



**Consumers
Power
Company**

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

May 4, 1984

DMB

| PRINCIPAL STAFF | |
|-----------------|----------|
| ✓ J/RA | has |
| A/RA | DE |
| RC | DRMSP |
| PAO | DRMA |
| SGA | SCS |
| ENF | ML |
| | File has |

aug 12

Mr J E Karr
Stone and Webster Michigan, Inc
P O Box 1963
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT - GW07020
STONE AND WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW
NONCONFORMANCE IDENTIFICATION REPORT NUMBER 022 DATED 03-23-84
FILE 24.2 SERIAL 27883 CSM-0768 LWW-11-84

In pursuance of Nonconformance Identification Report number 022, a response is attached to address your concerns delineated in your Nonconformance Identification Report Form.

Should you or your staff have any questions on the content, contact Lonnie Worley at extension 7707.

D L Quamme

D L Quamme
Site Manager

CC DDJohnson, MEC
BHPeck, MEC
NIREichel, MEC
TASpellman, MEC
JBKeppler, Regional Administrator, Region III
JJHarrison, Chief, Midland Section, Region III
BBurgess, NRC Resident Insepctor
RAWells, MEC

8405220404 840504
PDR ADOCK 05000329
S PDR

IE01
MAY 17 1984

Response to Nonconformance Identification Report 022 dated 03-23-84.

Workprint 219 is located with team 19. Distribution is done by Document Control and maintenance of the station is the responsibility of the team receiving the documents. This workprint station will be transferred to a controlled document station under the responsibility of Document Control for maintenance as well as distribution. All workprints audited were new workprints. (either distributed after the stop work order or reviewed in the conversion/verification process). This program is in line with our corrective action plan submitted in response to MCARR-DAT-1. QAR number RA-00157 dated 03-28-84 was written in response to Nonconformance Identification Report number 022 and closed on 05-02-84.

The following items address each of the concerns identified:

1. Finding 1. Documents were found to be missing at the workprint station. Replacement copy has been attached.
2. Findings 2, 9, 16, 17. In all cases, the distribution had been made from Document Control and the distribution date was noted on the register. The changes had not been posted by the personnel at the workprint station. No unreasonable time delays were found. A procedure to clarify posting requirements (FPD-1.000) was issued on March 23, 1984. These findings would all be in compliance with the new procedural requirements of FPD-1.000 which requires posting be completed within three working days of the distribution date. Construction assistants were reminded that changes must be completed in three working days per new procedural requirements (FPD-1.000).
3. Findings 6, 7, 12, 13. The ~~change~~ ^{change 6/24/84} paper had been removed from the document but had not been crossed off the front of the drawing or change paper had not been removed or converted. Discrepancies listed have been corrected.

These workprints were reviewed in the conversion/verification program and workprint station personnel were notified of the need to review workprint for procedural compliance.

4. Findings 4, 8, 18. Workprint station logs did not accurately reflect information on hard copy either through omission, miscopying or adding extraneous information. Workprint maintenance requirements were reviewed with construction personnel responsible for maintaining workprints.
5. Findings 3, 5. Drawing M-652-1-H130-FRL-1 was incorporated and was not listed on the front of the drawing as indicated on the Audit Report.

Drawing M-18-370 - alpha and numeric pages do add up to 1064. This number is a total page count used for microfilming.

6. Finding 11 indicated the drawing revision to be revision 7 however, a review of the drawing indicated a revision 8 (not very legible) in the revision block and a revision 8 in the description block (also not too legible). This drawing was returned to the vendor for correction.

7. Findings 19, 20. Drawings were replaced. Workprint personnel were reminded of the need to check drawing legibility.

LWW

5/4/84



Consumers
Power
Company

ORIGINAL
MIDLAND PROJECT
QUALITY ASSURANCE DEPARTMENT
QUALITY ACTION REQUEST

6. QAR Number

RA-00157

7. Date Issued

3/28/84

8. Revision

0

9.

Page 1 of 3

10. ASME Related

☐ Yes ☒ No

1. Requirement

FPG 7.300 Rev 4
FPD 3.000 Rev 11
FPD 1.000 Rev 19

2. Deficiency Stone and Webster NIR-022 identifies the following deficiencies during a CIO evaluation of work print station 219:

1. Attachments referenced on work prints not attached.
2. Drawing stamp errors have been identified.
3. Station log errors have been identified.

11. Potential 50.55(e)

☐ Yes ☒ No

3. QAR Originated by

St. McDonald

4. Discipline/Division/Section

PAP - Tech Services

5. Response Due Date

4/05/84

12. Date Reported to MPQA Mgr

N/A

13. Action Item No.

SO 5723

15. Item Priority

5

17. S/U Code

PGMOO

19. Action Organization

Bechtel Field
Document Control

20. QAR Reviewed by

P. Doe

14. Discipline

N/A

16. Trend Code

ZD-5-0001

18. Resb Code

BCPCO - STF-G

21. Date

3-28-84

22. Cause

SEE ATTACHED SHEETS

23. Proposed Corrective Action

SEE ATTACHED SHEETS

24. Responsible Organization/Person

DDC

25. Proposed Completion Date

4-3-84

26. Disposition Concurrence

P. Doe
QAR Reviewer

4/5/84

Date

NA 8U 5/2/84
PQAE (ASME Only)

Date

27. Disposition Action Taken

SEE ATTACHED SHEETS

J. A. Brown

28. Method of Disposition Verification

SEE ATTACHED FOR CLOSURE JUSTIFICATION.

29. QAR Closed by

SWinley 5/2/84
MPQAD Date

NA 8U 5/2/84
FFQCE (ASME Only) Date

☒ Acceptable

☐ Unacceptable

☐ Superseding QAR

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

DATE OF NONCONFORMANCE: 3-23-84

NIR NUMBER 022

IDENTIFICATION/LOCATION OF ITEMS:

WORK PRINT STATION 219

DESCRIPTION OF NONCONFORMANCE: DURING THE ONGOING EVALUATION OF SITE DOCUMENT CONTROL, CID PERFORMED A SAMPLE INSPECTION OF DOCUMENTS CONTAINED AT WORK PRINT STATION 219. THE POPULATION WAS DETERMINED TO BE 1,116. PER 95/5 CRITERIA, A SAMPLE OF 80 DOCUMENTS WERE RANDOMLY SELECTED. THE SAMPLE WAS DETERMINED TO BE ACCEPTABLE WITH 1 REJECT AND REJECTABLE WITH 2 REJECTS. SEE 20 DOCUMENTS WERE FOUND TO BE DISCREPANT. SEE ATTACHED SHEET FOR SPECIFIC DETAILS.

Edward A. Baranoff
INITIATOR

DATE 3/23/84

PROGRAM MGR

J. E. Kan

DATE

3-23-84

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT
INITIATOR _____
DATE _____

NEW NIR#

DATE

CONCURRENCE

PROGRAM MGR

DATE

REMARKS

Response to NIR 022, dated March 23, 1984, QAR RA-00157, dated March 28, 1984
Subject: Workprint Station 219

Workprint station 219 is located with team 19.

Workprint station 219 is located with team 19. Distribution is done by document control and maintenance of the station is the responsibility of the team receiving the documents. This workprint station will be transferred to a controlled document station in 4-6 weeks and placed under the responsibility of document control for maintenance as well as distribution. All workprints audited were new workprints. (Either distributed after the stop work order or reviewed in the conversion/verification process). This program is inline with our corrective action plan submitted in response to MCARR-DAT-1.

Note: For ease of reading, the findings have been grouped by subject. The letter identification noted on the NIR has been retained for cross-referencing.

1. In-Process Work Activities (Findings 2, 9, 16, 17)

In all cases, distribution had been made from document control and the distribution date was noted on the register. The changes had not been posted by the personnel at the workprint station. No unreasonable time delays were found. A procedure to clarify posting requirements (FPD-1.000) was issued on March 23, 1984. These findings would all be in compliance with the new procedural requirements of FPD-1.000 which requires posting be completed within three working days of the distribution date. Construction assistants will be reminded that changes must be completed in three working days per new procedural requirements (FPD-1.000).

2. Update of Workstation Logs to Reflect Conversion (Findings 5, 10, 14)

Workprint station logs were not updated to reflect workprints that had been converted/verified. Personnel will be reminded of the need to update logs. Workprint station logs/cards will be standardized when the maintenance of stations is transferred to document control. Until this conversion is complete, workprint maintenance requirements will be reviewed with team personnel for maintaining workprints by April 6, 1984.

3. Conversion/Verification Errors (Findings 6, 7, 12, 13)

The change paper had been removed from the document but had not been crossed off the front of the drawing or change paper had not been removed or converted.

These workprints were reviewed in the conversion/verification program. Workprint station personnel will be notified of the need to review workprints for procedural compliance by April 6, 1984.

4. Clerical Errors in Station Logs (Findings 4, 8, 18)

Workprint station logs did not accurately reflect information on hard copy either through omission, miscopying or adding extraneous information. Workprint maintenance requirements will be reviewed with construction personnel responsible for maintaining workprints by April 6, 1984.

5. Auditor Misinterpretations (Findings 3, 15)

Drawing M652-1-H130-FR1 1 was incorporated and was not listed on the front of the drawing as indicated on the audit report.

Drawing M18-370 -Alpha + numeric pages do add up to 1064. This number is a total page count used for microfilming.

6. Missing Documents (Findings 1, 11)

Documents were found to be missing at the workprint station. Replacement copies have been ordered.

7. Legibility (Findings 19, 20)

Drawings will be replaced. Workprint personnel will be reminded of the need to check drawing legibility by April 6, 1984.

f. A. Brown
4-3-84

DISCREPANCIES @ STATION 219

| DOCUMENT NUMBER | REV DWG | REV REG | DOCUMENTS IN QUESTION | IN REG | LISTED ON FRONT | ATTACH. TO BACK | OTHER COMMENTS | IN 5TH. LOG |
|-----------------|---------|---------|-----------------------|--------|-----------------|-----------------|--|-------------------|
| 1B-D-572-1 | 4 | 4 | FCR 110265 | Yes | Yes | No | | Yes |
| 1652-1-116 | 0 | 0 | IDCN 20123 | No | Yes | Yes | | Yes |
| 1652-1-11130 | 1 | 1 | FRL 1 | No | Yes | No | | Yes |
| 1652-2 | 3/FI | 3/FI | ICS "B" | No | Yes | No | | Yes |
| 1652-2-1122 | 2 | 2 | IDCN 20040 | No | No | No | | Yes |
| 118-151 | 5 | 5 | FCR 229112222 | No | Yes | No | | Yes |
| 118-152 | 5 | 5 | FCR 229112222 | No | Yes | No | | Yes |
| 1652-1 | 11/FI | 11/FI | TCS 3.8.13.14 | Yes | Yes | Yes | | No |
| 1652-1-1116 | 0 | 0 | FCR 3942 | No | No | No | | Yes |
| " " " | 0 | 0 | IDCN 20133 | No | Yes | Yes | | Yes |
| 118-176 | 7 | 7 | FCR 1129502025 | No | Yes | No | Transposed Number's Graphic Issue | Yes As FCN M-2195 |
| 118-175 | 7 | 8 | — | — | — | — | | — |
| 118-310-3 | 9 | 9 | M-4139 | No | Yes | Yes | DRAWING HAS NEW WORKPRINT SHMP ATTACHMENT HAS OLD WORKPRINT SAME | Yes |
| 118-310-4 | 5 | 5 | E-7551 | No | Yes | Yes | SAME AS ABOVE | Yes |
| 118-348-2 | 4 | 4 | E-2613 | No | Yes | No | | Yes |
| 118-370 | 7 | 7 | — | — | — | — | PAGE 5 SHOWS 1064 THIS 2037 PAGE LAST PAGE IS 1031 | — |
| 1652-1-112 | 0 | 0 | IDCN 20112 | No | No | No | | Yes |
| 1652-1-118 | 0 | 0 | IDCN 20125 | No | Yes | Yes | | Yes |
| 1652-1-1118 | — | — | FCN-8000 | No | Yes | Yes | | Yes |
| 1652-1-11-145 | 2 | 2 | — | — | — | — | AREA'S NOT LEGIBLE | — |
| 1652-1-11-147 | 1 | 1 | — | — | — | — | AREA'S NOT LEGIBLE | — |

IR No. 022 ATTACHMENT 1 OF 1

To LWWorley

FROM DRRainey *DRR*

DATE May 2, 1984

SUBJECT MIDLAND ENERGY CENTER PROJECT -
QAR RA-00157
FILE 17.0 SERIAL 27879

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

CC

LWW 9-84

A review of the discrepancies listed indicated all of the items were corrected. This review however, indicated that two of those listed were not a Station 219 problem.

Item 11 indicated the drawing revision to be revision 7 however, a review of the drawing indicated a revision 8 (not very legible) in the revision block and a revision 8 in the revision discription block (also not too legible). This drawing was returned to the vendor for correction.

Item 15 verified that document M18-370 did in fact contain the 1064 pages indicated on the front. Some of the pages were numbered A, B, C, etc. and some preliminary pages were not counted in the page count. All other items were corrected.

I recommend closure of QAR RA-00157.

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

DATE OF NONCONFORMANCE: 3-23-84

NIR NUMBER 022

IDENTIFICATION/LOCATION OF ITEMS:

WORK PRINT STATION 219

DESCRIPTION OF NONCONFORMANCE: DURING THE ONGOING EVALUATION OF SITE DOCUMENT CONTROL, CIO PERFORMED A SAMPLE INSPECTION OF DOCUMENTS CONTAINED AT WORK PRINT STATION 219. THE POPULATION WAS DETERMINED TO BE 4116. PER 35/5 CRITERIA, A SAMPLE OF 80 DOCUMENTS WERE RANDOMLY SELECTED. THE SAMPLE WAS DETERMINED TO BE ACCEPTABLE WITH 1 REJECT AND REJECTABLE WITH 2 REJECTS. SEE 20 DOCUMENTS WERE FOUND TO BE DISCREPANT. SEE ATTACHED SHEET FOR SPECIFIC DETAILS.

Edward E. Brown
INITIATOR

DATE 3/23/84

PROGRAM MGR

J. E. Kaur

DATE

3-2-84

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

30.00

VERIFICATION SAT UNSAT

NEW NIR#

CONCURRENCE

INITIATOR

PROGRAM MGR

DATE

DATE

DATE

| DOCUMENT NUMBER | REV DWG | REV REG | DOCUMENTS IN QUESTION | IN REG | LISTED ON FRONT | ATTACH. TO BACK | OTHER COMMENTS | IN STA. LOC. |
|-----------------|---------|---------|-----------------------|--------|-------------------|-------------------|---|---------------|
| 2-5-17-1 | 1 | 4 | FCR H10265 | YES | YES | No | | YES |
| 2-1-116 | 0 | 0 | IDCN 20123 | No | YES | YES | | YES |
| 2-1-11150 | 1 | 1 | FRL 1 | No | YES | No | | YES |
| 2-2 | 3/1 | 3/1 | ICS #8 | No | YES No | Yes No | | YES |
| 2-2-1122 | 2 | 2 | IDCN 20040 | No | No | No | | YES |
| 151 | 5 | 5 | FCR 222112222 | X No | YES | No | | YES |
| 152 | 5 | 5 | FCR 222112272 | No | YES | No | | YES |
| 2-1 | 11/1 | 11/1 | ICS 3.8.13.14 | YES | YES | YES | | No |
| 2-1-1116 | 0 | 0 | FCR 3942 | No | No | No | | YES |
| " " | 0 | 0 | IDCN 20133 | No | YES | YES | | YES |
| 76 | 7 | 17 | FCN H12950025 | No | YES FCN | No | Transposed Numbers Graphic Assoc | YES As H-2195 |
| 75 | 7 | 8 | — | — | — | — | | — |
| 10-2 | 9 | 9 | M-4139 | No | YES | YES | Drawing has New Watermark Stamp Attachment. Has Old Watermark Stamp | YES |
| 10-4 | 5 | 5 | E-7551 | No | YES | YES | SAME AS ABOVE | YES |
| 10B-2 | 1 | 4 | E-2613 | No | YES | No | | YES |
| 370 | 7 | 7 | — | — | — | — | TITAF PAGE SHOWS JULY 15 2031 | — |
| 2-1-112 | 0 | 0 | IDCN 20119 | No | No | No | | YES |
| 1-1-118 | 0 | 0 | IDCN 20125 | No | YES | YES | | YES |
| 1-1-113 | — | — | FCN-8000 | No | YES | YES | | YES |
| 1-1-11195 | 2 | 2 | — | — | — | — | Area's Not Legible | — |
| 1-1-11197 | 1 | 1 | — | — | — | — | Area's Not Legible | — |

| DOCUMENT NUMBER | REV DWG | REV REG | DOCUMENTS IN QUESTION | IN REG | LISTED ON FRONT | ATTACH. TO BACK | OTHER COMMENTS | IN STA. LOC. |
|-----------------|---------|---------|-----------------------|--------|-------------------|-------------------|--|---------------|
| 2-5-17-1 | 1 | 4 | FCR H10265 | YES | YES | No | | YES |
| 2-1-116 | 0 | 0 | IDCN 20123 | No | YES | YES | | YES |
| 2-1-11150 | 1 | 1 | FRL 1 | No | YES | No | | YES |
| 2-2 | 3/1 | 3/1 | ICS #8 | No | YES No | Yes No | | YES |
| 2-2-1122 | 2 | 2 | IDCN 20040 | No | No | No | | YES |
| 151 | 5 | 5 | FCR 222112222 | X No | YES | No | | YES |
| 152 | 5 | 5 | FCR 222112272 | No | YES | No | | YES |
| 2-1 | 11/1 | 11/1 | ICS 3.8.13.14 | YES | YES | YES | | No |
| 2-1-1116 | 0 | 0 | FCR 3942 | No | No | No | | YES |
| " " | 0 | 0 | IDCN 20133 | No | YES | YES | | YES |
| 76 | 7 | 17 | FCN H129500025 | No | YES FCN | No | Transposed Numbers Graphic Assoc | YES As H-2195 |
| 75 | 7 | 8 | — | — | — | — | | — |
| 10-2 | 9 | 9 | M-4139 | No | YES | YES | PREVIOUS HAS NEW WATERWIT SHIP ATTACHMENT HAS OLD WATER PRINT SHIP | YES |
| 10-4 | 5 | 5 | E-7551 | No | YES | YES | SAME AS ABOVE | YES |
| 10B-2 | 1 | 4 | E-2613 | No | YES | No | | YES |
| 370 | 7 | 7 | — | — | — | — | TITAF PAGE SHOWS 1064 115 2157 | — |
| 2-1-112 | 0 | 0 | IDCN 20119 | YES | No | No | | YES |
| 1-1-118 | 0 | 0 | IDCN 20125 | No | YES | YES | | YES |
| 1-1-113 | — | — | FCN-8000 | No | YES | YES | | YES |
| 1-1-11195 | 2 | 2 | — | — | — | — | AREA'S NOT LEGIBLE | — |
| 1-1-11197 | 1 | 1 | — | — | — | — | AREA'S NOT LEGIBLE | — |