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AA-G-100373

Ann Arbor, Michigan

Bechtel Associates Professional Corporation

TECHNICAL STECIFICATION

FOR

SUBCONTRACT FOR

AREA DEWATERING SYSTEM

FOR THE

CONSUMERS POWER COMPANY

MIDLAND PLANT

MIDLAND MICHIGAN



EXHIBIT D

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### TECHNICAL SPECIFICATION

### FOR

### SUBCONTRACT FOR

### AREA DEWATERING SYSTEM

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### APPENDIX

A LOCUMENTATION REQUIREMENTS

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#### 1. SCOPE

- A. GENERAL
  - 1) The work to be performed under this Subcontract shall consist of designing a dewatering system capable of lowering the groundwater to a minimum elevation of 580 feet with the pond at el 627'+. The lowering of the groundwater will allow others to excavate portions of the auxiliary building and feedwater isolation valve pit in a dry condition. This specification includes Q-listed work to be performed exclusively by Contractor as noted in Article 7.
- B. ITEMS INCLUDED
  - Design, furnish, install, maintain, operate, and remove dewatering system as indicated in the design drawings.
  - Provide and maintain standby equipment and power of sufficient capacity to perform the intended work.
  - 3) Install, maintain, and observe observation wells and/or piezometers and test pits for logging the water table elevations at the locations as required and approved by Contractor.
  - 4) Dispose of the groundwater to the cooling pond by installing a piping system from the dewatering system indicated in the drawings to the site storm drain system.
  - Provide protection of the dewatering system in areas designated as construction access as shown in the drawings.
  - Grout placement for all dewatering holes and wells upon completion of the subgrade dewatering.
  - Install 1/4-inch petcocks, bushing, and nipples at each dewatering well for obtaining samples of the return water.
  - Provide all reducers, couplings, piping etc necessary to adapt Contractor's flow meters to discharge line, fire hydrant, and recirculation line.
- C. RELATED ITEMS NOT INCLUDED
  - 1) Access roads to the area
  - Inspecting the water being pumped to determine the amount of fines being removed. In this specification, fines are defined as any nonorganic materials coarser than 0.005 millimeter.

2)

- 3) Concrete grout for sealing holes and wells
- Excavation required (trenching) to provide the areas for installing the dewatering systems
- 5) Location of all utilities, embedded plant facilities, and other subsurface structures at the location of the dewatering system
- 6) Drilling holes through the turbine building and auxiliary building concrete floors at elevations 614' and 634' at the locations required by Subcontractor
- Repairing the holes drilled in the auxiliary building and turbine building concrete floors
- 8) Electrical power to operate the pumps
- 9) All lines, grade, survey, excavation, fill, backfill, and protection of dewatering equipment at the road or ramp crossing as necessary
- 10) Repair and/or replacement of any utilities, embedded plant facilities, and/or other substructure damage encountered at the locations indicated by Contractor for locating eductor wells
- 2. QUALITY STANDARDS
  - A. GENERAL
    - Subcontractor shall be responsible for the quality of items and services to meet the requirements of this specification, applicable codes and standards, and other contract documents.
- 3. SUBMITTALS
  - A. STANDARD FORMS
    - Engineering document and quality verification document requirements are summarized in Form G-321-D and are augmented by detailed requirements in this specification.
  - B. PROCEDURES

Subcontractor shall submit the following procedures (in detail) to the satisfaction of Contractor.

- 1) Dewatering plant area procedure
- 2) Test pits procedure

Specification 7220-C-88(Q), Rev 2

- Observation wells
- 4) Jetting procedure
- 5) Grouting procedure
- 4. SERVICE REQUIREMENTS
  - A. OPERATIONAL REQUIREMENTS
    - 1) An adequate dewatering system shall be installed to lower and control the groundwater to provide a dry condition during construction, excavation, and placement of fill materials. The dewatering system shall be capable of lowering and continuously maintaining the groundwater level to el 600' initially so construction work can start and then lowering and maintaining the groundwater level as directed by Contractor to a minimum elevation of 580' until a written directive from Contractor to cease dewatering operations has been received.
    - 2) Deleted
    - Contractor shall provide operating electrical power. The drawing will indicate these locations.
  - B. SUBCONTRACTOR'S RESPONSIBILITY
    - Subcontractor shall be solely responsible for the design, installation, operation, and removal of a dewatering system. This system shall prevent the loss of fines in the soil, seepage, boils, quick conditions, or softening of the foundation strata. The stability of sides and bottom of excavation shall be maintained, thereby resulting in every phase of the excavation and construction being performed in dry conditions.
  - C. DATA AVAILABLE
    - The subsurface data and preliminary pump test results are available upon request and are for Subcontractor's information only. Subcontractor assumes the responsibility for any deductions, interpretations, or conclusions made on the basis of these data.
    - The test boring report and the Dames and Moore Report for this plant are located at Contractor's office and are available for review.
    - The estimated elevation of the groundwater table is 627 feet.

- D. APPROVAL OF DEWATERING SYSTEM
  - Approval by Contractor of the dewatering system proposed by Subcontractor will be only with respect to the basic methods Subcontractor intends to use. Approval of the dewatering system will be based on the demonstrated performance of the system to satisfy the requirements for dewatering as specified.
- E. CONTROL
  - The observation wells, piezometers, and measurements of fines shall be used as a primary basis of determining compliance with the requirements of this specification.
  - Test pits shall be used only as directed by Contractor in writing.
- 5. FIELD OPERATIONS
  - A. GENERAL
    - 1) Subcontractor shall furnish, install, operate, and maintain the dewatering system and, upon completion, remove all dewatering equipment except as approved in writing in advance by Contractor. Subcontractor shall perform all associated work required to remove and control the subsurface water so that the excavation, construction, and backfilling operations can be performed completely in dry conditions as approved by Contractor. All associated work required to remove and control localized pockets of trapped groundwater within the excavation will be done by others.
  - B. TRENCHING
    - Contractor shall perform excavation where required to allow for installation of the dewatering system.
  - C. TESTING DEWATERING SYSTEM
    - 1) Prior to any excavation below the groundwater level, the dewatering system shall be tested and placed in operation to lower the water levels as required and shall function continuously as required to provide a dry construction area. The pumping shall continue until the excavation and backfill operations are completed to the upper limits of the original groundwater level. Subcontractor shall obtain written approval from Contractor before discontinuing the dewatering operation.

- D. DISPOSAL OF WATER
  - 1) Subcontractor shall be responsible for all surface and subsurface water resulting from its operations and shall dispose of all water removed from the dewatering system in a manner that will not endanger public health, property, or any portion of the work under construction by other Subcontractors and associates working in the area. The water shall be conveyed through piping from the dewatering system to the existing site storm drain system only after it has been monitored for fines.
- E. STANDBY EQUIPMENT
  - Subcontractor shall provide standby equipment installed and available for immediate operation as may be required to maintain the dewatering adequately on a continuous basis in the event that all or any part of the dewatering system may become inadequate or fail.
  - 2) Subcontractor shall provide and maintain, in an operable condition, standby diesel-powered pumps and/or generators of sufficient capacity to start and operate all pumps and other required dewatering equipment for the duration of the dewatering.
- F. OBSERVATION WELLS
  - Subcontractor shall supply, install, take measurements, and maintain the required number of observation wells and/or piezometers and such additional observation wells as may be ordered by Contractor. Water levels in the observation wells and/or piezometers and volume of water shall be recorded and submitted to Contractor daily, Monday through Friday, during dewatering.
  - 2) The observation wells shall be of a type that will permit portions of the riser to be removed as the excavation work progresses. The proposed type shall be submitted to Contractor for approval prior to installation.
  - Subcontractor shall, by adding or removing water from all observation well risers, demonstrate that the observation wells are functioning properly prior to commencement of dewatering.
  - 4) Any observation wells and/or piezometers that become inactive, damaged, or destroyed by Subcontractor shall be replaced within 24 hours by Subcontractor at no additional expense to Contractor.

- 5) Jetting shall not be used for the installation of the observation wells/dewatering wells under any structure. Controlled jetting may be used for the installation of the observation wells/dewatering wells outside the structures, provided the jet water is brought up through the inside of the jetted casing and does not blow up the outside of the jetted casing. The above is applicable after the casing has been installed 10 feet below the ground surface. Jetting shall be done in accordance with the Subcontractor's approved procedure.
- G. DEWATERING
  - Subcontractor shall be solely responsible for the 1) arrangement, location, and depths of the dewatering system necessary to accomplish the work described under this section of the specification. Limits of the work are shown in the drawing. The dewatering shall be accomplished in a manner that will reduce the hydrostatic head in water-bearing strata below any excavation to the extent that the water level and piezometric water levels in the construction area are substantially (a minimum of 3 feet) below the prevailing excavation surface; will prevent the loss of fines, seepage, boils, quick conditions, or softening of the foundation strata; will maintain stability of the sides and bottom of the excavation; and will result in all construction operations being performed in a dry condition. For the area outside of the structures where pervious soil strata overlay considerably less pervious soil strata above the subgrade level, the groundwater in the pervious strata shall be lowered to within less than 2 feet of the top of the less pervious strata. As the area is excavated to the top of the less pervious strata, any groundwater remaining perched in the pervious strata above the less pervious strata shall be removed by others. If the water bearing strata are found to be absent, the well location shall be abandoned and the hole shall be sealed in accordance with Paragraph 5.G.7 of this specification.
  - 2) The dewatering operation shall be controlled in such a manner that the amount of fines of the soil in the discharge water shall be limited to 5 ppm. This is to be determined by measuring the amount of fines in the return line and discharge line corresponding to the guantity of groundwater measured at the discharge line.
    - a) All dewatering and observation wells located within the turbine building shall be installed using stainless steel well screen and risers. Unless directed otherwise in writing by the onsite geotechnical engineer.

- b) Dewatering wells located outside the turbine building area may be installed with a 6-inch diameter well screen, provided there is a sufficient quantity of sand and approval is obtained from the Contractor's onsite field geotechnical engineer.
- Jetting procedures shall be approved in advance in writing by Contractor and as indicated in Subparagraph 5.F.5 of this specification.
- 4) If the dewatering requirements are not satisfied because of inadequacy or failure of the dewatering system, loosening of the foundation strata and/or instability of the slopes may occur. The supply of all labor, materials, and the performance of all work necessary to carry out additional work for reinstatement of foundation soil resulting from such inadequacy or failure shall be undertaken by Subcontractor to the full satisfaction of Contractor, and at no additional expense to Contractor.
- 5) Prior to any excavation below the groundwater level, the dewatering system shall be placed into operation to lower the water levels as required and then shall be operated continuously 24 hours a day, 7 days a week until construction and placement of the subgrade structure and backfill has been satisfactorily completed and no longer requires dewatering, as notified by Contractor in written form.
- Subcontractor shall obtain written approval from Contractor before discontinuing the operation of the dewatering system.
- 7) Subcontractor shall seal, with 2,000 psi minimum concrete grout, any dewatering equipment buried or left in place under the structure and all observation wells, test pits, and holes after the dewatering operation is discontinued in accordance with the latest Michigan Wells Act.

### 6. INSPECTION

#### A. CONTRACTOR

- Contractor shall inspect the effluent of the well points to determine the amount of material (fines) being removed by the dewatering operation. This monitoring is Q-listed and shall be in accordance with 10 CFR 50, Appendix B.
- 2) The dewatering system shall be accepted by Contractor based on the difference in quantity of fines measured in the return line and discharge line and correlated with the quantity of groundwater being discharged

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through a water meter calibrated in gallons. The average quantity of fines shall not exceed the ratio of 5 ppm. The average quantity of fines shall be determined by testing a sample of water from the return line and the discharge line every Monday and Thursday that the pumping is in operation using a 1-liter Buchner funnel. The filter paper shall not be coarser than 0.005 millimeters. The corresponding number of gallons of groundwater pumped through an In-Line flowmeter located on the discharge line shall also be recorded by Contractor and the average ppm calculated. Contractor shall also monitor the number of gallons of recirculating water in Subcontractors eductor system. Contractor shall supply the 1-liter Buchner funnel and filter paper (no coarser than 0.005 millimeters) for the testing, and three flowmeters; one on the recirculation water line (10-inch Sparling In-Line with totalizer, Saddle Mount Series FM112) one on the discharge line (6-inch Sparling In-Line with totalizer Saddle Mount Series FM112) and one on the hydrant (3-inch Sparling In-Line with totalizer Series 162). If an individual test indicates the fines are greater than 5 ppm but the average ratio of fines to ground water pumped is less than 5 ppm, Subcontractor shall be alerted. If the quantity of fines exceeds the average ratio of 5 ppm for the total quantity of groundwater pumped, Subcontractor shall be notified that it has 24 hours to correct the condition. If, after 24 hours, Subcontractor has not been able to correct the problem, Contractor shall begin a systematic testing of each individual dewatering well. Any dewatering wells found to produce greater than 5 ppm of fines shall be repaired by Subcontractor or removed from Subcontractor shall notify Contractor the system. whenever it intends to purge any collected fines from the eductor tank. Subcontractor will estimate the quantity of water purged, and Contractor will collect all material from Subcontractor's eductor tank. The discharged bottom material shall be sieved through a Number 325 U.S. standard screen. The collected material shall be retained and stored for inspection by the onsite field geotechnical engineer.

- 3) Each individual well shall be inspected by Contractor during installation in accordance with the following criteria. After the initial 15 minutes of pumping, the effluent shall be tested for fines using a 1-liter Buchner funnel.
  - a) If the fines observed are 10 ppm or less, the well shall be accepted.
  - b) If the fines observed exceed 100 ppm, the well shall be rejected and pumping stopped.
  - c) If the fines observed are less than 100 ppm, but more than 10 ppm, the pumping shall stop. The well may be retested in accordance with the above

2

criteria after a minimum of a 1-hour delay. If the well has not met the acceptance criteria for fines within three retests, the well shall be rejected and pumping stopped.

- 4) Records shall be maintained for each well and for the entire system, including the amount of fines (ppm) each time readings are taken.
- B. SUBCONTRACTOR
  - Subcontractor shall perform all inspection and recording of the piezometers/observation wells in accordance with its approved procedure. All other inspection shall be in accordance with Subcontractor's approved procedures.

### 7. CLEANING AND RESTORATION

A. Subcontractor shall leave the work area in the same condition as prior to the start of operation and to the satisfaction of Contractor.

#### 8. QUALITY ASSURANCE REQUIREMENTS

- A. The monitoring of the fines of the soil in the discharge water is Q-listed and shall be performed and controlled by Contractor's quality assurance program.
- B. Contractor has the authority to stop or regulate any part of the dewatering operation to prevent damage to any part of Contractor's work.

#### 9. MEASUREMENT FOR PAYMENT

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- A. BASIS OF MEASUREMENT
  - The measurement of payment shall be in accordance with the terms of the subcontract.

#### APPENDIX A

### DOCUMENTATION REQUIREMENTS

1.0 The Subcontractor shall furnish documentation in accordance with the specification as summarized and directed by form G-321-D. To complete form G-321-D, the Subcontractor shall check in column 8 which documents are being transmitted, and shall sign line 21. The Subcontractor shall fill in lines 13 through 20 as applicable. Entries such as N/A (not applicable) and "See attached sheets" are permissible. The completed G-321-D form is then used for a cover sheet as directed on the back of the form.

#### Attachments:

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Form G-321-D, Engineering and Quality Verification Document Requirements

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QUALITY VERIFICATION DOCUMENT TRANSMITTAL - REPRODUCE THIS SIDE ONLY

#### INSTRUCTIONS FOR PREPARING G-321-D

- PURPOSE. This is a multi-purpose form to be used by Buyer/Contractor to specifically identify documents required of the supplier to setsify specification requirements, and is to be as . the supplier as a cover sheet for Quality Ventication Documents when submitting them to the Buyer/Contractor.
- GENERAL INFORMATION: Engineering (E) and Quality Verification (V) Documents are identified by Category number and title in section H, be
- USE: A copy of the front of this form shall be completed by the supplier and provided to the Bayer's/Contractor's Inspector along with the applicable Quality Verification Documents for his ٤. review prior to release of the unit(s).
- DISTRIBUTION: All Engineering (E) Documents are to be sent to the Project Engineer at the address shown below (Code a). 0.

When inspection release is completed, the Verification (V) Documents are to be distributed to the respective addresses shown below in accordance with the distribution code specified in Column 7. A copy of the completed Form G-321-D must accompany sech "package" of Verification Documents to its destination. Also, a copy of completed Form G-321-D is to be included with the hardware shipment and a copy sent separately to the Project Field Quality Coetrol Engineer at the jobsite.

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- 1.2 Assembly Drawings
- 1.3 Shop Detail Drawings
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- Wiring Diagrams
- 15 Cantrol Logic Diagrams
- 1.6 P& ID:
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- COMPLETED BECHTEL DATA SHEETS (E) 3.0
- INSTRUCTIONS (E) 4.0
  - Erection/Installatio 4.1
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- 10.0 SAMPLES (E)
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  - 17.4 Material Cartificate of Compli
  - 17.5 Electrical Property Reports
- CODE COMPLIANCE (V) 18.0
- UT ULTRASONIC EXAMINATION PRO-15.0 CEDURES (E), AND VERIFICATION RE-PORTS (V)

- 20.0 RT RADIOGRAPHIC EXAMINATION PROCEDURES (E), AND VERIFICATION REPORTS (V)
- 21.0 MT MAGNETIC PAPTICLE EXAMINA-TION PROCEDURES (E), AND VERIFICA-TION REPORTS (V)
- PT LIGUID PENETRANT EXAMINA-22.0 TION PROCEDURES (E). AND VERIFICA-TION REPORTS (V)
- 73.0 EDDY CURRENT EXAMINATION PROCE-DURES (E), AND VERIFICATION RE-PORTS (V)
- PRESSURE TEST MYDRO, AIR, LEAK 24.0 BUBBLE OR VACUUM TEST PROCEDURE (E), AND VERIFICATION REPORTS (V)
- INSPECTION PROCEDURE (E), AND VER-26.8 IFICATION REPORTS (V)
- 28.0 PERFORMANCE TEST PROCEDURES (E). AND VERIFICATION REPORTS (V) 26.1 Mechanical Tests 26.2 Electrical Tests
- PROTOTYPE TEST REPORT (E & V) 27.0
- SUPPLIER SHIPPING PREPARATION PRO-28.0 CEDURE (E)
- Specification 7220-C-88(Q)
- Appendix A Page 2 of 4

### Specification 7220-C-88(2) Appendix A Page 3 of 4 DOCUMENT CATEGORY DEFINITIONS

(E) - Engineering Documents. This term comprises procedures, drawings, specifications, QA plais, prototype qualification test reports, and other similar documents that require Bechtel approval prior to tablication, or prior to use of the document in the design, fabrication, installation, or other work process. The term is elso applied to price lists, and instructional documents for handling, storage, maintenance, etc., that are of informational interact only to project engineering.

(V) - Quality Verification Documents. This term comprises meterial test reports, heat treatment charts, welding records, NDE results, performance test reports, etc., which demonstrate or certify conformance to the technical or inspection requirements of the procurement documents.

#### 1.0 DRAWINGS (E)

- 1.1 Outline Dimensions, Services and Foundation/Mounting Details Drawings providing external envelope, including lugs, center line(s), location and size for electrical cable, conduit, fluid, and other service connections, isometrics, and details related to foundations and mountings.
- 1.2 Assembly Drewings Detailed drawings indicating sufficient information to facilitate assembly of the component parts of an equipment item.
- 1.3 Shop Detail Drawings Drawings which provide sufficient detail to facilitate the fabrication or manufacture of the equipment item. This includes but is not limited to, spool drawings, heat exchanger internal details, internal piping and wiring, cross-section details and erchitectural details.
- 1.4 Wiring Diagrams Drawings which show the schematic wiring and connection information for electrical items
- 1.5 Control Logic Diagrams Drawings which show the paths which input signals must follow to accomplish the required responses.
- 1.6 P & IDs Piping and Instrumentation Diagrams which show piping system details and the basic control elements.
- 2.0 PARTS LIST AND COST (E) Exploded view with identified parts and recommended spare parts for one year's operation with unit cost.
- 3.0 COMPLETED BECHTEL DATA SHEETS (E) Information provided by a supplier on data sheets turnished by Bechtel which states serial numbers, operating ranges, etc., of equipment that the supplier intends to deliver to satisfy the specification requirements.
- 4.0 INSTRUCTIONS (E)
  - 4.1 Erection/Installation Detailed written procedures, instructions, and drawings required to erect or install material or equipment.
  - 4.2 Operating Detailed written instructions describing how an item or system should be operated.
  - 4.3 Maintenance Detailed written instructions required to disassemble, reassemble and maintain items or systems in an operating condition.
  - 4.4 Site Storage and Handline Detailed written instructions which define the requirements and time period, for lubrication, rotation, heating, lifting or uther handling requirements to prevent damage or deterioration during storage and handling at jobsite. This includes return shipping instructions.
- 5.0 SCHEDULES: ENGINEERING AND FABRICATION/ERECTION (E) Bar charts, critical path methods, etc., which chronologically detail the sequence of
- 6.0 QUALITY ASSURANCE MANUAL/PROCEDURES (E) The document(s) which describe(s) the planned and systematic measures that are used to emere that structures, systems, and components will meet the requirements of the procurement rocuments.
- 7.0 SEISMIC DATA REPORT (E) The analytical or test data which provides physical response information on an item, meterial, component or system in relation to the conditions imposed by the stated seismic criteria.
- 8.0 ANALYSIS AND DESIGN REPORT (E) The analytical data, (stress, electrical loading, fluid dynamics, etc.), which assures that an item satisfies specified requirements.
- 3.0 ACOUSTIC DATA REPORT (E) The noise, sound and other vibration data required by specification which is in the audible range and above the seismic frequency.
- 10.0 SAMPLES (E)
  - 10.1 A representative data package which will be submitted for the items purchased as required in the specification.
  - 10.2 A representative example of the material to be used.
- 11.0 MATERIAL DESCRIPTION (E) The technical data describing a material which a supplier proposes to use for a specific order. This usually applies to architectural items, e.g.,metal siding, decking, doors, paints, coatings.
- 12.0 WELDING PROCEDURES AND QUALIFICATIONS (E), AND VERIFICATION REPORTS (V) The welding procedure specification and supporting welding procedure qualification test records required for welding, hard facing, overlay, brazing and soldering. A verification report of welds performed includes the identification of the qualified welder(s), and the procedure(s) used, and certification that the welder(s) were qualified.
- 13.0 WELD ROD CONTORL PROCEDURES (E), AND VERIFICATION REPORTS (V) The procedures for controlling issuance, handling, storage and traceability. Verification report(s) for weld rod are defined as cartified material test reports which include the requirements defined by the code and material specification imposed by the procurement documents.
- 14.0 REPAIR PROCEDURES (E), AND MAJOR REPAIR VERIFICATION REPORTS (V) The procedures for controlling material removal and replacement by welding, brazing, etc., subsequent thermal treatments, and final acceptance inspection. Verification reports may include weld repair locations (maps), material set reports for filter metal, pre-and-post-weld heat treatment records, NDE records, etc. The resolution of whether a repair is major or not is a Bechtel resonanciality.

### Appendix A Page 4 of 4 Specification 7220-C-880

- 15.0 CLEARING AND EDATION to 06 (101025 07). AND VERTERATION REPORTS (V) The procedures for removal of dut, grows or solver out to contamination and restocks apply down of protectors mained. Verteraty in reports include restole atom of visual examination. But surface preparation, surface profile, insteady, the Jumetry data, Democranic Relation Control Control as strappined by the parameterist documents.
- 16.0 HEAT TREATER AT PROCEDUINTS (i), AND VEDIFICACITY REPORTS (V) The procedures for controllion temperature, tone at temperature as a function of the kitss, furnace attempted and method, etc. Violation reports normally include furnace charts or similar records which mention and certify the itemisis iterated, the procedure used, turnace attempted to be at temperature, cooling rate, etc. Verification state may be in entire narrative or tabular form.

17.0 CERTIFIED MATCHIAL PROPERTY REPORTS (V)

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- 17.1 MTR (Certified Material Test Reports) These reports include all chemical, physical, mechanical and electrical property test dota required by the material specification and applicable codes. This is applicable to certified materials, cable jacket materials, rebar, rebar, sphices, etc. The certified MTR shall include a statement of conformance that the material ments the specification requirements.
- 17.2 Impact Test Data Results of all Charloy or drop weight tests inclusing specimen configuration, test temperature and fracture data.
- 17.3 Forme Data Report of the ferrite percentage for stainless steel inaterials used, including castings & wolding filler metals as deposited.
- 17.4 Material Certificate of Cumpliance Verification document which certifies conformance to the requirements of the applicable material specification.
- 17.5 Electrical Property Reports Report of electrical characteristics, e.g., thelector, impedance, resistance, flark-lest, corona, etc.
- 18.0 CODE COMPLIANCE (V) Verify eq ducinoents (sich as data Forms U-1, M-2, State, etc.), which are prepared by the manufacturer or installer and certified by the Authorized Code Inspector.
- 19.0 UT ULTRASONIC EXAMINATION PROCEDURES (E). AND VERIFICATION REPORTS (V) Mexical of detection and examination results of presence and certain characteristics of discontinuities and inclusions in elaterials by the use of high frequency acoustic energy.
- 20.0 RT RADIGGRAPHIC EXAMINATION PROCEDURES (E), AND VERIFICATION REPORTS (V) Method of detection and examination results of presence and certain characteristics of discontinuities and inclusions in materials by x-ray or gamma-fav through the photographic film.
- 21.0 MT MAGNETIC PARTICLE EXAMINATION PROCEDURES (E) AND VERIFICATION REPORTS (V) Method of detection and examination results of surface (or near surface) discontinuities or majority marginals by dista tion of an applied majority field.
- 22.0 PT LIQUID FENETRANT EXAMINATION PROCEDURLS (L), AND VERIFICATION REPORTS (V) Method of detection and examination results of surface discriminatios in materials by application of a penetrating liquid in complex with suitable developing feelingues.
- 23.0 EDDY CURRENT EXAMINATION PROCEDURES (E), AND VERIFICATION REPORTS (V) Method for deletion and examination results of discontinuous in material by distortion of an applied dectormagnetic field.
- 24.0 PRESSURE TEST HYDRD, AIR, LEAK, NUGBLE OR VACINES' TEST PROCEDURE (E), AND VERIFICATION REPORTS (V) Method for evaluating the structural and resolution of understanding or integraty or integraty by application of underennal pressures, and report of the test resolution.
- 25.0 INSPECTION PROCEDURE (E). AND VERIFICATION REPORTS (V) Organized process followed for the purpose of determining that specified requirements (dimensions, properties, performance results are inspection are included in the verification report.
- 26.0 PERFORMANCE TEST PROCEDURES (E). AND VERIFICATION REPORTS (V) Tests performed to demonstrate that functional design and operational parameters are miniped wire report of the test results.

26.1 Michanical Tests, e.g., pump curves, valve stroking, load, stimplerature the calibration, environmental, etc.

26.2 Electrical Tests, e.g., load, impulse, overlaad, continuity, voltage, temperature rise, calibration, saturation, loss, etc.

- 27.0 PROTOTYPE TEST REPORT (E & V) Report of a test which is pertonoidul on a standard or typical example of equipment, material or item, and is not required for each item produced in order to substandare the acceptability of equipal items. This normally includes tests which may, or could be expected to, result in damage to the item6.) tested.
- 28.0 SUPPLIER SHIPPING PREPARATION PROCIDUAL R.) The intracidure used by a supplier to prepare functional materials or equipment for shower the following the policy to the jobsite.

New York Street and

Send to Chuck Hunt

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PROBLEM:	"UNCOMPACTED	BACKFILL"	Plant	Area-does	not	Include	Dikes	
Statement of the second statement of the second statement of the second statement of the second statement of the	A REAL PROPERTY AND ADDRESS OF THE OWNER	the second se	the set of	the loss of the				

	6		
<u>15</u>	IS NOT	DISTINCTION	CHANGES
D/G Bldg.	Power Block	Recent Plant Area Fill	Use of both C-210, C-211 Prior - used only C-210
X-Former Pads	Evaporator Bldg	Not part of Dike/ North Plant Area Fill	Sand & clay vx clay alone
Condensate Tanks	Cooling Tower	Fill placed dur- ing different time periods	Two contractors - Bechtel & Canonie
Radwaste Bldg*	Steam Tunnel	Last ares to be backfilled	Bechtel used C-211
Tank Farm≉	Service** Water	Settlements seem to occur in spread type footings	Large equipment to large & small equipment
*Not as signi- ficant or wide spread as other areas Guard House	Circulating Water **Problem exists with sands around structure but not under	Excavation/Re- excavations (sig- nificant areas	Use of ramps/temporary fill
Occurred After 1975	Prior co 1975	Slowdown of 75 with personnel changes Late in jobless emphasis on civil work	Specification interpretation's by didfferent individuals deletion of 4" lift requiremen
		Cooling Pond	Urgent need to see work com-

Filled

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> Urgent need to see work completed

Sand/structural fill used together with clays

Qualification of personnel may have changed

Differing weather conditions

Rebar provlems occurred

PROBLEM: "UNCOMPACTED BACKFILL" Limited to Plant Area - does not Include Dikes

	IS	IS NOT	DISTINCTION	CHANGES
	Plant Area Fill AFter 1975	Plant Area Fill prior to 1975	Sand incorporated in fill	Sand/clay interfaces - softing of clays due to watering
E X T E	elev 612' & »bove	Below elev 612'	Smaller areas of fill	Larger lift thickness for equipment and harder to control lift thickness
т ?	Most signifi- cant problem area south & southeast of Turb Bldg		Most extensive esamination re-excavations	Introduction of smaller equipment
		Glacial Till	Require handling a	s

J H E	Backfill (clay) (sands)	Natural sands	Clays - N/W Plant dike sand/clay rest of area	More mixing & material interfacing
R E Y		Backfill Concrete	Area exposed the longest during construction	More winters

men:

North/West Flant Fill

Pos	sib	le	Caus	es
			-	

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Test	Yes	No	?	Cause
Use of different Specification	x			Problem is only associated with areas which used Spec C-211
Recent Work		×		
Not Part of Dike/Plant (N/W) Area			x	
Placement of Fill during different periods	x			Different personnel different equipment
Last Areas to be Backfilled	x			Schedule pressures
Occurs on spread FIGS	x			Design may be deficient
Excavations Re-Excavation	x			Most significant problem in area when most excavation/re-excavation occurre
Introduction of C-211	x			Differing requirements/people/ interpretations
Different Materials	x			Differing methods for compaction - addition of water to sands
Use of small equipment	x			Not able to compact as effectively ( test pads for small equipment qualify cations)
75 Slow Down	x			Changes in personnel and discontinuit of work
Filled Cooling Pond		x		Designed to be in saturated condition
Less emphasis on civil work	x			Less supervision and inspection
Specification intrepretation	x			Relates to personnel
Larger lifts per spec.	x			Coupled with small equipment

			1.1	
Test	Yes	No	?	Cause
Schedule pressures	x			Complete work hastily
Personnel qualifications	x			No soils engineer on site
Smaller fill areas	x			Relates to equipment and lifts
More Freeze-thaw cycles	x			These areas filled during several winters
Weather (dry or wet) also when material was placed			x	
Removal of temporary ramps and fill	x			Uncompacted materials placed and left in large amounts
Rebar Problem occurred	x			Deals - priorities for inspection/ extent of inspection

### ACTION PLAN

1.	Define problem areas better by boring logs and TOPO's (PMO - work on this).
2.	Define problems by elevations (us. poring logs) (PMO - QA later).
3.	Define difference between C-211 and C-210 (QA).
4.	Define what work was done by Bechtel and Canonie (PMO).
5.	Define where trenches were made (excavations) (photos, TOPO's, etc) (PMO - QA).
6.	List all equipment used by a) Bechtel b) Canonie (photos, rental sheets).
7.	Look at changes in personnel/qualifications (QA, PMO).
8.	Look at assignments of supervision to earthwork by period.
9.	Look at telecons/FCR's to spec, DR's (QA).
10.	Look at specs and also photos.
11.	Look at rate fill in areas there was problems (PMO).
12.	Check problem areas with completion of the year's work (freeze - thaw) do with 4.
13.	Look at number of QC people assigned to soils, their time involved with soils (IR's, FE Reports).
14.	Ramps - Check photos, TOPO's, compare with borings (also gravelly areas in borings)
	(can do in conjunction with 12, 4) (QA, PMO).

make in the state of the contract and in the the state and site and some any in the second of the se

15. Review weather date for periods of problems (PMO).

# DIMINUE STATECTED BACKFUL"

DG Bldg Admin Bldg Transf FND Cond Tank Area Diesel Tanks

Is

WHERE PI

WHAT

Plant Fill Area

Pond Dikes Plant Area Dikes Incl Evap Bldg Cooling Tower Radwaste Bldg Tank Farm Area Pipe Tunnel

IIs Not

Glacial Till (Undisturbed) Insitu Natural Sand Backfill under Powerblock N&W Plant Dikes Pond Dikes Undisturbed Plant Fill (? Cond Tank

in

Area)

Spec / Acceptance Criteria Diff Material

Distinctions

Smaller Areas Temporary Fill Ramps Q-Listed Process (Inspection) Reliance on Testing

**Changes** 

Small Equipment Nonuniform Compaction Different Contractors Test Frequency

# POSSIBLE CAUSES

SPECIFICATION / ACCEPTANCE CRITERIA TESTING DIFFERENT MATERIAL STRUCTURAL BACKFILL RLEXCAVATED AND REFILLED AREA (Procedures and Controls) SMALLER AREAS NONUNIFORM COMPACTION SMALL EQUI PMENT (Large Lifts) TEMPORARY IFILL NOT REMOVED RAMPS NOT REMOVED DIFFERENT CONTRACTORS **TEST FREQUENCY** 

Provide and the stand of the investor

hi alore

Test

### Cause

No Used All over Site Questionable, under Review, Check RAW Under Review, Relates to Proctors No Used All over Site Investigate Photos, Procedures; Controls No May continue experially flat Subcategory of Reexcavated Area as consider and Used All over Site Review Photos

**Review Photos** 

No (6)

? Check R/W

# POSSIBLE CAUSES (Ccn1.)

2

Test

Q-LI STED PROCESS (Inspection Process) ROND FILLED

74-75 SLOWDOWN 76-77 Dry Yiears BORROW AREA (Stockpile) INITIAL MOISTURE CONTENT FINAL MOISTURE CONTENT LATE IN SCHEDULE MORE WINTERS PERSONNEL PROXIMITY TO CCOLING POND EXTENSIVE C. STOR U/G INSTALLATIONS

### 'Cause

Except for IR/W

Other Areas Have Not Settled Although Pond Fiffed New

Impacted Personnel, Procedures, Controls ? Involves Moisture Content Questions Below Involves Moisture Content Questions Below

that falet issue

Under Review with Tests

Under Review with Tests 2

**Giber Areas Not Affected** 051

Other Areas Not Affected No

me Math Daniel

# ITERIS TO REVESTIGATE FOR MOST PROBABLE CAUSE(S)

REEXCAVATION AND BACKFILL

Material Selection

Inadequate Procedures & Controls

Review Photos, Procedures, Controls & Subcontractor Daily Reports

TEMPORARY FILL AND RAMPS NOT REMOVED

Inadequate Procedures & Controls

Review Photos, Procedures, Controls & Subcontractor Daily Reports

Q-LISTED PROCESS-INSPECTION PROCESS (7)

Review Surveillance & Inspection Procedures in Relation to Other Findings

Audit Procedures Bechtel and Canonie

TESTING

Results are Questionable - Relied on

Testing is under Review

Procedure Changed 9/78

PERSONNEL

Minimal Involvement of Technical Support after 74-75 Slowdown

Bulk of Earthwork Complete

Review Qualifications of Testing, Inspection, & Supervisory Personnel

71.1 +1

CAHunt,	P14-209B
	(h)
TCCooke	RIAL CEC

DATE February 20, 1979

SUBJECT MIDLAND PROJECT GNO 7020 - SETTLEMENT OF MIDLAND DIESEL GENERATOR BUILDING File: B3.0.3 Serial: CSC-3852

CC GSKeeley

Reference: CPCo Memo - DRW-12-78 and DRW-13-78

In : aference to the comments presented in DRW-13-78, we provide the following response for each numbered comment.

- Although the Bechtel summary reports the percentage as percent compaction, it is in fact percent relative density. A relative density of 125% does seem to be unreasonable, however, our efforts have been focused on clays. A number of proctor curves have been examined for compatibility with the zero air voids curve and some of these tests fall outside the curve which would indicate the selection of an incorrect standard for that particular type fill.
- Many tests were conducted other than those attached. A ramp was constructed in this area and these tests were not included but tests were available.
- Tests are requested to be taken every 500 cubic yards. There is no specification requirement to locate tests under buildings, utilities, or other references. Therefore, test locations are randomly selected.
- 4. With the addition of the ramp tests, the number of tests appear to exceed the amount required. Since location is not addressed by the specification, we cannot address the question of test locations.
- In determining the causes for this problem these items are being examined.
- 6. The borings and resultant tests are being examined both by Bechtel and the consultants.
- An extensive monitoring program has been implemented to identify the magnitude of differential settlements.
- The settlement rate for the Diesel Generator Building is significantly greater than that observed in other structures.
- 9. There are no settlement vs. time curves to compare the to date settlements with, but continued monitoring has shown that during the preload cycle the settling has started to slow down and to

Concumers Power Company

INTERNAL CORRESPONDENCE

To

FROM

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Page 2 CAllunt File: B3.0.3 Serial: CSC-3852

> level off as more weight is added to the area around the buildings. It is safe to say, however, that the to date settlements exceed Bechtel's expectations.

We hope this satisfactorily addresses your comments. We assume that any other comments or questions have been brought out at subsequent meetings with Bechtel's consultants and ourselves, which you have attended.

Should you have any further questions, please contact us.

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Cause Investigation and Analysis of Plant Area Backfill Settlement Problems          DAY       Wednesday, May 30, 1979         DAY       9:30 a.m.         TIME       9:30 a.m.         TO       Noon         LOCATION       Omference Room 7B3         ATTENDEES       Bechtel         Bechtel       Consumers         S. Afifi       D. Born         A. BOOS       C. Bunt         R. Castleberry (optional)       B. Wheeler         B. Dhar       B. Wheeler         J. Bink       P. Martinez         G. Richardson       SEND REPRESENTATION         PURPOSE OF THE MEETING       Discuss action items listed in March 12, 1979 meeting notes (each att-andree is requested to prepare responses to the action items as appropriate)         O       Discuss action items listed in March 12, 1979 meeting notes (each att-andree is requested to prepare responses to the action items as appropriate)         O       Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.         Cagenda ATTACHED       MEETING NOTES WILL BE DISTRIBUTED         Charleberr       Y169       5/22/79	UBJECT	OF THE MEETING			
DAY Wednesday, May 30, 1979 TIME 9:30 a.m.  DOAY Onference Room 7B3  UCCATION Onference Room 7B3  UTTENDEES Bechtel Consumers S. Afifi D. Born A. Boos C. Hunt R. Castleberry (optional) B. Wheeler J. Bink P. Martinez G. Richardson J. Wanzeck K. Wiedner The addresse, checked abow, if unable to stand, is requested to: ONFIFY CHAIRPERSON SEND REPRESENTATION URPOSE OF THE MEETING O Discuss action items listed in March 12, 1979 meeting notes (each att-andee is requested to prepare responses to the action items as appropriate) O Discuss action items listed in March 12, 1979 meeting notes (each att-andee is requested to prepare responses to the action items as appropriate) O Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.  AGENDA ATTACHED MEETING NOTES WILL BE DISTRIBUTED HAIRPERSON PHONE DATE Karl Wiedner x 7169 5/22/79		Cause Investiga Backfill Settle	ation and Analys. Ement Problems	is of Plant Area	
DAY					
TIME 9:30 a.m. TO NOON  LOCATION Onference Room 7B3  ATTENDEES  ATTENDEES  S. Afifi D. Born A. Boos C. Bunt R. Castleberry (optional) B. Wheeler B. Dhar J. Eink P. Martinez G. Richardson J. Wanzeck K. Wiedner  The addresse, checked above, if unable to strand, is requested to: S NOTIFY CHAIRPERSON SEND REPRESENTATION  PURPOSE OF THE MEETING  O Discuss action items listed in March 12, 1979 meeting notes (each attandee is requested to prepare responses to the action items as appropriate)  O Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.  AGENDA ATTACHED MEETING NOTES WILL BE DISTRIBUTED  MAIRPERSON PHONE DATE Karl Wiedner x 7169 5/22/79	DAY	Wednesday, May	30, 1979		
LOCATION <u>Conference Room 7B3</u> ATTENDEES Bechtel Consumers S. Afifi D. Born A. Boos C. Bunt R. CastLeberry (optional) B. Wheeler B. Dhar J. Bink P. Martinez G. Richardson J. Wanzeck K. Wiedner The addressee, checked above, if unable to attend, is requested to: C. NOTIFY CHAIRPERSON SEND REPRESENTATION PURPOSE OF THE MEETING O Discuss action items listed in March 12, 1979 meeting notes (each attardee is requested to prepare responses to the action items as appropriate) O Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979. AGENDA ATTACHED MEETING NOTES WILL BE DISTRIBUTED MAIRPERSON PHONE DATE Karl Wiedner x 7169 5/22/79		9:30 a.m.		Noon	
ATTENDEES           Bechtel         Consumers           S. Afifi         D. Born           A. Boos         C. Bunt           R. Castleberry (optional)         B. Wheeler           B. Dhar         J. Bink           F. Martinez         G. Richardson           J. Wanzeck         K. Wiedner   The addresse, checked above, if unable to attend, is requested to:           Image: Notify CHAIRPERSON         SEND REPRESENTATION   PURPOSE OF THE MEETING           O         Discuss action items listed in March 12, 1979 meeting notes (each attandee is requested to prepare responses to the action items as appropriate)           O         Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.             AGENDA ATTACHED         MEETING NOTES WILL BE DISTRIBUTED   HAIRPERSON PHONE DATE           Karl Wiedner         x 7169	LOCATIO	ON <u>Conference</u>	e Roam 783		
S. Afifi       D. Born         A. Boos       C. Bunt         R. Castleberry (optional)       B. Wheeler         B. Dhar       J. Bink         J. Bink       P. Martinez         G. Richardson       J. Wanzeck         K. Wiedner       NOTIFY CHAIRPERSON         Discuss action items listed in March 12, 1979 meeting notes (each attandee is requested to prepare responses to the action items as appropriate)         o       Discuss action items listed in March 12, 1979 meeting notes (each attandee is requested to prepare responses to the action items as appropriate)         o       Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.         AGENDA ATTACHED       MEETING NOTES WILL BE DISTRIBUTED         MAIRPERSON       PHONE       DATE         Karl Wiedner       x 7169       5/22/79	TTEND	ES Bechtel		Consumers	
A. Boos C. Hunt R. Castleberry (optional) B. Wheeler B. Dhar J. Bink P. Martinez G. Richardson J. Wanzeck K. Wiedner The addressee, checked above, if unable to attand, is requested to: NOTIFY CHAIRPERSON SEND REPRESENTATION URPOSE OF THE MEETING O Discuss action items listed in March 12, 1979 meeting notes (each attandee is requested to prepare responses to the action items as appropriate) O Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979. AGENDA ATTACHED MEETING NOTES WILL BE DISTRIBUTED HAIRPFERSON PHONE DATE Karl Wiedner x 7169 5/22/79		S. Afifi		D. Horn	
R. Castleberry (optional)       B. Name         B. Dhar       J. Hink         P. Martinez       G. Richardson         J. Wanzeck       K. Wiedner         The addressee, checked above, if unable to attend, is requested to:       Image: Comparison of the compare responses to the action items as appropriate)         O       Discuss action items listed in March 12, 1979 meeting notes (each attandee is requested to prepare responses to the action items as appropriate)         O       Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.         Image: Additional of the comparison o		A. Boos	(ambienel)	C. Hunt	
J. Bink         J. Martinez         G. Richardson         J. Wanzeck         K. Wiedner         The addressee, checked above, if unable to attend, is requested to:         Image: NOTIFY CHAIRPERSON         Image: SEND REPRESENTATION         URPOSE OF THE MEETING         O       Discuss action items listed in March 12, 1979 meeting notes (each attendee is requested to prepare responses to the action items as appropriate)         O       Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.         AGENDA ATTACHED       Immeeting NOTES WILL BE DISTRIBUTED         HAIRPERSON       PHONE         DATE       Karl Wiedner         x 7169       5/22/79		R. Castleberry	(Optional)	B. WINBELET	
P. Martinez         G. Richardson         J. Wanzeck         K. Wiedner         The addressee, checked above, if unable to attend, is requested to:         Image: Comparison in terms is requested to:         Image: Comparison is the comparison is requested to:         Image: Comparison is terms listed in March 12, 1979 meeting notes (each attendee is requested to prepare responses to the action items as appropriate)         O       Discuss action items listed in March 12, 1979 meeting notes (each attendee is requested to prepare responses to the action items as appropriate)         O       Prepare outline and strategy for cause presentation to NRC scheduled for mid-June, 1979.         AGENDA ATTACHED       Immetring NOTES WILL BE DISTRIBUTED         HAIRPERSON       PHONE         Karl Wiedner       x 7169		J. Hink			
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Karl Wiedner x 7169 5/22/79	HAIRPE	RSON	PHONE	DATE	
		Wiedner	x 7169	5/22/79	

3.8.7 74-

BECHTEL INVESTIGATION INTO CAUSES OF DIESEL GENERATOR BUILDING SETTLEMENT

-

....

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Consumers Power Company Midland Plant Units 1 and 2

# DEVIATION STATEMENT: "INSUFFICIENTLY COMPACTED BACKFILL"

Is

-

### Is Not

# DG Bldg Admin Bldg Transf FND Cond Tank Area Diesel Tanks

WHERE

WHAT

Plant Fill Area

Pond Dikes Plant Area Dikes incl Evap Bldg Cooling Tower Radwaste Bldg Tank Farm Area Pipe Tunnel Glacial Till (Undisturbed) Insitu Natural Sand Backfill under Powerblock

N&W Plant Dikes

**Undisturbed** Plant

Fill (? Cond Tank

Pond Dikes

Area)

### Distinctions

Spec / Acceptance Criteria Diff Material

Smaller Areas Temporary Fill Ramps Q-Listed Process (Inspection)

### Changes

**Reliance on Testing** 

Introduced Struct Backfill

Small Equipment Nonuniform Compaction Different Contractors Test Frequency

### Preliminary 2/15/79

- ----

.

# DEVIATION STATEMENT: "INSUFFICIENTLY COMPACTED BACKFILL" (Cont.)

YH	EN	

Sept 77 Admin Mid 78 Other

Is

Is Not

Prior to 1977

Distinctions

Changes

Pond Filled 74-75 Slowdown 76-77 Dry Yrs Late in Schedule Borrow Area Moisture Personnel Initial Moisture Content More Winters

EXTENT Area South of Turbine Bldg in the Upper Portion of the Fill Approx EL 615 to EL 628 Elsewhere or Below EL 615 Proximity to Cooling Pond Extensive U/G Installations Reexcavated Area

Preliminary 2/15/79

0-04 76-02

# **POSSIBLE CAUSES**

# Test

\*

### Cause

PECIFICATION / ACCEPTANCE CRITERIA
ESTING
IFFERENT MATERIAL
TRUCTURAL BACKFILL
REEXCAVATED AND REFILLED AREA Procedures and Controls)
SMALLER AREAS
NONUNIFORM COMPACTION
SMALL EQUIPMENT (Large Lifts)
TEMPORARY FILL NOT REMOVED?
RAMPS NOT REMOVED?
DIFFERENT CONTRACTORS
TEST FREQUENCY

No	Used All over Site
~	Questionable, under Review, Check R/W
?	Under Review, Relates to Proctors
No	Used All over Site
~	
	Investigate Photos, Procedures, Controls
No	
	Subcategory of Reexcavated Area
	Used All over Site
~	Review Photos
~	Review Photos
No	
?	Check R/W

# Preliminary 2/15/79

0-0478-04

# **POSSIBLE CAUSES (Cont.)**

7

### Test

Q-LISTED PROCESS (Inspection Process) POND FILLED

74-75 SLOWDOWN 76-77 Dry Years BORROW AREA (Stockpile) INITIAL MOISTURE CONTENT FINAL MOISTURE CONTENT LATE IN SCHEDULE MORE WINTERS PERSONNEL PROXIMITY TO COOLING POND EXTENSIVE UNDERGROUND INSTALLATIONS

### Cause

~	Except for R/W
	Other Areas Have Not Settled Although Pond Filled Now
?	Impacted Personnel, Procedures, Controls
?	Involves Moisture Content Questions Below
?	Involves Moisture Content Questions Below
?	Under Review with Tests
?	Under Review with Tests
No	Other Areas Not Affected
No	Other Areas Not Affected
~	

Preliminary 2/15/79

G-0476-06

# ITEMS TO INVESTIGATE FOR MOST PROBABLE CAUSE(S)

### **REEXCAVATION AND BACKFILL**

Material Selection Inadequate Procedures & Controls Review Photos, Procedures, Controls & Subcontractor Daily Reports

# TEMPORARY FILL AND RAMPS NOT REMOVED

Inadequate Procedures & Controls Review Photos, Procedures, Controls & Subcontractor Dally Reports

# **Q-LISTED PROCESS-INSPECTION PROCESS**

Review Surveillance & Inspection Procedures in Relation to Other Findings Audit Procedures Bechtel and Canonie

### TESTING

-

Results are Questionable - Relied on Testing is under Review Procedure Changed 9/78

### PERSONNEL

Minimal Involvement of Technical Support after 74-75 Slowdown Bulk of Earthwork Complete

Review Qualifications of Testing, Inspection, & Supervisory Personnel

# **Bechtel Power Corporation**

Midland Units 1 and 2 Bechtal Job 7220

February 16, 1979

### PREL IMINARY

### PROBLEM OF INSUFFICIENTLY COMPACTED BACKFILL

### QUESTIONS to be INVESTIGATED to ARRIVE at MOST FROBABLE CAUSE(S)

- (1) Re-excevation and backfill process --
  - (a) Material mix unacceptable?
  - (b) Construction did/did not have adequate procedural control for this type of activity?
- (2) Nonremoval of temporary fill and construction ramps?
- (3) Was inspection process by Bechtel (QC, Field Engineering and Subcontracts), Canonie QC, and sudit process adequate?
- (4) Nonrepresentative or invalid test results used as acceptance criteria?
- (5) Personnel --

.

- (a) Insufficient support by technical groups such as Geotech?
- (b) Turnover due to Project delays?
- (c) Turnover in UST personnel?
- (d) Qualification of all parties (Bechtel Field Engineering, QC, Canonie, UST technicians, etc.)?
Bechtel Power Corporation Midland Units 1 and 2 Bechtel Job 7220

February 16, 1979

### TASK FORCE PLAN

# INVESTIGATION INTO CAUSE(S) OF INSUFFICIENTLY COMPACTED BACKFILL

QUESTION		Investigate By	Investigation		
1)	Re-excavation & back fill process-				
	a) Material mix unacceptable?	Consultant review	Planned		
	b) Construction did/iid not have adequate procedural control for this type of activity?	Review of records (QCIRs, Subcon. reports, etc.)	Planned		
2)	Nonremoval of temp. fill & con- struction ramps?	Review of Construction records, photos, soil test records, Canonie's records.	In process		
3)	Was inspection process by Bechtel (QC, Field Eng. & Subcontracts), Canonie QC and audit process ade- quate?	Plot soil test results & review QCIRs, Canonie daily reports, audit re- ports, NCEs.	In process		
4)	Nonrepresentative or invalid test results used as acceptance cri- teria?	Review UST records; plot & review soil test records; select & dig test pits.	In process		
5)	Personnel				
	a) Insufficient support by tech. groups such as Geotech?	Review freq. of visits & trip reports.	Planned		
	b) Turnover due to Project delays?	Review Project manpower records.	Planned		
	c) Turnover in UST personnel?	Reviewing UST records.	Planned		
	<ul> <li>d) Qualification of all parties? (Bechtel Field Eng., QC,</li> <li>Canonie, UST technicians, etc.)</li> </ul>	Review personnel records & resumes, training rec- ords.	Planned		

MAP !

P. A. Martinez

MIDLAND PROJECT GNO 7020 - DIESEL CENERATOR FOUNDATION PRELIMINARY DEVIATION STATEMENT 2/15/79 (Kepler - Tregue Analysis) File: Serial:

We have some comments on the Bechtel's approach to identify the "most probable causes." Because the analysis could be self serving, CPCo has asked and Bechtel has agreed that CPCo should provide comments. These comments are noted below:

- Can Bechtel provide information regarding the levels of confidence which can be obtained in arriving at the most probable cause(s).
- 2. The individual items considered are broad and general rather than specific and narrow. By not being specific, certain basic items are deleted and will be ignored or forgotten in the final analysis. We believe specification/ acceptance is one of the distinctions which is deleted on broad and general analysis while in fact it is very germain to the cause discussion.
- 3. This method also discards items which are not different and concludes they are not problems. One could argue that this is not valid and use the liner plate bulge as an example. Embedded pipe was used on other projects and even in other areas of this project, yet at Midland it froze, cracked the concrete and bulged the liner plate.
- 4. We also note that development of CPCo and Bechtel Field were not involved in the development of the K-T Analysis used for this presentation.

Specific comments on analysis items listed by Bechtel:

Page 1:

A. Second column; Radwaste Building and Tank Farm area should be under IS
 E. Fifth column; Introduced Struct. Backfill - cite specification C-211.

- . C. Should also add the difference in Spec C-210, C-211.
  - D. Method for compacting material for dikes vs. plant area fill (excluding north & west plant area) was different. Should be included under changes.
     Under Changes; less inspection should be included.

#### Page 2:

- A. Third Column; Elsewhere or below 615' Was this material excavated (disturbed)?
- B. <u>Column 4 74-75 Slowdown</u> The time during the slow down (1974-75) would have provided more time for natural consolidation which was an early 1900's method of compaction.
- C. <u>Column 5 More winters</u> The local of the fill affected by "number of winters" is probably below elevation 615. Since this locale is supposedly satisfactorily compacted "winters" in itself should not be considered as an adverse factor. Incorporation of frozen backfill should be considered, however.
- D. <u>Column 5 Opposite "Extent"</u> The lower part of the Diesel Generator building foundation which lies below elev. 615' has already been subjected to preloading by the 20' of fill above it. Since portions of the lower part of the fill appears to be satisfactory preloading promises good results for the upper 20' of fill this observation may render the distinction of elevation of no consequence. In reviews of your records the differences in the fill between the lower and upper elevations should be documented and analyzed.

#### Page 3:

N. <u>Column 3 - Distinction</u> - Because buildings were constructed the problem was discovered. This should be added as a distinction. <u>Is not - Prior to 1977</u> - Special emphasis has been placed on the work below 615' and prior to 1977. Obviously, the time period should be developed for the fill placed below elev. 615', and the conditions in which placement was executed. It should 1so be determined whether major re-excavations were made below elevation 615' and whether sand was re-introduced to the fill below elevation 615'. In total Bechtel should scope the extent of the re-excavations in the problem areas.

- B. <u>Different Material and different contractors</u> relates to the capabilities of the individual personnel involved. Both these areas should be checked as a possible cause.
- C. <u>Re-excavated and refilled area</u> More research is required to define whether materials in question were disturbed.
- D. <u>Small areas Small equipment</u> These two items may contribute to nonuniform and inadequate compaction and should be included as a possible cause.

Page 4:

- A. Initial & Final Moisture Content should be examined from a time and elevation standpoint.
- B. <u>Proximity to cooling pond</u> This item should be answered "no" at this time considering the test item "pond filled".
- C. Testing Inspection Should also be ticd in with elevation and timing.

Listed below are some of the items we feel should be investigated as possible causes:

- Application of different specification creiteria may have contributed to the problem. Specifications may not have been clear or simple enough to satisfy proper implementation.
- Backfill sand and clay interfaces may have not been blended correctly. Sand in this regard may have been a problem.
- The fact that the work under the D/G Building was completed in smaller areas may have contributed to the problem.
- From borings it would appear that non-uniform compaction may be a site wide problem.

- The use of smaller equipment and large lifts should be included as a possible cause.
- Because Bechtel and Canonie both worked extensively in this area we feel that this aspect should be investigated. (This would relate also to inspection effort, controls and space.)
- Structural backfill and pit run sands may not have been placed in the correct areas.
- Buring placement of foundation footings, the underlying soil may have been frozen and subsequently heaved.
- Frozen soil may have been incorporated in the fill and covered by subsequent lifts.
- Equipment utilized for small areas may not have been adequate to achieve the required compaction.
- Material placement and compaction may not have been properly supervised or inspected.
- Areas of re-excavation may not have been dressed up to blend with materials used for trench backfill.
- 13. Fill may have been placed during rainy days.
- 14. Material may have been placed but not compacted, or test frequency required by specifications may have not been adequate for small areas.
- 15. Bechtel inspection was not as detailed or comprehensive as Canonie (lift checks, time in field).
- 16. No qualified soils engineer on site during 1975-1977 backfill operations.
- No plots of tests made to assure uniform coverage. This may be a specification
   deficiency.
- 18. Test location incorrectly called out.
- 19. Areas may have been prepared solely for the purpose of taking a test.
- Test records were not reviewed in a timely fashion and in the depth necessary to identify testing errors.

- Investigate the refill vs. the primry process of placing soils. There could be some differences that cause the problem.
- 22. Look hard at the Bechtel vs. Canonie performance why was there a difference in performance.
- 23. Flooding sand in trenches was a common practice to achieve compaction. It may
- be that surrounding clays were saturated and subsequently softened resulting in weak fill and poorly compacted sands.
- 24. Bechtel's QC involvement administration and direction of U.S. Testing activities may have resulted in inadequate testing procedures.

The above comments do not necessarily provide guidance or limit the extent of possible concerns or areas of investigation and should not be constructed as such.

41

То	BWMarguglio, JSC-220A		
FROM DATE	DEHorn, Midland SC44 9 October 31, 1978		Consumers Power
SUBJECT	MIDLAND PROJECT - NRC EXIT INTERVIEW OF OCTOBER 27, 1978 File: 0.4.2 Serial: 280FQA78		INTERNAL CORRESPONDENCE
cc	SAfifi, Bechtel - Ann Arbor WRBird, JSC-216B RLCastleberry, Bechtel - Ann Arbor TCCooke, Midland	JLCorley, Midland GSKeeley, P14-408B DBMiller, Midland JFNewgen, Bechtel	

The following people were in attendance at the subject exit interview which was conducted at the end of G. J. Gallagher's inspection of October 24-27, 1978:

CPCo	Bechtel	NRC
RCBauman TCCooke	WLBarclay ABoos	RJCook GJGallagher
JLCorley DEHorn	RLCastleberry LADreisbach	
GSKeeley DBMiller BHPock	PAMartinez	
RMWheeler		•

Mr. Gallagher stated that the visit was a follow-up on 50.55(e) report of the diesel generator settlement and that it was also a fact finding visit. The inspection consisted of a review of past data, activities in progress and planned activities for future work. Inspection was performed by review of the FSAR commitments; Specification C-210; Specification C-211; PQCI/IR C-1.02; Dames and Moore Report of Foundation Investigation and Preliminary Explorations for Borrowed Materials dated June 28, 1968 and supplement to this report dated March 15, 1969; preliminary data on diesel generator settlement problem including boring plan, cross sections of fill, blow count versus the elevation graphs, lab data, settlement data, boring logs, dutch cone logs, weather data and penetrameter readings in test pits; design drawings C-45, C-109, C-117 and C-1001; soil tests taken in the diesel generator building area during construction compiled by B. T. Cheek, Bechtel QC; observation of soil testing at the test lab and in the field; and discussions with Bechtel Geo-Tech, Project Engineering, Field Engineering, Quality Control Engineering, U.S. Testing, Consumers Power Company, PMO and QA personnel. Mr. Gallagher stated that he would not handle the findings as noncompliances, however, they could become items of noncompliance when they are reviewed by his management.

His findings/observations were as follows:

1. The FSAR states that during operation, settlement readings will be taken every 90 days. Because of the diesel generator settlement problem, this frequency should be re-evaluated for adequacy.

11-3

- FSAR Table 2.5-14 "Summary of Foundation Supporting Seismic Category I Structures" identifies the supporting soil materials under the diesel generator 2. building as being controlled, compacted cohesive soils. However, construction drawing C-109, Rev. 9 and C-117, Rev. 6 identifies the material in this area as Zone 2 material. Zone 2 material is identified as random fill described as any material free of organic or other deleterious materials. In the field a variety of materials have been used for the diesel generator foundation material, in particular, sands, clay, and lean concrete, silty sands and clayey sands. The apparent conflict is that Table 2.5-14 identifies cohesive soils where, in actuality, cohesionless sands have been utilized. A review of the records indicate that sands have been used between elevation 594'-608', areas of elevation 611'-613' and areas between 616'-268'. This indicates the extent of the variability of the material placed under the diesel generator building foundation. Mr. Gallagher did not feel it was good judgement to use random material under the support of a structure.
- 3. FSAR Table 2.5-21 "Summary of Compaction Requirements" identify random fill to require a compaction effort of a minimum of 4 passes with the specified equipment in this table. This requirement has not been an imposed requirement of Bechtel Specification C-210 nor an inspection requirement of Bechtel Quality Control Instruction C-1.02 for backfill.
- 4. FSAR section 3.8.5.5 states that settlements of shallow spread footings founded on compacted fill are estimated to be on the order of ½" or less. Site Survey Program has identified settlements in the diesel generator building foundation on spread footings to range from 0.55 inches to 2.30 inches and in excess of 3.0 inches for the diesel generator pedestal.
- 5. FSAR figure 2.5-47 indicates the foundation of the diesel generator building to be at elevation 634', according to design drawings C-1001, Rev. 5 it is indicated for the diesel generator spread footings and pedestal foundation to be at 628'.
- Specification C-210, section 13.7.1 requires all cohesive backfill in the plant area to be compacted to not less than 95% maximum density as deter-5. A. mined by ASTM D1557 method D which requires an effective compactive effort of 56,000 foot-pounds of energy per cubic foot of soil. However, section 13.4 Testing requires testing of the materials placed in the plant area to be performed in accordance with tests listed in section 12.4. This section, in particular section 12.4.5.1, "Cohesive Soils," requires maximum lab densities to be determined using ASTM D1557 Method D provided a compactive energy equal to 20,000 foot-pounds per cubmic foot is applied (Bechtel Modified Proctor Density). To date, the Bechtel Modified Proctor Density for determining maximum proctor density versus optimum moisture content has been utilized. This conflict results in an unconservative method of determining the maximum proctor density and method of assuring that the required percent compaction is achieved. In particular, the actual in-place compaction would be less using the Bechtel Modified Proctor Density as a reference than using the standard ASTM D1557 method D. This is due to the fact that the compactive energy exerted using the Bechtel Modified Method is less than the effort exerted by the standard method D example: 20,000 foot-pounds versus 56,000 foot-pounds.

Bechtel Quality Control Instruction C-1. 12 section 2.4 testing identifies the applicable inspection criteria and includes Specification C-210, section 13.7 and 12.4 which includes the apparent conflict as described in A further review of the original subsurface investigation performed by Dames and Mocre and Volumented in report supplement dated March 15, 1969 detail in Part A above.

page 16 indicates that the recremented in report supplement dated March 15, 196 page to indice us that the recommanded finimum completion criteria for support of structures be 100% of maximum density using a compactive effort of 20,000 footenantie (reculting from Bookrel Modified Proctor determine support of structures be 100% of maximum density using a compactive efform of 20,000 foot-pounds (regulating from Bechtel Modified Proctor determina-tion). However, this 100% of Bechtel Modified Proctor corresponds to 95% compactive accurding to the standard ASTA DISS7 method D and put 95% tion). However, this 100% of Bechtel Nowiffed Proctor corresponds to 95% common according to the standard ASTN D1557 method D and not 95% common according to Bechtel Modified Proctor method which has been utilized for the entire plant full uses for data. Furthermore, Dames and Moore for the entire plant fill area to data. Furthermore, Dames and Moore Report, page 15 states that all fill and backfill material should be Not one entire plant Like erea to data. Furthermore, Wames and moore Report, page 15 states that all fill and backfill material should be placed at or near the optimula moiscure content in near horizon al lifts approxiat or near the optimum moiscure content in near holizon at this approximately 6-8" in loose thicknest. Bechtel specification pendits a maximum of 12 inches which affects the compactability of the material. Piping, condensate lines, duct banks, and other utilities under the diesel generator building may also be affected and must be evaluated. Mr. Gallagher stated he was leaving not having seen design calculations and will be discussing design calculations account in a made and conflicts with will be discussing design calculations, accumptions made, and conflicts with the FSAR with Licensing

7.

- The inspector observed the structural concrete crack that has developed in the east effector wall. The crack was observed with members from Bechtel the FSAR with Licensing-8.
- Well and continued down through the spread footing as seen from the facily of wall and continued down through the spreaf footing as seen from the inside of the building The enach is expected to have been deduced flowwrally caused wall and continued down through the spreaf rooting as seen itom the inside of the building. The crack is expected to have been induced flexurally caused by differential entriement. Discussion with Real tol design back has indice by differential settlement. Discussion with Becktel design Staff has indicated Act-318-71 by differencial settlement. Discussion with Beckter design start has indicate that this track is under study and is surrencly being evaluated. ACI-318-71 that this track is under study and 15 suffering being evaluated. Aut-sight in the commentary section 10.6.4 limits flexural crack exposed to the outside to 0.012" Corrective action any to realize of this limit is exceeded. 9. in the commentary section 10.5.4 limits flexural crack exposed to the out to 0.013". Corrective action may be required if this limit is exceeded. The following tests were observed to be performed in accordance with the applic-

able tests stardards by U.S. Testing:

10. A. Lab Test ASIM D1557-70

Calculations should be scaluated on the increase and the rate of increase B. , Field Test ASTM D/1556-64'

of the pond fill and the effects of the water in other areas. Mr. Callagher stated that the NRC does not view preloading of the structure 13. Seismic loading calculations should be determined for the type of material to be a fix of resolution of the problem of this the. 11.

12.

existing in its provent condition.



Inconsistencies Discovered to Date Page 2

4) References:

a. Bechtel Design Standard C-501

b. Bechtel Spec C-211

AA Bechtel Design Standard - Table of Minimum Compaction Criteria

On site Purpose of fill Sand soil support of structure Percent relative density \_\_\_\_ 852 (D2049-69) sign Thing. under Buld

Spec C-211, Section 5.5.1 - "Cohesionless (sand) material shall be compacted to not less than 80% relative density.... by ASTM D. 2049"

Spec and Design Standard conflict.

5) References:

1.7.5 ::0

Dames & Moore Report (Page 14) [.a.

FSAR Page 2-7 b.

Drawing C-44

Dames & Moore - "It is recommended that all areas in which the final grade will be raised by placement of fill be stripped of all topsoil and other unsuitable soil if any and be thoroughly proof rolled."

FSAR - "All loose in-site sands, soft or compressible clay soils, and organic suils will be excavated in the Turbine Building area."

Bechtel Drawing C-44, Note #4 - "Within the excavation area shown all loose With John surficial sands with relative density less than 75% shall be removed." 621

Veur

Added to this drawing 8/23/75.

Boring logs show us that the soil was not removed, however, it may be greater than 75%.

Vibration + ....





1.1 2 . 500 -

2:



80EP10.1.3 General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • (517) 788-0550

January 23, 1980

Mr Tom Newell Acting District Engineer PO Box 30028 Lansing, MI 43909

MIDLAND PLANT - SITE DEWATERING

As part of the engineering design to control groundwater elevation in the area North of the cooling pond, dewatering wells have been installed by Loughney Dewatering, Inc, Certificate of Registration under Act 294 attached. Approximately 138 temporary wells (1-1/2") have been installed since August 1, 1979. Identification of individual wells, well depth and estimated pumping rate of each 'series' of wells is provided in the attached data sheets. Well locations are identified in the attached drawing entitled "Midland Power Plant, Temporary Dewatering Well Locations".

The dewatering discharge of all wells will be directed to the cooling pond. As you can see from the data sheets, the flow to the pond will be about 320 gpm. Data derived from the temporary dewatering operation will aid in the design and operation of a number of permanent dewatering wells to be installed at some future date.

The Company requests dewatering as described above be addressed in the following parts of the draft Midland NPDES permit issued January 2, 1980:

- (1) Fact S. set
- (2) Final Effluent Limitations Cooling Pond Discharge prior to cutfall 001, page 6 of 19.

The dewstering discharge to the cooling pond is expected to commence January 31, 1980. Unless advised otherwise by Staff, the dewatering discharge to the pond will proceed as scheduled.

If you have any questions regarding this matter, please let me know.

Ronald & Fobes

R L Fobes Environmental Advisor

BCC TCCooke/RLBull, Midland DLAndersen, Midland RCBauman, P-14-412 RFGreen, P-14-303 Cillant/TRTniruvengedam, P-14-209B w/calledno.tc

CC Chang Bek

RLF/ksh

3	To Typist: (Public Line)	49201 + (517) 788-0650
Evaluation of the Turbine Building Wall is a strengthening of the Turbine Buil	In response to the conflicts addressed in NRC Inspection Reports 50-329/78-12 and 50-330/78-12 dated November 14, 1978, an FSAR change notice has been initiated to correct the talineing discrepancies, KE TAISERT B CHARGEN discrepancies, Further evaluation of the additional items are continuing and Will be addressed in subsequent reports.	NC NC Provided in the state trached drawing entitled ions". Will be directed to the he flow to the pond will dewatering operation will manent dewatering wells scribed above be address hermit issued January 2, ling Pond Discharge prio ug pond is expected to co caff, the dewatering disc his matter, please let me BCC TCCooke/RLBull, DLAndersen, Mid

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cooling pond. be about 320 l aid in the to be installed

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Midland land 412 03

rengadam, P-14-209B upe attachmente

Tu	File	
From	JEBrunner, P-24-513 JEBrunn: / pjg	CONSUMERS POWER
Date	October 3, 1980	COMPANY
Subject	MIDLAND PROJECT MINUTES OF 8/29/80 MEETING TO APPEAL NEED FOR ADDITIONAL BORINGS FILE: 0485.16 UFI: 002345, 71*01 SERIAL: 9610	Internal Correspondence
сс	JWCook, P-14-113A TCCooke, Midland GSKeeley, P-14-113B DBMiller, Midland CWiedner, Bechtel	

The meeting was convened at 1:00 pm at the Midland Service Center. The attendance list is enclosed as Attachment 1. The agenda for the meeting is enclosed as Attachment 2. Following introductions, G S Keeley summarized historical events relating to the supply of soils-related information to the NRC. Keeley indicated that CP Co had submitted information via 50.54(f) responses, 50.55e reports, meetings and site visits, and responses to requests for document production covering a period of almost two years (See Attachment-3).

J D Wanzeck of Bechtel Geotech then described the soil investigation done to date, all of which excepting information on 59 borings have been supplied to the NRC in connection with CP Co's proposed soils fix. Wanzeck reviewed past borings taken to date, test pits, cross-hole shors, and settlement information as well as other aspects of CP Co's past efforts to develop soils data necessary to demonstrate the adequacy of the proposed fix. He stated that CP Co had taken over 900 borings at the Midland site and expressed the opinion that no additional borings are necessary.

Dr Ralph Peck, Bech.cel's consultant, who is an internationally recognized expert on foundation soils, then discussed the technical basis for Consumer's conclusion that the pre-load program would provide an acceptable solution ot the diesel generator building settlement problem. Peck, with admirable clarity and organization, described the pre-load program, the settlements observed upon surcharging, pore pressure variations as observed through piezometer readings and the future settlements which may be predicted based on an extrapolation of observed settlements. Peck expressed the opinion that the pre-load approach is universally accepted in the soils field and that the information directly supplied via pre-loading would accurately predict future settlement behavior.

A method utilizing results from borings lacks this accuracy, according to Peck, because of inherent inaccuracies in an indirect approach, and because the "fix" would not eliminate all variations in soils parameters below the diesel generator building. Peck felt that the borings approach would erroneously predict greater settlements than would be observed.

Peck's presentation was illustrated with charts and graphs showing settlement measurements and predictions with and without the surcharge, variations in porewater pressure during and after the pre-load, and the loading level on

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soils below the diesel generator building as a function of elevation during the preload. The latter clearly showed that the effective stresses in the fill up to elevation 603 under full surcharge load exceeded the post-surcharge effective stresses upon the fill with the full dead and live loads, including effects of permanent dewatering. This was documented in Amendment 81.

Peck was followed by A J Hendron, Jr, another noted expert in the field. Hendron began his presentation with an analysis of inherent errors that can be expected in settlement computations derived from consolidation tests performed on best-possible, undisturbed samples obtained from borings. His conclusion was that the measurement errors inherent in such an approach would totally eliminate any value otherwise obtainable.

Hendron then addressed the subject of bearing capacity. He stated that new calculations which he had recently performed provide a more accurate prediction of the behavior of the soils from a bearing capacity standpoint than had past analyses, which had excluded certain terms from the bearing capacity equation. His latest calculations, which included such terms, demonstrated a factor of safety from a bearing capacity failure on the order of 6 or 7. The design goal for bearing capacity safety factor is 3. Hendron concluded that additional borings were totally unnecessary to demonstrate adequate bearing capacity. This was documented in Amendment 81.

M T Davisson then concluded the technical part of CP Co's presentation with a discussion of underpinnings - piles and caissons. Davisson stated that the use of underpinnings was designed to eliminate the need to consider soils characteristics in plant fill. Additional borings were technically inferior to the in-place tests under load which would be carried out when underpinnings are installed. Davisson felt that additional borings would be useless and misleading. This was documented in Amendment 81.

After a short recess, the staff presented its arguments in favor of more borings. Lyman Heller, US NRC, in a short introductory statement, argued that the additional borings were not intended to "negate" field data, but only to supplement it. Heller also argued that the Corps had requested only 18 additional borings, compared with over 900 already taken. Heller further stated that the staff had been "burned" twice at North Anna by the use of field data alone.

Joseph D Kane, US NRC/NRR/HGEB, then presented the major substance of the NRR arguments. Referring first to the cooling pond dike, Kane stated that a series of borings and lab tests should be taken to provide the dikes stable under all conditions and to determine the properties of fill after compaction.

In the area where underpinnings would be installed, Kane stated that it was proper engineering procedure to estimate foundation behavior prior to any field tests. Kane also stated that borings were necessary because of possible space limitations if the number of caissons necessary to do the job was under estimated. He also expressed concern about negative skin friction being factored into underpinning design.

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With respect to the diesel generator building, Kane admitted that field testing was advantageous, but that borings would confirm predicted values, that he was not sure if primary consolidation had been completed, that the building had settled 4" before pre-load and 3-1/2" during pre-loading, and that certain observations of piezometer levels taken during the surcharge may have resulted from errors introduced by varying the level of the cooling pond. Kane also mentioned that CP Co had presented only positive effects of surcharge, and had failed to address 4"-settlement which took place and its effects on structures. Kane failed to state what connection the latter point has with the additional borings issue.

After Kane's presentation, the NRR caucaused.

Messrs Vollmer and Knight then questioned the various individuals present. Vollmer indicated that, in view of the present political climate, he was somewhat surprised at CP Co's attitude toward not supplying additional technical information. He inquired of Mr Cook whether or not CP Co's objections went to the mere necessity of the borings or went to the possibility that the borings results would be actually misleading and counterproductive. Mr Cook answered that both points were primary objections.

Mr Knight wanted to know whether or not CP Co had been advised of the additional borings request when the latest 66 samples were taken. CP Co answered in the negative.

Following a discussion on the negative porewater pressure question (during which there was an exchange between Kane, Peck, Hendron, and Davisson, in which Peck stated that the results were exactly as he would expect), Vollmer indicated, though somewhat ambiguously, that the data supplied seemingly satisfied his concern on the settlement issue. He further stated that new information had been presented during the meeting and that this should formally be supplied. He stated that if he had to make a decision immediately he would have to agree with the staff's recommendation.

It was decided that CP Co would supply a sumary of all soils information including the additional information supplied at the meeting, by 9/15/80. The meeting was then adjourned.

On the same day as and prior to the above meeting, Mr G Lear (NRC) was shown pictures of the piping associated with the return of emergency service water. The part of the piping which is buried along the sides of the emergency cooling pond was exhibited to Lear using the following photos:

Cartridge	4253	Frame	1965
			1966
			2057
			2058
		•	2033
			2039

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Pictures 905 906 907 908 1080 1081

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The review of the above photos showed that the pipe was located in an excavated trench in the berm and not the dike slope. Therefore, a postulated baffle dike failure precipitated by the trench is not considered to be a plausable scenario and would not interfere with functioning of the Emergency Cooling Pond.

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CC: CAHunt DBMiller TCCooke RMWheeler

NRC Exit on Diesel Foundation -

Gallahger was asked to follow-up on 50.55(e) Report to fact-find on what brought it about and what our plans were. Findings which won't be infractions, but their management will evaluate. FSAR commits to checking settlement every 90 days. Assumes we will modify as necessary after we take corrective action.

13

FSAR 2.5-14 gives supporting materials as cohesive controlled fill. Another table shows clays. Thought it would not be sands. Feels random fills are not good policy. C-109 and -117 indicate Zone II, this is discrepancy from FSAR #1.

2.5.21 summarizes compaction requirement. Requires 4 minute passes but not req by C-210 until added in 1977 and was not imposed. C1.02 does not make reference to it. . US Testing says they were not required to.

This is discrepancy from FSAR #2. 3.8.5.5 shallow footings settlements estimated to be 1/2" or less. Has to be corrected in FSAR.

Figure 2.5-47, Diesel Generator Building 634 but its at 628.

C-210; -211, 1.02 (QC instr) - C-210 Section 13.7.1 requires all cohesive backfill to 95% but 13.4 refers 12.4.5.4 to Bechtel Modified Proctor which gives unconservatism. 1.02 is confusing since has to compact to different requirements.

Dames & Moore 3/69 - recommends 100% and at or near 6" to 8".

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Ductbanks and piping under building was looked at and probably effects diff settlement.

Using random fill makes it difficult to determine amount of settlement yet it was estimated as 1/4". Asked for calculation for basis of estimate but has not received. Crack on east wall. Does not feel these are minor but are flexural cracks and if so have to correct to meet ACI 318 Section 10.4. Feels Testing people are testing ok. Does not believe material was placed as is indicated. Have low blow counts.

Pond level should and rate should be taken into account on effect on soil. Should evaluate and effect on BWST main transformer tanks. Diff water levels between diesel generator area and BWST area.

Reviewed plans for monitoring preload. NRC does not feel this is corrective action. Says mat foundations are usually used with random fill.

GSKeeley/cg 10/30/78

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## **Bechtel Power Corporation**

013421

777 East Eisenhower Parkway Ann Arbor, Michigan



Mail Address P.O. Box 1000, Ann Arbor, Michigan 48106

October 8, 1980

BLC-9839

Consumers Power Company 1945 West Parnall Road Jackson, Michigan 49201

Attention: Mr. J.W. Cook Vice President Projects, Engineering and Construction

> Subject: Midland Plant Units 1 and 2 Consumers Power Company Bechtel Job 7220 50.54(f) September Status Report

Attached is the September Status Report giving the status of commitments made in the responses to NRC 50.54(f) Questions and supplementary questions from letters, meetings, etc. The structure of the report has been changed to group items by status code to allow greater visibility of outstanding items. The following is a summary of the attached report:

St	tatus Codes: (1)	Ques 1-22(1)	Ques 23(1)	Ques 24-35(1)	Supp. Ques. (1)
	Code 1	62	30	0	0
	Code 2	4	10	5	4
	Code 3	21	11	2	0
	Code 4	16	5	5	3
	Code 5	8	0	0	2
	Total Action	ns 111	56	12	9

(1) See first page of status report.

The October Status Report will be submitted by November 10, 1980.

ry troly yours, Dow for John A. Rutgers

Project Manager

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Attachment: 50.54(f) September Status Report cc: W.R. Bird ; G.R. Eagle (CPCo/AA); D.E. Horn; G.S. Keeley; B.W. Marguglio . (all w/a)

Written Response Requested: No

#### CONSUMERS POWER COMPANY

### MIDLAND UNITS 1 AND 2

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES

STATUS SORT: PARTS I AND 2

013421

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Bechtel Power Corporation October 8, 1980

#### MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES

#### RESPONSIBLE ORGANIZATIONS:

Status Codes:

LEGEND

1	Complete, verified by quality assurance	PD Plant design	CPCo		Consumers	Power	Company	
	compretery restored and the state	PS Pipe stress	CPCo	QA	Consumers	Power	Company	quality
		LS Licensing			assurance			
2	Reported complete, not yet verified	GT Geotechnical	CPCO	PMO	Consumers	Power	Company	project
1.1		services			management	organ	Itzation	
1	Due, but not complete. Dates have been	CE Civil engineering						
	reforecast. Original due dates are	services						
	in parentheses.	FE Field engineering						
	xii pareneneoror	QA Quality assurance						
	Not yet due	OE Quality engini-						
	nor ler and	neering						
-	and the second and the second se							

5 Insufficient documentation in 50.54(f) files to establish or verify status

#### Notes:

- Commitment dates for action items indicated by asterisks (\*) have been transmitted to the NRC. These dates will not be changed without a formal transmittal to the NRC.
- Questions 1 through 22 action item numbers are basically the same as those used by the diesel generator building task group, but have been modified to acknowledge action items/commitments made in all revisions of the responses.
- 3. Question 23 action item numbering is based on the Response to Question 23 submitted to Consumers Power Company via via BLC68460, J.A. Rutgers to G.S. Keeley, dated November 14, 1979. These action item numbers have been modified to acknowledge action items/commitments made in all revisions of the responses.
- Questions 24 through 35 action items were identified for the first time in the April issue of this status report and will be referred to by the action item numbers established in that issue.

References (applicable to Part II only):

A. Letter from G.S. Keeley to J.A. Rutgers, CPCo Serial 8548, 3/27/80

B. Commitments made in February 1980 meeting with NRC, Midland, Michigan

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES

### PART I: COMMITMENTS FROM QUESTIONS 1 to 35

Item	Description	Page	Rev	Resp Org	Responsible Engineer	Due	Status	Status Remarks
1-5*	Review specifications not included in the specificity study initially	1-5 I-8	0 0	QE		790629	5	See Item 23-10
1-19*	Complete in-depth review of soil test results	I-17		GT		790731	5	
6-5	Monitor the piping between the BWST and the auxiliary building	6-1	1	CE			5	Ongoing activity
6-6	Evaluate the settlement from Item 6-3 in accordance with the procedure described in Question 17	6-1	1	PS			5	Complete monitor upon load test
7-2	Make results of continuity checks and settlement surveys available						5	See Item 7-1
7-3	If further corrective action is required, determine corrective measures						5	See Item 7-1
13-9 (13-2)	Review piping system for seismic response from Item 13-6	13-2	0	PD	A. Patel		5	
15-1	Prenare additional response to the NRC					791231	5	

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp	Responsible Engineer	Due Date	Status	Status Remarks
4-6	Monitor the non-Seismic Category I con- densate storage tanks	4-4	5	GT CE	J. Wanzeck S. Rao	801130	•	Load test ongoing; results will be evaluated by geotech and civil
4-8	Fill the BWST with water to perform a full-scale test of subsurface material	4-3	3	GT CE	J. Wanzeck S. Rao	801130	•	See Items 6-1, 6-3, 6-6, and 31-1. Dwg C-1148 issued for construction. Load test to start in 10/80
6-9	Determine long-term settlement based on the measured settlement of the loaded tanks	6-2	3	GT			•	Geotech to review load and predict long-term settlement based on Items 4-6, 4-8, and 4-9
8-3	Review and modify the monitoring fre- quency for the diesel generator pedestal markers after 1 year of operation	8-2	0	CPCo		850101	•	
12-5	Pressure grouting of void below the mud mat of the control tower as required	Тb1 12-1	0	CE	R. 240	801231	•	
13-7 (13-1)	Review structural design for seismic response from Item 13-6	13-2	0	CE		801031	•	
13-8 (13-2)	Review Seismic Category I equipment for seismic response from Item 13-6	13-2	0	CE	B. McConnel	810201 (801231	, *	
13-10	Review electrical system for seismic response from Item 13-6	13-2	0	CE	B. McConnel	810201 (801231	, •	
13-11 (13-3)	Conduct a seismic reanalysis for the aervice water pump structure	13-2	0	CE	B. McConnel	801031	•	
13-13 (13-3)	Review Seismic Category I equipment for seismic response from Item 13-11	13-2	0	CE	B. McConnel	810201 (801231	, *	
13-14 (13-3)	Review piping system for seismic response from Item 13-11	13-2	0	PD			•	
13-18 (13-4)	Review Seismic Category I equipment for seismic response from Item 13-16	13-3	0	CE	B. McConnel	801231	•	
13-19	Review piping system for seismic response from Item 13-16	13-3	0	PD			•	

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

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Item	Description	Page	Rev	Org	Responsible Engineer	Due	Status	Status Remarks
13-20 (13-4)	Review electrical system for seismic response from Item 13-16	13-3	0	CE	B. McConnel	801231	4	
13-21 (13-5)	Investigate the effect on underground utilities for differential building displacement resulting from Items 13-6, 13-11, 13-16	13-5	0	CE PS	B. McConnel	810131	4	
17-4	Profile the borated water lines by optical means	17-1	2	CE			٠	Tracked by Item 6-5
23-37*	Consistent with the intent of Items 23-35 and 23-36, QA will review noncon- formance reports which were open as of November 13, 1979, or became open prior to implementation of the improved Project Quality Assurance Trend Analysis program as stated in Item 36.	23-33	5	QA		801231	•	
23-40* (31)	Design documents, instructions, and pro- cedures for those activities requiring inprocess controls will be reviewed to assess the adequacy of existing proce- dural controls and technical direction. Engineering review is acheduled for com- pletion by October 24, 1980, and field engineering and quality control review is scheduled for completion by Nov- ember 28, 1980.	I-11, 23-20, 23-30	•	FE,QC		801128	•	Project engineering to provide list of design documents to FE and QC to start this item
23-41*	QCIs in use will be reviewed to ascer- tain that provisions have been included consistent with the revised control docu- ment, SF/PSP G-6.1, Quality Control Inspection Plans.	I-18, 23-22, 23-25	5	QC		801115	•	See Item 23-34

## MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 59.54(f) RESPONSES (Continued)

PART I: COMMITMENTS PROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp Org	Responsible Engineer	Due	Status	Status Remarks
23-42* (31) (40)	Design documents, instructions, and pro- cedures for those activities requiring inprocess controls will be reviewed to assess the adequacy of existing pro- cedural controls and technical direction. Engineering review is scheduled for completion by October 24, 1980, and field engineering and quality control review is scheduled for completion by November 28, 1980. Any revisions required will be completed by January 23, 1981.	I-11, 23-22, 23-30	•	PE, FE,QC		810123	•	
23-43*	The impact of Item 41 on com- pleted work will be evaluated, and appro- priate actions will be taken as necessary.	23-22, 23-25	•	QC		810115	•	
24-1	Determine final number of observation wells	24-21	5	GT		811031	•	Ongoing activity
24-2	Develop frequency for monitoring the observation wells	24-21	5	GT		810131	•	Ongoing activity
24-3	Develop system and schedule for moni- toring sand removal	24-22	5	GT		810131	•	Ongoing activity
24-4	Evaluate results of temporary dewatering system to verify design bases	24-8	5	GT		811031	•	Ongoing activity
25-3	Revise seismic analysis for service water pump structure using soil properties determined by the recent investigation and any foundation modification	25-5	5	CE			•	Tracked by Item 13-11

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Sheet 5 10/8/80

MASTER LIST OF COMMIT TENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp	Responsible Engineer	Due Date St	atus	Status Remarks
1-21A	Modify QCIs based on Item 1-21	NA		<b>0</b> C	E. Smith	801115 (800901)	3	See Items 23-1%A, 23-34, and 23-41
1-23	Incorporate scientific sampling plans for inspection	1-20		0C		801115 (791019)	3	See Item 23-34. Committed statements not yet com- piled with
13-6 (13-1)	Conduct a seismic reanalysis for the diesel generator building	13-2	0	CE	B. McConnel	801115 (801015)	3	
13-12	Review structural design for seismic response from Item 13-11	13-2	0	CE		801231 (800831)	3	
13-15	Review electrical system for seismic response from Item 13-11	13-2	0	CE	B. McConnel	810201 (801231)	3	
13-16	Conduct a seismic reanalysis for the auxiliary building	13-3	0	CE	B. McConnel	801215 (800815)	3	
13-17	Review structural design for seismic response from Item 13-16	13-3	0	CE	R. 2ao	801130 (800930)	3	
14-7	Analyze the BWST foundation for variable foundation properties	14-2	5	CE	R. Zao	801231 (800831)	3	Analysis ongoing
14-8	Compare allowable versus calculated forces and moments at critical sections for auxiliary building electrical pene- tration area and service water pump structure	14-5	5	CE		801231 (800831)	3	Analysis ongoing
15-2	Expand the Midland project structural design criteria for Seismic Category I structures to include the differential settlement effect.	15-2	0	CE	D. Reeves	801130 (800831)	3	Design criteria in CPCo review
17-5	Analyze buried piping considering the probable ultimate settlement. Provide unique resolution for any unacceptable stress conditions for the portion of the system	17-3	5	PS	J. Legette	810131 (800801)	3	Report on method for analysis being reviewed
17-6	Investigate the excess rounding of profile data	тb1 17-2	2	PS	J. Legette	810131 (800801)	3	Same as Item 17-5

## MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(E) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	• Description	Page	Rev	Resp Org	Re	esponsible Engineer	Due Date	Status	Status Remarks
18-1	Perform reexamination of the stresses in all Seismic Category I connecting piping between buildings as a normal iteration of design. Consider stresses induced by differential settlement after con- necting pipe and anticipated future settlement	18-1	0	PS	J.	Legette	810131 (800801)	3	Same as Item 17-5
18-2	Perform final analyses to demonstrate the margin of acceptability for addi- tional differential settlement beyond that expected for the life of the plant	18-2	5	PS	Ј.	Legette	810131 (800801)	3	Same as Item 17-5
18-3	Design piping connecting from the diesel generator building to the pedestals which will accommodate the expected future settlement	18-2	5	PS	ј.	Legette	810131 (800801)	3	Dependent on 17-5
19-1	Profile pipes in the vicinity of diesel generator building after removal of preload and evaluate as described in the Response to Question 17	19-1	0	PS	ј.	Legette	810131 (800801)	3	Dependent on 17-5
19-3*	Perform a complete evaluation of safety- related piping after completion of the preload program	19-3	0	PS	ј.	Legette	810131 (800801)	3	Dependent on Item 18-1
20-1	Analytically check the Seismic Category I systems affected by settlement for pump and nozzle loadings and verify that they are within specified or vendor-accepted limits	20-1	5	PS	J.	Legette	810131 (800801)	3	Dependent on Item 18-1
20-2	Verify piping support loads for systems subjected to settlement-induced loads	20-1	5	PS	ј.	Legette	810131 (800801)	3	Dependent on Item 18-1
20-3	Prepare additional response to the NRC						810131 (800801)	3	
20-4	Evaluate active values affected by settlement for imposed loads and reactions; compare to the allowable for operability	20-1	5	PS	ј.	Legette	810131 (800801)	3	Dependent on Item 18-1

## MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS PROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
23-19A*	This action modified to include neces- sary revision to QCIs resulting from evaluation of surveillance and review callouts	I-18		0C	E. Smith	801115 (800901)	3	To be completed when Item 23-41 is completed and QC Procedure G6.1 is ap- proved by CPCo. See Item 1-21A
23-20*	Field Instruction 1.100 will be supple- mented by establishing requirements for demonstrating equipment capability, including responsibility for equipment approval, and providing records identi- fying this capability.	23-18	5	FE		801231 (791204)	3	Awaiting equipment qualifi- cation report from geotech- nical services based on CPCO NCR
23-25*	Quality assurance will issue a Nuclear Quality Assurance Manual amendment to clarify the requirement that procedures include measures for qualifying equip- ment under spec'fied conditions.	23-18		OA		801017 (800902)	3	Awaiting issuance of re- maining NQAM procedures needed for the CPCo/Bechtel QA integration
23-28*	Civil/Structural Design Criteria 7220- C-501 will be modified to contain the requirements that a duct bank penetra- tion shall be designed to eliminate the possibility of the nonspecific size duct interacting with the structures.	23-15	5	CE	D. Reeves	801130 (800831)	3	Design criteria in CPCo review
23-30* (39)	Engineering will clarify specifications and construction will prepare procedures (governing the soils compaction equip- ment) to implement the requirements of the Nuclear Quality Assurance Manual as stated in Item 25	23-18	5	CE/PE		801230 (800912)	3	Dependent on compaction report and NQAM
23-31*	Design documents, instructions, and pro- cedures for those activities requiring inprocess controls will be reviewed to assess the adequacy of existing proce- dural controls and technical direction. Engineering review is scheduled for completion by October 24, 1980.	1-11, 23-20, 23-30	5	PE	C. Russell	801131 (801024)	3	

# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	* Description	Page	Rev	Org	Engineer	Date	Status	Status Remarks
23-33*	The quality assurance audit and moni- toring program will be revised to empha- size and increase attention to the need for evaluating policy and procedural adequacy and assessment of product qual- ity. A specialized audit training pro- gram will be developed and implemented to ensure guidance for this revised approach.	23-35	5	QA		800912	3	Action completed except developing audit trainin program
23-34*	Control Document SP/PSP G-6.1 will be revised to provide requirements for inspection planning specificity and for the utilization of scientific samp- ling rather than percentage sampling.	1-20, 23-22, 23-24	5	QC		a01115 (800915)	3	SF/PSP G-6.1 has been submitted for review. See Item 1-23
23-39* (30)	Engineering will clarify specifications and construction will prepare procedures (governing the soils compaction equip- ment) to implement the requirements of the Nuclear Quality Assurance Manual as stated in Item 25.	23-18	5	PE		801231 (801017	3	
23-448*	The audit committed to in our response to Question 1. Part b and described in Part 2, Section 5.0 will be conducted once during the FSAR rereview (com- mencing March 17, 1980) and again after completion of the rereview (com- mencing September 1, 1980).		•	QA		801231 (800901	)	See Item 1-4
23-47*	See Item 23-4	23-9, 23-25	•	PE		801231 (801031	, 3	0
~ .	balues the effect of differential	26-2	5	CE	R. Zao	801031	3	
26-1	settlement of the diesel generator build-					(800930	))	8
	ing in accordance with ACI 349 as supple-							CT.
	mented by Redutatory outdo their							

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Org	Responsible Engineer	Due	Status	Status Remarks
33-1	Fill the diesel fuel oil tanks with oil prior to preoperational testing	33-2	5	CE		810831 (800829)	) 3	See Items 4-9 and 6-4 Will be accomplished just prior to preoperational testing

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# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS PROM QUESTIONS 1 to 35 (Continued)

Item	*Description	Page	Rev	Org	Responsible Engineer	Due Date	Status	Status Remarks
4-7	Remove unsuitable material in the tank farm and replace by compacted fill	4-3	3	GT	J. Wanzeck S. Rao	791130	2	
15-1*	Evaluate the differential settlements in accordance with provisions of ACI 318-71 for Seismic Category I structures founded partially upon natural soil and partially upon fill material	15-1	0	CE		791231	2	Superseded by Items 26-1 and 26-2. See Item 14-6
17-2	If future profiles show any extreme conditions, analyze the piping system and make necessary repairs	17-3	0	CE		790901	2	Superseded by Item 17-5
19-2	Take additional gap measurements between embedded sleeves and pipes when surcharge is removed. Coordinate this information with the profile data	19-2	0	CE			2	Closed by Rev 5
23-35*	Control Document SF/PSP G-3.2. Control of Nonconforming Items, is being revised to improve the definition of implementing require- ments for identifying repetitive non- conforming conditions.	23-33	5	QC		800815	2	See Item 1-24. PSP G-3.2 Rev. 6 issued 6/10/80
23-44*	FSAR sections are being rereviewed as discussed in the Response to Question 23, Part 2.	23-7, 23-11	4	PE		800931	2	See Item 1-2
23-45*	U.S. Testing will be required to demon- strate to the cognizant engineering rep- resentative that testing procedures, equipment, and personnel used for quality verification testing (for other than NDE and soils) were, and are, capable of providing accurate test results in accordance with the requirements of applicable design documents.	I-18, 23-27, 23-31	5	CE		801001	2	Report submitted to QA
23-46*	A sampling of U.S. Testing's test reports (for other than NDE and soils) will be reviewed by the cognizant engineering representative to ascertain that results evidence conformance to testing require- ments and design document limits.	23-28, 23-31	5	CP		801001	2	Report submitted to QA

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART 1: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
23-48*	CPCo will implement overinspection for soils placement, utilizing a specific overinspection plan.	I-11, I-16	4	CPCo- QA		NA	2	Ongoing activity
23-49*	CPCo will perform overinspection of the U.S. Testing soils testing activities and reports, utilizing a specific over- inspection plan.	1-17	•	CPCo- QA		NA	2	III Ongoing activity
23-50*	CPCo project management and QA review field procedures (new and revised) and CPCo QA reviews QCIs (new and revised) in line with Bechtel before release.	1-19	•	CPCo- QA, CPCo- PMO		NA	2	() Ongoing activity
23-51*	In 1978, CPCo implemented an overin- spection plan to independently verify the adequacy of construction and the Bechtel inspection process, with the exception of civil activities. Rein- forcing steel and embeds were covered in the overinspection.	I-19	•	CPCo- QA		NA	2	" Ongoing activity
23-52*	CPCo reviews onsite subcontractor QA manuals and covers their work in the audit process.	I-19	•	CPCo- QA		NA	2	(") Ongoing activity
23-53*	An ongoing effort is improving the "sur- veillance" mode called for in the QCIs by causing more specific accountability as to what characteristics are inspected on what specific hardware and in sore cases changing "surveillance" to "inspection."	1-19	•	QC		А	2	See Item 23-19A
25-1	Revise seismic analysis for diesel' generator building using the soil properties determined by the recent investigation and any foundation modi- fications	25-3	5	CE			2	Tracked by Item 13-6
25-2	Revise seismic analysis for auxiliary building using the soil properties deter- mined by the recent investigation and any foundation modifications	25-3	5	CE			2	Tracked by Item 13-16

<sup>(1)</sup> Bechtel verification of this item is not required.

# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Org	Responsible Engineer	Date	Status	Status Remarks
26-2	Incorporate in the Midland project standard design criteria the effect of differential settlement of structures which are founded partially or totally on fill	26-1	5	CE			2	Tracked by Item 15-2
27-1	Prohibit final piping connection to the diesel generator building before 12/31/81	Fig 27-9	5	PD	R. Tulloch	800731	2	
31-1	Perform full-scale load test by filling	31-2	5	GT CE		801130	2	Tracked by Item 4-8

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# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFP 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS PROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Org	Responsible Engineer	Due Date	Status	Status Remarks
1-1*	Perform a final review and update of PSAR commitment list	1-3	1	LS		800101	1	
1-2*	Review sections of the FSAR determined to be inactive	1-4	1	LS		800101	1	Superseded by Item 23-44
1-3*	Review EDP 4.22	1-4	0	QE		790629	1	
1-4	Audit action items 1-3	1-4	0	QA		801101	1	Superseded by Item 23-44A
1-6*	Complete review of the Dames and Moore report	1-6		GT		790629	1	
1-7*	Complete review of pertinent portions of PSAR Sections 2.5 and 3.8	I-6		GT,CE		790629	1	
1-8	Correct settlement calculations	I-6		GT		791101	1	
1-9	Schedule audits of the geotech sections on a 6-month basis	I-7		QA		790504	1	
1-10*	Review drawings for possible effect of vertical duct bank restrictions	I-7		CE		790106	1	
1-11*	Complete actions in response to DRVCL audit	1-7/8	•	QE		790518	1	
1-12*	Revise EDP 4-49 to incorporate clarifi- cations and instructions for use of SCN	I-8		QE		790504	1	See Item 23-4
1-13	Schedule audits of each design disci- pline calculations on a yearly basis	I-8/9	,	QA		790504	1	
1-14	Reevaluate construction equipment used for compaction	I-11		FE		791204	1	See Item 23-20
1-15	Assign field soils engineer and soils engineer from design section	1-11		FE		790501	1	
1-16*	Review construction specifications and procedures to identify equipment requiring qualification	I-11		FE		790529	1	See Item 23-8
1-17*	Review field procedure PPG-3.00 to ensure clarity and completeness	I-11		FE		790531	1	See Item 23-7A

# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

# PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

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Iten	Description	Page	Rev	Resp	Responsible Engineer	Due	Status	Status Remarks
1-18	Revise PQCI C-1.02 to provide inspection rather than surveillance and to record	I-16		0C		800801	1	
	inspections	1-18		OA		790531	1	See Item 23-15
1-20*	Perform in-depth audit of 0.5. reserves					700629		See Item 23-19
1-21*	Review all active QCIs for surveillance callouts	I-18		QC.		/90029		
1-22*	Evaluate documentation (review) call- outs on QCIs	I-18	1	0C		790629	1	Superseded by Item 23-19
1-24*	Complete in-depth review of the Bechtel	1-22		QA		790601	1	See Items 23-18, 23-35, and 23-36
1-25*	Conduct QA training	1-22		QA		790601	1	Superseded by Items 23-16 and 23-17
3-1*	Clarify the Response to Question 362.12 in PSAR Revision 18	3-1	0	LS		790531	1	
4-1*	Provide criteria for permissible residual settlement	4-1	3	GT CE		791231	1	
4-2*	Provide details of treatment of loose sands	4-2	0	GT CE		790831	1	
4-3	Take dynamic modular measurements upon removal of preloads for diesel generator building and other buildings	4-3	3	GT		791031	1	
4-4	Use data of Item 4-3 to evaluate the seismic response of the structures	4-3	3	CE		791130	1	Partial Requirement of Items 13-6, 13-11, 13-16
4-5	Prepare additional response to NRC for Items 4-1 and 4-2	NA		CE		790831	1	0
4-9	Fill the diesel fuel oil tank with water to perform a full-scale test of the foundation soil	4-2	0	GT			1	See Item 5-4
5-1	Monitor the settlement of the structures (which were subjected to preload) during the life of the plant to provide a record of performance	5-1	0	GT			1	Ongoing activery, require ments in Dwg C-994, Spec C-76

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MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
6-1	Construct and fill the borated water tank to make a full-scale test of the founda- tion soils	6-1	0	GT CE			1	Tracked by Item 4-8
6-2	Delay the piping connections to the BWST until most of the settlement has taken place under the test load	6-1	0				1	
6-3	Use settlement data from BWST to allow conservative piping connection design		0	NA			1	Tracked by Item 4-8
6-4	Evaluate the load test result of the diesel fuel oil tank and provide precise corrective measures if required	6-2	0	GT			1	Set Item 4-9
6-7	Remove all unsuitable material in the tank farm area and replace with suitable compacted fill	6-1	3	GT			1	Tracked by Item 4-7
6-8	Monitor the non-Seismic Category I con- densate storage tanks	6-2	3	GT			1	Tracked by Item 0-6
7-1*	Perform continuity check on duct banks after completion of preload program	7-3	3	FE		791130	1	
8-1	Establish a requirement to realign diesel generators if manufacturer's tolerance for pitch and roll are exceeded	8-2	0	CE		800304	1	Requirement shown in Dwg C-1011, Note 4
8-2	Monitor the diesel generator pedestal markers on a 60-day cycle throughout the construction phase.	8-2	0	CE		NA	1	Ongoing activity. Requirements in Dwg C-994 and Spec C-76. Included in Item 5-1
12-1	Complete one additional boring in the middle of diesel fuel oil tank area	12-1	0	GT		790423	1	
12-2	Complete three additional borings in the auxiliary building control tower area	12-1	0	GT		790531	1	
12-3	Complete Table 12-1 for soils investi- gation and planned remedial measures; respond to NRC	ть1 12-1	1	CE		790531	1	
12-4	Provide supporting soil condition for Seismic Category I utilities	Tb1 12-1	0	CE		790531	1	

MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Iter	Description	Page	Rev	Org	Responsible Engineer	Due Date	Status	Status Remarks
12-6	Provide a detailed description of planned corrective actions in Interim Report 6 of MCAR 24	ть1 1?-1	1	CE		790630	1	
12-7	Perform a continuity check on one con- duit in each duct bank made with a hard- fiber rabbit prior to cable pulling	Tb1 12-1 Pg 4	1	FE		800630	1	See Item 7-1. Ongoing activity. See field pro- cedure FIE 4.500
12-8	Measure the gaps between embedded sleeves and pipes entering the service water valve pits when the surcharge is removed	Tb1 12-1 Pg 5	3	CE			1	
13-1	Complete seismic reanalysis of diesel generator building to account for current lack of compaction	13-1	0	CE		791031	1	Superseded by Items 13-6 and 13-7
13-2	Review diesel generator building design and Seismic Category I equipment piping, and electrical systems to the enveloped seismic responses	13-		CE		791231	1	Superseded by Items 13-8 through 13-10
13-3A	Conduct a seismic reanalysis to account for revised soil structure interaction of service water pump structure	13-2	0	CE		791231	1	Superseded by Items 13-11 through 13-15
13-3B	Review structural design and Seismic Category I equipment, piping, and electrical systems and incorporate the seismic responses of the reanalysis for the service water pump structure	13-2	0	CE		791231	1	Superseded by Items 13-11 through 13-15
13-4A	If significant change of foundation properties of the auxiliary building result, conduct a seismic reanalysis;			CE		791231	1	Superseded by Items 13-16 through 13-20
13-4B	Review structural design and Seismic Category I equipment, piping, and electrical systems and incorporate the seismic response of the reanalysis for the auxiliary building			CE		791231	1	Superseded by Items 13-16 through 13-20

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# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
13-5	Underground utilities - Investigate the change in differential displace- ment separately for buildings founded on fill pending results of seismic reanalysis					791231	1	Superseded by Item 13-21
14-1	Review the estimated settlement upon completion of the load test program of the BWST	14-1	5	GT		810131	1	Tracked by Item 4-8
14-2	Analyze flexible buildings for differ- ential settlement based on stiffness at the time of distortion. Evaluate forces duz to arching or distortion according to Question 15	14-2	0	CE			1	Superseded by Item 26-1. See Item 14-6
14-3*	Map significant cracks in auxiliary building, feedwater isolation valve pits, and ring foundation for the BWSTs	14-3	0	CE		790630	1	
14-4*	Analyze buildings affected by differ- ential settlement for observed differ- ential settlement plus predicted differential settlement	14-4	0	CE		790831	1	Superseded by Item 26-1. See Items 14-2 and 14-6
14-5	Prepare additional response to the NRC	14-		CE		790831	1	
14-6*	Analyze the diesel generator building for variable foundation properties by finite element model	14-2	3	CE		791231	1	
16-1*	Perform soil borings in areas of buried pipes	16-1	0	GT		790831	1	Deleted in Rev 5. Require- ment to perform borings is in Dwg C-1146
17-1*	Evaluate impact of the failure of buried non-Seismic Category I piping on safety- related structures, foundations, and equipment	17-1	0	CE		790629	1	Deleted in Rev 2. Evalua- tion was not requested by NRC.
17-3	Prepare additional response to the NRC					790629	1	

# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	* Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
23-1*	Consultant reports other than Dames 6 Moore were considered in accordance with the guidelines provided in NRC Regula- tory Guide 1.70, Revision 2. Consul- tant reports were not attached to the FSAR, but portions of consultant reports were extracted and incorporated into the FSAR text itself. Those portions incorporated into the FSAR become commitments. Therefore, disposition of recommendations in consulting reports has been adequately accounted for in the preparation of the FSAR.	I-8, 23-7	•	PE		790518	1	
	Verification that those portions of consultant reports determined to be commitments and incorporated into the FSAR have been adequately reflected in project design documents is being accomplished via the FSAR rereview program described in the response to Question 23, Part 2.							
	The two Bechtel QA audit findings reported in our April 24, 1979, re- sponse (Paragraph D.1, Page I-8) have been closed.							
23-2*	On April 3, 1979, Midland project engineering group supervisors in all disciplines were reinstructed that the only procedurally correct methods of implementing specification changes are through the use of specification revisions or specification change notices. This was followed by an interoffice memorandum from the project engineer to all engineering group	23-8, 23-24	•	PE		790312	ı	0
23-3*	Engineering Department Project Instruc- tion 4.49.1 was revised in Revision 2 to state, "Under no circumstances will interoffice memoranda, memoranda, telexes, TWXs, etc be used to change the requirements of a specification."	1-8, 23-9, 23-24	•	PE			1	3421

#### MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

of Q-listed items will be initiated.

Item	* Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
23-4 9	A review of interoffice memoranda, memo- randa, telexes, TWXs, and other corres- pondence relating to specifications for construction and selected procurements	23-5, 23-9	•	PE			1	

The purpose of the review will be to identify any clarifications which might reasonably have been interpreted as modifying a specification requirement and for which the specification itself was not formally changed. An evaluation will be made to determine the effect on the technical acceptability, safety implications of the potential specification modification, and any work that has been or may be affected. If it is determined that the interpretation may have affected any completed work or future work, a formal change will be issued and remedial action necessary for product quality will be taken in accordance with approved procedures.

The foregoing procedure will be followed for all specifications applying to construction of Q-listed items.

For specifications concerning the procurement of Q-listed items, the foregoing procedure will be implemented on a random sampling basis. The sample size has been established and the specification selection has been made.

- (21) Review and acceptance criteria for the specifications will be defined by March 14, 1980.
- (47) The review of construction and selected procurement specifications is scheduled to be completed by October 1980.

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# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(E) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

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Item	* Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
	If the acceptance criteria are not met, the review will be expanded to include other apecifications for Q-listed items. At that time, a revised completion date will be established.							
23-5*	A study was completed which examined current procedures and practices for the preparation and control of the FSAR in view of these experiences. Pro- cedural changes will be initiated by the revision of or addition to the engineering department procedures. This action is scheduled to be completed by January 31, 1980.	23-11	s			800131	1	
23-6*	An interoffice memorandum dated April 12, 1979, was issued by geotechnical services to alert personnel of the need to revise or annotate calculations to reflect current design status.	23-13	•	GT		790312	1	
23-7°	Field Instruction FIC 1.100, Q-listed Soils Placement Job Responsibilities Matrix, has been prepared and estab- lishes responsibilities for performing soils placement and compaction.	I-11, 23-18, 23-20, 23-30		PE			1	
23-7A*	Review Field Procedure FPG 3.000 to ensure clarity and completeness	1-11		PE			1	See Item 1-17
23-6*	Construction specifications, instruc- tions, and procedures were reviewed to identify any other equipment requiring qualification which had not yet been qualified. No such equipment was	I-11, 23-18	5	PE			1	See Item 1-16
	identified.							
23-9*	A dimensional tolerance study was com- pleted using the reactor building spray pump and ancillary system as the study mechanism.	1-8	•	PE			1	3421
23-10*	Engineering reviewed specifications not previously reviewed for the specificity or tolerance studies.	I-8					1	See Item 1-5

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# MASTER LIST OF COMMITMENTS TO NEC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS PROM QUESTIONS 1 to 35 (Continued)

Item	- Description	Page	Rev	Resp Org	Responsible Engineer	Due Date	Status	Status Remarks
23-11*	A specific review of the PSAR and speci- fication requirements for the qualifi- cation of electrical and mechanical com- ponents has been made as part of the corrective action relating to CPCo's 50.55(e) report on component qualifi- cation.	I-8					1	
23-12*	Quality assurance will schedule yearly audits of the design calculational pro- cess for techniques and actual analysis in each of the design disciplines.	I-8					1	
23-13*	Audits of ITT Grinnell hanger design and CPCo relay setting calculation have been conducted.	1-8		QA			1	See Item 1-13
23-14*	Bechtel project engineering will review design drawings for cases where ducts penetrate vertically through foundations. The possibility of the duct being en- larged over the design requirements and th effect this enlargement may have upon the structure's behavior will be evaluated by June 1, 1979. Proper remediai measures will be taken if the investiga- tion shows potential problems.	1-7 ie					1	
23-15*	An in-depth audit of U.S. Testing opera- tions, covering testing and implementa- tion of its QA program, will be con- ducted in late April or early May 1979, by Bechtel project QA and engineering.	I-18		QA			1	See Item 1-20
23-16*	An in-depth training session will be given to Midland QA engineers covering the settlement problem and methods to identif, similar conditions in the future.	1-22	•	QA		791130	1	See Items 1-25 and 23-17
23-17*	An in-depth training session will be given to all CPCo and Bechtel QA engi- neers and auditors to increase their awareness of the settlement problem and discuss auditing and monitoring tech- niques to increase audit effectiveness.	1-22	•	QA		800229	1	See Item 1-25 and 23-16

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# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	Description	Page	Rev	Org	Responsible Engineer	Due	Status	Status Remarks
23-18*	An in-depth review of the Bechtel trend program data will be undertaken by Bechtel QA management to assure the identification of any other similar areas that were not analyzed in suffi- cient depth in the past reviews.	1-22	•	QA .			1	See Item 1-24
23-19*	Quality control instructions will be evaluated to ensure that the documen- tation characteristics which are to be inspected (i.e., surveillance and review callouts) are clearly specified.	1-18	•	0C			1	See Items 1-21 and 1-22
23-21*	See Item 23-4		5	FE		800314	1	
23-22*	Guidelines for surveillance of testing operations will be developed and included in field instructions for the onsite soils engineer. Engineering/geotechnical services will develop the guidelines by November 30, 1979.	23-27	5	GT		791130	1	
23-23*	Engineering will revise Engineering Department Procedure 4.22 by December 1, 1979, to clarify that engineering person- nel preparing the FSAR will follow the requirements of Regulatory Guide 1.70, Revision 2, Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants (September 1975). Speci- fically, Regulatory Guide 1.70 (Pages iv and v of the Introduction) requires that such consultant reports only be refer- enced with the applicable commitments and supporting information included in the text (third paragraph, Page v). Such a requirement would preclude repe- tition of this circumstance.	23-7, 23-46	5	PE		791130	1	013421
23-24*	To preclude any future inconsistencies between the FSAR and specifications, Engineering Department Project Instruc- tion 4.1.1 will be revised to state that all specification changes, rather than just "major changes," will be reviewed for consistency with the FSAR.	23-11	5	PE		791130	1	

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PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	* Description	Page	Rev	Resp Org	Responsible Engineer	Date	Status	Status Remarks
23-26*	In view of Item 6, geotechnical services will revise Procedure FP-6437 by December 31, 1979, to require that calculations be annotated to reflect cur- rent design status.	23-13	5	GT		800328	1	
23-27*	Engineering Department Procedure 4.37 will also be revised by December 31, 1979, to require that calculations be annotated to reflect current design status.	23-13	5	QA		1227	1	
23-29*	The civil standard detail drawings will be revised to include a detail showing horizontal and vertical clearance re- guirements for duct bank penetrations. The detail will address any mud mat re- strictions.	23-15	5	CE		791231	1	Shown in Dwg C-141
23-32*	Guidelines for surveillance of testing operations will be developed and included in field instructions for the onsite soils engineer. Engineering/geotechni- cal services will develop the guidelines by November 30, 1979, and field engi- neering will prepare the instructions by February 29, 1980.	23-27	5	PE		800229	1	
23-36*	Control Document QADP C-101, Project Quality Assurance Trend Analysis, is being revised to improve the defini- tion of implementing requirements for identifying repetitive nonconforming conditions.	23-33	5	AQ		800124	1	See Item 1-24
23-38*	A study was completed by October 31, 1979, to examine current procedures and practices for the preparation and control of the FSAR in view of these experiences. Procedural changes will be initiated by the revision of or addition to the engineering department procedures.	23-11	5	LS		791130	1	

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## MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(E) RESPONSES (Continued)

PART I: COMMITMENTS FROM QUESTIONS 1 to 35 (Continued)

Item	* Description	Page	Rev	Org	Engineer	Date	Status	Status Remarks
2-0	No Action Item						-	
9-0	No Action Item	NA						
10-0	No Action Item	NA					-	
11-0	No Action Item	NA					1.0	
21-0	No Action Item							
22-0	No Action Item							
28-0	No Action Item						-	
29-0	No Action Item						-	
30-0	No Action Item							
32-0	No Action Item						-	
34-0	No Action Item						•	
35-0	No Action Item						-	

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## MASTER LIST OF COMMITMENTS TO NRC ON 10 CPR 50.54(f) RESPONSES (Continued)

### PART II: COMMITMENTS FROM SUPPLEMENTARY QUESTIONS

Item	Description	Page	Rev	Resp	Responsible Engineer	Due	Status	Status Remarks
8-6	Continue involvement of CPCo/Bechtel consultants for reviewing remedial actions	8					5	
S-7	Monitor service water pump structure and pile displacement during jacking operation to verify pile dynamic stiff- ness used in seismic analysis	B		GT CE	B. McConnel		5	

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# MASTER LIST OF COMMITMENTS TO NRC ON 10 CFR 50.54(f) RESPONSES (Continued)

FART II: COMMITMENTS FROM SUPPLEMENTARY QUESTIONS

Item	Description	Page	Rev	Resp	Responsible Engineer	Due	Status	Status Remarks
S-1	Advise Bechtel to commence dewatering and underpinning activities	A		CPCo			•	After favorable SER
S-2	Develop settlement time rate criteria for all Seismic Category I structures	*		GT		810331	•	
<b>S-</b> 3	Monitor concrete cracks for service water pump structure and auxiliary building electrical penetration areas and the feedwater isolation valve pits before and after installation of piles and caissons	B		CE		801031	•	Due date is for incorpora- ting requirement into draw- ing

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# MASTER LIST OF COMMITMENTS TO NEC ON 10 CFR 50.54(f) RESPONSES (Continued)

PART II: COMMITMENTS FROM SUPPLEMENTARY QUESTIONS

Item	Description	Page	Rev	Org	Responsible Engineer	Date	Status	Status Remarks
8-4	Monitor concrete cracks in the BWST valve pits and repair any observed crack exceeding the ACI code limits	B		CE		800630	2	Due date is for incor- porating requirement into drawing. Dwg C-1148 has been issued.
8-5	Grout the local gaps between diesel generator building footing and mud mat	B		CE		800407	2	Grouting requirement in Dwg C-1147
8-8	Envelope pile stiffness for the seismic analysis of service water pump structure	в		CE	B. McConnel		2	Completed seismic model. See Item 13-11.
8-9	Check the limited clearance between the service water pipe at the building penetration	в		PD CE	R. Tulloch	800731	2	See Response to Ques- tion 45