

September 22, 1982

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

APPLICANT: Consumers Power Company  
FACILITY: Midland Plant, Units 1 and 2  
SUBJECT: SUMMARY OF SEPTEMBER 8, 1982, MEETING ON  
SOILS-RELATED QUALITY ASSURANCE IMPROVEMENTS

On September 8, 1982, the NRC staff met in Bethesda, Maryland with Mr. J. Mooney of Consumers Power Company (the Applicant) to discuss measures being considered to assure successful implementation of the quality plan for the Midland soils remedial work. Meeting attendees are listed in Enclosure 1.

During a September 2, 1982, meeting between NRC management and CPCo management and during an earlier SALP meeting, the NRC indicated that implementation of the quality assurance program needs to be improved, especially in the soils remedial areas. Mr. Mooney noted that in response to these NRC concerns, he is preparing a letter to address measures which will be taken to gauge and assure the successful implementation of the quality program, with particular emphasis in the soils areas. The purpose of the meeting was to discuss a preliminary draft of the letter (Enclosure 2) in the soils areas. Another letter covering the total Midland Quality Program implementation is also being drafted by Mr. Mooney.

Mr. Mooney expects to issue his letters in about a week.

*BS*  
Darl S. Hood, Project Manager  
Licensing Branch No. 4  
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Enclosures:  
As stated

cc: See next page

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PDR ADOCK 05000329  
A PDR

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- 2 -

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ENCLOSURE 1

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September 8, 1982

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D. Hood  
W. Shafer (RIII)

CPCo

J. Mooney  
J. Cook (part time via telephone)

OFFICE ▶	.....	.....	.....	.....	.....	.....	.....
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**Consumers  
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September 7, 1982

*Received during Meeting  
of September 8, 1982*

Harold R Denton, Director  
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MIDLAND NUCLEAR COGENERATION PLANT  
MIDLAND DOCKET NOS 50-329, 50-330  
RESPONSE TO OPEN ITEMS OF DRAFT SER  
FILE 0485.16 SERIAL 19158

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This letter summarizes Consumers Power Company's discussions with the NRC management regarding our mutual desire to implement a successful quality program for the Midland soils remedial work.

The 1980/1981 SALP Report, presented to Consumers in late April of this year, indicated that activities in the soils area should receive more inspection effort on the part of both the NRC and CP Co. Follow-up discussions with the NRR staff and Region III Inspectors led to the conclusion that the Quality Program and its definition was adequate; however, there was concern that certain aspects were not being or might not be satisfactorily implemented. This was corroborated by the fact that the majority of the NRCs recent inspection findings at the Midland Site were in the soils area.

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Consumers Power has performed an in-depth review of all aspects of the implementation plans for the Midland Soils work activities. This review included the areas of design and construction requirements and plans, organization and personnel, project controls and management involvement. The results of this review and the proposed steps for the successful implementation of the Quality Program were discussed with the NRC management in a meeting held in Chicago on September 2, 1982. In addition, because of the expanded underpinning activities scheduled to begin shortly, Consumers proposes to retain a qualified third party for an assessment of the initial phase of the implementation of these work activities. The highlights of the September 2 discussions are presented in the following paragraphs.

The design for the required remedial activities is in an advanced state; design details and adequacy have been reviewed by numerous organizations. A special ACRS Subcommittee reviewed the soils activities and concluded that there were no open items, while commenting favorably on the thoroughness and conservatism of the review and remedial approaches. Numerous submittals to the NRC have been presented to clarify the design intent. The NRC Staff has subsequently completed its detailed review of all design aspects, has reached the conclusion that no open issues remain, and is in the process of issuing an SSER. Following-up on design activities, Bechtel has assigned to the site a design team comprised of experienced structural and geotechnical engineers under the Resident Engineer. This team will monitor and review the field implementation, resolve on a timely basis routine construction questions requiring engineering response and immediately administer contingency plans immediately if any problem should arise during the underpinning work.

Following, coupled with an effective design process, the next step in quality performance of the soils remedial work involves a system to assure that all design requirements and commitments are properly reflected in the final product. To this end, all soils activities covered by the ASLB Order of April 30, 1982 are "Q-listed" and are covered under soils-specific QA plans. These require that appropriate procedures are in place to accomplish the work in a quality manner successfully and that detailed inspection plans and over-inspection plans have been developed and are utilized. Additionally, the Work Authorization Procedure and Work Permit System insure the NRC and CP Co have specifically approved and released the work.

To assure that all commitments made to the NRC are properly accounted for in design documents, Consumers reviews written records of commitments and incorporates them in design detail. The Project is also undertaking a review of past correspondence to create a computer listing of all commitment not already placed in construction documents. This computer list will be periodically reviewed to insure that commitments are incorporated in design or construction documents in a timely fashion.

Another aspect of the Company's quality implementation program calls for an efficient, integrated quality organization staffed by qualified, experienced personnel. The present project organization provides single-point accountability, dedicated personnel, minimum interfaces - particularly at the working level, and a quality organization integrating quality assurance and quality control. This organization is staffed by personnel with the experience

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necessary to successfully accomplish the work. (The qualifications of key personnel were discussed in more detail in our recent meeting.)

To enhance the performance of key project organizations, the Company will maintain day-to-day control over scheduling, both through the construction approval process and by frequent meetings with the involved contractors and subcontractors. Each week, underpinning subcontractors will present proposed construction work to the Company. In addition, to reduce schedule pressures on involved subcontractors, all subcontracts were entered into on a time-material basis. This should improve subcontractor attention to detail in performance of specific construction activities.

Another important element of the proposed soils implementation plan involves employee training. The training program, which includes all organization and personnel, covers both general training in quality and specific training relative to the construction procedures. More specifically, all personnel associated with Remedial Soils work have attended a special Quality Assurance Indoctrination Session. This includes Bechtel Remedial Soils Group, Bechtel QC, MPQAD, Mergentime and Spencer, White and Prentis (SW&P) personnel down to the craft foreman level. This training consists of one three-hour session covering Federal Nuclear Regulations, the NRC, Quality Programs in general, and the Remedial Soils Quality Plan in detail. In addition to the forementioned training, both Mergentime and SW&P Procedures for Quality Related Training require specific training prior to initiating any quality related construction activity. The extent of this training, and identification of individuals to receive it, are spelled out in



the each separate procedures governing quality related activities. Training requirements are listed in the prerequisites section of each procedure, and are QC and QA Hold Points, which must be signed by a QC and QA representative prior to the beginning of relevant activities.

Beyond training, an additional measure to improve performance involves the creation of a new Quality Improvement Program (QIP) for the soils project. To launch their effort, an indoctrination program will be presented to all individuals, stressing the absolutes of Quality and the concept of "Doing it right the first time." Measures specific to soils will be developed for those critical areas which are indicative of a "quality product". Tracking these activities will provide an indication of the effectiveness of the program. The QIP will provide mechanisms for individual "feedback" and will enhance existing QIP programs.

In addition to embracing well-defined design and implementation requirements, a qualified organization and strict performance standards, the soils remedial work will include a high level of senior management involvement. Towards this end, project senior management will conduct weekly in-depth reviews on site of all aspects of the work including quality and implementation of commitments. The Company's CEO is briefed on a regular basis and schedules bi-monthly briefings on all aspects of the project including soils. During the bi-monthly briefings the CEO tours the Midland site.

Complementing the enhanced CP Co management role, NRC Region Management overview of the construction process will be assured by monthly meeting, agreed upon by the Region, to overview the results of the quality program and the progress of the soils project. These meetings will cover any or all aspects of the project of general or special interest to the NRC management.

A final element of the Company's of quality implementation effort is the establishing of an independent appraisal program. This program is independent of the design and construction effort and will assess implementation during the initial three months of the underpinning of the auxiliary building or longer if circumstance warrant. This independent appraisal program implementation will be in place prior to starting Phase 3, which is defined as starting with the removal of soil for the grillage beams at Piers East and West #8 (Piers E/W8 are installed as Phase 2).

The independent appraisal will be conducted by a team of nuclear plant construction and quality assurance experts. This team will be supplemented by the addition of an underpinning consultant who will review the design documents, construction plans and construction itself to assure not only that the design intent is being implemented but also that the construction is consistent with industry standards. The assesment will further assure that the QC program is being implemented satisfactorily and that the construction itself is being implemented in accordance with the construction documents. Contract negotiations are in process with Stone and Webster to assume the lead role in this appraisal. They will be assisted by Parsons, Brinkerhoff, Quade and Douglas, Inc who will provide technical expertise.

Based on the discussion outlined above, CP Co believes that the soils program has been thoroughly and critically evaluated, and that all prerequisites for successful implementation have been or are being accomplished. The Company's program, with the initial overview from the independent implementation assessment, and the continuing overview by the NRC staff and management should provide proper assurance that the remedial soils activities will be successfully completed.

JWC/JAM/cl

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                      Dated

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

CONSUMERS POWER COMPANY

By

\_\_\_\_\_  
J W Cook, Vice President  
Projects, Engineering and Construction

Sworn and subscribed before me this \_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Notary Public  
Jackson County, Michigan

My Commission Expires \_\_\_\_\_

oc0982-2607a102

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CONSUMERS POWER COMPANY

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

Letter Serial                      Dated

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

CONSUMERS POWER COMPANY

By            /s/ J W Cook

\_\_\_\_\_  
J W Cook, Vice President  
Projects, Engineering and Construction

Sworn and subscribed before me this \_\_\_\_ day of \_\_\_\_\_.

/s/ Barbara P Townsend

\_\_\_\_\_  
Notary Public  
Jackson County, Michigan

My Commission Expires \_\_\_\_\_

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MEETING SUMMARY DISTRIBUTION

September 22, 1982

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