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MEMORANDUM FOR: L. S. Rubenstein, Acting Chief, Light Water Reactors Branch No. 4, Division of Project Management

FROM: Walter P. Haass, Chief, Quality Assurance Branch, Division of Project Management

SUBJECT: QAB REVIEW OF CONSUMERS' RESPONSE TO 10 CFR 50.54(f) QUESTION 1

We have reviewed Consumers Power Company's (CPC) response to question 1 of NRC's March 21, 1979 letter, "10 CFR 50.54 Request Regarding Plant Fill." Question 1 addresses the quality assurance program for the design and construction of the Midland Nuclear Power Plant, and the response by CPC was provided by letters dated April 24 and May 31, 1979. (An additional CPC letter dated July 9, 1979 did not revise the response to question 1.) As a result of our review, we have determined that additional information is necessary.

We recommend that a meeting with CPC be arranged to discuss this matter. For this purpose, we have prepared items where additional information is needed that can serve as an agenda for the meeting. The enclosed request for additional information should be transmitted to Consumers Power Company in advance of the meeting.

Original signed by
Walter P. Haass

Walter P. Haass, Chief
Quality Assurance Branch
Division of Project Management

Enclosure:
Request for Additional Information

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DATE	8/29/79	8/29/79				A

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REQUEST FOR ADDITIONAL INFORMATION

We have reviewed Consumers Power Company's response to question 1 of NRC's March 21, 1979 letter, "10 CFR 50.54 Request Regarding Plant Fill" and conclude that the information provided is not sufficient to determine that an acceptable QA program has been, and is being, implemented for the Midland project. Accordingly, in order to gain a better understanding of your response to question 1, provide your response to the following:

1. Your response to question 1a does not provide sufficient information relative to the root causes of the 13 deficiencies. In order to determine the acceptability of the corrective actions for the 13 deficiencies considering the possibility that these deficiencies are of a generic nature that could affect other areas of the facility, a more complete understanding of the root cause of each deficiency is necessary. Accordingly, provide a clearer description of the root causes of each of the 13 deficiencies, including a detailed discussion of the conditions that existed to allow these deficiencies and the changes that have been made to preclude the recurrence of such deficiencies.

2a. The first seven paragraphs of your response to question 1b do not provide sufficient information to assure that contradictions do not continue to exist in the PSAR, FSAR, design documents, implementing procedures, and as-built conditions since the controls described in these seven paragraphs were in effect prior to the I&E findings. Modify your response to clearly describe the control revisions you have instituted to preclude design contradictions.

b. Items 1, 2, and 3 of the eighth paragraph describe the review and update of the PSAR commitment list, the review of the inactive sections of the FSAR, and the review of procedure EDP 4.22, "Preparation and Control of Safety Analysis Reports," without describing the extent of the review process or the qualifications of personnel involved in the review. Accordingly, describe what each of these reviews entails, including the extent these reviews are verified, approved, and documented. Identify the organizational unit that is, or will be, involved in these reviews and the qualifications of the involved personnel.

c. Item 2 of the eighth paragraph includes a statement that a review of the remaining sections of the FSAR is not necessary, "...because of the ongoing review process described above." Describe your rationale for not reviewing these remaining sections of the FSAR when it appears that the original review of the FSAR was performed prior to the I&E findings.

d. Describe the extent of the audit committed to in item 4 of the eighth paragraph.

3. Question 1c requested that other activities be investigated to determine whether programmatic quality assurance deficiencies exist in view of the apparent breakdown of certain quality assurance controls, and that the activities investigated and the results be identified. Your response addressed certain specifications and instructions that received a review in 1977; providing for more in-depth verification; increasing management audits from one to two per year; increasing the staff of Bechtel's QA engineers at the site from five to eight; instituting an overinspection program on certain Q-listed construction activities; assigning resident engineers at the site to aid in the interpretation of drawings and increasing their number from one to twenty-two; and initiating a trend analysis program. According to your response, most of these actions were initiated in 1977. Describe your rationale for assuming that these actions provide confidence that quality assurance deficiencies do not exist in other areas. In order to determine if other areas have deficiencies, work already accomplished in these areas should be investigated. This includes the review of completed documentation, including inspection results, to verify consistency with design and SAR requirements. Also, representative sample inspections of completed work would seem appropriate to determine the acceptability of this work. Accordingly, describe a program in detail to accomplish the above or provide rationale as to why it is not necessary.

   Also, the use of generalized statements such as the review of, increase audits, overinspection, identifying trends, and increase of staff does not provide sufficient specificity regarding the detail and extent these actions will take place and the effect they will have in assuring other areas are not deficient. Accordingly, in each of these areas provide a clearer description of these actions to permit one to understand the full impact they will have in assuring an effective QA program and that other areas are not deficient. In those cases where credit is taken for actions already accomplished (such as reviews, inspections, and audits), provide a summary of the results of these actions such that the success or failure of the actions can be determined.

4. Considering the results of your investigation requested in our question 1c, question 1d requested that you describe your position as to the overall effectiveness of the QA program for the Midland facility. Accordingly, an overall assessment of the effectiveness of your program should be based on your revised response to our question 1c. The results of this assessment, including a description of the scope and extent of the assessment effort and the identification and qualifications of the individuals involved in this assessment, should be documented and reported to us.