



Consumers
Power
Company

James W Cook
Vice President - Projects, Engineering
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September 30, 1982

Mr J G Keppler, Regional Administrator
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND PROJECT -
INSPECTION REPORT NOS 50-329/82-05 (DETP) & 50-330/82-05 (DETP) AND
50-329/82-06 & 50-330/82-06
FILE: 0.4.2 SERIAL: 19052

- References:
- (1) NRC Letter, C E Norelius to J W Cook, dated April 26, 1982, transmitting Inspection Report 82-05
 - (2) NRC Letter, C E Norelius to J W Cook, dated April 26, 1982, transmitting Inspection Report 82-06
 - (3) Letter, J W Cook to J G Keppler, dated May 28, 1982, providing CP Co's response to Inspection Reports 82-05 and 82-06
 - (4) NRC Letter, R F Warnick to J W Cook, dated September 2, 1982, requesting an additional response to Inspection Reports 82-05 and 82-06
 - (5) Letter, J W Cook to J G Keppler, dated August 13, 1982, providing CP Co's response to Inspection Report 82-03
 - (6) NRC Letter, R F Warnick to J W Cook, dated September 22, 1982, requesting a further response for noncompliance item 82-03-01A

Reference 4 asked for an additional response by September 27, 1982, to non-compliance items 82-05-02, part a and b, and item 82-06-01. Mr R Gardner extended our response due date to September 30, 1982, at the oral request of our M J Schaeffer.

Regarding item 82-05-02, part a, the positions relative to the "Q" listing of the soldier pile installation are well documented in References 1, 3 and 4. This situation could not be repeated now because of the additional controls initiated since the soldier piles were installed. These controls include:

- 1) Mergentine Procedure MGP 1.000 Q requires a specific cover sheet format appropriate to the Mergentine procedures, as well as providing overall procedural controls.

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- 2) An excavation permit system is in place to control excavations in "Q" soil.
- 3) The ALAB Order dated April 30, 1982 and the Quality Assurance Plan, MPQP-2, now clearly make this type of work subject to the Quality Assurance Program.
- 4) The NRC and CP Co Work Authorization Procedure, dated August 12, 1982, provides for the specific authorization by the NRC as a prerequisite for any construction work covered by the ALAB Order of April 30, 1982.

The implementation of the above controls provided the corrective action to assure that the Project is in compliance on this matter.

Regarding Item 82-05-02, Part B, we believe that it is impractical to proceduralize a time limit for the distribution of Specification Change Notices (SCNs) from the time they are released by Project Engineering to the time they are distributed at the site. As described in Reference 4, Project Engineering must provide the effectivity of the SCN, including its effect on any backfit and on work underway. Distribution of the SCN, once received by Construction Document Control, is normally within two working days. A review will be made of the SCNs written in September to determine how long it takes for an SCN to be distributed once released by Project Engineering. This should provide a basis for determining if improvements are necessary in the scheduler controls for SCN distribution.

Regarding 82-06-02 dealing with the overinspection of Class IE Cable, we are continuing the review of this task to determine the most effective approach and the schedule to accomplish the objective of assuring that cable routing satisfies FSAR requirements. We anticipate providing a further response on this item by October 15, 1982.

Regarding Item 82-03-01, Reference 5 stated that by August 30, 1982, the Bechtel procedures would be revised to require the incorporation of FCRs/FCNs into the drawing when a combined total of 15 FCNs and FCRs are approved by Project Engineering. During the week of September 13, 1982, Dr R Landsman was informed that this procedural change was not yet issued. It should be noted that the new requirement was issued by Project Engineering directive on June 17, 1982. Since the initial response was made, the Project has been discussing additional measures to further control this process. The Bechtel procedural revision was not initiated while awaiting the final decision on these measures. As of September 23, 1982, Project Engineering issued a further directive that requires that Bechtel will initiate incorporation when 15 drawing change documents are received (rather than when they are approved) and that the drawing revision will be processed within 30 days (including the final approval). The same type of exclusions remain as to the types of design change documents which do not have to be incorporated. The formal change of the Engineering Procedures will be made by October 30, 1982.

We are revising the Consumers Power Company Quality Assurance Program Procedure No 6-1 concerning the number of attachment changes to drawings, to require that Lead Design Organizations, during the design and construction phase, have controls in place appropriate to their scope of work. This provides the additional corrective action required by Reference 6. The procedure will be changed by October 30, 1982.

Consumers Power Company

By James W. Cook

Sworn and subscribed to before me on this 30th day of September, 1982.

Patricia A. Puffer
Notary Public, Bay County, Mich

My Commission Expires 3/4/86

- CC RWarnick, NRC Region III
- WDShafer, NRC Region III
- RNGardner, NRC Region III
- RJCook, NRC Resident Inspector, Midland Site
- RBLandsman, NRC Region III
- BLBurgess, NRC Region III

BCC RCBauman, P-14-314B
WRBird, P-14-418A
JEBrunner, M-1079
MLCurland, Midland
LHCurtis, Bechtel-AA
LEDavis, Bechtel-Midland
MADietrich, Bechtel-Midland
FDField, Union Electric
JFFirlit, JSC-236A
JAFisher, Bechtel-Midland
MEGibbs, IL&B-Chicago
WDGreenwell, Bechtel-AA
RCHollar, Bechtel-AA
DEHorn, Midland
KEMarbaugh, Midland QA/NO
BWMarguglio, Midland
JKMeisenheimer, Midland
DBMiller, Midland (3)
JAMooney, P-14-115A
NRC Corres File, P-24-517
SJPoulos, Geotech
JARutgers, Bechtel-AA
JRSchaub, P-14-309
PSteptoe, IL&B-Chicago
DMTurnbull, Midland
RAWells, P-14-113A
FCWilliams, IL&B-Washington