Consumers Power Company

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October 31, 1980

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 NUCLEAR PLANT
UNIT NO 1, DOCKET NO 50-329
UNIT NO 2, DOCKET NO 50-330
NSSS COMPONENT IDENTIFICATION
FILE: 0.4.9.39 UFI: 73*10*01, 02400(S) SERIAL: 9781

References: 1) J W Cook letter to J G Keppler, dated May 22, 1980, Same Subject, Serial 8987

2) J W Cook letter to J G Keppler, dated August 13, 1980, Same Subject, Serial 8811

The referenced letters were interim 50.55(e) reports concerning inconsistent cross-referencing between B&W and Bechtel numbering systems affecting instrument systems in Midland Plant Unit 2. This letter is the final report. The attachment to this letter provides the actions being taken to resolve the condition. The schedule shows that all actions necessary to be completed to place the Plant in conformance will be completed in the third quarter of 1981.

James W. Cook

WRB/lr

Attachment 1: MCAR-38, Final Report, dated October 3, 1980

CC: Director of Office of Inspection & Enforcement
Att: Mr Victor Stello, USNRC (15)

Director of Office of Management
Information & Program Control, USNRC (1)

R Cook, USNRC Resident Inspector
Midland Nuclear Plant (1)

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SUBJECT: MCAR 138 (Component Identification) dated March 11, 1980

FINAL REPORT

013360

Project: Consumers Power Company
Midland Plant Units 1 and 2
Bechtel Job 7220

Date: October 3, 1980

Introduction

This report is submitted regarding the final status and actions taken pursuant to MCAR 138.

Description of Discrepancy

Inconsistent cross-referencing has occurred on Unit 2 between B&W and Bechtel numbering systems for B&W-supplied instrument systems [Non-Nuclear Instrumentation (NNI), Integrated Control Systems (ICS), Emergency Core Cooling Actuation System (ECCAS), and Nuclear Instrumentation and Reactor Protection System (NI/RPS)] and other components. This inconsistent cross-referencing has resulted in inconsistent wiring of B&W-supplied systems. If the inconsistent wiring were to remain uncorrected, the ICS and NNI would not function properly and some incorrect indications would be displayed to the operator.

The most probable cause appears to be some misinterpretation by design personnel regarding the system of cross-referencing between the B&W and Bechtel component numbering system for Unit 2.

Safety Implications

Based on the expressed concern that the inconsistencies could result in inappropriate operator action which could adversely affect the safety of plant operations, we conclude that the deficiency should be classed within the "adverse to safety" requirement of 10 CFR 50.55(e).

Reportability

Based on the safety implications stated above, we conclude that the subject deficiency is reportable under 10 CFR 50.55(e). This is due to the fact that the deficiency will be classed within the "adverse to safety" requirement of 10 CFR 50.55(e) AND it has been determined to be within the "significant deficiency in final design" requirement.

Corrective Action Status

It was agreed among Consumers Power Company, Bechtel, and B&W that no changes in component numbering are required, but that the instrument index and electrical schemes would be revised to consistently apply the appropriate Bechtel/B&W instrument cross-references.

Of the 928 Unit 2 cables placed on engineering hold pending resolution of the wiring inconsistencies, 841 correct cables were released on July 17, 1980, for pulling. The schemes for the remaining 87 incorrect cables were revised and released prior to September 17, 1980. The Instrument Index is currently being revised; scheduled completion is January 1, 1981.

The Midland Project Component Numbering Task Group (CNTG) is presently in the final stages of reviewing the design documents for the B&W instrument systems involved (NNI, ICS, ECCAS and NI/RPS) to identify and correct all numbering and wiring inconsistencies. Design documents have been marked up for revision with the corrected component numbering. Scheduled completion date for the CNTG review activities is January 1, 1981.

In a letter from B&W to Bechtel dated September 3, 1980, B&W stated that no major technical obstacle exists that would limit this corrective action. Approximately 114 B&W documents need to be revised, and it may be desirable to generate two new B&W P&IDs for Unit 2. All affected B&W documents are scheduled for correction by August 1, 1981.

The CNTG is taking action to plan, schedule, monitor, report, and cause complete implementation of these actions.

Submitted by: _____
J.M. Anderson

Approved by: _____
L.H. Curtis

Concurrence by: _____
for K.D. Bailey

Concurrence by: _____
for L.A. Dreisbach

MRG/pjh