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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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USNRC

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETING & SERVICE
BRANCH

In the Matter of:)	Docket Nos. 50-329 OM
)	50-330 OM
CONSUMERS POWER COMPANY)	Docket Nos. 50-329 OL
(Midland Plant, Units 1 & 2))	50-330 OL

TESTIMONY OF ROBERT M. WHEELER
ON QUALITY ASSURANCE

- Q1. Please state your name and position.
- A1. My name is Robert M. Wheeler. I am Soils Section Head in Consumers Power Company Midland Construction Department. I previously testified in these proceedings on February 14, 15, and 16, 1983.
- Q2. Mr. Wheeler, have you read the Staff's testimony on quality assurance which was filed October 29, 1982?
- A2. Yes, I have.
- Q3. Mr. Wheeler, paragraph 11(c) of Attachment B to Mr. Keppler's October 29, 1982 testimony raises the concern that the Company had set up to drill a well hole in safety-related dirt using a technique which was not authorized. Would you please describe the cir-

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cumstances surrounding this event?

- A3. The situation involved the setting up of a rotary drill rig to drill a temporary construction dewatering well between the turbine and diesel generator buildings (ME55). On June 11, 1982, Dr. Ross Landsman informed the Company that the rotary method of drilling which we planned to use for ME55 had not been approved by the NRC. The Company halted rotary drilling until this issue could be satisfactorily resolved.

Prior to the concern raised on the auxiliary building construction wells, the Company had discussed and submitted plans to the NRC outlining the locations and a schematic for the proposed wells. Based on discussions with NRR and the NRC review of the wells for the service water structure which utilized the rotary method, the Company believed that the NRC concurred with the rotary method for the auxiliary building wells. The discussion and agreement with the NRC to install the additional auxiliary building dewatering wells occurred on May 26, 1982.

During the May 26, 1982 call, the NRC expressed concerns regarding fines monitoring for the auxiliary building construction dewatering wells, and the Company agreed to implement the monitoring criteria. Because of the May 26, 1982 discussion, the Company believed

that the requirement for NRC staff notification for the installation of the wells had been fulfilled.

When the question concerning drilling techniques was again raised in June, it was decided that NRR should be contacted to determine if the rotary drilling was authorized. Mr. Joe Kane of NRR was called to discuss this matter. Mr. Kane stated that he expected these wells to be installed using the cable tool method used for permanent wells. I concluded from the call however, that some confusion existed even on the NRC's part as to what the real concerns were with regard to well installation.

Based on the call with NRR and the need to resolve the confusion surrounding this matter, a stop work letter was issued on June 11, 1982 and work was stopped. No drilling for ME55 had taken place by this time.

During a June 25, 1982 meeting with the NRC, the Company verified and confirmed that the rotary drilling method is acceptable for auxiliary building construction wells.

- Q4. Why did the Company seek to continue excavation of soils in proximity of the Feedwater Isolation Valve Pit without determining whether the supports were adequate as described in Mr. Keppler's October 29, 1982 testimony,

Attachment B, paragraph 14?

- A4. Originally, the structural steel supports for the Feedwater Isolation Valve Pit ("FIVP") were installed and load tested non-Q. The original load test was conducted to demonstrate that the steel support system was capable of supporting the calculated weight of the FIVP. The original load test was successfully completed by June 1981.

In June 1982 Consumers Power Company presented a plan to the NRC which called for modifications to the FIVP support system. The Company's reason for proposing the modification was to provide increased margins of safety. In a letter from the Company to Harold Denton dated June 18, 1982, an attachment entitled "Supplemental Information on Feedwater Isolation Valve Pits" described the construction restriction related to excavation near the FIVP, i.e., the support system adequacy would be verified prior to excavating under the FIVP. It was the Company's position that the FIVP support modification and the new proof load only affected excavation work under the FIVP. Therefore, the Company believed that excavations which did not go directly under the FIVP could begin prior to completion of the FIVP support modifications.

The NRC inspection report (August 9, 1982) dis-

cussed the need to complete the FIVP modification work in terms of excavation below elevation 609; piers 11, 12, 13, 14 and KC2 (phase 2A). Since none of these piers resulted in excavations directly under the FIVP, the Company desired to begin this phase of the work. Any work of this nature would be discussed and prior approval from NRC Region III would be obtained.

The NRC suggested that the structural steel should first be overviewed since it had been installed non-Q. The Company inspected the steel and noted minor changes which were approved by Engineering as is. After several discussions with the NRC inspector, it was agreed that the modifications and the new load test did not need to be completed prior to drifting to the pier 12 (part of phase 2A). This agreement is documented in an August 25, 1982 letter to W. D. Shafer from D. B. Miller.