

R. C. Youngdahl
Executive Vice President



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June 14, 1976

Mr James G. Keppler
US Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

DOCKET 50-155, LICENSE DPR-t -
BIG ROCK POINT PLANT

By letter dated May 19, 1976, you transmitted Inspection Report 050-155/76-09 and requested that we respond to two infractions identified therein and, in addition, requested that we respond to three items in the cover letter. On May 26, 1976, Mr R. B. Sewell responded by letter to the item regarding third-party inspection. The purpose of this letter is to respond to the remaining items identified.

Infraction

"A. Contrary to Technical Specification 4.1.2(b), the primary core spray system did not meet operability requirements during power operations from June 1975 to February 1976 due to unacceptability of weld No. S with code (B31.1.0) following a modification of the core spray system in May 1975."

Response

The plant was not operated intentionally with a code unacceptable weld. Further, even though the weld was not code acceptable, the system structural integrity was adequate such that the weld would not rupture under operating conditions. As stated in the event report dated April 5, 1976, plant Management did not recognize that a code unacceptable weld existed until February 1976. At that time, corrective action was initiated. In addition, we believe that the systematic corrective action taken since the occurrence in June 1975, as described briefly in our April 5, 1976 event report and amplified later in this letter, will preclude recurrence.

Infraction

"B. Contrary to Appendix B to 10 CFR Part 50, Criteria IX, X and XVI, weld No. S. of the primary core spray system was not accomplished in accordance with applicable codes (B31.1.0). The program for inspection of the weld activity failed to verify conformance with the weld procedure, and measures to assure nonconformance is

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promptly identified and corrected were not taken; although according to the licensee's records, the weld was rejected by Radiography on May 16, 1975, and subsequently found to be unacceptable by technical review by a level III examiner in June 1975."

Response

The corrective action taken to preclude recurrence is described later in this letter. It should be noted that the statement in the infraction regarding the weld being rejected by radiography on May 16, 1975 is misleading. This statement is true; however, the weld was reworked and finally accepted (in error) by radiography on May 18, 1975.

Concern Expressed Related to Laxity of Quality Assurance Controls

The error in accepting the weld by radiography occurred on May 18, 1975. On May 29, 1975 the "S" weld was examined by an approved ultrasonic preservice technique and found to be code acceptable. In June 1975 the weld was classified as code unacceptable by radiography; however, this reclassification was not documented. At the time of the occurrence, the current QA Program Procedures for Operations were in the process of being issued for use. Indoctrination of CP Co supervisory and Management personnel, including NDT supervisory and Management personnel, in basic quality assurance philosophy and requirements was completed in June 1975. This indoctrination session included indoctrination in the 18 criteria of Appendix B to 10 CFR 50, but did not address specific requirements for implementing the QA Program for Operations.

QA Program Procedures 15-51 and 16-51 covering deviation reporting and corrective action were implemented by the QA Department in October 1975. The System Protection and Laboratory Services (SP&LS) Department Procedures were issued for use in February 1976. SP&LS Department Procedure SPLS-26 is entitled "Nonconformance and Corrective Action," and implements the requirements of QA Program Procedures 15-51 and 16-51 for the System Protection and Laboratory Services Department.

Training of all NDT personnel, including supervisors and technicians, in SP&LS Procedure SPLS-26, "Nonconformance and Corrective Action," was completed on May 4, 1976. Training of NDT supervisory personnel by the QA Department in QA Program Procedures 15-51 and 16-51 is ongoing at the present time and will be completed on June 11, 1976. The NDT Section Supervisor attended the June 3-4, 1976 session. The emphasis of these sessions is each individual's responsibility for reporting and dispositioning conditions adverse to quality.

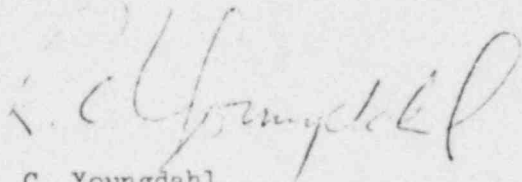
Most of the SP&LS Department's activities at a nuclear plant are in the area of inspection of equipment against a set of acceptance criteria. In the case of NDT, the acceptance criteria is determined by code. For each weld inspected, the NDT technician prepares a report which documents whether or not the weld meets the acceptance criteria. If the acceptance criteria is not met, the NDT technician also prepares a deviation report, has it reviewed by his supervisor (ie, telecon) and submits the deviation report to the plant for disposition and appropriate corrective action and submits a copy of the deviation report to the plant QA representative.

A maintenance work order package is assembled for each job. These packages are audited by a qualified CP Co NDT Level III inspector following completion of the job. If a weld that had been previously accepted was deemed rejectable by the Level III inspector, the Level III inspector would prepare a deviation report and submit it to the plant for disposition and appropriate corrective action. The deviation reporting system has now been fully implemented by NDT Section personnel.

This specific event has been reviewed with the Level III Supervisor involved, the Manager of the SP&LS Department, the Manager of Production - Nuclear, the Nuclear Licensing Administrator and the Vice President of Production and Transmission (Company officer). We conclude that this review, along with the implementation of QA Program Procedures 15-51 and 16-51, SP&LS Department Procedure SPLS-26 and the training of SP&LS NDT personnel, provides adequate corrective action to prevent recurrence.

Upgrading the Quality of Code Acceptable Welds

Your letter requested that Consumers Power describe the measures we plan to take to upgrade the quality of weld, above the code acceptable level, performed by the plant maintenance staff on safety-related piping. Several years ago, Consumers Power Company intensified its efforts in welder training. As a minimum, it is our intent to meet the requirements of the code. In addition, we are continually offering and upgrading training programs to enhance the skills of welders and from time to time offer classes to appropriate supervision in proper welding standards.



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