



Consumers
Power
Company

James W Cook
Vice President - Projects, Engineering
and Construction

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0453

July 27, 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
IMMEDIATE ACTION LETTER DATED 5/22/81
FILE: 0.4.2 SERIAL: 13604

- References: 1) Letter J G Keppler to J W Cook dated May 22, 1981
- 2) Letter J W Cook to J G Keppler: Subject - "Immediate Action Letter dated 5/22/81", Serial 12012 dated 5/29/81

Reference 1 was an Immediate Action Letter (IAL) which identified seven actions Consumers Power had agreed to undertake to provide corrective action with regard to small bore piping and piping supports which did not have the required Committed Preliminary Design Calculations (CPDC's). Reference 2 documented the completion of the first four items of the IAL and provided Consumers Power's schedule for completion of the reviews necessary to assure that there are proper CPDC's for all small bore piping isometrics.

On July 24 members of the Midland Project Management Team met with Mr. A. B. Davis and other members of your staff. We reviewed the status of the calculational review to upgrade all small bore piping calculations to full CPDC status. Your office was informed that as of July 24th calculations for 1,226 piping isometrics had been reviewed and upgraded to CPDC status, and 144 isometrics still remained to be checked. This effort represented the commitment of between 40 to 50 small pipe stress analysis personnel working an average of 60 hours per week since May 22. Besides having substantially completed the entire calculational review, this effort has established that the original calculations, even without a completed cover sheet, were technically adequate although in procedural non-compliance.

As a result of not having completed our review by July 24th, Consumers is identifying drawings which had been issued to the field and which are not now supported by CPDC's and are placing a hold on the further use of these drawings until such time as each of them is backed by a CPDC. The identity of all such drawings will be completed by July 28, 1981, with physical retraction from the field to be completed by July 30.

8108280261 810803
PDR ADOCK 05000329
A PDR

EEOT
S/H

JUL 31 1981

Page 2

Mr. J. G. Keppler

File: 0.4.2 Serial: 13604

July 27, 1981

The second portion of our discussion with your staff on July 24, 1981 was to present our in-place drawing controls concerning the red-lining process. During that discussion, it was recognized that the procedures required some modification to fully document all the methodology discussed in our presentation. Revisions will be drafted for submittal to Region III for your review by August 3, 1981.

An additional clarification made in our meeting on July 24, 1981 was that we have identified all small bore piping and hangers which were installed without CPDC's, and as part of our response to Reference 1 we are well along in preparing CPDC's for these hangers.

We appreciated the opportunity to meet with your staff to discuss these issues, and hope you share our view that this type of session was of mutual benefit and can be utilized in the future as appropriate.

James W. Cook

WRB/pp

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