

September 22, 1982

Docket Nos: 50-329 OM, OL
and 50-330 OM, OL

APPLICANT: Consumers Power Company

FACILITY: Midland Plant, Units 1 & 2

SUBJECT: DRAFT LETTER ON IMPLEMENTATION OF QUALITY PROGRAMS

Enclosure 1 is a draft copy of a letter being prepared by Consumers Power Company to address measures directed to implementation of quality programs at the Midland Plant, Units 1 and 2. It is in response to a management meeting on September 2, 1982, and was hand delivered to NRR by Consumers's Nuclear Licensing Representative in Bethesda, Maryland. Enclosure 1 is directed to overall project quality implementation and the performance of the primary inspection function (QC) at the Midland site.

A related draft letter directed to implementation of the quality program for the Midland soils remedial work was provided to the NRC during a September 8, 1982, meeting and is included with the meeting summary report dated September 22, 1982.

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Enclosure:
As stated

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Enclosure 1

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September 10, 1982

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Received 9/13/82
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MIDLAND NUCLEAR COGENERATION PLANT
QUALITY PROGRAM IMPLEMENTATION
File: 0485.16 Serial:

REFERENCE: CPCo Letter Serial 19158, 9/ /82, "Quality 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 Program for the Midland soils remedial work. In addition to the discussions specifically related to soils, the total Midland Quality Program implementation was reviewed and areas were identified where additional efforts should be directed to insure successful overall project quality 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.

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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 separated action.

Independent Verification - Total Project

Consumers Power proposes a new and expanded approach which will give a broader overview than the "vertical slice" assessment currently being recommended by the NRC for other NTOL plants. The assessment which is suggested for Midland will combine an INPO type construction project evaluation, which is a broad "horizontal" type review of all 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 which are currently being selected. The details of this extensive independent assessment will then be finalized with the assistance of the selected contractor(s) and presented to NRC management for concurrence. The INPO portion of the program will be initiated immediately to comply with the INPO schedule and industry commitments except 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. The Company expects to meet with the NRC shortly and finalize this proposal.

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 "big ticket" hardware problems.
2. The degree to which the physical characteristics of selected significant supplied components and parts meet their respective quality requirements.
3. The overall adequacy of the Quality Assurance Program to include corrective actions, effectiveness of the supplier documentation review efforts, checkout and preoperational testing activities and personnel qualifications.

This assessment was 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. To assure independence, the assessment team was specifically chosen to be independent from the Bechtel Ann Arbor office. This team consisted of Senior experienced personnel with appropriate expertise having previously performed similar work on other projects. 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 successful implementation of the remaining work to complete the plant and verification program, including both quality records, test program results, and third party assessments, that will certify the adequacy of the plant as constructed.

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MEETING SUMMARY DISTRIBUTION

September 22, 1982

Docket No(s): 50-329/330

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