## ISHAM, LINCOLN & BEALE

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April 26, 1982

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )		
)	Docket Nos.	50-329-OM
CONSUMERS POWER COMPANY )		50-330-OM
)		50-329-OL
(Midland Plant, Units 1 ) and 2)		50-330-OL

Dear Administrative Judges:

EDWARD S. ISHAM. 1872-1902

ROBERT T LINCOLN. 1872-1889 WILLIAM G BEALE. 1885-1923

> We have enclosed Consumers Power Company's Response to Intervenor Barbara Stamiris Proposed Supplemental Findings of Fact and Conclusions of Law for Partial Decision on Quality Assurance and Management Attitude Issues in the above captioned case.

> These proposed findings address the quality assurance and management attitude issues raised by the December 6, 1979 Order Modifying Construction Permits and related Contentions of Intervenor Barbara Stamiris. In particular, they involve (1) the National SALP report; (2) the MPQAD modifications; (3) Audit Report F-77-32; and (4) Quality Control Inspector qualifications. Consumers Power Company, Intervenors Barbara Stamiris, Wendell Marshall and Mary Sinclair and the Staff of the NRC presented evidence concerning those issues at hearings held in Midland, Michigan on December 15 through 17, 1981, February 2, 1982 and February 19, 1982.

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Although it was not originally designated as one of the issues to be addressed in the Supplemental Findings, Ms. Stamiris also addresses the issue of managerial attitude in her Supplemental Findings. Accordingly, Consumers Power felt it necessary to respond to Ms. Stamiris' additional discussion.

Respectfully,

Robert G. Fitzgitbons Jr. One of the Attorneys for Consumers Power Company