

Appendix A

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329

Docket No. 50-330

As a result of the inspection conducted on May 18-22, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion XVI states, in part, that "Measures shall be established to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective materials and equipment, and nonconformances are promptly identified and corrected...the identification of the significant condition adverse to quality, the cause of the condition, and the corrective action taken shall be documented and reported to appropriate levels of management."

Consumers Power Company Program Policy No. 16. Revision 9, Paragraph 1.0 states, in part, "corrective action is that action taken to correct and preclude recurrence of significant conditions adverse to the quality of items."

Consumers Power Company Quality Assurance Procedure M-2, dated March 2, 1981 requires the Midland Project Quality Assurance trend analysis be implemented. Specifically, for each performance area identify trends requiring corrective action, determine the sources of these trends and obtain appropriate corrective action commitments. Corrective action commitments are the responsibility of the "Appropriate Individuals."

Contrary to the above, a review of Monthly Trend Analysis Reports and related documentation covering the period July 17, 1980 - March 31, 1981 revealed that appropriate site managers have not routinely established comprehensive corrective actions in response to the identification of adverse quality trends. Moreover, evaluations of adverse trends have not routinely identified the root causes of nonconformances. For example, 22 instances of construction personnel bypassing QC hold points were included in monthly trend analysis, but an adequate analysis to identify the root cause of these occurrences was not performed. (329/81-12-04; 330/81-12-04)

This is a Severity Level IV violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion X states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

Consumers Power Company Quality Assurance Program Policy No. 10, Revision 8, Paragraph 1.0 states, in part, "Inspection and surveillance are performed to assure that activities affecting quality comply with documented instructions, design documents and applicable codes and standards."

Contrary to the above, the electrical contractor's Quality Control (QC) inspections of cable termination activities on May 12, 1981, failed to verify conformance to Paragraph 3.11 of Project Quality Control Instruction E-5.0 which states, in part, "Verify that the ...minimum installed cable bend radius is not violated." A violation of the minimum bend criteria for Cable No. 2AB2322B, that was observed by the NRC inspector, and it had not been identified by the QC inspections. (330/81-12-07)

This is a Severity Level VI violation (Supplement II).

3. 10 CFR 50, Appendix B, Criterion XVI states, in part, "Measures shall be established to assure that conditions adverse to quality...are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition."

Consumers Power Company Quality Assurance Program Policy No. 16, Revision 9, Paragraph 1.0 states, in part, "Corrective action is that action taken to correct and preclude recurrence of significant conditions adverse to the quality of items or operations."

Contrary to the above, as of May 22, 1981, corrective action had not been taken in response to Bechtel Quality Assurance Finding SA-97, dated April 3, 1980 and Consumers Power Company Audit Finding Report No. M-01-02-1-06, dated January 27, 1981, which identified the lack of approved procedures for the rework of items which had been accepted by Quality Control. (329/81-12-09; 330/81-12-10)

This is a Severity Level V violation (Supplement II).

4. 10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings...and shall be accomplished in accordance with these instructions, procedures, or drawings."

The Consumers Power Company Quality Assurance Program Policy No. 5, Revision 9 states, in part, "Instructions for controlling and performing activities affecting quality of equipment or operations during the design, construction...phases of nuclear power plants, such as...construction, installation...are documented in instructions...and other forms of documents," and the responsible CP departments shall "also verify through audits that the required instructions...are implemented."

Contrary to the above, seven large bore pipe restraints, supports, and anchors were not installed in accordance with design drawing and specification requirements. (329/81-12-11; 330/81-12-12)

This is a Severity Level V violation (Supplement II).

5. 10 CFR 50, Appendix B, Criterion X states, in part, "A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity."

The Consumers Power Company Quality Assurance Program Policy No. 10, Revision 8 states, in part, "Inspection and surveillance are performed to assure that activities affecting quality comply with...design documents."

Contrary to the above, licensee construction quality control inspectors inspected and accepted six of seven large bore pipe restraints, supports, and anchors that, in fact, had not been installed in accordance with design drawings and specifications as determined by the NRC inspector. (32 /81-12-12; 330-81-12-13)

This is a Severity Level V violation (Supplement II).

6. 10 CFR 50, Appendix B, Criterion III states, in part, "the design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews... Design control measures shall be applied to items such as...stress analysis..."

The Consumers Power Company Quality Assurance Program Policy No. 3, Revision 9 states, in part, "The design organization identifies the applicable regulatory requirements, design bases, codes and standards; develop the design and specify the design interfaces; perform design verification and prepare design documents."

Contrary to the above, several of the small bore pipe and piping suspension system designs performed at the site had not been prepared, reviewed and approved in accordance with established design control procedures. (329/81-12-13; 330/81-12-14)

This is a Severity Level IV violation (Supplement II).

7. 10 CFR 50, Appendix B, Criterion VI states, in part, "Measures shall be established to control the issuance of documents...including the changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents including changes, are reviewed...and approved...by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

The Consumers Power Company Quality Assurance Program Policy No. 6, Revision 8 states, in part, "Measures are included to assure that documents, including changes, are reviewed for adequacy and approved for release by the supervisory personnel of the organization preparing the document, and are distributed according to controlled distribution to the user functions."

Contrary to the above, an outdated specification was maintained at the small bore piping design group work location and revised calculations were not marked "Superseded" in accordance with the procedural requirements. (329/81-12-14; 330/81-12-15)

This is a Severity Level V violation (Supplement II).

8. 10 CFR 50, Appendix B, Criterion XVIII states, in part, "A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program."

The Consumers Power Company Quality Assurance Program Policy No. 5, Revision 9 states, in part, "The various Consumers Power Departments and Suppliers who perform a safety-related activity prepare required instructions, procedures and other instructional-type documents prior to initiation of safety-related activities. Reviews of Consumers Power Company departmental procedures for adequacy are conducted during the design and construction phase,...by the Quality Assurance Audit and Administration Section within Environmental Services, Quality Assurance and Testing. They also verify through audits that the required instructions and procedures are prepared and implemented."

Contrary to the above, licensee and contractor audits of small bore piping design activities at the site did not include detailed review of system stress analysis and followup on previously identified hanger calculation problems was not being performed. (329/81-12-16; 330/81-12-17)

This is a Severity Level V violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be

taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation. Consideration may be given to extending your response time for good cause shown.

July 10 1981  
Dated

James G. Keppler  
James G. Keppler  
Director