



Consumers
Power
Company

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September 17, 1982

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US Nuclear Regulatory Commission
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MIDLAND NUCLEAR COGENERATION PLANT
MIDLAND DOCKET NOS 50-329, 50-330
QUALITY ASSURANCE PROGRAM IMPLEMENTATION
FILE: 0485.16 SERIAL: 18850

REFERENCE: CPCo Letter Serial 18845, 9/17/82, "Quality Assurance Program
Implementation for Soils Remedial Work"

The referenced letter summarized Consumers Power Company's discussions with the NRC management regarding the implementation of the Quality Assurance Program for the Midland soils remedial work. In addition to the discussions specifically related to soils, the total Midland Quality Assurance Program implementation was reviewed and areas were identified where additional efforts should be directed to insure successful overall project implementation and the performance of the primary inspection function (QC) on site. In response to these concerns Consumers Power made two significant new commitments which are conceptually described in the following paragraphs. Additional documentation will be provided as the details of these commitments are worked out.

Quality Control Function

In order to improve the performance of the Quality Control function and to make it more responsive to direction from the Quality Assurance organization, the responsibility for directing the entire Quality Control function will be assumed by Consumers Power. The Quality Control group will functionally report to MPQAD. The programmatic aspects now in place will continue to be used and the combined inspection resources of both Bechtel and CPCo will be integrated. This reorganization will be fully implemented as soon as the appropriate procedural changes are finalized. The integration of the QC resources for soils into MPQAD has already been accomplished as a separate action.

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Independent Verification - Total Project

Consumers Power proposes a new and expanded approach for verifying the overall quality of the project. This approach will give a broader overview than the assessments currently being recommended by the NRC for other NTOL plants. The assessment which is suggested for Midland is to combine an INPO type construction project evaluation, which is a broad "horizontal" type review of many aspects of current project operations with the detailed "vertical slice" review of all aspects, current and historical of a critical plant system or subsystem. The entire review will be performed by one or more independent contractors who are currently being selected. With the assistance of the selected contractors, the detailed plans for this extensive independent assessment will be finalized and presented to NRC management shortly for their concurrence prior to initiating the major work activities.

The INPO portion of the program will be initiated immediately at least through the planning phase to comply with the INPO schedule and industry commitments to the NRC. The INPO construction program evaluation for Midland will differ from the majority of the industry's self-initiated evaluations in that an independent contractor rather than utility personnel will carry out the INPO evaluation. The results will then be overviewed by the INPO staff to assure adequacy and consistency with other evaluations.

Additional Assessment Programs

In addition to the above, Consumers Power has proposed to retain a qualified third party for an assessment of the underpinning activities as detailed in the referenced letter.

Consumers Power Company has also initiated other appraisals to assess the adequacy of the Quality Assurance Program. Two major recent examples of this practice that have occurred are as follows.

In 1981, Management Analysis Company (MAC) conducted an assessment which focused on performance in three major areas as follows:

1. Adequacy and timeliness of both part and process corrective actions taken on a sample of the historical hardware problems that have been identified at Midland over its lifetime.
2. The degree to which the physical characteristics of selected supplied components and parts meet their respective quality requirements.
3. The overall adequacy of the Quality Assurance Program with particular emphasis in corrective actions, effectiveness of the supplier documentation review efforts and personnel qualifications.

This assessment has been completed, the results were positive and all open items have been resolved and closed. The final report has been previously submitted to the NRC.

A Bechtel Corporate Staff project evaluation was initiated in April 1982. A report on the results of this assessment is being finalized at this time. The

purpose of this evaluation was to review the Midland engineering activities to determine if design criteria have been implemented and if the design assumptions, design methods, and the design processes are satisfactory. Bechtel Corporate Management was asked to initiate this assessment in order to certify that the Midland project met all the standards expected of any Bechtel project. To carry out this assignment the assessment team was specifically chosen to be independent from the Bechtel Ann Arbor Power Division. The team consisted of senior experienced personnel with appropriate expertise having previously performed similar work on other projects. A Consumers Power representative was a direct participant on the assessment team. The final report will be sent to the NRC upon completion and whatever other documentation or discussion as may be requested will be provided.

Conclusion

Based on the discussion outlined above and in the reference letter, Consumers Power believes that steps have been taken to insure both the successful implementation of the remaining work to complete the plant and a verification program, including quality records, test program results, and third party assessments, that will certify the adequacy of the plant as constructed.

James W. Cook

JWC/JAM/bjw

CC Atomic Safety and Licensing Appeal Board

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

Letter Serial 18850 Dated September 17, 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 information regarding the implementation of the Consumers Power Company Quality Program for the Midland Plant.

CONSUMERS POWER COMPANY

By J W Cook
J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 17th day of Sept 1982.

Patricia A. Luffner
Notary Public
Bay County, Michigan

My Commission Expires 3-4-86