



Consumers
Power
Company

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May 3, 1981

Mr J G Keppler, Regional Director
Office of Inspection and Enforcement
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND PROJECT -
INSPECTION REPORT NO 50-329/80-32 AND 50-330/80-33
FILE 0.4.2 UFI 73*60*13 SERIAL 12349

Reference 1. NRC letter, J G Keppler to J W Cook, dated April 14, 1981
2. CP Co letter, J W Cook to J G Keppler, dated February 9, 1981

This letter is in response to Reference 1 which requested further information regarding Item 1 of Appendix A from NRC Inspection Report No 50-329/80-32 and 50-330/80-33.

Upon further review, we conclude that the failure to initiate a corrective action cycle regarding the Block 8 inconsistencies identified in the Interim Audit (March 1980) was not in compliance with 10 CFR 50, Appendix B, Criterion XVI or with CP Co's own policy on corrective action. The decision not to initiate that cycle was a conscious one on the part of the personnel involved (ie, the audit team), and was based on the factors explained in Reference 2. However, when the same problem was identified in the November 1980 audit, the corrective action cycle was properly initiated in that the item was identified specifically as UNRESOLVED pending the Technical Review portion of the audit.

This second Technical Review was completed and a report issued April 20, 1981 and, like the Technical Review in the first audit, the results identified no technical conflicts. Therefore, the Unresolved Item from the second audit pertaining to Block 8 inconsistencies was closed, and our conclusion remains that the inconsistencies in Block 8 of the Re-Review packages had no adverse effect on the adequacy of the Re-Review.

Our confidence in the Re-Review is further supported by the extensive evidence of substantive review. The effort was an inter-company one spanning over 18 months, with Bechtel alone putting in over 10,000 manhours. Approximately 2,400 documents were listed in Block 8 as having been reviewed and over 400 SAR change notices were issued. While the FSAR re-review program has been an extensive, one-time effort to improve the accuracy of the FSAR, the FSAR is

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very actively used. It is expected to be in a state of continuous review until receipt of the operating license. These reviews are both formal, as a result of procedure requirements, and informal, as a result of applicant support of the NRC staff review. Examples of these reviews are:

1. Applicable sections are reviewed for consistency with Bechtel design documents, which are undergoing revision, in accordance with Engineering Department Procedure EDPI 4.1.1, Revision 2 "Preparation of the Design Requirements Verification Checklist for the Midland Project." This procedure defines a system for assuring the conclusion of all applicable design requirements in design documents and for providing documentation of this activity.
2. Preparations for the recent Structural Audit by NRR
3. Design Review Board presentations (eg, Cold Shutdown)
4. Special presentations to NRC on certain matters (eg, Aux Feedwater)
5. Chapter 7 re-write (April 1981 Amendment)
6. The ongoing development of the Operating Technical Specifications (Chapter 16)
7. Independent reviews for editorial content and consistency with Reg Guide 1.70, Rev 2.

Due to the confidence we have, based on the two audits and Technical Reviews and the other elements discussed above, CP Co considers that no additional corrective action measures are required. CP Co does intend to do one further audit at the completion of the present re-review effort being performed as a result of the audit finding that certain sections were missed in the initial re-review effort.

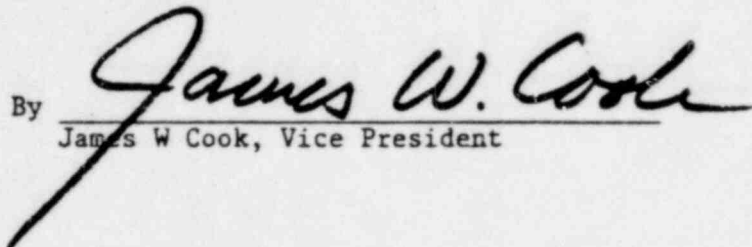
Regarding a revised 50.54(f) response, Consumers Power Company will provide a revised response to reflect the status of the two audits including providing detail as to the disposition of the Block 8 Item. A change is not appropriate for the re-review procedure in that past variations from the procedure have been recognized and dealt with as indicated in this letter and is explained in Reference 2. Any future re-review work under this procedure will be accomplished in accordance with the

procedure. To this end, the procedure's requirement regarding Block 8 have been re-emphasized to the personnel doing further re-review work.

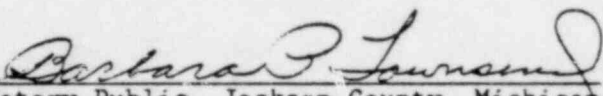
Consumers Power Company

Dated May 8, 1981

By


James W Cook, Vice President

Sworn and subscribed to before me on this 8th day of May, 1981


Barbara P. Lunsford
Notary Public, Jackson County, Michigan
My commission expires September 8, 1984

JWC/WRB/mo

CC RJCook, USNRC Resident Inspector
Midland Nuclear Plant (1)