## TESTIMONY CONCERNING QUALITY ASSURANCE MIDLAND PLANT, UNITS 1 AND 2

By

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I am presently employed as a Senior Reactor Inspection Specialist, in the Advanced Program Development Branch, Regulatory Operations, U. S. Atomic Energy Commission. My testimony concerns the philosophy of the AEC Regulatory Operations implementation of Appendix B to 10 CFR 50.

The Directorate of Regulatory Operations is the inspection and enforcement arm of the AEC Regulatory Staff, and is responsible for performing inspections and audits, which are in its judgement, appropriate and sufficient to provide reasonable assurance that the CP holder has constructed a plant which conforms to the requirements of the AEC regulations and to the conditions of the CP. The RO inspection program is not designed to perform detailed acceptance inspections, but rather to test the adequacy and acceptability of the CP holder's activities in controlling those required quality related activities during all phases of design, fabrication, construction, testing and operations of an AEC licensed nuclear facility. The licensee is responsible for imposing on its agents, contractors, and vendors, a requirement to develop a QA program that, considering the technical aspects as to the type of organization, the nature of the product, and its importance to nuclear safety, complies with the regulations.

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I participated in the RO inspection conducted at the Midland site on December 6 and 7, 1973. The purpose of this inspection was to verify the status of the corrective action initiated by the licensee concerning the identified programmatic deficiencies relating to cadweld activities. The corrective action of each identified deficiency was examined and found to be consistent with the QA program. This inspection resulted in a memo being sent from Knuth to Muntzing, dated December 13, 1973, recommending that the "Order to Show Cause" be modified to permit cadwelding activities to resume.

I also participated in the RO inspection conducted on January 10 and 11, 1974. The purpose of this inspection was to verify the implementation of the cadweld activities, and also to verify implementation of commitments made by Consumers Power in their "Answer to Order to Show Cause." The inspection indicated that the various commitments made by Consumers Power, were being implemented and corporate management was becoming involved in the administration of the QA program.

I observed that these inspections were properly conducted in accordance with RO's inspection policies as outlined above.

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