

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329

Docket No. 50-330

As a result of the inspection conducted on July 13-15, 28-30, August 4-5, 9-13, 16-20, and 23-25, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violations were identified:

1. 10 CFR 50, Appendix B, Criterion III, states, in part, that, "Measures shall be established to assure that applicable regulatory requirements and the design basis, as defined in 50.2 and as specified in the license application ... are correctly translated into ... drawings ..."

Consumers Power Quality Assurance Program Policy No. 3, Revision 12, Paragraph 3.3 states, in part, "Each group or organization performing detailed design translates the applicable regulatory requirements, design bases, codes, standards and design criteria into design documents, such as ... drawings ..."

Contrary to the above, the licensee failed to translate, into applicable raceway drawings, the requirements of Paragraph 8.3.1.4.1.1 of the Midland FSAR which states, in part, "The minimum separation distance between redundant class 1E cable ... is ... three feet ... separated vertically ... In cases where three foot separation is unattainable, enclosed raceways that qualify as barriers or other barriers are provided between redundant circuits." This is exemplified by the 2' 5" centerline to centerline vertical dimension requirement for redundant raceway 1DH058 and 1BFF001 as identified on raceway drawing E-628(Q). Further, there were no barrier requirements identified on the applicable raceway drawings. As a result, approximately 30 class 1E cables were installed in raceways 1DH058 and 1BFF001 with a vertical separation of approximately 20 inches.

This is a Severity Level V violation (Supplement II).

2. 10 CFR 50, Appendix B, Criterion III, states in part, that, "Measures shall include provisions to assure that appropriate quality standards are specified and included in design documents..."

Consumers Power Company Quality Assurance Program Policy No. 3, Revision 12, Paragraph 3.4 states in part, that, "The organization assures that the designs and materials are suitable."

Contrary to the above, Specification C-197 did not specify the location for the well sampling points. Furthermore, the sampling points being used were in the wrong locations.

This is a Severity Level IV violation (Supplement II).

3. 10 CFR 50, Appendix B, Criterion V, states in part, that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings ... and shall be accomplished in accordance with these instructions, procedures, or drawings.

Consumers Power Quality Assurance Program Policy No. 5, Revision 12, Paragraph 1.0 states, in part that, "Instructions for controlling and performing activities affecting quality ... are documented on instructions ... these documents provide qualitative and quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, the licensee failed to assure that the slope layback at the Auxiliary Building access shaft was constructed in accordance with design drawing C-1421. The completed slope was 1:1 instead of 1 1/2: 1 as required by the drawing. Furthermore, Bechtel issued an FCN after the fact instead of an NCR as required by their procedures. Additionally, the Onsite Geotechnical Engineer did not perform his monitoring duties as required by the site Excavation Permit System Procedure.

This is a Severity Level IV violation (Supplement II).

4. 10 CFR 50, Appendix B, Criterion IX, states in part, that, "Measures shall be established to assure that special processes ... are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable ... criteria, and other special requirements.

Consumers Power Quality Assurance Program Policy No. 9, Revision 12, Paragraph 1.0. states in part, that, "Where the required level of quality cannot be measured by inspection only of the item ... accomplish these processes under controlled conditions in accordance with applicable codes, standards and specifications using qualified procedures, equipment and personnel."

Contrary to the above, the inspector determined that the calibration of the crack grouting equipment being used for the BWST was not controlled using qualified procedures. This resulted in inadequate assurance that both the required grouting pressure and component mix ratios were being adhered to.

