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Docket No. 50-329

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Consumers Power Company
ATTN: Mr. James W. Cook
Vice President
Midland Project
1945 West Parnall Road
Jackson, MI 49201

Gentlemen:

By letter dated June 10, 1983, Consumers Power Company (CPCo) submitted its proposed Construction Completion Program (CCP) for the Midland Nuclear facility. The program as submitted was a compilation of all prior CPCo submittals with revisions incorporated.

The NRC has completed a review of the June 10, 1983, CCP submittal. As a result of this review, the following comments were developed. Prior to final approval of the CCP, the responses to these comments must be incorporated into the CCP.

A. Comments on Construction Completion Program

1. Executive Summary

The scope of the CCP is not clear. The statement in the first paragraph of the Executive Summary appears to be in conflict with the penultimate paragraph on page 4 and the Description Section (9.3) on page 34. In addition, the relationship of the Quality Verification Program to the CCP is not clear. Clarify the scope of the CCP and define the relationship of the Quality Verification Program to the CCP.

2. Page 2

- a. Page 2 of the CCP states that, "safety-related systems and areas of the plant will be systematically reviewed." Define or identify what is meant by the term "safety-related systems and areas."
- b. As stated in the CCP, phase 1 implementation will be on an area-by-area basis, but will be accomplished mainly by teams organized with systems responsibility. Our concern deals with the interface between the area-by-area basis and the systems basis. Provide assurance that all safety related systems and components of the plant are covered during phase 1.

3. Page 3

The description of the major components of the CCP does not include NRC Hold Points. Describe the NRC Hold Points to be covered prior to initiating phase 1 and phase 2 activities.

4. Page 4

- a. As stated in the CCP, the major areas of continuing safety-related work outside the CCP includes post-turnover punch list work. Provide assurance that these post-turnover list activities are minor and not major.
- b. This section states that CPCo intends to schedule periodic reviews of Program status and progress with the NRC. Provide assurance that such meetings will be noticed such that members of the public and interested parties will be provided the opportunity to attend as observers.

5. Page 7

As stated in the CCP, during phase 2 implementation the assigned team will plan and carry out the remaining work needed for completion including QC inspections. Since we understand that QC inspections will not be performed by the CCP teams, clarify the teams involvement in QC inspection activities during phase 2.

6. Page 8

In describing the limitation to work on Q-Systems, the CCP states that this limitation permits important work to proceed outside the CCP. Describe the measures to be taken to prevent nonconforming items, in areas covered by the CCP, from becoming inaccessible due to ongoing work.

7. Figure 1-1

The CCP schematic does not identify the NRC Hold Points. Revise this schematic to include the phase 1 and phase 2 Hold Points.

8. Page 11 - Section 3.1 and Section 3.2.1

As stated in the CCP, MPQAD was expanded to assume direct control of QC except ASME. Clarify the boundaries of MPQAD and CCP controls over "N" stamp activities and non-"N" stamp activities.

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9. Page 12 - Section 3.3.5

As stated in the CCP, MPQAD will continue to use Bechtel's Quality Control Notices Manual (QCNM) and Quality Assurance Manual (BQAM). Provide clarification as to the decision not to use the Consumers QA manual. In addition, describe the measures taken to provide assurance that the Bechtel and Consumers manuals are in agreement.

10. Page 13 - Paragraph 2 and Paragraph 3.B

Regarding the revision to PQCI's, identify in the CCP:

- a. That the documented basis for the determination of the need (or lack thereof) for pilot runs will be available for review by the NRC.
- b. That the documented basis for the determination of the need (or lack thereof) for retraining or recertification of affected QC inspectors will be available for review by the NRC.

11. Page 17

Describe the criteria to be used in determining the need and extent for reinspection of the past work of an inspector failing any part of the recertification process. Also identify who will make the determination and the manner in which the determination will be documented.

12. Page 19

- a. As stated in the CCP, the scope of team work activities includes the requirements to ensure early identification and resolution of problem areas. In view of the fact that phase 1 allows only the identification (and not the resolution) of problems, clarify this statement.
- b. In the discussion of the team MPQAD representative, it is stated, "He assures validation of NCR's." Explain what this statement means.

13. Page 20

- a. As stated in the CCP, tool box training sessions will be conducted at least monthly. Address the adequacy of the tool box training sessions and the manner in which the sessions will be documented.

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- b. As stated in the CCP, nonconformances are documented in nonconformance reports. Identify how incomplete items (system status) will be documented.

14. Page 21 - Section 4.3.2.b

Although not quantified, it would appear that a significant portion of the CCP will be involved with verification of acceptability of inaccessible attributes. This is predominantly a paperwork review, but "if required" will be supplemented by NDE techniques and destructive examination. In view of past documentation problems and the extent of inaccessible items, explain why the CCP should not include some NDE of inaccessible items on a sampling basis. Also define "if required."

15. Page 24 - Section 4.5.4

Identify the critical systems referred to in this section.

16. Page 28

Identify the composition of project management, site management and management teams. Also clarify the scope of the phase 2 management reviews.

17. Page 32

Identify whether the CIO review of site construction activities will include systems excluded from the CCP.

18. Page 33

Clarify the extent of measures taken to maintain and protect equipment in system layup.

19. Page 34 - Section 9.2

Clarify the second sentence.

20. Page 35

- a. Clarify the extent to which the third party CCP overview will address the three systems in the TERA scope and revise, if necessary, the statement on page 32 of the CCP which states that the CIO will not include an overview of the other third party evaluations being conducted.

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- b. Provide your rationale for not including in the CCP systems and equipment that are important to safety but that are not safety-related.
- c. Provide a definition of your understanding of the term "systems important to safety."

21. Page 36 - Section 10.3

Clarify this section to provide assurance that changes to the CCP will not be implemented without prior NRC review and approval.

B. Comments on Quality Verification Program (QVP)

1. Page 1 - Section 2

- a. Clarify the scope of the QVP in regards to the implementation of IPIN's in Soils, HVAC, and B&W work activities.
- b. Clarify the reinspection requirements for partially completed IR's.

2. Page 9

- a. Clarify the statement "System/area reinspection will be supplemented by random plant-wide inspections as appropriate to establish a valid quality baseline on an expeditious basis."
- b. As stated in the CCP, any nonconforming condition observed during the implementation of this program other than those previously identified on nonconformance reports will be identified by a nonconformance report. Clarify this statement to provide assurance that the nonconforming condition need not be documented only if there is an open NCR on the same item.

3. Page 10 - Section 5.3.1

As stated in the CCP, any deficiencies, other than those previously identified on nonconformance reports as a result of prior inspections, will be identified on a nonconformance report. Clarify this statement to provide assurance that the deficiency need not be documented only if there is an open NCR on the same item.

4. Page 13 - Section 6.4

Identify whether material traceability aspects are to be covered by this program.

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1. Page 1

Should you have any questions regarding this letter please contact Mr. R. F. Warnick of my staff.

Original signed by
James G. Keppler

cc: DMB/Document Control Desk (RIDS)
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