

UNCONTROLLED

APPENDIX 1
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QUALITY VERIFICATION PROGRAM MIDLAND NUCLEAR COGENERATION PLANT UNITS 1 AND 2

Index of Topics

1. Purpose
2. Scope
 - 2.1 Remedial Soils Activities
 - 2.2 HVAC Activities
 - 2.3 Cable Routing and Identification Reinspection
 - 2.4 ASME Hanger Reinspection
 - 2.5 B&W Construction Activities
3. References
4. Definitions
5. Program Content
 - 5.1 Detailed Scope
 - 5.2 Methodology
 - 5.3 Identification of Deficiencies
 - 5.3.1 Deficiencies Found During Reinspection of Accessible Attributes
 - 5.3.2 Deficiencies Found During Reinspection of Inaccessible Attributes
6. Special Program Elements
 - 6.1 Cable Reinspection
 - 6.2 In Process Inspection Notices and Discrepancy Reports
 - 6.2.1 Attachment 10 Forms
 - 6.3 Exceptions to this Plan
 - 6.4 Purchased Material
 - 6.5 Inaccessible Attributes

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Rev. 2, 6/10/83
PK0483-0014A-QL07

QUALITY VERIFICATION PROGRAM
MILLANT NUCLEAR COGENERATION PLANT UNITS 1 AND 2

Index of Topics

7. Documentation and Reports

- 7.1 Documentation of Results
- 7.2 Documentation of Nonconformances
 - 7.2.1 Trending
- 7.3 Reports
 - 7.3.1 Reports to Executive Manager - MPQAD
 - 7.3.2 Reports from Executive Manager - MPQAD
 - 7.3.3 Reports to NRC and Construction Implementation Overview Team

8. Implementation

- 8.1 Organizational Responsibilities
 - 8.1.1 MPQAD - BOP QA
 - 8.1.2 MPQAD - BOP QC
 - 8.1.3 MPQAD - Site Audit Section
 - 8.1.4 MPQAD - QA Administration and Training

9. Appendices

- A. List of PQCI's
- B. PQCI's to be Verified by Documentation Review
- C. Statistical Sampling Plan

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1

QUALITY VERIFICATION PROGRAM

Midland Nuclear Cogeneration Plant Units 1 and 2

1. Purpose: To confirm through a verification program under the direction of Consumers Power Company, the acceptable quality status of safety related procurement and construction activities completed and inspected by the Engineer-Constructor quality control personnel prior to December 2, 1982.
2. Scope: This program will cover all closed Inspection Records of inspections performed by the Engineer-Constructor quality control personnel on safety related material, systems, components and structures of the Midland Nuclear Cogeneration Plant Units 1 and 2 prior to December 2, 1982, except:
 - 2.1 Remedial Soils Work, which has been under the direction of Consumers Power Company Quality Assurance (QA) personnel since August, 1982.
 - 2.2 HVAC work, which has been under the direction of Consumers Power Company QA personnel since the major reorganization in June 1981.
 - 2.3 Verification of cable routing, identification and other accessible attributes which is being done on a 100% reinspection basis in accordance with PQCI E-4.0.

2.4 Verification of ASME hangers which will be done under a separate reinspection program as previously committed to the NRC on November 15, 1982 and March 29, 1983. This program requires 100% reinspection of all hangers with closed IR's as of December 1982. This program will be conducted under the direction of Consumers Power Company QA personnel.

2.5 B&W Construction Company activities which have been performed under the B&W Quality Assurance Program.

3. References:

3.1 Regulatory Guide 1.58, Rev 1, Qualification of Nuclear Power Inspection, Examination and Testing Personnel.

3.2 MPQAD Procedure E-3M, Preparation and Approval of Project Quality Control Instructions

4. Definitions:

Attachment 10

A form previously utilized to Document Walkdown status on specified piping systems prior to Hydrostatic or Pneumatic Testing.

Discrepancy Report (DR):

A form similar to the IPIN previously used to report inprocess nonconformances.

Inaccessible:

An item or attribute of an item which, due to its physical location or configuration, cannot be physically or visually reinspected without removing and thereby invalidating installed work. Under the Quality Verification Program, this includes those items or attributes normally inspected in process and which subsequent construction processing makes inaccessible, eg, piping fit-up, root weld and subsequent layers under the cover pass, anchor bolt hole drilling, internal cleanliness, embedment in concrete, etc. Inaccessible does not include those items which can reasonably be reached by scaffold erection, limited access (remote) areas which require the physical size of the inspection personnel to be limited or those items that can be viewed by removal of access cover or panels, eg, electrical consoles, cabinets, conduit boxes, etc.

The inaccessibility of attributes covered by insulation or coatings will be handled on a case by case basis. When such coverings can be practically removed and replaced and where their particular reinspection is required to establish an acceptable level of confidence of the quality of a particular attribute, the coverings will be removed. Items which fall into this category and are scheduled for verification in accordance with plan requirements will not be considered inaccessible unless so approved on a case by case basis by the Executive Manager - MPQAD.

In Process Inspection
Notice (IPIN):

A form previously used to record nonconforming conditions or work returned to construction forces for rework prior to completion of inspection activities for the item in question.

Inspection by Attributes:

Inspection whereby the item or attribute is classified simply as conforming or nonconforming without regard for the degree of nonconformance.

| | |
|---|---|
| Inspection Record (IR): | A report that scopes the inspection to be performed, relating it to a specific PQCI and a system, component, structure or portion thereof and which records the results of inspections. |
| Nonconformance: | A deficiency in characteristic, documentation or procedure which renders the quality of an item unacceptable or indeterminate. |
| Nonconformance Report (NCR): | A document used for reporting nonconforming conditions. |
| Population: | The entire quantity of closed Inspection Records (IR) as of December 2, 1982 relating to a specific PQCI. |
| Project Quality Control Instruction (PQCI): | The document that provides Quality Control Engineers (QCEs) with specific direction as to attributes to be verified, how they are to be verified and the acceptance criteria. |

Reinspection:

As used in this Verification Program, reinspection means a complete review of requisite documentation and a physical or visual recheck of accessible inspection attributes covered by a specific PQCI or a review of applicable inspection records and related quality documentation where attributes are not accessible.

Verification:

As used in this program, verification refers to the overall process of establishing the quality acceptance of the total population of completed and inspected work through combinations, as applicable, of efforts such as re-inspection, documentation review, review of past efforts to investigate and resolve problems, analysis of past overinspection results and, if necessary, NDE techniques and destructive examination.

5. Program Content: As identified in Section 2, Scope, Consumers Power Company (CPCo) will conduct a Quality Verification Program of safety related procurement and construction work in which the prior 100% inspections have been performed under the direct supervision of the Engineer-Constructor. Such inspections were performed in accordance with approximately 100 PQCI's, as listed in Appendix A, that specified the inspection requirements to be achieved by Quality Control (QC) Personnel. As noted in section 5.1, this listing includes all inspections completed by the Engineer-Constructor prior to December 2, 1982, including those excluded from this program for reasons stated herein. The Quality Verification Program has the purpose of establishing a quality baseline for the completion of construction of the Midland Project.

- 5.1 Detailed Scope: The program will include approximately 100,900 IRs subject to the Quality Verification Program, for which the Engineer-Constructor has a record of completed inspections as documented by closed Inspection Records (IR) and for which no other 100% verification activity has taken place or is scheduled to take place. There are approximately 147,500 closed IRs of which approximately 14,700 were for reinspections which occurred due to design change, construction rework, etc., and approximately 31,900 which are excluded, due to previous commitments under the Remedial Soil, HVAC, Cable routing and identification and ASME Rigger Programs. Where a reinspection has occurred on a specific item or

attribute the verification will relate to the latest IR. In addition, prior to the use of PQCI's, Material Receipt Inspections (MRI), Field Inspection Plans (FIP) and Welding Inspection WR-5 forms were used as quality instructions and records. These also will be used for quality verification. Where applicable, the results of the inspections will be grouped with like PQCI's. Otherwise they will be treated as separate populations.

- 5.2 Methodology: This program will confirm the acceptable quality status of completed work and establish the validity of prior inspections. To accomplish this, accessible attributes of items covered by completed IRs will be reinspected to the latest design requirements with PQCI's which have been reviewed and/or revised as necessary to assure clarity of acceptance criteria and uniformity of implementation. For inaccessible attributes, the original inspection documents will be reviewed for evidence of acceptability, and justification will be developed as described in section 6.5 to establish hardware quality and support the validity of inspections associated with such PQCI's. Each IR relates to a specific PQCI. PQCI's are organized by discipline and further structured to activities within that discipline, e.g., there are separate PQCI's and corresponding IRs for preplacement, placement and post-placement inspections of concrete. Closed IRs related to each PQCI provide a population of like activities. Closed IRs are those where the Engineer-Constructors 100% inspection of construction and installed hardware has been completed.

To assess the validity of these past completed inspections, and verify the hardware quality, CPCo will initiate a 100% reinspection of the population to provide adequate confidence that safety related systems components and structures will perform satisfactorily in service.

The initial 100% reinspection effort will be based on a systems/area orientation to provide a quality baseline for subsequent construction completion activities. System/area reinspections will be supplemented by random plant-wide inspections as appropriate to establish a valid quality baseline on an expeditious basis.

At some future date, once the quality level of completed work has been established, CPCo will make a determination as to whether or not further verification efforts can appropriately be based on less than a 100% reinspection program.

When CPCo believes that sufficient justification exists for a reduction in the 100% commitment, it will recommend such a reduction to the NRC in accordance with the statistical sampling plan attached as Appendix C.

- 5.3 Identification of Deficiencies: Any nonconforming condition observed during the implementation of this program other than those previously identified on nonperformance reports, will be identified

by a nonconformance report and will be dispositioned in accordance with established procedures.

5.3.1 Deficiencies Found During Reinspection of Accessible

Attributes: Reinspections will be conducted in accordance with PQCI's which have been reviewed and/or revised since implementation of the Construction Completion Program (CCP) and in accordance with current design drawings and specifications. An acceptable reinspection will validate both the hardware quality and the prior IR. Any deficiencies, other than those previously identified on nonconformance reports as a result of prior inspections, will be identified on a nonconformance report which will be traceable to both the verification and original IR and the item or attribute in question. When a nonconformance documents a difference between the as built condition of the unit and the referenced design drawing or specification, a further check will be made to determine the design basis against which the IR was originally completed, as well as the current stage of construction, to further establish the validity of the original IR.

5.3.2 Deficiencies Found During Reinspection of Documentation

for Inaccessible Attributes: The verification process for inaccessible attributes is discussed in Section 6.5. As

noted in that section, any documentation deficiencies will be recorded on the new IR, entered on a nonconformance report and cross referenced to the original IR.

6. Special Program Elements

- 6.1 Cable Reinspection: As noted in Section 2, Scope, reinspection of routing and identification of installed cables is underway and is being performed 100% for all accessible attributes per PQCI E-4.0. Other electrical work, including cable tensioning and terminations, on which inspections have been completed by the Engineer Constructor will be handled in accordance with this program. This includes PQCI's E-1.0, E-1.1, E-1.60, E-2.0, E-2.1, E-3.1, E-5.0, E-6.0, E-6.2, E-6.6 and E-6.6.1. These PQCI's are further defined and affected quantities of IRs are shown in Appendix A.
- 6.2 IPIN and DR: In accordance with approved procedures the QC inspection process has used in the past In Process Inspection Notices (IPIN) and Discrepancy Reports (DR) rather than Nonconformance Reports (NCR) to record nonconforming conditions noted by the inspector on work returned to construction for rework. The process required that IPINs be dispositioned before the Inspection Record could be closed. Because the use of IPINs and DRs raises the possibility that a complete inspection may not have been performed on items or attributes covered by IRs with associated IPINs or DRs,

all such IRs will be treated as a unique population and will be reinspected 100%. IPINs are no longer used in the inspection process. Discrepancy Reports (DR) were used prior to the use of the IPINs. They are no longer in use, but are recorded and will be treated the same as the IPIN.

6.2.1 Attachment 10 Forms: Attachment 10's were used in conjunction with Hydrostatic/Pneumatic Test Procedures as a punchlist for a defined Hydrostatic or Pneumatic Test, and included line numbers, drawing numbers and test boundaries. The Attachment 10 was not intended to be the quality document that identified documented acceptance by the QCE of subsequent action taken to correct punchlist deficiencies identified during the walkdown process. These deficiencies were intended to be tracked on other quality documents, such as Nonconformance Reports, Inspection Reports, etc. In order to verify that this use of the Attachment 10 did not compromise the quality of installed hardware, all completed hardware inspections documented on closed IRs falling within the system boundaries identified on existing Attachment 10 forms will be 100% verified during the Quality Verification Program.

- 6.3 Exceptions to this Program: Exceptions to this Program shall not be taken unless such exceptions can be fully justified. One such example would be a case where objective evidence is available of a CPCo overinspection of the the Engineer-Constructor's inspections and which demonstrates effective quality control and provides the basis to verify acceptability of the items or attributes covered by these past IRs.

Where such exceptions are proposed to be taken, a special report will be prepared by the MPQAD-QA General Superintendent for review and approval of the Executive Manager-MPQAD. This report will contain full justification for the exception and documentation of objective evidence to support the exception. The Executive Manager-MPQAD will inform the NRC Region III whenever he has made a decision to allow such an exception to the Program prior to implementing the exception.

- 6.4 Purchased Material: Purchased safety related material and components whether source inspected or inspected upon receipt are subject to this Program for verification of completed receipt inspections performed by the Engineer-Constructor prior to December 2, 1982. In many cases, purchased items have been installed and are not fully accessible for reinspection; however inaccessible interfaces will have been demonstrated and their functional acceptability proven through installation and subsequent testing. Accessible features will be reinspected in accordance with this Program.

The total number of IRs associated with PQCI R-1.00, Material Receiving Inspection, is approximately 12,000. In addition, prior to the introduction of PQCI R-1.00, approximately 150 MRIs and 20 FIPs were used for receipt inspection, covering approximately 700 items. Based upon further review, receipt inspections covered by MRIs will either be grouped with like items covered by PQCI R-1.00 or be reinspected separately. FIPs were also used for construction activities and will be treated separately under this plan. Where materials such as rebar, certain structural members or features of components are inaccessible for reinspection, documentation will be reviewed in accordance with this Program.

- 6.5 Inaccessible Attributes: There are 57 PQCIs which cover activities that are deemed to be inaccessible for reinspection. These include rebar installed in placed concrete, containment building tendon reinspection, and PQCIs relating to surveillance of sub-contractor activities. A complete listing of these is given in Appendix B to this Program. A brief statement as to why attributes of these IRs are considered inaccessible and why verification by documentation review is appropriate appears in Appendix B. Documentation relating to these PQCIs will be reviewed as indicated in this Program, in accordance with a revised PQCI or checklist specifically developed for review of documentation. These PQCIs, either individually or by groups, will be reviewed and specific detailed justification will be developed to verify the quality

status of associated hardware. This will be done by a combination of methods, applied as necessary to achieve verification, including validation of prior inspections through documentation review, re-inspections of attributes that may still be accessible, a review of past overinspections, a review of past activities to resolve problems, and if required, application of NDE techniques or limited destructive examinations. This justification, or recommendations for additional verification activities, where this justification cannot be established, will be provided by the MPQAD-QA General Superintendent to the Executive Manager-MPQAD for decision and approval. Deficiencies in documentation will be reported on nonconformance reports, the disposition of which will determine further actions necessary. These actions will include special testing programs as required to satisfactorily establish the quality acceptance of this category of PQCI's.

7. Documentation and Reports:

- 7.1 Documentation of Results: Results of reinspections and document reviews will be recorded on new IRs opened specifically for this purpose. Each such new IR will be cross-reference to the closed original IR. A proper notation will be made on the new IR to identify whether the existing original inspection covered by the IR was validated, rejected or is indeterminate. The new IR will provide the basis to document the quality status of the items or attributes being reinspected.

7.2 Documentation of Nonconformances: Nonconforming conditions observed during reinspection activities will be documented on a nonconformance report and appropriately analyzed for management attention. This includes instances where a design or construction modification has occurred since the Inspection Record was closed and a new IR not yet opened. (Note discussion in Section 5.3.1)

7.2.1 Trending: Deficiencies noted during the verification process will be trended as appropriate for analysis and management information.

7.3 Reports:

7.3.1 Reports to Executive Manager-MPQAD: A weekly status report will be made jointly by the CPCo BOP Quality Control (QC) Superintendent and Quality Assurance (QA) General Superintendent to the Executive Manager - Midland Project Quality Assurance Department (MPQAD) summarizing the results of the program. The report will note the completed Inspection Reports by the unique PQCI number, Nonconformance Reports issued and identification of attribute(s) causing the nonconformance(s).

7.3.2 Reports from Executive Manager-MPOAD: The Executive Manager-MPOAD will inform the CPCo Site Manager, the Engineer-Constructor Project Manager, and the Vice President, Projects, Engineering and Construction, of the status of the quality verification program on a biweekly basis and will provide them with a formal monthly report of the verification effort. As appropriate, he will also report on the acceptability of completed work as it may be impacted by nonconformances.

7.3.3 Reports to NRC and Construction Implementation Overview Team: The Executive Manager-MPOAD will provide copies of the monthly reports noted in section 7.3.2 to NRC Region III and the Construction Implementation Overview Team.

8. Implementation: This program will be implemented under the direct control of MPQAD through procedures approved and issued according to normal programmatic requirements.

8.1 Organizational Responsibilities: The Executive Manager-MPOAD has total overall responsibility and authority for the development and implementation of all quality related aspects of this verification program. He will be responsible for seeing that the implementation phase of the program is coordinated with other project departments as required to assure proper support for this plan commensurate with overall project goals.

8.1.1 MPQAD - BOP QA: is responsible for the programmatic elements of the verification program including, but not limited to, procedure development, PQCI review and approval, nonconformance review, analysis of results, justification for document review, verification of inaccessible attributes, program content modifications and certifying that the verification has been completed for a given area or system, and performing management overview of the reinspection process with appropriate documentation of results.

8.1.2 MPQAD - BOP QC: is responsible for program implementation including, but not limited to, conducting the reinspection activities with QC personnel that satisfy Regulatory Guide 1.58, Rev 1, which requires personnel certification in accordance with ANSI N45.2.6 (no person will reinspect activities for which he performed the original inspection), reporting results to the Executive Manager-MPQAD, reporting nonconformances to MPQAD-BOP QA, and coordinating with Construction Services and Consumers Site Management Office to establish schedule priorities for reinspection activities.

8.1.3 MPQAD - Site Audit Section: is responsible for formal audits of the overall verification program implementation.

8.1.4 MPQAD - QA Administration and Training: MPQAD Procedures will be developed in accordance with programmatic requirements to direct implementation of this plan.

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|--|----------|-------|----------|--|
| C-1.02 | Compacted Backfill | 181 | | | Hardware & documentation under remedial soils program |
| C-1.09 | Inspection of Crack for BWST Foundation Ring Wall | 5 | | | Hardware & documentation under remedial soils program |
| C-1.10 | Insp of Grouting and Dry Packing | 1833 | ± | ± | Surface condition and documentation |
| C-1.11 | Drilling & Grouting Rebar | 66 | ± | x | |
| C-1.20 | Concrete Preplacement Inspection | 767 | ± | ± | Inspection of remaining unplaced concrete areas plus past documentation |
| C-1.21 | Inspection of Reinforcing Steel | 259 | ± | ± | Inspection of accessible rebar plus past documentation |
| C-1.22 | Inspection of Reinforcing Steel at Construction Joints | 19 | ± | ± | Inspection of accessible rebar at remaining joints plus past documentation |

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

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A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|---|----------|-------|----------|--|
| C-1.30 | Concrete Placement Inspection | 780 | ± | x | |
| C-1.31 | Inspection of Concrete Activities | 246 | ± | x | |
| C-1.40 | Concrete Post Placement Inspection | 1002 | ± | ± | Inspection of concrete surfaces plus documentation |
| C-1.50 | Installation and Testing of Expansion Anchors | 4982 | ± | ± | Inspection for proper installed condition |
| C-1.51 | Retest Verification of Drop In Expansion Anchors | 54 | ± | x | |
| C-1.52 | Reinspection of Seismic Category I Pipe Support Expansion Anchors | 294 | ± | x | |
| C-1.53 | Reinspection of Expansion Anchors for Seismic Cat I Support | 0 | | | |

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|---|----------|-------|----------|---|
| C-1.56 | Reinspection of Rock Bolt Installation | 20 | ± | x | |
| C-1.60 | Concrete Drilling and Cutting Reinforcing Steel | 325 | ± | x | |
| C-1.70 | Installation of Pressured Concrete Pipe | 2 | ± | x | |
| C-1.80 | Installation of Concrete Unit Masonry | 102 | ± | x | |
| C-1.81 | Installation of Concrete Unit Masonry | 139 | ± | x | |
| C-1.90 | Installation of SWI Sluice Gates | 0 | | | |
| C-2.00 | Plant Area Dewatering | 59 | | | Hardware and documentation under remedial soils program |

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|---|----------|-------|----------|--|
| C-2.02 | Permanent Gravel Packed Wells | 17 | | | Hardware and documentation under remedial soils program |
| C-2.03 | Drawdown Recharge Test | 1 | | | One time test under remedial soils program |
| C-2.05 | Drilling Q-Listed Areas for Underpinning Operations | 14 | | | Remedial Soils Program |
| C-2.10 | Structural Steel Erection | 121 | ± | ± | Inspection of accessible attributes plus documentation |
| C-2.11 | Installation of Watertight and Airtight Doors | 0 | | | |
| C-2.20 | Field Fabrication of Miscellaneous Steel | 1502 | ± | x | |
| C-2.21 | Field and Offsite Fabrication of Reinforcing Steel | 0 | | | |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|--|----------|-------|----------|---|
| C-2.56 | Load Monitoring of the Feedwater/Isolation Valve Pit Rod & Rock Bolt | 0 | | | Remedial Soils Program |
| C-3.01 | Installation Inspection of Spent Fuel Storage Racks | 20 | ± | ± | Inspection of accessible attributes plus documentation |
| C-3.02 | Installation Inspection of Spent Fuel Storage Racks | 8 | ± | ± | Inspection of accessible attributes plus documentation |
| C-3.03 | Inspection of Test for Acceptability of the Spent Fuel Rack Cells | 0 | | | |
| C-4.10 | Batch Plant Inspection | 929 | ± | x | |
| C-5.10 | Shear Connector Installation | 503 | ± | x | |
| C-6.00 | Mechanical Splicing of Reinforcing Bars | 787 | ± | x | |

Rev. 2, 6/10/83
PR0483-0014F-QL07

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|---|----------|-------|----------|--|
| C-7.00 | Erection of Reactor Building Liner Plate | 10 | ± | x | |
| C-8.50 | Inspection of Surface Preparation Application Touch Up & Repair of Coating | 908 | ± | x | |
| C-8.51 | Inspection of Decontamination Coat for Concrete | 17 | ± | ± | Inspection of surface condition plus documentation |
| C-8.60 | Inspection of Surface Preparation Application Touchup & Repair of Coatings Reactor Bldg Liner Plate | 0 | | | |
| C-9.00 | Installation-Post Tensioning Components | 40 | ± | x | |
| C-9.10 | Post Tensioning System Stressing | 309 | ± | x | |

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------|---|----------|-------|----------|--|
| C-9.20 | Containment Bldg Tension Reinsp | 11 | ± | x | |
| CW-1.00 | Welding & NDE of "Q" Listed Non ASME Items | 381 | ± | ± | Inspection of surface condition and radiographs plus documentation |
| E-1.0 | Installation of Conduit Boxes and Supports | 4716 | ± | ± | Inspection of accessible attributes plus documentation |
| E-1.1 | Installation of Boxes | 9 | ± | ± | Inspection of accessible attributes plus documentation |
| E-1.60 | In Process Inspection of Electrical Item Installation | 85 | ± | x | |
| E-2.0 | Installation of Cable Tray and Wireway | 1368 | ± | ± | Inspection of accessible attributes plus documentation |
| E-2.1 | Installation of Tray Supports | 799 | ± | ± | Inspection of accessible attributes plus documentation |

KEY:

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x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|--|----------|-------|----------|---|
| E-3.0 | Final Electrical Area Completion Activity | 0 | | | |
| E-3.1 | Electrical System Turnover Activities | 108 | ± | x | |
| E-4.0 | Installation of Electric Cables | 7954 | ± | x | Inspection of accessible attributes has been accomplished under cable routing & ID program |
| E-5.0 | Cable Terminations | 12361 | ± | ± | Inspection of accessible attributes plus documentation |
| E-6.0 | Installation of Electric Equipment and Instrumentation | 346 | ± | ± | Inspection of accessible attributes plus documentation |
| E-6.1 | Modification of Electric Equipment | 209 | ± | ± | Combine with RW 1.10 Inspect accessible attributes plus documentation |

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------|--|----------|-------|----------|---|
| E-6.2 | Installation of Terminal Boxes | 108 | ± | ± | Inspect accessible attributes plus documentation |
| E-6.6 | Installation of Electric Penetrations | 127 | ± | ± | Inspect accessible attributes plus documentation |
| E-6.6.1 | Installation of Feed Through Assy's for Elec Penetration | 388 | ± | ± | Inspect accessible attributes plus documentation |
| E-6.7.1 | Installation of Batteries & Racks | 9 | ± | ± | Inspect accessible attributes plus documentation |
| RW-1.10 | Modification to Electrical Equipment | 144 | ± | ± | Combine with E-6.1 Inspection of accessible attributes plus documentation |
| I-1.10 | Installation of Instruments | 159 | ± | ± | Inspection of accessible attributes plus documentation |
| M-1.00 | Installation of Mechanical Equipment | 11 | ± | ± | Inspection of accessible attributes plus documentation |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

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| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|------------------|---|----------|-------|----------|--|
| M-2.00 | Installation of Rotating Equipment | 28 | ± | ± | Inspection of accessible attributes plus documentation |
| M-3.10 | Installation of Cranes | 1 | ± | ± | Inspection of accessible attributes plus documentation |
| M-4.00 | Complete Installations of Mechanical Equipment | 2 | ± | ± | Inspection of accessible attributes plus documentation |
| MP-1.00 | Disassembly Reassembly and Modification of Systems and Components | 4 | ± | ± | Inspection of accessible attributes plus documentation |
| MW-1.00 Rev 1 | Welding and NDE of Mechanical Equipment | 0 | | | |
| P-1.00 | Piping Completed Line Installation | 80 | ± | ± | Inspection of accessible attributes plus documentation |
| P-1.10 | Piping Subassembly Field Installation RW | 1858 | ± | ± | Inspection of accessible attributes plus documentation |

Rev. 2, 6/10/83
PR0483-0014F-QL07

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x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|---|----------|-------|----------|---|
| P-1.20 | Piping Subassembly Shop Fab & Rework | 994 | ± | ± | Inspection of accessible attributes plus documentation |
| P-1.30 | Valve and Inline Component Install | 1247 | ± | ± | Inspection of accessible attributes plus documentation |
| P-1.60 | In Process Insp Fab/Installation Rework of Piping | 167 | ± | x | |
| P-2.00 | Pipe Component Supports Final Setting | 5 | ± | ± | Inspection of accessible attributes plus documentation |
| F-2.10 | Pipe (Component) Support Installation | 7057 | | | |
| P-2.20 | Pipe (Component) Supports Fabrication | 6460 | ± | ± | Inspection of accessible attributes plus documentation |
| F-2.30 | Pipe (Component) Support P119/P129 Walkdown | 0 | | | Closed IR's from P-2.10 and P-2.20 will be reinspected to requirements of P-2.30 where installed |

Rev. 2, 6/10/83
PR0483-0014F-QL07

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|----------|--|----------|-------|----------|--|
| PF-1.10 | Pipe Flange Installation and Rework | 820 | ± | ± | Inspection of accessible attributes plus documentation |
| PI-1.40 | Field Fabrication and Installation of Piping Related Instrumentation | 204 | ± | ± | Inspection of accessible attributes plus documentation |
| PI-2.40 | Off-Site Fabrication/Weld of Piping Related Instrument Supports | 84 | ± | ± | Inspection of accessible attributes plus documentation |
| PIW-1.00 | Welding and NDE of Instrument Tubing and Fittings | 642 | ± | ± | Inspection of accessible attributes plus documentation |
| PW-1.00 | Fab/Weld/Heat Treat and NDE of ASME III Piping | 31014 | ± | ± | Inspection of accessible attributes plus documentation |
| R-1.00 | Material Receiving Inspection | 12007 | ± | ± | Inspection of accessible attributes plus documentation |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------|---|----------|-------|----------|--|
| R-1.60 | Receiving Area and Storage Facilities Inspection | 45 | ± | x | Walk through of existing conditions plus documentation |
| R-2.00 | Receiving Inspection for NSSS Equipment | 198 | ± | x | |
| R-2.10 | Receiving Inspection for NSSS Equipment | 42 | ± | x | |
| R-2.20 | Receiving Inspection for NSSS Equipment Documentation | 217 | ± | x | |
| S-1.00 | Storage Area/ Facilities Surv | 67 | ± | x | Walk through of existing conditions plus review of documentation |
| SC-1.05 | Material Testing Services | 306 | ± | x | |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------|--|----------|-------|----------|---------|
| SC-1.06 | Recoating Work of Cont Bldg Liner Plate, Misc Steel, and Pipe Hanger Attachment | 0 | | | |
| SC-1.07 | Agreement for Tech Services for Soils Laboratory Testing | 0 | | | |
| SC-1.10 | Earthwork Subcontract Surveillance | 0 | | | |
| SC-1.11 | Concrete and Unit Masonry Surface Sub/ Contract Surv | 406 | ± | x | |
| SC-1.14 | Subcontract Surveillance of Installation of Underpinning | 0 | | | |
| SC-1.16 | Field Erected Storage Tanks/Subcontract Surveillance | 108 | ± | x | |

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------|---|----------|-------|----------|------------------------|
| SC-8.00 | Subcontractor Surv of Installation of Soil and Crack Monitoring Devices | 58 | | | Remedial Soils Program |
| SE-1.00 | Measuring and Testing Equipment Laboratory Surveillance Inspection | 31 | ± | x | |
| SM-1.03 | Heat, Ventilation and Air Conditioning Subcontract Surveillance | 828 | ± | x | |
| SM-1.04 | Field Erected Component Cooling Water Surge Tanks Subcontracts Surveillance | 108 | ± | x | |
| SM-1.17 | Field Fabricated Incore Installation Tanks Subcontract Surveillance | 183 | ± | x | |
| SW-1.01 | NDE-Subcontractor Surveillance | 120 | ± | x | |

KEY:

± Document-Review documentation for completeness
± Hardware-Reinspect accessible attributes
x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|--|----------|-------|----------|---|
| T-1.00 | Hydrostatic and Pneumatic Leak Testing | 460 | ± | x | |
| T-1.10 | Final Cleaning of Interior Surfaces of Piping, Mech Equipment and Instrumentation | 0 | | | |
| T-5.00 | Lift Test for Cranes | 0 | | | |
| W-1.00 | Welding, Heat Treat- ment and Non Destructive Examination | 20251 | ± | ± | Inspection of accessible attributes, radiography plus documentation |
| W-1.60 | Area Inspection Of In Process Activities For Welding Q-Listed And ASME III Items | 164 | ± | x | |
| C-1.01 | Excavation in Q-Soil Area | NA | | | Remedial Soils Program |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|--------|--|----------|-------|----------|--|
| C-2.01 | Gravel Packed Wells | 224 | | | Documentation and hardware is under remedial soils program |
| C-2.22 | Field Fabrication Of Reinforcing Steel | 0 | | | |
| C-3.05 | Inspection Of The Feedwater Isolation Valve Pit Jacking Operation | NA | | | Remedial Soils program |
| EU-1.0 | Installation Of Conduit & Box For Under Pinning Data Aquisitions System | 61 | | | Documentation and hardware is under remedial soils program |
| EU-4.0 | Installation Of Electrical Cables For Under Pinning Data Aquisition System | 117 | | | Documentation and Hardware is under remedial soils program |
| EU-5.0 | Cable Termination For Under Pinning Data Aquisition System | 178 | | | Documentation and Hardware is under remedial soils program |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------|--|----------|-------|----------|---|
| EU-6.0 | Installation Of Instruments For Under Pinning Data Aquisitions System | 25 | | | Documentation and Hardware is under remedial soils program |
| EU-6.1 | Installation Of Instrument Supports For Under Pinning Data Aquisitions System | 29 | | | Documentation and Hardware is under remedial soils program |
| IC-1.0 | Instrument Checkout | 67 | | | Documentation and Hardware is under remedial soils program |
| RM-1.00 | Storage & Maintenance Of Material Released To Mergentine | NA | | | Remedial soils program |
| RS-1.00 | Storage & Maintenance Of Material Released To Spencer, White & Prentis | NA | | | Remedial soils program |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not acessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

| PQCI # | PQCI TITLE | QUANTITY | DOC'T | HARDWARE | REMARKS |
|---------------|---|----------|-------|----------|---|
| SCM-1.0 | Crack Monitoring Of The Feedwater Isolation Valve Pits Sub- Contract Surveillance | 36 | | | Documentation and Hardware is under remedial soils program |
| SD-1.0 | Monitoring, Reducing and Reporting Under Pinning Instrument Data Sub- Contracts Surveillance | 189 | | | Documentation and Hardware is under remedial soils program |
| UP C-1.004 | Welding And NDE Of "Q" Material | 8 | | | Documentation and Hardware is under remedial soils program |
| UP C-1.008 | Excavation And Lagging Of Access Pits Piers and Drifts For UP | 1 | | | Documentation and Hardware is under remedial soils program |
| UP C-1.010 | Field Fabrication Of Steel Sets For Under Pinning Of Aux Bldg & FIVP | 5 | | | Documentation and Hardware is under remedial soils program |

KEY:

- ± Document-Review documentation for completeness
- ± Hardware-Reinspect accessible attributes
- x Hardware-Attributes not accessible for reinspection

A LIST OF ALL PQCI'S WITH QUANTITY AND REINSPECTION INFORMATION

The Remedial Soils Program has initiated the following additional PQCI's for which there are no Engineer-Constructor IR's, Inspections have all been conducted by CPCo supervision

| | | | |
|------------|------------|------------|--------|
| UP-C-1.002 | UP-C-1.011 | UP-C-1.019 | SD-2.0 |
| UP-C-1.003 | UP-C-1.012 | UP-C-2.003 | |
| UP-C-1.005 | UP-C-1.013 | UP-C-2.004 | |
| UP-C-1.006 | UP-C-1.014 | UP-C-2.005 | |
| UP-C-1.007 | UP-C-1.015 | UP-C-2.007 | |
| UP-C-1.009 | UP-C-1.016 | UP-C-2.008 | |
| UP-C-1.011 | UP-C-1.017 | UP-C-2.009 | |
| UP-C-1.019 | UP-C-1.018 | UP-C-2.010 | |
| UP-C-1.020 | | UP-C-2.019 | |
| UP-C-1.023 | | UP-C-2.042 | |
| | | UP-C-2.150 | |
| | | UP-C-3.001 | |
| | | RM/RS-1.00 | |

UNCONTROLLED

APPENDIX B
Page 1 of 10

APPENDIX B

PQCI's To Be Verified by Review of Documentation Only

The following PQCI's are deemed inaccessible for attribute reinspection. Hardware acceptability will be established by documentation validation where possible and by supplemental verification efforts where documentation review alone does not establish hardware acceptability:

1. Remedial Soils Program

C-1.02 - Compacted Backfill

C-1.09 - Inspection of Crack for BWST Foundation Ring Wall

C-2.00 - Plant Area Dewatering

C-2.01 - Gravel Packed Wells

C-2.02 - Permanent Gravel Packed Wells

C-2.05 - Drilling in Q-Listed Areas for Underpinning Operations

EU-1.0 - Installation Of Conduit and Boxes For UP Data Acquisition System

EU-4.0 - Installation Of Electrical Cables for UP Data Acquisition System

EU-5.0 - Cable Termination for UP Data Acquisition System

EU-6.0 - Installation Of Instruments For UP Data Acquisition System

EU-6.1 - Installation Of Instrument Supports For UP Data Acquisition
System

IC-1.0 - Instrument Checkout For UP Data Acquisition

SCM-1.0 - Crack Monitoring Of FW Iso Valve Pits Subcontractor Surveillance

SD-1.0 - Monitoring, Reducing and Reporting UP Inst. Data Subcontractor

Surveillance

UP-C-1.004 - Welding And NDE of Q-Material

UP-C-1.008 - Excavation & Lagging of Access Pits, Piers and Drifts For UP

UP-C-1.010 - Field Fabrication Of Steel Sets for UP Of Aux. Building and

FIVP.

The above PQCI's relate to the remedial soils program which has been established as a separate project and for which inspections have been performed under the direction of MPQAD since August 1982. Soils work and related documentation have been reviewed by MPQAD for acceptability and corrective measures instituted where required.

2. Reinspection of Expansion Anchors and Rock Bolt Installation.

C-1.51 - Retest Verification of Drop In Expansion Anchors

C-1.52 - Reinspection of Seismic Category I Pipe Support Expansion Anchors.

C-1.56 - Reinspection of Rock Bolt Installation

The above PQCI's relate to reinspections which have been completed and results reported to the NRC.

3. In-Process Activities.

E-3.1 - Electrical System Turnover Activities

E-1.60 - In Process Inspection of Electric Item Installation

R-1.60 - Receiving Area and Storage Facilities Inspection

W-1.60 - Area Inspection Of In Process Activities For Welding

Q-listed and ASME III Items

S-1.00 - Storage Area/Facilities Surveillance

P-1.60 - In Process Inspection of Fabrication/Installation Rework of
Piping

The above PQCI's relate to in-process activities where affected work would now be completed and any reinspection would be of completed work covered by other PQCI's, e.g., PQCI's E-6.0, W-1.00 and IW-1.00. In the cases of R-1.60 and S-1.00, these are an inspection or surveillance of general facilities maintenance which can be repeated, but not on a basis which would have any meaning relative to conditions existing when the inspections were made. In short, a single inspection can attest to conditions existing today without relation to past conditions.

4. Surveillance of Subcontractor Activities.

SC-1.05 - Material Testing Services

SC-1.11 - Concrete and Unit Masonry Surface Subcontract Surveillance

SC-1.16 - Field Erected Storage Tanks Subcontractor Surveillance

SC-8.00 - Subcontractor Surveillance of Installation of Soil and Crack
Monitoring Devices

SE-1.00 - Measuring and Testing Equipment Laboratory Surveillance
Inspection

SM-1.03 - HVAC Subcontract Surveillance

SM-1.04 - Field Erected Component Cooling Water Tank Subcontractor
Surveillance

SW-1.01 - NDE Subcontractor Surveillance

SM-1.17 - Field Fabricated Incore Installation Tank Subcontractor
Surveillance

The above PQCI's all relate to surveillance of subcontractor activities. Where work has not been completed, such surveillance activities can be repeated when safety related work resumes. Otherwise, they can be evaluated only by a review of documentation and a single walk down of affected areas for assessment of current in-place conditions, but not of past activities. In addition, SM-1.03 - HVAC Subcontractor Surveillance, relates to activities outside the scope of this quality verification program. In depth participation by CPCo continues in this work.

5. Hydrostatic and Pneumatic Leak Testing.

T-1.00 - Hydrostatic and Pneumatic Leak Testing

CPCo has already conducted an extensive evaluation of hydrostatic and pneumatic leak testing and corrective actions relative to such evaluation are being conducted separately from this reinspection program.

6. Special "One Time Only" Testing.

C-2.03 - Drawdown Recharge Test.

This is a test required to have been performed once and which demonstrated acceptable results. The remedial soils program which is not within the scope of this verification program would provide any necessary justification for a repeat of such a test.

7. Previously Documented Responses to the NRC.

C-6.00 - Mechanical Splicing of Reinforcing Bars

This PQCI relates to necessary inspections of the "Cadweld" process of mechanically splicing reinforcing steel. The constructor's processes were the subject of extensive investigation by the NRC in 1973 and 1974 which determined that corrective action had been identified and implemented including requalification of personnel, review of work instructions for Class I work, CPCo QA review of work procedures, and audits of Class I work. Affected mechanically spliced rebar is now inaccessible due to concrete placement. CPCo overinspection of any continued use of this process in remaining construction will be a continuing process.

C-7.00 - Erection of Reactor Building Liner Plate

This PQCI relates to the preparation and installation of steel plates which provide the inner surface for the containment building. The liner is now inaccessible, being backed up by reinforced concrete on the outside and nuclear coated on the inside. Extensive review was made by CPCo in 1974 of the accuracy of liner plate records. Controls implemented after NRC investigation were evaluated and found satisfactory. In 1977, a deformation of liner plate occurred due to freezing of an embedded construction water line. This resulted in selected removal and replacement of steel liner plates. Quality of the liner plate installations have been verified through radiography, and extensive CPCo involvement in the installation and repair. The NRC has reviewed actions taken and closed its reports on the installation of steel liner plates.

C-1.11 - Drilling and Grouting of Rebar

This PQCI provides documented instructions for the drilling and grouting of reinforcement steel and in itself is a corrective action for previously cited deficiencies that such a procedure did not exist. Its usage is documented evidence of the implementation of corrective action.

C-5.10 - Shear Connector Installation

This PQCI is used to assure that the proper installation of shear connectors has been accomplished which tie the supporting beams, steel and concrete floor decking into a composite structure. Since the shear

connector serves as concrete reinforcement, it is not visible once the concrete is placed. NRC reviewed corrective actions relative to installation problems with Nelson stud shear connectors and closed reports relative to this problem. PQCI 5.10-IRs document accomplishment of required inspections.

C-8.50 - Inspection of Surface Preparation Application Touch Up and
Repair of Coating

This PQCI addresses the preparation of concrete surfaces and the application of a coating to seal the surface to prevent contamination being absorbed into the concrete. Once the coating is applied, the surface preparation cannot be examined. The final coating can be examined for presence but not for the process steps that applied the coating.

C-1.60 - Concrete Drilling and Cutting Reinforcing Steel

This PQCI describes the quality control steps necessary in drilling concrete to minimize cutting of reinforcing steel. Completion of the PQCI-IR identifies whether proper inspections were made and results encountered and documented. Since the holes will have been drilled, and items either mounted in the holes or the holes grouted, it is not possible to physically inspect the concrete or the reinforcement. This is particularly true where expansion anchors have been used which cannot be nondestructively removed.

8. Post Tensioning Requirements.

C-9.00 - Installation-Post Tensioning Components

C-9.10 - Post Tensioning System Stressing

C-9.20 - Containment Building Tension Reinspection

These PQCI's document the re-routing of tendon sheathing, tendon installation and tensioning. CPCo identified a problem to the NRC in 1977 indicating the misplacement of two tendon sheaths and the omission of two sheaths. The misplacement of the two sheaths brought about approved re-routing of the tendons. The omitted sheaths were replaced. The NRC conducted a special investigation of the corrective measures in May 1977 and deemed them acceptable. A final 50.55(e) report was issued by CPCo in August 1977.

9. Concrete Placement Activities.

C-1.30 - Concrete Placement Inspection

C-1.31 - Inspection of Concrete Activities

The PQCI's relate to inspections during placement of concrete. Where concrete has been placed, inspections will be made in accordance with C-1.40 "Concrete Post Placement Inspection." Where concrete has not been placed, a preplacement inspection will be required before placement when construction is resumed.

C-1.80 Installation of Concrete Unit Masonry

C-1.81 Installation of Concrete Unit Masonry

These PQCI's relate to the installation of concrete block walls many of which have been removed as a result of subsequent plant modifications. The remaining walls can be inspected for presence of the wall and visual quality but not for the process controls necessary to properly erect them.

C-4.10 - Batch Plant Inspection

This PQCI was prepared for necessary controls of concrete batch plant activities. The batch plant has now been removed from the site. Concrete necessary for completion of the plant is procured from an offsite supplier. Currently concrete is procured only for the Soils program and for non-Q construction. Reinspection is limited to review of documents of past operations. Adherence to this PQCI will be enforced on procured concrete for balance of plant safety related constructions when construction is resumed.

10. Field Fabrication

C-2.20 - Field Fabrication of Miscellaneous Steel.

This PQCI addresses fabrication of steel which will have been consumed and erected into items which will be inspected if accessible, under other PQCI's.

11. NSSS Receiving Inspection Activities.

R-2.00 - Receiving Inspection for NSSS Equipment

R-2.10 - Receiving Inspection for NSSS Equipment

R-2.20 - Receiving Inspection for NSSS Equipment Documentation

These PQCI's address the constructor's receiving inspection of components and materials used by the NSSS supplier constructor. In general, the items will have been installed by that contractor. Any accessible attributes will have been confirmed by activities of the NSSS constructor.

12. Other.

C-1.70 - Installation of Pressured Concrete Pipe

This PQCI covered the installation of the main water line from the river to the cooling pond. This line is now submerged as the pond is full. Inspection of internal surfaces could be performed through use of divers. Integrity has been demonstrated through use of the system.

E-4.0 - Installation of Electrical Cables

One hundred percent reinspection of installed cables has been completed and reported under a separate program. Documentation has not yet been reviewed.

UNCONTROLLED

APPENDIX C
Page 1 of 16

STATISTICAL SAMPLING PLAN INDEX OF TOPICS

- 1.0 Purpose
- 2.0 Scope
- 3.0 References
- 4.0 Definitions
- 5.0 Plan Content
 - 5.1 Detailed Scope
 - 5.2 Description of Sampling
 - 5.3 Sampling Process
 - 5.4 Sampling Tables
 - 5.5 Determination of Lot Sizes
 - 5.6 Sample Selection
 - 5.7 Substitution
 - 5.8 Increased or Reduced Sampling
 - 5.9 Treatment of Reinspection Deficiencies
 - 5.10 Deficiencies Found During Reinspection of Documentation
- 6.0 Documentation and Reports
 - 6.1 Documentation of Results
 - 6.2 Documentation of Nonconformances
 - 6.3 Reports
- 7.0 Implementation

SAMPLING PLAN FOR CPCo QUALITY VERIFICATION PROGRAM

1. Purpose:

To provide a statistically valid method, under the direction of Consumers Power Company, of confirming the acceptable quality status of safety related procurement and construction activities completed and inspected by the Engineer-Constructor Quality Control personnel prior to December 2, 1982.

2. Scope:

This plan applies to closed Inspection Records (IR's) related to specific Project Quality Control Instructions (PQCI's) where the quantity of closed IR's is in excess of one hundred and for which there are no other ongoing or planned programs to confirm quality.

3. References:

MIL-STD-105D Change Notice 2 (March 1964), Sampling Procedures and Tables for Inspection by Attributes.

US NRC I&E Bulletin 79-02, Reinspection of Anchor Bolts.

MIL-HDBK-53-1A 1 FEB 1982 - Guide for Attribute Lot Sampling and

MIL-STD-105.

4. Definitions:

Population:

The entire quantity of closed
(IR's) relating to a specific PQCI.

Time Centered:

The term used to describe the ordering of lots, and items within a lot, based upon the time sequence in which an IR was initiated

Homogeneity:

Homogeneity implies that a series of units of product should be alike or similar in nature. Homogeneity under this plan will be achieved by utilizing specific project Quality Control Instruction (PQCI) categories covering like activities and generally within a defined time period.

Acceptance Number (AC):

The number of nonconformances permitted to be found in a sample of a lot without rejecting the lot for a specific acceptable quality level.

Rejection Number (Re):

The number of nonconformances found in a sample of a lot that requires rejection of the lot for a specific acceptable quality level.

Acceptable Quality Level (AQL): The AQL is the maximum percent of nonconformances that, for the purpose of sampling inspection, can be considered satisfactory as a process average.

Attribute: An attribute is a characteristic or property which is appraised in terms of whether it does or does not comply with a given requirement.

Inspection by Attributes: Inspection for which the item or attribute is classified simply as conforming or nonconforming without regard for the degree of nonconformance.

Limiting Quality (LQ): The term applies to sampling plans that provide not less than a specified percentage of quality protection. Consumers Power Company has selected an LQ of five percent which provides 95% confidence that at least 95% of inspection elements of the lot/population will be acceptable.

Lot: A quantity of items, such as completed inspection records covering the same activity, equal to or less than the total population and representing a subdivision of that population.

Nonconformance: A deficiency in characteristic, documentation or procedure which renders the quality of an item unacceptable or indeterminate.

Pa - Probability of Acceptance: The probability of accepting a lot with a predetermined percent defective, when a given sample plan is used.

Random Sample: A sample taken from a population or lot in which each of the items has an equal chance of being selected, regardless of its quality. If the units in a lot have been arranged without bias as to their quality a sample drawn anywhere in the lot will meet the requirements for randomness¹. PQCI's are logged in accordance with the date they were opened, totally independent of the

(1 Mil-Hdbk - 53 -1A Para 12.2)

resulting quality, thus sampling by
logged date or other means meets this
requirement.

Sampling Plan:

A sampling plan indicates for a given
lot size the number of items or compo-
nents from each lot (sample size or a
series of sample sizes) which are to be
inspected from the lot and the criteria
for determining the acceptability of the
lot.

5.0 Plan Content

- 5.1 Detailed Scope: This sampling plan applies to closed Engineer-Constructor IR's related to specific Project Quality Control Instruction (PQCI's) for Balance of Plant safety related materials, components, systems and structures, which are not covered by other ongoing programs to confirm quality. It is applicable to closed IR's where the quantity of closed IRs for a given PQCI is in excess of 100 and where it has been demonstrated by one hundred percent inspection of a significant portion of each population that the accepted quality level of that population has been established. The specific QCIs and quantities of closed IRs that make up this total population are identified in Appendix A. That appendix also indicates whether both hardware and documentation are planned to be verified or whether documentation alone is planned to be reviewed because of inaccessibility of hardware features.
- 5.2 Description of Sampling: Sampling inspection is that type of activity in which units of product are selected at random and examined for one or more quality attributes. Sampling inspection is an acceptable way of determining the conformance or nonconformance of items to specified quality requirements. The amount of inspection can be increased where the product quality is deteriorating or reduced where the level of quality is high².

Statistical sampling methods force one hundred percent verification of quality whenever the required quality level has not been attained. The statistical methods proposed herein are designed to provide 95 percent confidence that the inspectable elements of the entire population are acceptable based upon the acceptability of items or attributes previously 100 percent inspected to provide a satisfactory quality baseline. This is consistent with past NRC recommendations related to reinspections of safety related items³ and will produce results at least equivalent to those expected from 100% inspection.

The statistical quality control methods proposed are in accordance with MIL-STD-105D Tables I, IIA and VIIA. MIL-STD-105D is probably the most widely used sampling standard in the United States. This Program is a rigorous application of statistical quality control methods to assess the quality of nuclear power plant construction.

(3 NCR I&E Bulletin 79-02, Appendix A)

5.3 Sampling Process: The application of statistically valid sampling plans requires lot sizes to be large enough to permit taking of a sample quantity sufficient to limit the risk of accepting nonconforming items. When quantities are not large enough, one hundred percent reinspection will be performed. Because of the Limiting Quality planned to be used, populations of PQCI items are required to be greater than 50 to be eligible for sampling further; however, CP Co has committed to performing 100 percent inspection of PQCIs having 100 or less IRs. In addition, populations to be sampled must be first qualified by having demonstrated acceptable quality levels through one hundred percent inspection of a quantity of items sufficient to provide adequate confidence the existing quality level is acceptable. When 100% inspections have established this confidence, CPCo will consider that the one hundred percent inspection of a significant portion of each PQCI has established a valid basis for statistical sampling of any remaining quantities.

The statistical sampling plan will be conducted as follows:

Two lots for each PQCI will be sampled at normal sampling levels in accordance with MIL-STD-105D, Tables I, IIA and VIIA to a limiting quality of 5 percent at a 95 percent confidence level. If these two successive lots validate that the required level of quality has been maintained, remaining lots will be sampled to the same criteria, but at reduced sampling levels per MIL-STD-105D, Table IIA.

The Executive Manager may recommend to the NRC discontinuance of further sampling where quality levels have demonstrated that past Engineer-Constructor inspections have provided acceptable control of quality.

5.3.1 Switching: The sampling plan will include switching procedures to provide Consumers Power Company the protection provided by the tightened plan, when evidence that the desired quality level is below prescribed levels and the advantage of the reduced plan, when evidence that the desired quality level has been achieved. Due to the known quantities of specific PQCI's available for sampling (non-continuous production run) the following switching rules will be implemented:

- o Establish acceptable base quality level through 100% reinspection.
- o Single normal plan for two lots.
- o From single normal, switch to single reduced, after acceptance of two consecutive lots. Switch back to single normal after the first rejected lot.
- o From single normal, switch to single tightened, after the first rejected lot for two consecutive lots, then switch back to single normal if both lots are acceptable. If either or both of the single tightened lots are rejected switch to 100% inspection of lots, until two consecutive lots are accepted.

5.4 Sampling Tables: The following tables indicate sampling information for Single Normal, Single Reduced and Single Tightened sampling plans:

SINGLE NORMAL

| Population Lot Size <u>N</u> | Sample Size <u>n</u> | Accept Number <u>Ac</u> | Reject Number <u>Re</u> |
|------------------------------------|----------------------------|-------------------------------|-------------------------------|
| 2-50 | ALL | 0 | 1 |
| 51-500 | 50 | 0 | 1 |
| 501-1200 | 80 | 0 | 1 |
| 1201-3200 | 125 | 2 | 3 |
| 3201-10,000 | 200 | 3 | 4 |
| 10,001-∞ | 315 | 7 | 8 |

SINGLE REDUCED

| | | | |
|-------------|-----------|---|---|
| 2-50 | ALL to 20 | 0 | 1 |
| 51-500 | 20 | 0 | 1 |
| 501-1200 | 32 | 0 | 1 |
| 1201-3200 | 50 | 1 | 2 |
| 3201-10,000 | 80 | 1 | 2 |
| 10,001-∞ | 125 | 3 | 4 |

SINGLE TIGHTENED

| | | | |
|-------------|-----|----|----|
| 0-80 | All | 0 | 1 |
| 80-500 | 80 | 0 | 1 |
| 500-1200 | 125 | 0 | 1 |
| 1201-3200 | 200 | 3 | 4 |
| 3201-10,000 | 315 | 5 | 6 |
| 10,001-∞ | 500 | 10 | 11 |

The specific PQCI's and total quantities of closed Inspection Records to which these lot and sample sizes apply are included in Appendix A to the Quality Verification Program.

- 5.5 Determination of Lot Sizes: A reinspection lot is a collection of units of product (closed inspection records of like activities) from which a sample is drawn and inspected to determine conformance with the acceptance criteria and may differ from a collection of units designated as a lot for other purposes such as production or procurement⁴. The size of the lot is one of the factors that determines the sample size to be used in sampling inspection. For this program the formation of each lot is planned to be at least equal to the normal sample size for the entire population; thus for a population of 1000, the minimum lot size would be 80; the optimal lot size would be 281 or greater.

Normally the total quantity of the population will not be a direct multiple of the lot size. After dividing the population quantity

(4 Mil-Hdbk - 53 Para 6.4.1)

by the lot quantity, any residual quantity may be combined with the last lot, or be treated separately for sampling convenience so long as the sample size is in accordance with MIL-STD-105D. Lots will be time centered. The purpose of this is to further enhance homogeneity for each lot and to identify and isolate conditions which may have occurred in specific time periods during construction of the Midland Plant. This method of stratifying samples and lots, yields more information for corrective action than sampling the entire population. Quantities used for determining lot sizes will exclude inspection records where reinspections have occurred, since this will preclude counting the same item twice. A limited number of PQCI's cover like activities. These will be grouped, where appropriate, to provide a single population. An example of such grouping would be PQCI's E-6.1 and RW-1.00, "Modification of Electrical Equipment."

- 5.6 Sample Selection: Samples will be selected by dividing the lot size by the sample size indicated by MIL-STD-105D Tables I and IIA for normal sampling. For example, for a lot of 500, the sample size is 50. In this case any of the first 10 IRs and every tenth IR for a specific PQCI would be selected for reverification. This assures randomness, since the manner of filing is totally independent of the quality of the item and of the person selecting the sample, and all IRs have an equal chance of selection. It also provides a cross section as related to time, since the IRs are

logged by the date they were opened. Where there are multiple lots of the same size, the same method may be used, so that each sequential lot is time centered with the preceding lot and each item sampled is time sequenced within the lot.

- 5.7 Substitution: Where accessibility is found to inhibit inspection of attributes of a specific item intended for sample reinspection, the Executive Manager-MPQAD has sole authority to direct the selection of a substitute random item for reinspection from the same lot, or in the event that no item(s) is accessible for reinspection, a documentation review of the inaccessible item(s). Justification for this substitution will be documented.

- 5.8 Increased or Reduced Sampling: The Executive Manager-MPQAD has authority to direct 100% reinspection at any point where the ability to conduct a valid sample reinspection is determined to be impractical. Switching to reduced or tightened sampling will require prior approval by the Executive Manager-MPQAD in accordance with criteria described in this plan.

- 5.9 Treatment of Reinspection Deficiencies in Verification Sampling Program: Deficiencies identified by reinspections will be recorded on a nonconformance report and promptly reported to MPQAD-QA and others for processing per procedure. The party responsible for recommending the initial disposition of the nonconformance will

review the intended disposition with MPQAD-QA prior to further processing of the nonconformance. The purpose of this MPQAD-QA review is to insure proper treatment of the nonconformance in the sampling analysis. Deficiencies determined to be acceptable to "use as is" will be evaluated by Project Engineering to determine whether the design criteria requirement which the attribute failed to meet will be modified to clarify the inspection requirement. If Project Engineering modifies the requirement on a generic basis, the deficiency will be considered "acceptable" for purposes of sample analysis. The final decision as to whether the deficiency constitutes a sample defect will be made by the Executive Manager-MPQAD. This decision and its justification will be documented.

- 5.10 Deficiencies Found During Reinspection of Documentation for Inaccessible Attributes: The verification process for inaccessible attributes is discussed in Section 6.5 of the Quality Verification Plan. As noted in that section, any documentation deficiencies will be noted on the verification IR, entered on a nonconformance report and cross referenced to the original IR. The treatment of sampled lots containing nonconformances will be determined on a case by case basis and further verification requirements will be determined taking into account the disposition of the nonconforming condition.

6.0 Documentation and Reports

6.1 Documentation of Results: Results of sampling reinspection will be documented on IR's and statused to specifically identify the PQCI, the lot number, the quantity in the lot, the quantity inspected, the quantity found acceptable, the NCR's identifying any deficiencies and the results of the nonconformance disposition, and acceptability of the lot.

6.2 Documentation of Nonconformances: Nonconforming conditions will be reported and dispositioned in accordance with approved procedures. Disposition of the nonconformances will include necessary actions to be taken on the balance of the lot; e.g., screen balance of the lot for the rejected attributes, or 100% inspect the balance of the lot.

6.3 Reports: The results of the sampling plan for each lot related to each PQCI will be included in reports made by the CPCo BOP Quality Control Superintendent and the Quality Assurance General Superintendent QA as described in section 7.3 of the Quality Verification Program.

7.0 Implementation: This plan will be implemented as directed by the Executive Manager MPQAD. The organizational responsibilities are the same as shown in section 8 of the Quality Verification Program. In addition, MPQAD BOP Quality Control shall have the responsibility of selecting the IR's to be sampled from lot sizes predetermined by MPQAD-QA.