

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/82-21(OSC); 50-330/82-21(OSC)

Docket Nos. 50-329; 50-330

Licenses No. CPPR-81; CPPR-82

Licensee: Consumers Power Company  
1945 West Parnall Road  
Jackson, MI 49201

Facility Name: Midland Nuclear Power Plant, Units 1 and 2

Inspection At: Midland Site, Midland, MI

Inspection Conducted: September 20 through October 12, 1982

Inspectors: <sup>For</sup> B. L. Burgess *R. B. Landsman* 11/8/82  
R. J. Cook *R. J. Cook* 11/4/82  
R. N. Gardner *R. N. Gardner* 11/4/82  
R. B. Landsman *R. B. Landsman* 11/4/82  
Approved By: *R. F. Wannick for*  
W. D. Shafer, Chief 11/8/82  
Midland Section

Inspection Summary

Inspection on September 20 through October 12, 1982 (Reports No. 50-329/82-21(OSC); 50-330/82-21(OSC))

Areas Inspected: Review of Remedial Soils QC recertification program; examination of site conditions; conditions for limited site fire main capability and repairs; management meetings and examination of the Zimmer site. The inspection involved 180 inspector-hours on site by four NRC inspectors.

Results: Of the areas inspected, one item of noncompliance was identified with two examples: Severity Level IV, failure to maintain the latest revision of documents.

## DETAILS

### Persons Contacted

#### Consumers Power Company

J. A. Mooney, Executive Manager  
D. B. Miller, Site Manager  
M. L. Curland, Site Project QA Superintendent  
D. E. Horn, MPQAD, Civil  
J. K. Meisenheimer, MPQAD, Soils  
B. H. Peck, Construction Superintendent  
J. Schaub, Midland Project Office  
R. M. Wheeler, Technical Section Supervisor

#### Bechtel Power Corporation

M. A. Dietrich, Project QA Engineer  
J. Fisher, Manager, Remedial Soils  
M. M. Blendy, QC, Civil  
J. W. Darbey, Resident Engineer  
S. D. Kirker, QC, Civil

Other licensee and contractor personnel were routinely contacted during the course of these inspections.

### Functional or Program Areas Inspected

#### 1. Review of Remedial Soils QC Recertification Program

Consumer Power Company letter to the NRC, dated September 17, 1982, "Quality Assurance Program Implementation for Soils Remedial Work", identified the licensee's actions in regards to integrating the Soils QA and QC functions under the direction of MPQAD. In response to this letter, the licensee was required to initiate a recertification program for all Bechtel QC inspectors integrated into the Soils QA/QC organization. The licensee subsequently informed the NRC that the recertification of Bechtel QC inspectors would be accomplished through oral examinations. A schedule of these examinations was submitted by the licensee at the request of the NRC.

On September 23-24, 1982, the Region III inspectors conducted an inspection of the Bechtel QC recertification activities being accomplished by MPQAD. During this inspection, the inspectors determined the following:

- a. The inspectors observed that in administering the oral examinations, MPQAD would excessively repeat the questions, allowing the examinee several attempts to correct previously incorrect examination responses.

- b. The inspectors observed that in administering the oral examination, MPQAD would mark questions, which the examinee failed to correctly answer, as NA, when the question was relevant to the pertinent PQCI.
- c. The inspectors observed that the technical portion of the oral examination lacked the technical content necessary to establish the examinee's level of comprehension of the activity addressed by the subject PQCI.
- d. The inspectors observed that the QA examiner used a controlled copy of PQCI UP-C-1.013 to make up the exam questions. This copy was different from another controlled copy obtained from the QC records vault. Both documents were marked revision 0 and dated 8/20/82. There were two pages that were different dealing with the same interface document, UP-C-1.008. This failure to control documents is in noncompliance with 10 CFR Part 50, Appendix B, Criterion VI, as described in the Appendix of the report transmittal letter (50-329/82-21-1A; 50-330/82-21-1A). Furthermore, during the inspection, the licensee could not produce the controlled distribution list for the referenced PQCI.

The inspectors, while attempting to ascertain why the PQCIs were different, reviewed ten copies of the Bechtel "Quality Control Notices Manual", Procedure G-6.1, which controls PQCIs. During the review, one controlled copy of G-6.1 had pages missing from the procedure. Two other copies, Manual numbers 1456 and 1369A, of G-6.1 were not of the latest revision. This is another example of noncompliance to 10 CFR 50, Appendix B, Criterion VI, as described in the Appendix of the report transmittal letter (50-329/82-21-01B; 50-330/82-21-01B).

During the exit meeting, the licensee committed to review the complete PQCI control process.

Subsequently, Region III issued a Confirmatory Action Letter (CAL) on September 24, 1982, regarding the licensee's commitments in regard to the problems identified in the remedial soils QC requalification program. The licensee commitments identified by the CAL included: (1) the issuance of a Stop Work for all work on remedial soils with the exception of those continuous activities such as maintaining the freeze wall; (2) the suspension of all examinations relating to remedial soils QC requalifications; (3) the decertification of all remedial soils QC personnel previously certified; (4) the establishment of a retraining program for all QC personnel who fail the recertification examinations; and (5) the development of a written examination for all remedial soils QC recertifications.

## 2. Site Tours

At periodic intervals during the report period, tours of selected site areas were performed. These tours were intended to assess the cleanliness of the site; storage conditions of equipment and piping being used in site construction; the potential for fire or other hazards which might have a deleterious effect on personnel and equipment; and to witness construction activities in progress. A system walk down was performed of portions of the decay heat removal and component cooling water systems prior to the witnessing of initial performance testing.

## 3. Limited Site Fire Main Capability

As a result of inspection effort into the qualification of QC Inspectors for the remedial soils work, a Stop Work was invoked on September 24, 1982. However, at the time of the Stop Work, the licensee was in the process of making a tie-in between the temporary construction fire main and the permanent site fire main. This tie-in was being made to facilitate remedial soils work at the Service Water Building. Although no excavation was involved, the work was being controlled by use of an excavation permit (WP-106). The Stop Work negated the excavation permit and subsequently any work being performed under the excavation permit.

The licensee became fully aware of the limited fire main capacity on September 25, 1982, and completed working on the fire main tie-in to restore fire main capacity. The licensee notified the NRC that technically the work may have violated the Stop Work, but when considering the limited fire main capacity, it was more prudent to take emergency measures to restore the system to normal capacity. The Resident Inspector was informed of these actions and examined the system tie-in. No excavation work was in process as the excavation for access to the fire main had been performed at an earlier time. The NRC concurred with the licensee emergency action to restore the fire main capacity. (Reference ltr. Warnick to Cook dtd. October 5, 1982).

## 4. Management Meetings

On September 29, 1982, a meeting was conducted at the Ramada Inn Central in Midland, Michigan. The purpose of the meeting was to discuss the integration of Quality Control (QC) activities into the Midland Project Quality Assurance Department (MPQAD).

On September 28, 1982, the Midland Inspection Site Team met with members of Stone & Webster and Consumers Power Company. The meeting was conducted to introduce the Third Party Independent Assessment Team members for remedial soils work and to explain their function onsite.

On September 22, 1982, the Midland Inspection Site Team met in the regional office to discuss with Consumers Power Company the management of Quality Control personnel onsite. One of the issues discussed was how Consumers Power Company could manage and supervise Bechtel QC inspectors without jeopardizing the Bechtel owned "N" stamp.

5. Resident Inspector Visit to Zimmer Nuclear Power Station

On October 7 and 8, 1982, the Senior Resident Inspector (SRI) toured the Zimmer Nuclear Power Station. This tour was performed to compare the uniqueness of regulatory difficulties between the Zimmer and Midland Sites - both plants have been assigned special attention through Inspection Teams assigned to the Office of Special Cases, RIII.

It appeared to the SRI that inadequate structural steel, welding material traceability and the extensiveness of rework (excluding soils work) were more profound at the Zimmer Station than at Midland. It was apparent that there was little similarity between the exact nature of nonconforming conditions at the Zimmer and Midland Plants.

6. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspection on September 24, 1982. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the information.