



**Consumers
Power
Company**

James W Cook
Vice President - Projects, Engineering
and Construction

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

September 3, 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 50-329/82-11 (DETP) & 50-330/82-11 (DETP)
FILE: 0.4.2 SERIAL: 17599

Reference: (1) NRC letter, W S Little to J W Cook, dated August 9, 1982,
transmitting Inspection Report 82-11

This letter, including Attachment 1, provides our response to Reference 1,
which transmitted the subject Inspection Report and which requested our
written response on the item of noncompliance and the deviation therein.

Consumers Power Company

By

James W. Cook
James W Cook

Sworn and subscribed to before me on this 3rd day of September, 1982.

Beverly A. Avery Beverly A. Avery
Notary Public, Jackson County, Mich

My commission expires Jan 16, 1985

JWC/BWM/WRB/jac

CC: RWarnick, NRC Region III (w/att)
WDSafer, NRC Region III (w/att)
RNGardner, NRC Region III (w/att)
RJCook, NRC Resident Inspector, Midland Site (w/att)
RBLandsman, NRC Region III (w/att)
BLBurgess, NRC Region III (w/att)

Attachment 1: Consumers Power Company's response to US Nuclear Regulatory
Commission, Region III Inspection Report 50-329/82-11 (DETP);
50-330/82-11 (DETP) Docket Nos 50-329 and 50-330

CONSUMERS POWER COMPANY'S RESPONSE TO
US NUCLEAR REGULATORY COMMISSION, REGION III
INSPECTION REPORT NO 50-329/82-11 (DETP); 50-330/82-11 (DEPT)
DOCKET NOS 50-329 and 50-330

Appendix A (Notice of Violation) to Inspection Report No 50-329/82-11 and 50-330/82-11 provides an item of noncompliance to 10 CFR 50, Appendix B, Criterion V, with one example. The NCR statement and our response are given below.

NRC Statement

"10 CFR 50, Appendix B, Criterion V, states in part that, 'Activities affecting quality shall be prescribed by documented instructions. . . and shall be accomplished in accordance with these instructions. . . instruction, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.'

CP Co Quality Assurance Program Policy No 5, states in part that, 'organizations. . .prepare and maintain procedures as necessary to provide instructions. . .for a consistent method of performing recurring engineering, construction and Quality Assurance activities. . .these documents provide qualitative and quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished.'

Specification C305, Table 4.1 requires that a 3/8 inch anchor have a minimum embedment of 1 3/8 inch after torquing.

Contrary to the above, one of the 3/8 inch anchors on extensometer EX5 was found to have an embedment of only one inch."

Also the following was stated on Page 7 of the Inspection Report:

"During the observation of extensometer EX5, one anchor was found to not have the required embedment depth as specified in Specification C305. Construction and Engineering had signed-off on the coordination form for that instruction indicating completion of this activity. This failure to properly install the anchor bolt is in noncompliance to 10 CFR Part 50, Appendix B, Criterion V, as described in Appendix A of the report transmittal letter (50-329/82-11-02; 50-330/82-11-02). Subsequently, the licensee initiated an NCR on this item."

Consumers Power Company Response

As stated on Page 7 of the NRC Inspection Report, "Construction and Engineering had signed-off on the coordination form for that instrument indicating completion of this activity." The sign-off on the form does not indicate formal acceptance of the activity. The sign-off indicates that Constuction has sufficiently checked to be reasonably certain that the activity is complete, in compliance to requirements and ready to proceed to the next step.

Extensometer EX5 had not been inspected by Quality Control prior to the NRC observation. Subsequent to the NRC inspection, the anchor bolt in question was removed and replaced. Quality Control inspected and accepted it on August 7, 1982 and the item is now in compliance with requirements. Replacement or other rework is a standard resolution of any construction activity presented to Quality Control for inspection and found to be nonconforming. Construction supervision, specifically Field Engineering, has been counseled on the importance of identifying and correcting any deviations from requirements prior to calling for QC inspection.

Appendix B (Notice of Deviation) to Inspection Report No 50-329/82-11 and 50-330/82-11 provides the NRC statement given immediately below. Our response follows the statement.

NRC Statement

"As a result of the inspection conducted on May 26-28, June 17, and 30 through July 2, 1982, the following was cited as a deviation.

During the May 28 and June 17, 1982, NRC exit meetings and during a conference call between the inspector and licensee representatives on June 18, 1982, the licensee committed to the use of approved installation/coordination forms during the installation of affected underpinning instrumentation.

Contrary to the above, it was determined on July 1, 1982 that unapproved installation/coordination forms were being used by construction personnel to document underpinning instrumentation installation."

Consumers Power Company Response

An unapproved installation/coordination form was being utilized by construction personnel for the underpinning instrumentation installations. The unapproved installation/coordination form was removed from the instrument locations and replaced by the approved form. The difference between the unapproved and approved form was one of format not content.

The personnel involved with the use of the form were reinstructed regarding the importance associated with the use of approved forms only. The use of the installation/coordination form will be proceduralized in a Bechtel field procedure by September 30, 1982.