



Consumers
Power
Company

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April 22, 1982

Harold R Denton, Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND PROJECT
MIDLAND DOCKET NOS 50-329, 50-330
SAFETY EVALUATION REPORT INFORMATION
FILE 0505.16, 0.4 SERIAL 16658



A draft of Section 17.1 of the Midland SER indicates that the QA Program for Operational Nuclear Power Plants, Topical Report CPC-2A, complies with the Standard Review Plan (SRP), Revision 2, except for the following controls for which no clear commitment is provided:

1. The designated QA personnel are involved in day-to-day plant activities important to safety (that is, the QA organization routinely attends and participates in daily plant work schedule and status meetings to ensure they are kept abreast of day-to-day work assignments throughout the plant and that there is adequate QA coverage relative to procedural and inspection controls, acceptance criteria, and QA staffing and qualification of personnel to carry out QA assignments (SRP Section 17.1, Item 1B6).
2. That the QA organization participates early in the QA program definition stage to determine and identify the extent to which QA controls are to be applied to specific structures, systems, and components. This effort involves applying a defined graded approach to certain structures, systems, and components in accordance with their importance to safety and affects such disciplines as design, procurement, document control, inspection tests, special processes, records, audits, and others described in 10 CFR 50, Appendix B (SRP 17.1, Item 2B3 partial).
3. That for commercial "off-the-shelf" items where specific quality assurance controls appropriate for nuclear applications cannot be imposed in a practicable manner, special quality verification requirements shall be established and described to provide the necessary assurance of an acceptable item by the purchaser (SRP Section 17.1, Item 7B4).

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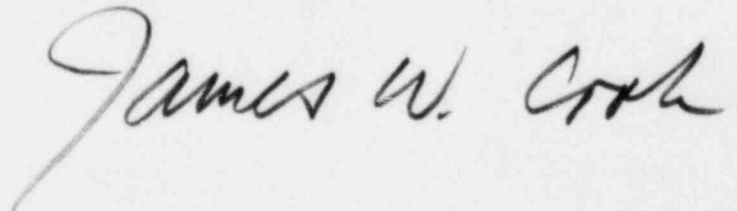
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4. That the QA organization is involved in the qualification activities for procedures, equipment, and personnel associated with special processes to ensure they are satisfactorily performed (SRP Section 17.1, Item 9B1 partial) .
5. That program procedures provide criteria for determining the accuracy requirements of inspection equipment and criteria for determining when inspections are required or define how and when inspections are performed. The QA organization participates in the above functions (SRP 17.1, Item 10A partial).

The draft SER Section 17.1 further states that the NRC Staff believes that the above additional terms described in SRP Revision 2 are not mandatory and that adequate program controls exist at the Midland plant without these additional items.

Consumers Power Company would like to take this opportunity to discuss the above five items and their relationship with respect to the SER. Concerning items 1, 2, and 4, Consumers Power Company feels that Topical Report CPC-2A already addresses the intent of the Standard Review Plan. However, the Topical Report will be revised to clarify our commitment. Concerning item 3, Consumers Power Company feels that Topical Report CPC-2A, Section 7.2.3, adequately responds to 7B4 of the SRP Section 17.1 and no further clarification is necessary. Concerning item 5, Consumers Power Company feels that Topical Report CPC-2A, Sections 10.2.2, 10.2.4, 10.2.5, adequately respond to items 10A of the SRP, Section 17.1 and no further clarification is necessary.

These concerns have been discussed with J Gilray of the NRC Staff. Pursuant to the clarifications expressed by Mr Gilray and the ensuing commitments made in this letter, it is our expectation that the above five items will not appear in the SER.



JWC/JNL/acr

CC RJCook, US NRC, Midland Resident Inspector
WHaass, NRC
RHernan, US NRC
RWHuston, Washington
DBMiller (3), Midland

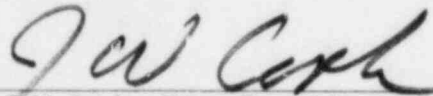
CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 16658 Dated April 22, 1982

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits this letter containing information to address and resolve the items related to the Standard Review Plan in Section 17 of the Midland SER.


CONSUMERS POWER COMPANY

By



J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 22nd day of April 1982.



Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984