



Consumers  
Power  
Company

James W Cook  
Vice President - Projects, Engineering  
and Construction

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

August 13, 1982

Mr J G Keppler, Regional Administrator  
US Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

MIDLAND PROJECT -  
INSPECTION REPORT NO 50-329/82-07 & 50-330/82-07  
FILE: 0.4.2 SERIAL: 17572

Reference: NRC Letter, C E Norelius to J W Cook, dated July 15, 1982,  
transmitting Inspection Report 82-07

The referenced letter requested that we continue to evaluate, for 10CFR50.55(e) reportability, the conditions found during the overinspections of pipe supports and restraints. It also requested that specific reinspections of pipe supports and restraints be performed or that we provide an alternate proposal. This letter provides our response to these requests.

Our continued evaluation indicates that the conditions are not reportable under 50.55(e). Analysis of all of the conditions and tests of selected conditions have indicated that none of the conditions would have adversely impacted safety.

Nevertheless, in the interest of conservatism, some of the types of conditions were designated to be of generic concern were they to occur elsewhere in the plant and remain undetected. For these types of conditions, either Quality Control reinspections or Project Engineering walkdowns will be performed to specific procedures and with official documentation to assure that these conditions are detected and corrected where they may exist. These Quality Control reinspections and Project Engineering walkdowns will be performed on 100% of all the installed hangers for the types of generic conditions in question.

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The remaining types of conditions were not of generic concern. Because of their lesser significance and because early in 1981 there were corrective actions to improve the installation and inspection process, we propose that these types of conditions not be subject to any Quality Control reinspections or Project Engineering walkdowns. We believe the initial Quality Control inspection supplemented by the Midland Project Quality Assurance Department overinspections will assure an adequate process output.

The attached Hanger Report provides the background leading to the aforementioned overinspections; the overinspection results; the specifics of the conditions found; the generic implications of each type of condition; and either the reinspections or walkdowns to assure that the conditions with generic implications will not exist in the plant as finally constructed, or the reasons for our belief that the primary inspection and Quality Assurance overinspection will suffice for the conditions that are not of generic concern. We had the opportunity to discuss this subject with your Messrs W Shafer and R Cook on August 6, 1982. At that time, a draft copy of the Hanger Report was given to both Messrs Shafer and Cook. The attached report is the officially released one. We would be pleased to have the opportunity to further discuss this subject with you or Messrs R Warnick, W Shafer or any other members of your staff.

Consumers Power Company

By James A. Mooney  
James A Mooney for James W Cook

Sworn and subscribed to before me on this 13th day of August, 1982.

Pamela J. Griffin  
Notary Public, Jackson County, Mich

My commission expires Sept 8, 1984

JWC/BWM/WRB/jac

CC: RWarnick, NRC Region III (w/att)  
WShafer, NRC Region III (w/att)  
RGardner, NRC Region III (w/att)  
RJCook, NRC Resident Inspector, Midland Site (w/att)  
RBLandsman, NRC Region III (w/o att)  
BBurgess, NRC Region III (w/o att)

Attachment: Hanger Report/Midland Plant Units 1 and 2, dated August 9, 1982