



Consumers
Power
Company

James W Cook
Vice President - Projects, Engineering
and Construction

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0453

December 3, 1982

H R Denton, Director
Office of Nuclear Reactor Regulation
Att: Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND NUCLEAR COGENERATION PLANT
DOCKET NOS 50-329 AND 50-330
QUALIFICATION OF INSPECTION, EXAMINATION AND TESTING
AND AUDIT PERSONNEL FOR THE MIDLAND PROJECT
FILE: 0.4.10 SERIAL: 19094

- References: (1) E G Adensam (NRC) letter to J W Cook, Same Subject,
dated October 5, 1982
(2) CPCo CPC-1-A, "Quality Assurance Program Manual for Nuclear
Power Plants, Volume I, Policies"
(3) A B Davis (NRC) letter to J W Cook, Re: QC Training Program
and Written Exams for Remedial Soils, dated October 28,
1982

Reference 1 asked for additional information on Consumers Power's position in regard to Regulatory Guide 1.58, Revision 1. This letter responds only for the Midland Project for certification of personnel to the enclosed Procedure B-3M-1. The procedure was issued October 25, 1982 and is utilized for all new certifications in the Midland Project Quality Assurance Department (MPQAD) and for recertification or new certification of Bechtel Quality Control Engineers utilized on the Midland Jobsite after February 1, 1982. The specific requests are repeated below along with our response.

1. Requested Information

"Describe the qualification requirements of those personnel responsible for reviewing and approving inspection, examination and test procedures and of evaluating the adequacy of such procedures to accomplish the inspection, examination and test objectives. (See Position C.5)"

CPCo Response

In regard to Level III personnel capabilities, Section C.5 states; "In addition, the individual should be capable of reviewing and approving inspection, examination, and testing procedures and of evaluating the adequacy of such procedures to accomplish the inspection, examination, and test objectives." Policy No 2 of our approved Topical Report (Reference 2) provides the following "Exception/Interpretation"; "While a Level III

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individual should be capable of reviewing and approving inspection, examination and testing procedures and of evaluating the adequacy of such procedures to accomplish the inspection, examination and test objectives, this is not construed by Consumers Power Company as requiring personnel who review, approve or evaluate such procedures to be certified as Level III personnel."

Both the Bechtel and Consumers programs require that the inspection planning authorized for use at the Midland Jobsite be approved by both the inspection agency and by MPQAD (Quality Assurance Engineering function). The programs require that supervisory level personnel provide the final approvals for the inspection plans. For the most part, these individuals have been certified as either Level II or III.

The program for certification of Level III personnel is consistent with Position C.5. The minimum education and experience requirements for such personnel are identical to the requirements stated in Section 3.5.3 of ANSI N45.2.6-1978. These individuals must demonstrate proficiency in writing inspection plans. They must also demonstrate a thorough understanding of the quality control program requirements by successfully passing a written examination.

Personnel who evaluate inspection, examination and testing procedures as part of the independent evaluation process of an audit are qualified and certified to the requirements of NRC Regulatory Guide 1.146, "Qualification of Quality Program Audit Personnel for Nuclear Power Plants."

2. Requested Information

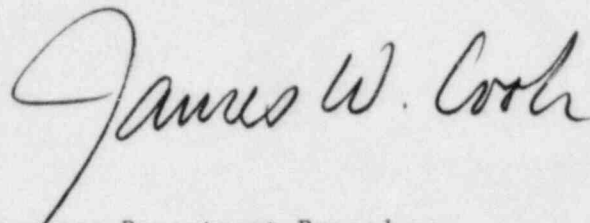
"Describe in more detail the extent to which the procedures and record results of written, oral and on-the-job performance demonstration tests are documented and determined acceptable. (See Position C.10)"

CPCo Response

Section 5.7 of MPQAD Procedure B-3M-1 describes in detail the written examinations and performance demonstration tests used to determine initial capability or to recertify inspection personnel. The individual record of performance tests are maintained along with the answer sheets for each written examination.

New employees who are candidates for inspection certification are being reviewed to assure that they will meet at least the minimum education and experience recommendations stipulated by Section 3.5 of ANSI N45.2.6 for the certification level for which they are candidates. Thus, for these candidates, Position C.10 is not applicable.

Procedure B-3M-1 was reviewed by the NRC Region III staff. Their concurrence (Reference 3) on its content was obtained prior to their authorization for CPCo to commence remedial soils QC requalification activities.



JWC/WRB/lr

Enclosure: Midland Project Quality Assurance Department Procedure
No B-3M-1, Rev 1, dated 10/25/82, "Qualification and
Certification of Inspection and Test Personnel"

CC: RJCook, NRC Resident Inspector, Midland Site
WShafer, NRC Reg III
RGardner, NRC Reg III
JGKepler, NRC Reg III
RHernan, NRC Office of NRR

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

Letter Serial 19094 Dated December 3, 1982


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 information regarding the implementation of the Consumers Power Company Quality Program for the Midland Plant.

CONSUMERS POWER COMPANY

By


J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 6 day of December, 1982


Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984