

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/82-06(DETP); 50-330/82-06(DETP)

Docket Nos. 50-329; 50-330

Licenses No. CPPR-81; CPPR-82

Licensee: Consumers Power Company
1945 West Parnall Road
Jackson, MI 49201

Facility Name: Midland Nuclear Power Plant, Units 1 and 2

Inspection At: Midland Site, Midland, MI

Inspection Conducted: March 17-19, 1982

Inspectors: *R. N. Gardner*
R. N. Gardner

4/12/82

C.C. Williams for:
R. B. Landsman

4/13/82

Approved By: *C.C. Williams*
C. C. Williams, Chief
Plant Systems Section

4/13/82

Inspection Summary

Inspection on March 17-19, 1982 (Reports No. 50-329/82-06(DETP);
50-330/82-06(DETP))

Areas Inspected: Verification of QA program for auxiliary building remedial
soils instrumentation and a review of a previously identified item.

Results: Of the areas inspected, two items of noncompliance were identified -
Severity Level IV, Lack of QA Program; Severity Level IV, Lack of Adequate
Inspection.

DETAILS

Persons at Exit Interview

Consumers Power Company (CPCo)

B. Marguglio, QA Director
W. Bird, QA Manager
M. Corland, MPQAD, Site Superintendent
D. E. Horn, MPQAD, Civil Section Head
M. J. Schaeffer, MPQAD, Electrical Section Head
R. E. Savo, MPQAD, IE&TV Civil Supervisor
*J. Mooney, Project Office
*J. Schaub, Engineering

Bechtel Power Corporation

*A. Boos, Assistant Project Manager
M. A. Dietrich, PQAE
S. Kirker, QC Civil

NRC

R. Cook, Resident Inspector

Other licensee and contractor personnel were routinely contacted during the course of the inspection.

*Denotes those attending the exit interview by telecon.

1. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (329/81-12-08; 330/81-12-09): During a previous inspection, it was determined that the Midland Project Quality Assurance Department (MPQAD) was identifying numerous non-conforming conditions pertaining to items that had been previously inspected and accepted by the electrical contractor's Quality Control (QC) inspectors. As a result of the inspectors' concerns with this matter, the licensee was requested to perform the following:

- a. Verify the adequacy of the training, qualification, and examination of personnel.

The licensee has conducted two audits of the Bechtel QC department. Audit No. M-01-24-01 was conducted during the period of June 2 to July 3, 1981. Audit No. M-01-72-1 was conducted during the period of November 2-6, 1981. These audits evaluated the adequacy of the Bechtel QC training and certification program. As a result of the audits, the following improvements have been made in the area of QC inspector training and certification.

- (1) Bechtel is now documenting on-the-job training as part of the certification/training process for QC inspectors.
- (2) MPQAD site personnel are overviewing Bechtel's certification process to ensure that the certification of QC inspectors meets Midland Project requirements.

The inspector selected three QC inspectors to be questioned concerning two Quality Control Instructions (QCI's) to which they had previously been certified. The QCI's pertained to cable pulling and cable terminations. The selected QC inspectors were each hired in 1981, had no prior QC experience, and were certified within approximately three months of their reporting date. In answering the inspector's questions, the QC inspectors demonstrated acceptable knowledge in the two areas.

- b. Determine if previous inspections performed by the QC inspectors, against whom MPQAD had initiated nonconformance reports, were acceptable.

The licensee has reported to the inspector that MPQAD and Bechtel QC personnel have performed overinspections of 1,084 Class 1E cables pulled and inspected during the period of October 9, 1978 to July 21, 1981. During these overinspections, MPQAD and Bechtel QC inspectors have identified 55 misrouted cables. This is contrary to the inspection requirements of Paragraph 2.6 of Project Quality Control Instruction (PQCI) E-4.0 which states, in part, "Verify that the cable is correctly installed in the identified vias as specified on the Cable Pull Card." In performing the overinspections, MPQAD personnel and Bechtel QC personnel have identified 66 instances in which nonconforming cable reel numbers were recorded on inspection documents. This is contrary to the inspection requirements of Paragraph 2.1 of PQCI E-4.0 which states, in part, "Verify that the cable to be installed...is identified by a reel number which incorporates the purchase order number and the manufacturer's reel number."

The inspector informed the licensee that this unresolved item is escalated to an item of noncompliance with 10 CFR 50, Appendix B, Criterion X, as described in Appendix A of the report transmittal letter. (329/82-06-01; 330/82-06-01)

2. Observation of Underpinning Instrumentation Installation Activities

- a. At the conclusion of the March 10, 1982, meeting in Bethesda, Maryland between licensee representatives, NRR Licensing representatives, and NRC Region III representatives, all remaining underpinning activities were classified as "C." The purpose of this inspection was to observe underpinning instrumentation installation activities and determine the conformance of these activities with documented instructions, procedures, and drawings. During this inspection, it was determined that the licensee had

initiated underpinning instrumentation cable pulling activities on March 11, 1982. In observing the instrumentation cable pulling activities, the inspectors determined the following:

- (1) Cable pulling activities were being conducted without approved instructions or procedures.
- (2) Cable routing was being conducted in accordance with an unapproved drawing. (C-1493(Q))
- (3) Inspection and audit requirements for cable pulling activities were not developed or implemented.
- (4) Measures had not been established for the selection and review for acceptability of purchased underpinning instrumentation.

The inspectors questioned MPQAD personnel concerning the Quality Assurance program established to control the cable pulling activities. The inspectors were informed that no Quality Assurance program had been established to provide controls over these activities.

This failure to establish a Quality Assurance program which provides controls over the installation of underpinning instrumentation cables is considered to be in noncompliance with 10 CFR 50, Appendix B, Criterion II as described in Appendix A of the report transmittal letter. (329/82-06-02; 330/82-06-02)

Subsequent to the inspectors' identification of this matter, the licensee's QA staff informed the inspectors that cable pulling would be stopped. On the following day, the inspectors observed that cable pulling was continuing. Based on discussions with licensee personnel, it was determined that some confusion existed on the part of the licensee as to whether this activity was "Q" or not. The licensee requested another day to decide if this activity was "Q" or not.

Based on this evaluation, the licensee again informed the inspectors that cable pulling would be suspended. However, licensee personnel indicated that no formal stop work would be issued. The licensee was informed that the Region was considering the initiation of escalated enforcement action on this matter pending a meeting to be held in the Region III office. See IE Report No. 82-05.

- b. The inspectors determined from reviewing Drawings C-1490 and C-1491 that there were nine outstanding FCR's on each drawing. These FCR's are, by site procedures, taped onto the back of each drawing. To say the least, it is confusing to review let alone figure out what the designers intent really is. The inspectors further determined that site Procedure MED 4.62 controls

the revisions of drawings with changes. The procedure requires that a drawing be revised after five DCN's have been issued and after ten FCN's have been issued. However, it only requires for FCR's that a drawing be revised after 180 days have elapsed. It does not have a limit on the number of FCR's that can be issued on a drawing before requiring a revision. The licensee agreed to review their criteria for outstanding FCR's in Procedure MED 4.62. Pending results of their review, this item remains open. (329/82-06-03; 330/82-06-03)

Open Items

Open items are matters, not otherwise categorized in the report, that require followup during future inspections. Open items disclosed during this inspection are discussed in Section 2, Paragraph b.

Exit Interview

The inspectors met with licensee representatives (denoted under Persons at Exit Interview) at the conclusion of the inspection on March 19, 1982. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the information.