



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

W. Lovelace

SEP 17 1982

Docket Nos: 50-329
and 50-330

MEMORANDUM FOR: Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

THRU: Elinor G. Adensam, Chief
Licensing Branch No. 4
Division of Licensing

FROM: Ronald W. Hernan, Project Manager
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SUBJECT: FIRE PROTECTION SITE SURVEY - MIDLAND PLANT

In the course of reviewing compliance with NRC fire protection requirements, it has been the practice of the Chemical Engineering Branch (Fire Protection Section) to conduct an on-site survey prior to issuance of an operating license. Between April 1981 and June 1982, a number of meetings were held with Consumers Power Company to resolve fire protection open items pertaining to the Midland Plant, Units 1 and 2. It had been Division of Licensing's opinion that a preliminary site visit by the fire protection reviewer was desirable prior to issuance of the Safety Evaluation Report (see meeting summary dated October 27, 1982). However, CMEB has consistently taken the position that only one site visit would be authorized and that visit would be the final site survey. The guidance given to the Project Manager had been that the site survey could be scheduled after approximately 90% of all electrical cabling had been installed. As of October 1981, the projection was that 90% completion on cabling installation would be reached in "mid-1982". Consumers Power presently estimates that 91% of the cabling has been "installed" but that only 70% of the total connections (or terminations) have been completed.

The Midland SER, issued in May 1982, stated that "the site visit has not been conducted yet because the construction of the plant has not progressed to the level where such a visit would allow the staff to make a final assessment." Following issuance of the SER, the Project Manager was informed by CMEB of an additional prerequisite that had to be met prior to scheduling the site survey and that was for the NRC Resident Inspector for Midland to notify NRR when he considered the plant to be ready for the fire protection site survey. Since May 1982, the Project Manager has had frequent contact with the Midland Resident Inspector to stay apprised of construction progress as related to readiness for this site survey.

On September 8, 1982, a meeting was held with the Midland Resident Inspector and CMEB management to assess the plant's readiness for the fire protection site survey.

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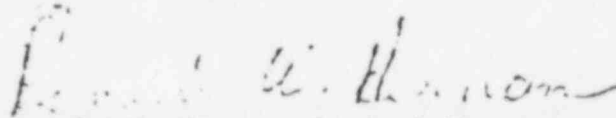
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During the course of that meeting the following points were made by the resident:

1. Although over 90% of the "total" cabling has been installed, a significantly lesser percentage of "safety-related" cabling has been installed. In his opinion, NRR should be more interested in looking at safety-related cabling in its nearly completed form.
2. Consumers Power considers a cable "installed" when it has been placed in its raceway or "via" even though the cable may not be connected to anything. In fact, there are a large number of cables that have been placed in their raceways (therefore considered to be installed) but have their ends coiled up pending installation of their terminal devices (breakers, motors, panels, etc.). The resident stated, and CMEB agreed, that the site survey may not accomplish its purpose with large numbers of cables not yet terminated and/or routed into their respective panels or termination devices. *Just
like
before!*
3. One of the more significant areas in the plant that the fire protection reviewer would look at is the main control room and associated control panels. Due to HVAC work in progress in the Midland control room, most of the control panels have had wooden protective enclosures built around them. The staff considers that these enclosures would seriously inhibit conduct of the fire protection survey of that area.
4. Consumers Power has become aware of the fact that a number of safety-related cables have been improperly routed and has initiated a program to identify the scope of and correct the problem. Since the survey focuses on safety-related cabling, it would be premature to conduct the survey prior to correction of this problem.
5. Application of fire-retardant wrapping of electrical cables has not yet begun and is not scheduled to begin until early 1983. It was the opinion of the resident that some of the wrapping should start before the site survey in order to assess the methods on a sampling basis. CMEB agreed with this opinion.
6. The staff believes that before a site survey is conducted by NRR, Consumers Power should conduct their own review and be prepared to discuss their findings with the Resident Inspector.

It was concluded by the participants of the September 8 meeting that construction of the Midland Plant has not progressed far enough at this point in time to conduct the fire protection site survey. It was agreed that the Resident Inspector and CMEB will discuss readiness for the survey in early January 1983.



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