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orig + 3

STONE AND WEBSTER MICHIGAN, INC. *JMB*  
P.O. BOX 1963, MIDLAND, MICHIGAN 48640

DATE	5/22/84
J O NO	14509
P O NO	
LTR NO	SWM-123
REF.	

329  
330

VIA  
TO DISTRIBUTION

DEAR SIRs:  
THE FOLLOWING ARE  ATTACHED.  SENT SEPARATELY.

<input checked="" type="checkbox"/> COPIES	<input type="checkbox"/> PRINTS	<input type="checkbox"/> REPRODUCIBLES	<input type="checkbox"/> MICROFILM APERTURE CARDS
EACH OF			
<input type="checkbox"/> DRAWINGS	<input type="checkbox"/> SPECIFICATIONS	<input type="checkbox"/> NOTES OF CONFERENCE	
<input checked="" type="checkbox"/> DOCUMENTS			

STATUS		PLEASE NOTE	SENT FOR YOUR	
<input type="checkbox"/> FINAL	<input checked="" type="checkbox"/> APPROVED	<input type="checkbox"/> REVISIONS	<input type="checkbox"/> APPROVAL	<input type="checkbox"/> COMMENT
<input type="checkbox"/> PRELIMINARY	<input type="checkbox"/> APPROVED AS REVISED <small>AS DEFINED IN SPECIFICATION</small>	<input type="checkbox"/> ADDITIONS	<input type="checkbox"/> USE	<input type="checkbox"/> INFORMATION
<input type="checkbox"/> NO COMMENT	<input type="checkbox"/> UNACCEPTABLE	<input type="checkbox"/> COMMENTS	<input checked="" type="checkbox"/> FILES	<input type="checkbox"/> CONCURRENCE
<input type="checkbox"/> SUGGESTIONS AS NOTED	<input checked="" type="checkbox"/> CLOSED		<input type="checkbox"/>	

YOUR ATTENTION IS DIRECTED TO THE FOLLOWING:

RELEASED FOR:  FABRICATION  PURCHASE OF NECESSARY MATERIALS

PLEASE REVISE AND SUBMIT \_\_\_\_\_ PRINTS \_\_\_\_\_ REPRODUCIBLES \_\_\_\_\_ MICROFILM APERTURE CARDS

PLEASE SUBMIT \_\_\_\_\_ PRINTS \_\_\_\_\_ REPRODUCIBLES \_\_\_\_\_ MICROFILM APERTURE CARDS OF  DOCUMENTS  DRAWINGS  SHOP DETAIL

PLEASE RETURN ONE COPY EACH OF THIS MATERIAL BEARING YOUR APPROVAL OR COMMENTS

PLEASE ACKNOWLEDGE RECEIPT OF THIS MATERIAL BY SIGNING AND RETURNING THE ENCLOSED COPY OF THIS FORM.

WE TRUST THAT THESE NOTES ARE IN ACCORDANCE WITH YOUR UNDERSTANDING. IF NOT, PLEASE ADVISE US

IMPORTANT SHOULD ANY REVISION TO DOCUMENTS OR DRAWINGS RETURNED HEREWITH INVOLVE A PRICE INCREASE THE SUPPLIER MUST NOTIFY STONE & WEBSTER PURCHASING DEPARTMENT WITHIN TEN (10) DAYS EVEN THOUGH A DEFINITE ESTIMATE CANNOT BE GIVEN AT THE TIME OTHERWISE THE PURCHASER WILL CONSIDER THE REVISIONS MADE WITHOUT COST.

The following Closed CIO Item/Hold Point Notification(s) is (are) attached for your action/information:

ITEM 059 \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

DISTRIBUTION:

- Job File C.3 (orig + 1)
- DLQuamme, CPCo
- NIReichel, CPCo
- RAWells, CPCo
- JGKepler, NRC
- JJHarrison, NRC
- BLBurgess, NRC (site)
- APAmoruso (2)
- KRARndt/Chrono/Vault w/o attach(2)
- Initiator

*J. E. Karr*  
J. E. Karr  
CIO Program Manager

8406010354 840522  
PDR ADDCK 05000329  
S PDR

MAY 25 1984

*JED*

<b>STONE &amp; WEBSTER</b> <b>CONSTRUCTION IMPLEMENTATION</b> <b>OVERVIEW</b> <b>MIDLAND NUCLEAR PLANT J.O. NO. 14509</b>	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="padding: 2px;">ITEM NUMBER 059</td> <td style="padding: 2px;">HOLD POINT NUMBER</td> </tr> <tr> <td colspan="2" style="padding: 2px;"><input type="checkbox"/> TRACKED ACTION ITEM</td> </tr> <tr> <td colspan="2" style="padding: 2px;"><input checked="" type="checkbox"/> TRACKED INFORMATION ITEM</td> </tr> <tr> <td colspan="2" style="padding: 2px;"><input type="checkbox"/> TRACKED RECOMMENDATION ITEM</td> </tr> <tr> <td colspan="2" style="padding: 2px;"><input type="checkbox"/> UNTRACKED ITEM</td> </tr> <tr> <td colspan="2" style="padding: 2px;"><input type="checkbox"/> HOLD POINT NOTIFICATION</td> </tr> </table>	ITEM NUMBER 059	HOLD POINT NUMBER	<input type="checkbox"/> TRACKED ACTION ITEM		<input checked="" type="checkbox"/> TRACKED INFORMATION ITEM		<input type="checkbox"/> TRACKED RECOMMENDATION ITEM		<input type="checkbox"/> UNTRACKED ITEM		<input type="checkbox"/> HOLD POINT NOTIFICATION	
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<input type="checkbox"/> UNTRACKED ITEM													
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REFERENCE(S) CIO Evaluation No. MP-MIS-072-0001													

**CONDITION DETAILS**

10CFR50, Appendix B, Criterion No. XVI corrective action requires, in part, that conditions adverse to quality be promptly identified and corrected. The January 1984 Status Report (MPQAD Site Audits) indicated that 37 audit reports were open, of which 22 had been open for six months or longer, some dating back to 1981. 15 of the 37 audit reports had findings overdue.

Records revealed a failure to maintain audit report, and related corrective actions (memo L.J. Barbieri to R.A. Wells 2/7/84).

A review of audits (open and closed) prior to June 1983 should be conducted to assure adequacy of auditing, proper close out of findings, compliance to 10CFR50, Appendix B, and objective evidence as to adequacy of past audits.

Please advise CIO of actions to be taken.

YES (PAGE NO.'S)       NO

ATTACHMENTS	
DATE RESPONSE REQ'D. March 19, 1984	INITIATOR/DATE <i>George K. Hader</i> <i>R. W. Brown</i> 2-15-84
INITIATION APPROVED/DATE <i>J. E. Kou</i> 2-18-84	

**RESPONSE**

See Attached

The attached response (Attachment 1), along with CPCo Internal Correspondence RCSember to BHPeck, dated 5/10/84. Serial No. 29575 (Attachment 2) is acceptable and this Item is considered closed.

YES (PAGE NO.'S) <sup>T-16</sup> 2 3       NO

ATTACHMENTS			
EST. CORRECTIVE ACTION COMPLETION DATE	RESPONDENT <i>RCSember</i> RCSember	TITLE Audit Branch Head	DATE 3/13/84

RESPONSE ACCEPTED/DATE <i>R. W. Brown</i> 5/21/84	RESPONSE VERIFIED/CLOSED <i>J. E. Kou</i>	DATE 5-22-84
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The first paragraph reports there may exist a condition adverse to quality due to overdue and lack of attention to tracking Audit Findings.

The following is a summary and status of open Audit Reports which was developed from a status report which the Audit Branch issues monthly to Consumers Power Company and Bechtel management.

Status of Action Items

1. Audit Reports with open Action Items = 33
2. Audit Reports from #1 above, open 6 months or longer = 21
3. Of #2 above, 11 Audit Reports are indefinitely extended.
4. Of #1 above, open 6 months or less = 12 Audit Reports
5. Of #2 above, only 7 of the cumulative 33 Audit Findings issued with 21 reports are beyond commitment date and all 7 have had reminders issued.
6. Of #5 above, the remaining 26 Findings are not beyond the required commitment response date.
7. From #3 above, the 11 Audit Reports involve a total of 45 Findings which were indefinitely extended as a result of no construction activities on Q work since 2/12/82.
8. Therefore, the Status Summary indicates there are 21 Audit Reports (#2 above) open with action items 6 months or longer and of those 21, 11 have been indefinitely extended because of no construction activity. Therefore, there are 10 Audit Reports open 6 months or longer. Of those 10 Audit Reports, there is a total of 33 open AFR/URIs. Seven of the 33 are open beyond commitment date, with action item reminders issued and the remaining 25 are within commitment dates. Therefore, a review is not warranted at this time because all open action items are being tracked and are not judged to be creating conditions adverse to quality.

The second paragraph states that Audit Reports and related corrective actions were not being maintained. In fact, the Audit Reports and related action items (AFRs, URIs) were being maintained according to MPQAD Procedure F-12M, Rev 4. The requirement as stated in Rev 4 was for the auditor to maintain the original Report and Findings until closure of all outstanding action items and at that time, the Audit Report became a Quality Record and was to be controlled as a Quality Record. It should be understood that this was the practice prior to a singular dedicated audit activity being established on the Midland Project and audits were previously conducted by individual disciplines. The Site Audit Branch, with management agreement, made a decision to centralize and control (and proceduralize this control) all past and related corrective actions. The memo from LJBarbieri to RAWells documented this activity and did not indicate in any way some previous failure to maintain Audit Reports. It should be noted that all Audit Reports with their respective action items have been accounted for as evidenced by Audit Log entries.

Paragraph three recommends a review of all audits (opened and closed) prior to June, 1983, to assure adequacy of auditing proper close-out of Findings, compliance to 10CFR50, Appendix B and objective evidence as to adequacy of past audits. There is no indication that the audits themselves, close-out of findings or compliance to 10CFR50, Appendix B are suspect. To confirm the adequacy of audits performed prior to June, 1983, a nonstatistical sample will be reviewed and an evaluation made over the next 12 months. This will also include a review of any third party concerns. Corrective action will be taken if required. The Site Audit Branch is scheduling future audits which will provide a new look at the same activities and current status will be determined.

To BHPeck, Midland Energy Center

FROM RCSember, Audit Branch *RCSember*

DATE May 10, 1984

SUBJECT MIDLAND ENERGY CENTER PROJECT -  
RESPONSE TO CIO ITEM 059  
FILE 24.2 SERIAL 29575

**Consumers  
Power  
Company**

INTERNAL  
CORRESPONDENCE

CC

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The purpose of this memo is to provide additional information/clarification of the actions being taken by the Site Audit Branch regarding CIO Tracked Information Item 059. In conjunction with actions which took place as a result of our developing a tracking mechanism/matrix (Tracked Item 060 Item 2b) a review of past audit findings was performed. Past Findings/Unresolved Items were also screened for appropriateness, correctness, and proper close out. No adverse trends were noted and it was decided that there did not seem to be any major deficiencies in past audits.

During the normal course of preparing for new audits a review is made of past audits in the same area. Since most of the areas are audited, as a minimum, yearly, it is anticipated that during the next 12 months all past Audit Reports and Findings/Unresolved Items should be reviewed in depth and any areas found deficient in past audits will be reaudited.

If you have any questions regarding our actions, please feel free to contact Mr L J Barbieri or me.