31, 1977 to instruct all Civil Field Engineers to identify any broken rebar to Quality Control. Qaulity Control will then identify these broken rebar as nonconforming in accordance with SF/PSP G-3.2.

II. Reactor Vessel Skirt Hold Down Studs Not Protected After Installation

A. Description of the Noncompliance

1. From Page 2 of the report:

"Contrary to Criterion XIII of Appendix B to 10 CFR, Part 50, ... hold down studs for the reactor vessel skirt were not protected, following installation of the embedments. This infraction applies to Unit 1 only."

2. From Page 13 of the report:

"Two concentric rings of studs which will hold down the reactor pressure vessel skirt after setting of the vessel were not uniformly protected from corrosion or damage from falling objects. These seismic Class 1 studs were installed in the embeds and surrounding concrete. In two studs the threads were open to the environment with no protection. Of the remaining 94 studs some were covered with tape and others with a netting material. The contractor had instituted a storage level of 'C' before installation for these studs which required either inside storage or outside covered storage and surveillance every 30 days. After installation, a continuing program for corrosion protection and other protection, as required, should have been instituted but was not."

II. Reactor Vessel Skirt Hold Down Studs Not Protected After Installation (Contd)

B. Pertinent Background Information

In the interest of accuracy, it should be noted that the studs in question are in Unit 2, not Unit 1. The Unit 1 studs have not been installed at this time.

C. Corrective Action

Bechtel Field Engineering will generate a F-10 form (Maintenance Requirements) to cover inplace maintenance requirements. This F-10 will include requirements for protection of the bolts and periodic inspection. This F-10 will be issued and protection completed by January 31, 1977.