

50-329
50-330

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC-7285

Date: February 6, 1984

To: Stone & Webster
P O Box 1963
Midland, MI 48640

PRINCIPAL STAFF	
<input checked="" type="checkbox"/>	<i>for</i>
<input type="checkbox"/>	<i>for</i>
<input type="checkbox"/>	<i>orig+3</i>
<input type="checkbox"/>	<i>for</i>

- Attached Is: Partial Response To
 Complete Response To
 For Your Information
 Other

Description:

Tracked Information Items 045 and 050.

These were previously transmitted without a SMO signature in the respondent space.

Signature: *[Handwritten Signature]*

- cc: JGKepler, NRC Region III w/a
 JJHarrison, NRC Region III w/a
 RJCook, NRC Site w/a
 RAWells, MPQAD w/a
 BHPeck, MEC w/a
 NIREichel, MEC w/a
 DDJohnson, MEC w/a

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PDR ADOCK 05000329
S PDR

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CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC-7269

Date: February 1, 1984

To: Stone & Webster
P O Box 1963
Midland, MI 48640

Attached Is: Partial Response To
 Complete Response To
 For Your Information
 Other

Description:

Tracked Information Item 050.

NIR Signature:



cc: JGKepler, NRC Region III w/a
JHarrison, NRC Region III w/a
RJCook, NRC Site w/a
RAWells, MPQAD w/a
BHPeck, MEC w/a
NIReichel, MEC w/a
DDJohnson, MEC w/a

STONE & WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW MIDLAND NUCLEAR PLANT J.O. NO. 14509	ITEM NUMBER 050	HOLD POINT NUMBER: _____
REFERENCE(S) CPCo Memo, CSC-7119 of 12/23/83 (copy attached)	<input type="checkbox"/> TRACKED ACTION ITEM	
	<input checked="" type="checkbox"/> TRACKED INFORMATION ITEM	
	<input type="checkbox"/> TRACKED RECOMMENDATION ITEM	
	<input type="checkbox"/> UNTRACKED ITEM	
	<input type="checkbox"/> HOLD POINT NOTIFICATION	

CONDITION DETAILS

The following documents discuss Q and/or Q-interface CWP's/items:

- 1) FPG-7.300, Rev. 3 "Construction Work Plans (CWP)"
- 2) MPQAD Procedure T-3, Rev. 1, "Control, Release and Handling of Construction Work Plans (CWP) and Quality Work Packages (QWP)"
- 3) CPCo "Ground Rules for Construction Work", dated June 2, 1983

In discussing the above with CPCo personnel, the following was noted:

- 1) Q-interface work may or may not require inspection.
- 2) The inspection/non-inspection guideline in use presently by the TQR's/MPQAD QCE's is a handwritten list.

YES (PAGE NO.'S) 1 NO

SEE SHEET 2 OF 2

ATTACHMENTS

DATE RESPONSE REQ'D.	INITIATOR/DATE	INITIATION APPROVED/DATE
2-6-84	<i>J. Haber</i> 1/30/84	<i>J. Elan</i> 1-30-84

RESPONSE

- A) CPCo attached letter CSC-7229 dated January 31, 1984 is Consumers Power Company's complete response to Item #050.
- B) The above referenced memo CSC-7119 dated December 23, 1983 is not a issue in Item #050.

YES (PAGE NO.'S) NO

ATTACHMENTS

EST. CORRECTIVE ACTION COMPLETION DATE	RESPONDENT	TITLE	DATE
N/A	<i>J. Haber</i>	Const Syst	2/6/84

RESPONSE ACCEPTED	DATE	RESPONSE VERIFIED/CLOSED	DATE

- 3) There is no specification/PQCI/Procedure which establishes which Q-interface items receive or do not receive inspections. Thus, there is no design/engineering consideration being given to the present inspection/non-inspection guidelines.

Please advise CIO of the resolution of this condition where there is no formal direction for which Q-interface items do or do not require inspection.

NOTE: The subject above was addressed prior to utilization of this reporting form. As such, this information item is being issued as a tracking mechanism.



Consumers
Power
Company

Dean L. Quamme
Site Manager
Midland Project

Midland Project: PO Box 1963, Midland, MI 48640 • (517) 631-8550

January 31, 1984

Mr G A Hierzer
Bechtel Power Corporation
P O Box 2167
Midland, MI 48640

MIDLAND ENERGY CENTER GWO 7020
Q-INTERFACE CWP POLICY STATEMENT
File: 0456, 0655, B1.1.7 UIF: 99*08, 53*50*04, 12*50 Serial: CSC-7229

Recently Stone & Webster had a concern about what inspections were necessary for Q-Interface CWPs. This was a result from a Stone & Webster representative having discussions with various Field Engineers and Team Quality Reps on the Teams. The result of these discussions indicated that there was some confusion among these Team members as to what was the purpose of a Q-Interface CWP, what work was required to be inspected and also where to find these requirements.


It was agreed by Consumers Site Management and Stone & Webster that a policy statement should be distributed to the Teams. The attached policy statement should be distributed to all System/Area Teams for their immediate notification. Team Supervisors and Lead TQR should ensure that all Team members receive a copy and that the Field Engineers and Team Quality Reps fully understand all aspects of Q-Interface CWPs. If any questions still remain, the Team should contact their CPCo Construction Engineer for further clarification. This action should be completed by February 8, 1984. Furthermore, this policy statement should be incorporated in MPQAD Procedure T-3 and FPG-7.300 as an attachment. This will ensure that any personnel requiring training in either of these procedures in the future will be instructed as to the purpose of Q-Interface and how to determine what inspections are necessary.

The attached policy statement's development was coordinated with Bechtel and MPQAD.

DLQ/DLH/klp

cc: RAWells, MPQAD
BHPeck, MEC
DDJohnson, MEC
NIReichel, MEC
JChristy, MPQAD
JReinsch, BPCo

To Bechtel System/Area Team Members

From 
CPCo Site Management

Date January 27, 1984

Subject Q-INTERFACE CWP POLICY STATEMENT

Q-Interface is a word coined by Consumers Power Site Management. Its purpose is to ensure that any work which comes in contact with a Q Commodity or renders a Q Commodity inaccessible, is ultimately controlled by Consumers Site Management. Q-Interface CWPs in an area will be discontinued at commencement of Phase II of the CCP.

The reason CPCo requires control of these Q-Interface CWPs is two-fold: (1) to ensure that the installation of a commodity will not conceal Q items that need verification inspection and (2) to ensure that the work activities being done does not violate Phase I controls set up by CPCo & the NRC. These controls are being incorporated into Section 7 of FPG-7.300 Rev 4, and are delineated in the CCP Confirmatory Order. (These controls were formally referred to as the "Ground Rules".)

Actual work that is performed in the field is Q or Non-Q. CWPs are marked as Q-Interface only as a management tool to ensure that the above requirements are met. Some Non-Q work performed by a Q-Interface CWP may have programmatic QC hold points which are addressed in the PQCI.

The Field Engineer will fill out a CWP in accordance with FPG-7.300 and make the determination of which block (Non-Q, Q-Interface or Q) to check based on drawings and specifications in which he is working with. Hold points are assigned based on the applicable specifications and the PQCI. This is described in Section 4.5.3 of the Construction Completion Program.

The Team Quality Representative receives the Q-Interface or Q CWP following the initial preparation and reviews the hold points ensuring the requirements of the PQCI are met, per FPG-7.300 and MPQAD Procedure T-3. The TQR shall not sign the CWP until all quality planning is complete.

Once all the above items are completed per applicable specifications and procedures the Q or Q-Interface CWP is forwarded to CPCo Site Management Office for review and sign-off.

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC-7268

Date: February 1, 1984

To: Stone & Webster
P O Box 1963
Midland, MI 48640

Attached Is: Partial Response To
 Complete response To
 For Your Information
 Other

Description:

Tracked Information Item 045.

NIR Signature:



cc: JGKepler, NRC Region III w/a
JHarrison, NRC Region III w/a
RJCook, NRC Site w/a
RAWells, MPQAD w/a
BHPeck, MEC w/a
NIRichel, MEC w/a
DDJohnson, MEC w/a

STONE & WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW MIDLAND NUCLEAR PLANT J.O. NO. 14509	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">ITEM NUMBER 045</td> <td style="width:50%;">HOLD POINT NUMBER</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> TRACKED ACTION ITEM</td> </tr> <tr> <td colspan="2"><input checked="" type="checkbox"/> TRACKED INFORMATION ITEM</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> TRACKED RECOMMENDATION ITEM</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> UNTRACKED ITEM</td> </tr> <tr> <td colspan="2"><input type="checkbox"/> HOLD POINT NOTIFICATION</td> </tr> </table>	ITEM NUMBER 045	HOLD POINT NUMBER	<input type="checkbox"/> TRACKED ACTION ITEM		<input checked="" type="checkbox"/> TRACKED INFORMATION ITEM		<input type="checkbox"/> TRACKED RECOMMENDATION ITEM		<input type="checkbox"/> UNTRACKED ITEM		<input type="checkbox"/> HOLD POINT NOTIFICATION	
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<input type="checkbox"/> UNTRACKED ITEM													
<input type="checkbox"/> HOLD POINT NOTIFICATION													
REFERENCE(S) CIO Item Number 038 CPCo Letter CSC-7134 of January 5, 1984													

CONDITION DETAILS

The response provided to CIO Item Number 038, copy attached, by the above referenced CPCo letter is not acceptable to CIO. Therefore, Item Number 038 has been closed and this report issued to address the concern. Without appropriate administrative controls, the tendency will be for personnel to develop a reliance on checklists rather than the governing procedures and Engineering documents.

If it is your intention to utilize incomplete checklists for portions of the work, CIO needs to know what actions will be taken by CPCo to assure that work is done to Engineering documents and that a reliance on checklists does not develop.

It is also noted that the checklist for FPM-7.000 has been revised to include all procedural items and incorporated as a part of the procedure.

YES (PAGE NO.'S) 1 NO

ATTACHMENTS

DATE RESPONSE REQ'D. Jan. 27, 1984	INITIATOR/DATE <i>J. E. Kar</i> 1-18-84	INITIATION APPROVED/DATE <i>J. E. Kar</i> 1-18-84
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RESPONSE

Reference attached letter CSC-7221 dated January 26, 1984.

YES (PAGE NO.'S) NO

ATTACHMENTS

EST. CORRECTIVE ACTION COMPLETION DATE 2/24/84	RESPONDENT <i>[Signature]</i>	TITLE COST SPT	DATE 2/6/84
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RESPONSE ACCEPTED	DATE	RESPONSE VERIFIED/CLOSED	DATE
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Consumers
Power
Company

Dean L. Quamme
Site Manager
Midland Project

Midland Project: PO Box 1963, Midland, MI 48640 • (517) 631-8650

January 26, 1984

Mr G A Hierzer
Bechtel Power Corporation
P O Box 2167
Midland, MI 48640

MIDLAND ENERGY CENTER 7020
CIO OBSERVATION 045
FILE: B1.17 UFI: 99*08, 53*50*04, 12*50 SERIAL: CSC-7221

Per conversation with Stone & Webster the subject of using checklists in procedures has been clarified.

As you are aware, the checklist for FPM 7.000 has been revised to include all procedural items and incorporated as part of the procedure. This resolved Stone & Webster's concern in that area.

Any existing procedures which utilize checklists must be reviewed and revised if necessary, to insure the checklist is complete and fully consistent with all requirements of the procedure it is to be used in conjunction with. Any new procedures and related checklists must also conform to these requirements. It is also requested that each checklist to be used contain a statement that it is a memory key aid and not a substitution for the required use of Design Drawings and Specifications.

Please have this completed and reply back by February 24, 1984.

DLQ/JPB/sc

cc: TAspelman
NIReichel
BHPeck