



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
789 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

March 14, 1984

MEMORANDUM FOR: Director, DPRP
Director, DE
Director, DRMS
Director, SCS
Director, DRMA

FROM: Pearl T. Smidth, RIII FOIA Coordinator

SUBJECT: FOIA REQUEST 84-158

The attached FOIA request has been received in RIII and MUST be given PRIORITY ATTENTION.

Please check the applicable block and return the attached Form RIII/0959A to the Director, DRMA at the Regional Administrator's 8:15 a.m. meeting on March 16, 1984.

All documents subject to this request must be provided to me no later than COB, March 20, 1984.

If the documents cannot be provided within the time required, the request for extension must be submitted to the Regional Administrator (using the Form RIII/0959B attached) and approved by him.

Thank you for your cooperation.

Pearl T. Smidth
RIII FOIA Coordinator

Attachments:

1. FOIA Request
2. Form RIII/0959A
3. Form RIII/0959B

cc w/atts:

A. B. Davis
Steve Lewis
W. H. Schultz

8406020107 840517
PDR FOIA
RICE84-96 PDR

GOVERNMENT ACCOUNTABILITY PROJECT

Institute for Policy Studies

1901 Que Street, N.W., Washington, D C 20009

(202) 234-9382

March 6, 1984

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-84-151

Rec'd 3-7-84

Mr. William Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: FOIA84-A-6
(FOIA83-706)

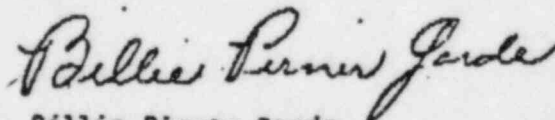
Dear Mr. Dircks:

Your undated response to my January 17, 1984 letter of inquiry regarding FOIA83-706 did not answer my questions. I will restate them here, and request a specific response:

1. Did Mr. Novak create or obtain any notes, reports, memos to the file, make any trips to either the Region III office or the Midland site during the September, 1982-December, 1982, time period? *We don't know.*
2. If they ever had such notes, etc., when were they destroyed, or are they in someone else's possession? *We don't know*
3. Has the Region III OSC staff been requested to produce any notes, memos, etc. that they kept of Mr. Novak's meetings with them regarding the Midland plant? *Yes. Our answer is attached*
4. I requested, and re-state my request, for a Vaugh index for the ? relevant documents.

I look forward to your response within 20 days.

Sincerely,



Billie Pirner Garde
Citizens Clinic Director

BPG:me

THOMAS M. NOVAK - MIDLAND PLANT

TRAVEL TO GLEN ELLYN, IL AND MIDLAND/SAGINAW, MI

<u>DATE</u>	<u>PLACE</u>	<u>PURPOSE</u>
8/26/82	Glen Ellyn, IL Region III	Attend meeting with Consumers Power management regarding Midland Plant. Rental Car
9/28-30/82	Midland/Saginaw	Attend QA meeting w/Region III and applicant re: Midland Plant. Rental Car
2/8-9/83	Midland/Saginaw	Meeting with Midland Licensee on QA and attendance of public meeting to discuss Midland. Rental Car
7/28/83	Chicago, IL	Attend management meeting, Region III Administrator, on Midland. Accompanied by Darrell G. Eisenhut in rental car.
8/11-12/83	Midland, MI	Attend public meeting on Midland CCP and licensee SALP on Midland and Midland site visit. Passenger in Darl Hood's Rental Car
8/24-25/83	Midland/Saginaw	Meeting with S&W on construction implementation overview of the Midland CCP Rental car
10/11/83	Glen Ellyn, IL	Enforcement Conference meeting Region III Passenger in Darl Hood's Rental Car

UNITED STATES GOVERNMENT
memorandum

DATE:

REPLY TO
ATTN OF:

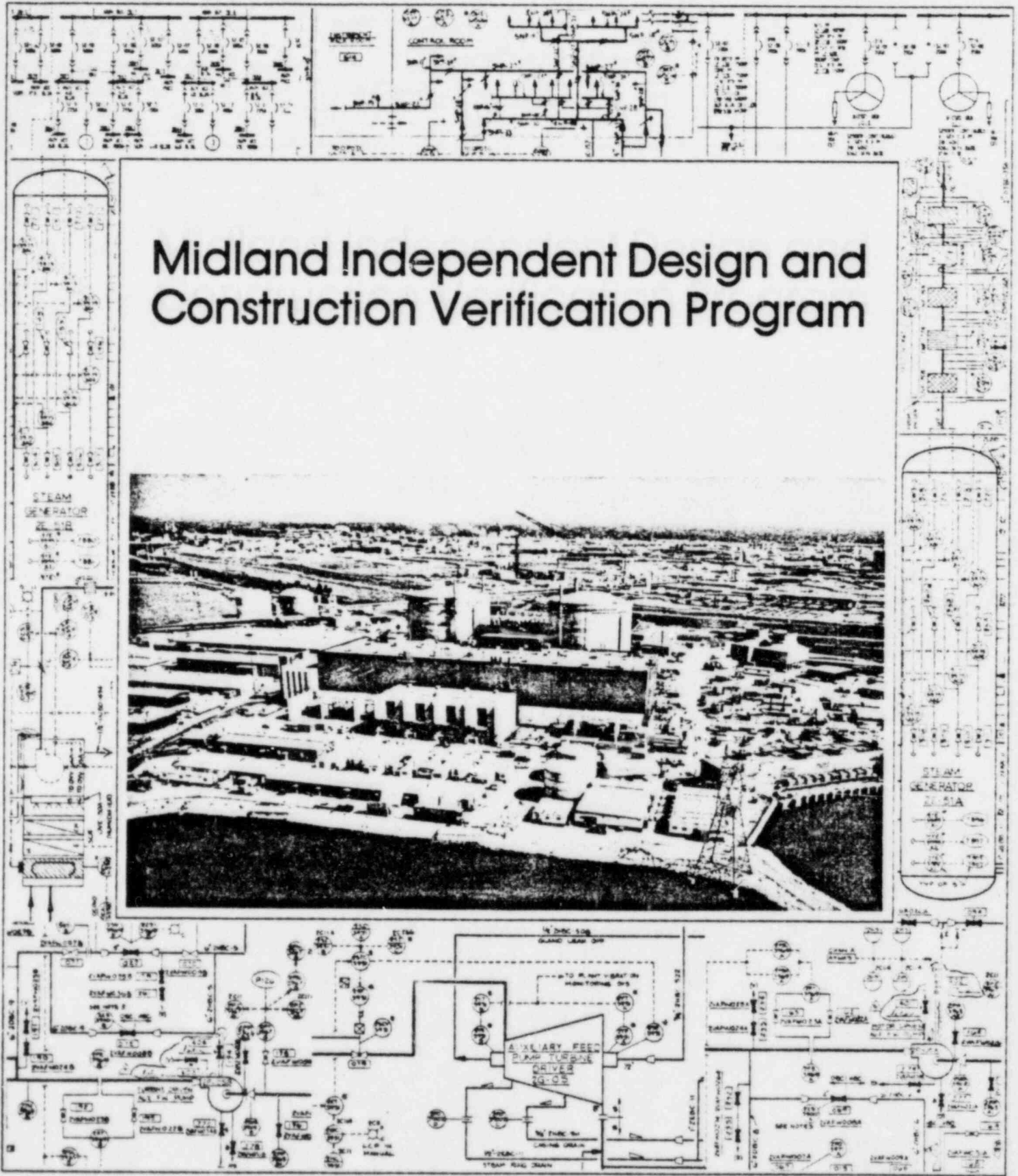
SUBJECT:

TO:

A duplicate.
Not necessary to
copy.

Steve Lewis
Return to Warwick

Midland Independent Design and Construction Verification Program



*Don Tulodieski - Co-ordinator
of IDCVP*

*Frank Dougherty - Design
of IDCVP*

**AGENDA
MEETING TO DISCUSS PLANS FOR
COMPLETION OF THE
MIDLAND IDCVP
MARCH 13, 1984
BETHESDA, MD**

- PURPOSE - BECK (TERA)
- INTRODUCTION AND BACKGROUND - LEVIN (TERA)
 - STATUS OF THE IDCVP
 - RELATIONSHIP OF THE IDCVP AND ONGOING ACTIVITIES
 - REVIEW OF IDCVP OBJECTIVES/PHILOSOPHY
 - SUMMARY OF IDCVP COMPLETION PLANS
- COMPLETION OF THE DESIGN VERIFICATION - DOUGHERTY (TERA)
 - REVIEW OF IDVP METHODOLOGY
 - EFFECT OF ONGOING DESIGN-RELATED ACTIVITIES
 - SCOPE OF REVIEW/APPROACH TO SAMPLE SELECTION
 - REVIEW AREA STATUS/FUTURE ACTIONS
- COMPLETION OF THE CONSTRUCTION VERIFICATION - TULODIESKI (TERA)
 - CURRENT STATUS AND ACTIVITIES
 - QVP REVIEW
 - FUTURE ACTIVITIES
- SUMMARY OF IDCVP ENHANCEMENTS - LEVIN (TERA)
- DISCUSSION - LEVIN (TERA), ANKRUM (NRC), GIBSON (CPC)
- PUBLIC COMMENTS - AS REQUESTED BY OBSERVERS
- SUMMARY - BECK (TERA)



PURPOSE

- TO DESCRIBE PLANS FOR COMPLETION OF THE MIDLAND INDEPENDENT DESIGN AND CONSTRUCTION VERIFICATION PROGRAM AS SUMMARIZED IN TERA'S FEBRUARY 10, 1984, LETTER TO NRC AND CPC.



STATUS

MIDLAND IDCVP

MSR 9 (2/15/84)

MSR Status Report

● PERCENTAGE COMPLETE

- IDVP = 64%
- ICVP = 26%
- IDCVP = 51%

●

<u>OCRs/FINDINGS</u>	<u>IDENTIFIED</u>	<u>ACTIVE</u>
- POTENTIAL OPEN ITEMS (P)	154	0 86
- OPEN ITEMS (O)	136	16
- CONFIRMED ITEMS (C)	97	58
- FINDINGS (F)	20	12
- RESOLVED ITEMS (R)	37	-
- FINDING RESOLUTION (Z)	8	-
- OBSERVATIONS(B)	23	-

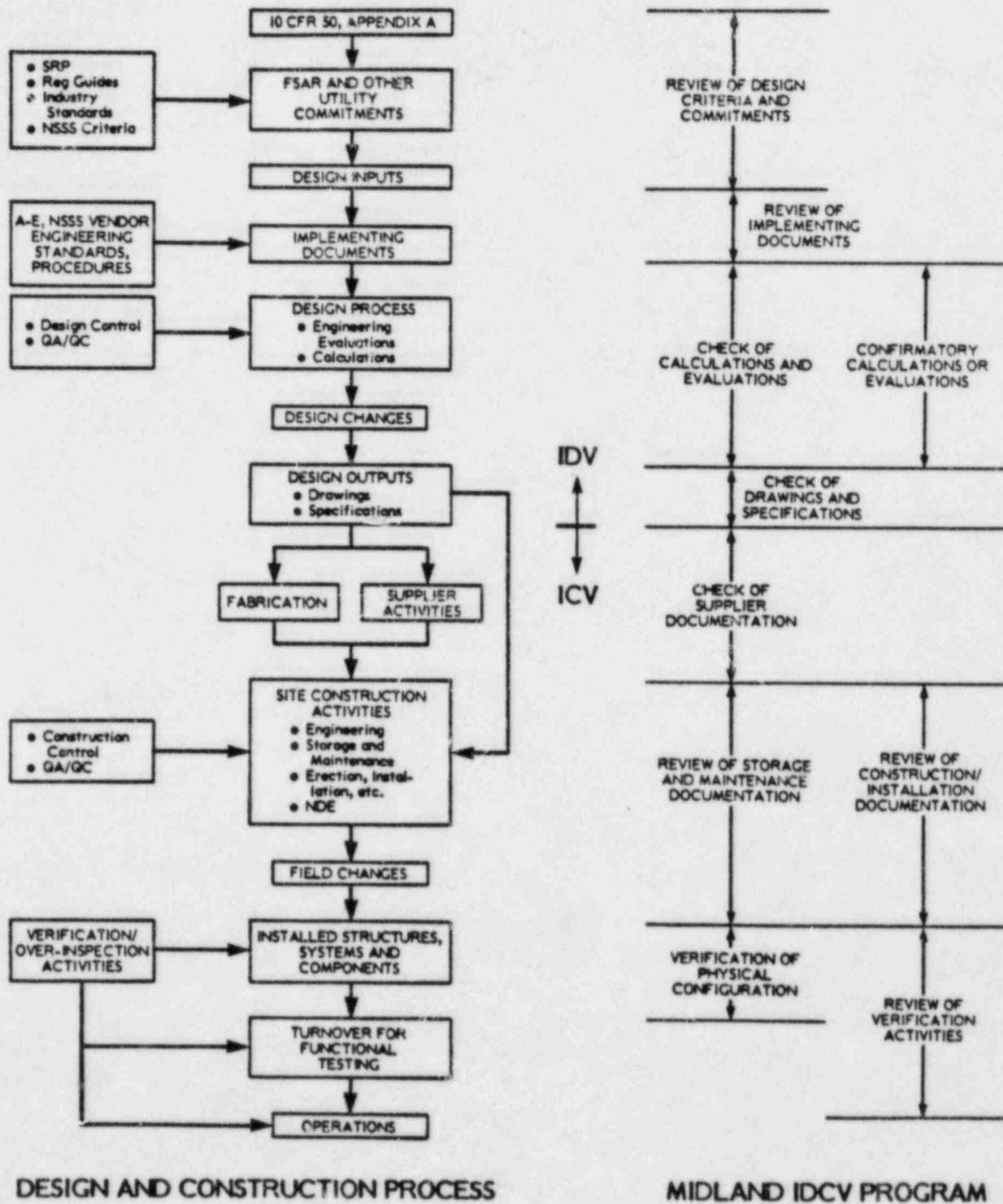
$$P = O_A + C_A + F_A + R + Z + B$$

●

<u>CURRENT ACTIVITIES</u>	<u>IDVP</u>	<u>ICVP</u>
- BASE SCOPE	X	
- OCR DISPOSITION	X	X
- REPORTS	X	



INTER-RELATIONSHIP BETWEEN THE MIDLAND DESIGN AND CONSTRUCTION PROCESS AND THE MIDLAND IDCV PROGRAM



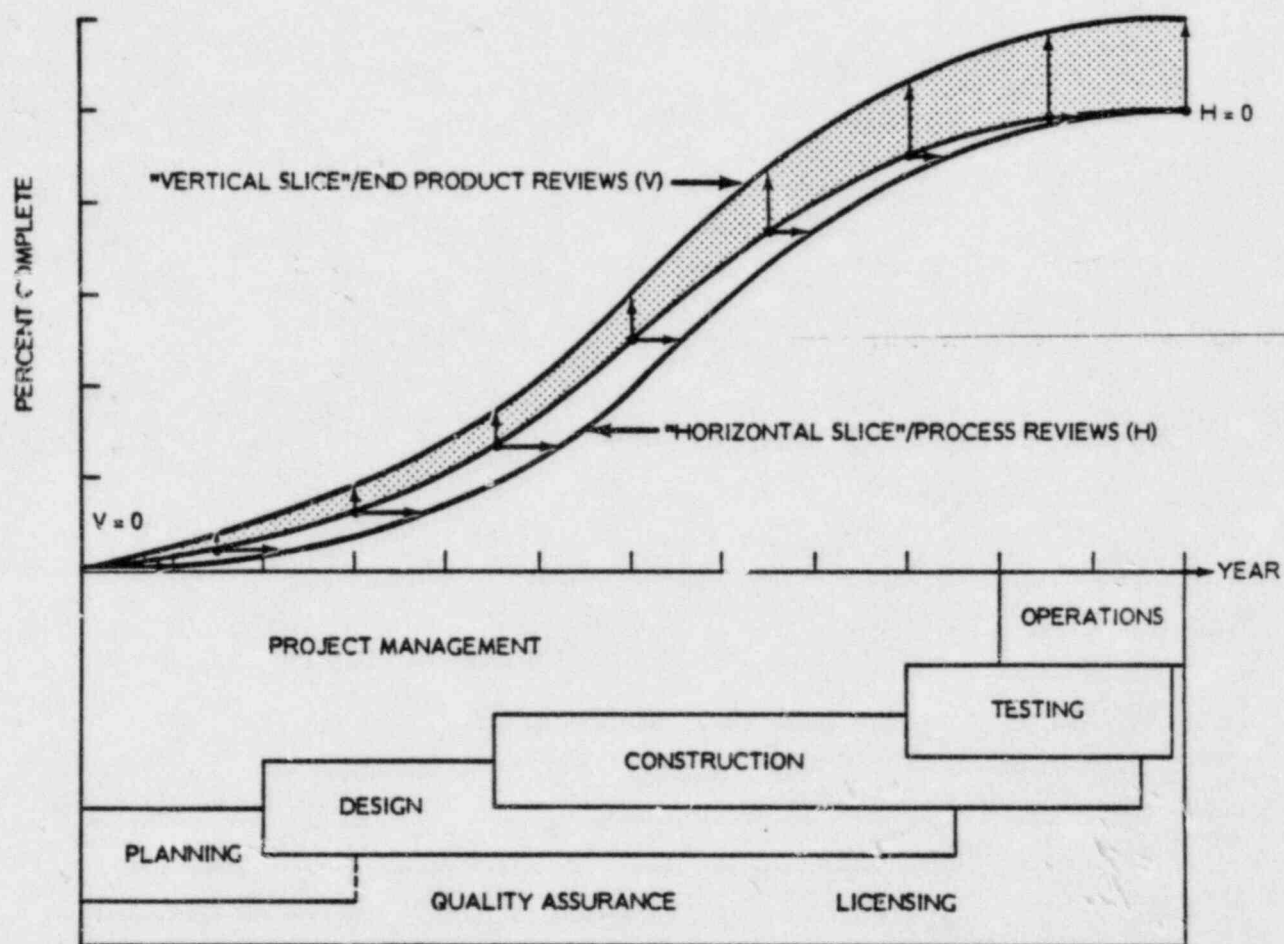
RELATIONSHIP OF THE IDCVP AND
ONGOING ACTIVITIES

- MIDLAND PROJECT STATUS
 - CONSTRUCTION COMPLETION PROGRAM
 - DESIGN CHANGES/RECONCILIATION



- INDEPENDENT VERIFICATION DURING THE PROJECT COMPLETION CYCLE
 - ROLE OF IDCVP VERTICAL SLICE
 - ROLE OF CIO, ETC.



USE OF INDEPENDENT DESIGN AND CONSTRUCTION VERIFICATION PROGRAMS THROUGH THE NUCLEAR PROJECT COMPLETION CYCLE



KEY:

- 
 SPECIFIC DESIGN/CONSTRUCTION VERIFICATION PROGRAM SHOWING RELATIVE EMPHASIS OF VERTICAL AND HORIZONTAL SLICE REVIEWS
- 
 RELATIVE IMPORTANCE OF END PRODUCT REVIEWS AND PROCESS REVIEWS TO AN ASSESSMENT OF QUALITY AT A SPECIFIC PERCENTAGE COMPLETION AND INTERVAL OF TIME

PHILOSOPHY OF REVIEW

- SELECT A REPRESENTATIVE SAMPLE OF ENGINEERED SYSTEMS, COMPONENTS, AND STRUCTURES WHICH WILL FACILITATE:
 - AN INTEGRATED ASSESSMENT OF IMPORTANT PARAMETERS AFFECTING THE FUNCTIONAL CAPABILITY OF THE THREE SYSTEMS, AND
 - THE ABILITY TO EXTRAPOLATE FINDINGS TO SIMILARLY DESIGNED FEATURES WITH A HIGH DEGREE OF CONFIDENCE
- CONSIDER POSITIVE AND NEGATIVE FINDINGS WHICH WILL ALLOW A BALANCED VIEW OF OVERALL QUALITY
- ASSESS ROOT CAUSE AND EXTENT OF IDENTIFIED FINDINGS
- REVIEW CORRECTIVE ACTION TAKEN TO ADDRESS FINDINGS



SUMMARY OF IDCVP COMPLETION PLANS

- MAINTAIN EXISTING VERTICAL SLICE APPROACH IN IDCVP
 - END PRODUCT EMPHASIS
 - SUPPLEMENTAL REVIEW OF SELECTED ENGINEERING PROCESSES
 - ONGOING CONFIRMATORY PROGRAMS (E.G., FIRE PROTECTION)

- POSTPONEMENT OF SELECTED ICVP UNTIL PHASE I OF CCP
 - SUPPLEMENTAL REVIEW OF QVP DOCUMENTATION PROCESSES

- FOCUSED REVIEW OF IDENTIFIED PROCESS-RELATED ISSUES RESULTING FROM FINDINGS (E.G., FIELD CHANGE/DESIGN CHANGE CONTROL PROCESS)



COMPLETION OF THE DESIGN VERIFICATION

- REVIEW OF IDVP METHODOLOGY
- EFFECT OF ONGOING DESIGN-RELATED ACTIVITIES
- SCOPE OF REVIEW/APPROACH TO SAMPLE SELECTION
- REVIEW AREA STATUS/FUTURE ACTIONS



**INITIAL SAMPLE REVIEW MATRIX FOR THE AUXILIARY FEEDWATER SYSTEM
MIDLAND INDEPENDENT DESIGN VERIFICATION PROGRAM**

DESIGN AREA	SCOPE OF REVIEW				
	REVIEW OF DESIGN CRITERIA AND COMMITMENTS	REVIEW OF IMPLEMENTING DOCUMENTS	CHECK OF CALCULATIONS AND EVALUATIONS	CONFIRMATORY CALCULATION OR EVALUATION	CHECK OF DRAWINGS AND SPECIFICATIONS
I. <u>AFW SYSTEM PERFORMANCE REQUIREMENTS</u>					
SYSTEM OPERATING LIMITS	X	X	X		
ACCIDENT ANALYSIS CONSIDERATIONS	X				
SINGLE FAILURE	X	X	X	•	
TECHNICAL SPECIFICATIONS	X	X			
SYSTEM ALIGNMENT/SWITCHOVER	X	X			
REMOTE OPERATION AND SHUTDOWN	X				
SYSTEM ISOLATION/INTERLOCKS	X	X			
OVERPRESSURE PROTECTION	X	•	•	•	
COMPONENT FUNCTIONAL REQUIREMENTS	X	X	X		X
SYSTEM HYDRAULIC DESIGN	X	X	X	•	
SYSTEM HEAT REMOVAL CAPABILITY	X	X	X	•	
COOLING REQUIREMENTS	X				
WATER SUPPLIES	X	X			
PRESERVICE TESTING/CAPABILITY FOR OPERATIONAL TESTING	X	•	•		•
POWER SUPPLIES	X	X			•
ELECTRICAL CHARACTERISTICS	X	•	•		
PROTECTIVE DEVICES/SETTINGS	X	X			X
INSTRUMENTATION	X	X	X		X
CONTROL SYSTEMS	X	X	X		•
ACTUATION SYSTEMS	X				•
NDE COMMITMENTS	X	•			•
MATERIALS SELECTION	X	X			
FAILURE MODES AND EFFECTS	•	•		•	

KEY

X - INITIAL SCOPE OF REVIEW

(X) - DELETED SCOPE OF REVIEW

• - ADDED SCOPE OF REVIEW

INITIAL SAMPLE REVIEW MATRIX FOR THE AUXILIARY FEEDWATER SYSTEM
MIDLAND INDEPENDENT DESIGN VERIFICATION PROGRAM (CONTINUED)

DESIGN AREA	SCOPE OF REVIEW				
	REVIEW OF DESIGN CRITERIA AND COMMITMENTS	REVIEW OF IMPLEMENTING DOCUMENTS	CHECK OF CALCULATIONS AND EVALUATIONS	CONFIRMATORY CALCULATION OR EVALUATION	CHECK OF DRAWINGS AND SPECIFICATIONS
II. <u>AFW SYSTEM PROTECTION FEATURES</u>					
SEISMIC DESIGN	X				
• PRESSURE BOUNDARY	X	X	X	X	X
• PIPE/EQUIPMENT SUPPORT	X	X	X	X	X
• EQUIPMENT QUALIFICATION	X	X	X		X
HIGH ENERGY LINE BREAK ACCIDENTS	X				
• PIPE WHIP	X	X	X		X
• JET IMPINGEMENT	X				
ENVIRONMENTAL PROTECTION	X				
• ENVIRONMENTAL ENVELOPES	X	X	X		X
• EQUIPMENT QUALIFICATION	X	X	X		X
• HVAC DESIGN	X				
FIRE PROTECTION	X	X	X		
MISSILE PROTECTION	X				
SYSTEMS INTERACTION	X	X	X		
III. <u>STRUCTURES THAT HOUSE THE AFW SYSTEM</u>					
SEISMIC DESIGN/INPUT TO EQUIPMENT	X	X	X		X
WIND & TORNADO DESIGN/MISSILE PROTECTION	X				
FLOOD PROTECTION	X				
HELBA LOADS	X				
CIVIL/STRUCTURAL DESIGN CONSIDERATIONS	X				
• FOUNDATIONS	X	X	X		
• CONCRETE/STEEL DESIGN	X	X	X		X
• TANKS	(X)	(X)	(X)		

KEY

X - INITIAL SCOPE OF REVIEW

(X) - DELETED SCOPE OF REVIEW

• - ADDED SCOPE OF REVIEW

**INITIAL SAMPLE REVIEW MATRIX FOR THE AUXILIARY FEEDWATER SYSTEM
MIDLAND INDEPENDENT CONSTRUCTION VERIFICATION PROGRAM**

SYSTEM/COMPONENT	SCOPE OF REVIEW				
	REVIEW OF SUPPLIER DOCUMENTATION	REVIEW OF STORAGE AND MAINTENANCE DOCUMENTATION	REVIEW OF CONSTRUCTION/INSTALLATION DOCUMENTATION	REVIEW OF SELECTED VERIFICATION ACTIVITIES	VERIFICATION OF PHYSICAL CONFIGURATION
I. MECHANICAL					
● EQUIPMENT	X	X	X	X	X
● PIPING	X		X	X	X
● PIPE SUPPORTS	X		X	X	X
II. ELECTRICAL					
● EQUIPMENT	X	X	X	X	X
● TRAYS AND SUPPORTS	X		•	•	X
● CONDUIT AND SUPPORTS	X		•	•	X
● CABLE	X	X	X	X	X
III. INSTRUMENTATION AND CONTROL					
● INSTRUMENTS	X	X	X	X	X
● PIPING/TUBING	X				X
● CABLE	X		•	•	X
IV. HVAC					
● EQUIPMENT	X	X	X	X	X
● DUCTS AND SUPPORTS	X				X
V. STRUCTURAL					
● FOUNDATIONS	X		X		
● CONCRETE	X		X		X
● STRUCTURAL STEEL	X		X		X
VI. NDE/MATERIAL TESTING PROGRAM					X

KEY

- X - INITIAL SCOPE OF REVIEW
- (X) - DELETED SCOPE OF REVIEW
- - ADDED SCOPE OF REVIEW

EFFECT ON IDVP OF
ONGOING DESIGN-RELATED ACTIVITIES

<u>MEASURE</u>	<u>TOTAL NUMBER</u>	<u>NUMBER AFFECTED</u>	<u>PERCENTAGE AFFECTED</u>
MATRIX XS	352	34	10
LINE ITEMS	127	15	12
ENGINEERING EVALUATIONS	80	12	15

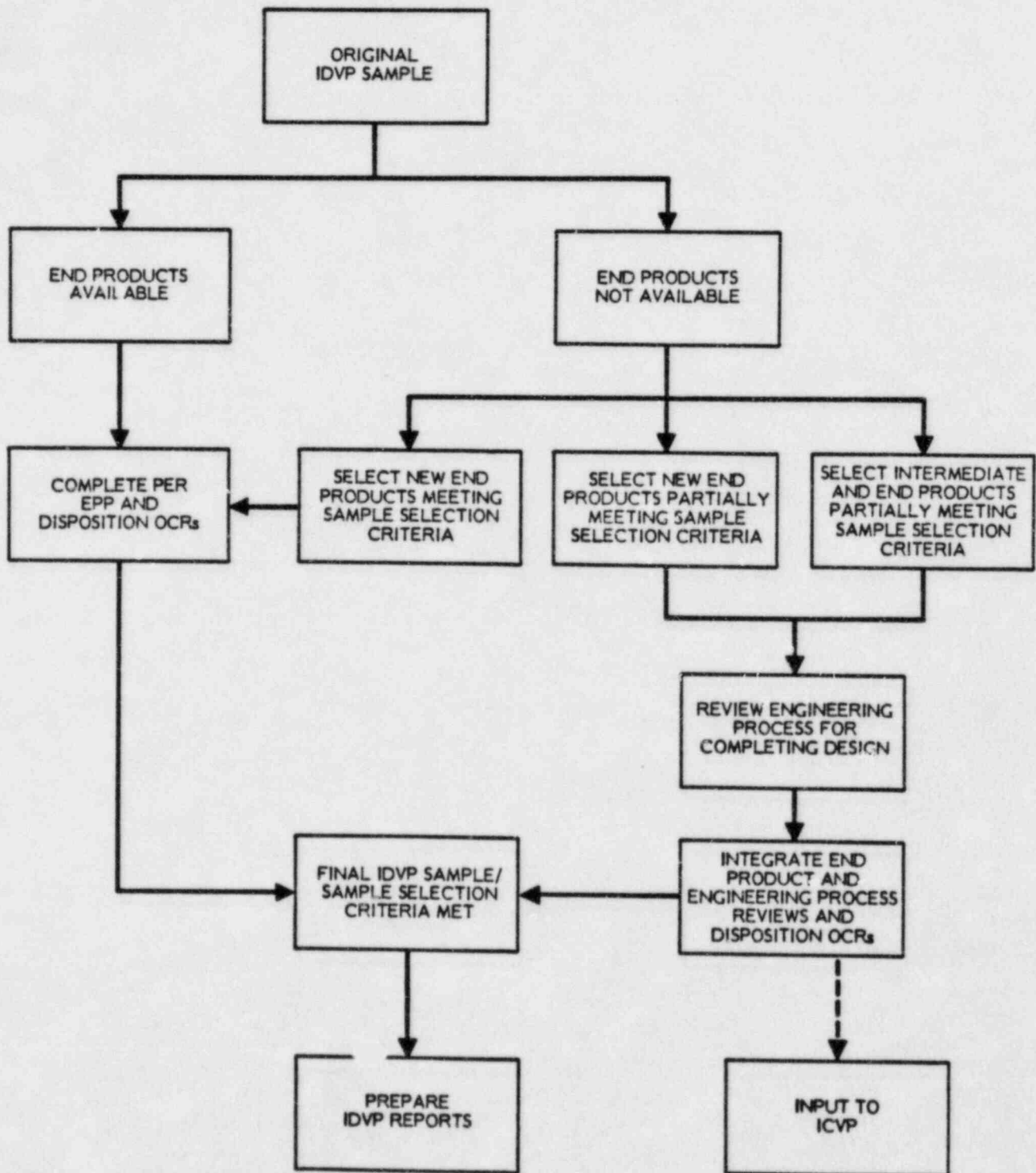


SAMPLE SELECTION CRITERIA

- IMPORTANCE TO SAFETY
- DESIGN/CONSTRUCTION INTERFACES
- ABILITY TO EXTRAPOLATE RESULTS
- DIVERSITY
- PREVIOUS EXPERIENCE
- TESTABILITY



IDVP REVIEW APPROACH TO SAMPLE SELECTION
FOR SPECIFIC DESIGN TOPICS



REVIEW AREA STATUS

TECH SPECS

<u>STATUS</u>	<u>PROPOSED ACTION</u>
● IN DRAFT FORM	● VERIFY THAT PROCESS ENSURES COMPATIBILITY OF TECH SPECS AND DESIGN
● REVISED IN FSAR AMENDMENT 49	
● SPECIFIC NUMBERS NEED TO BE DEVELOPED	
● TYPICAL OF PLANT AT THIS STAGE	



REVIEW AREA STATUS

SEISMIC DESIGN/EQUIPMENT QUALIFICATION

<u>STATUS</u>	<u>PROPOSED ACTION</u>
● APPROXIMATELY 70% COMPLETE	● REVIEW AVAILABLE DOCUMENTATION
● OUTSIDE CONTRACTOR HAS SIGNIFICANT SCOPE	● SUBSTITUTE COMPONENTS FOR INCOMPLETE PACKAGES WHEN NECESSARY
● AFFECTS ALL 3 SYSTEMS IN SAMPLE	● REVIEW SQRT PROCEDURE
● 50% OF PREVIOUSLY SELECTED PACKAGES NOT COMPLETE	
● OCRs INDICATE A NEED FOR ADDITIONAL DOCUMENTATION	



REVIEW AREA STATUS

HIGH ENERGY LINE BREAK ACCIDENT
PIPE WHIP/JET IMPINGEMENT

<u>STATUS</u>	<u>PROPOSED ACTION</u>
<ul style="list-style-type: none">● BASIC EFFORT IS ESSENTIALLY COMPLETE	<ul style="list-style-type: none">● REVIEW PROCEDURES
<ul style="list-style-type: none">● WALKDOWN FOR FIELD RUN OR FIELD LOCATED ITEMS MUST BE DONE	<ul style="list-style-type: none">● USE ICVP TO VERIFY RESULTS



REVIEW AREA STATUS

ENVIRONMENTAL PROTECTION/EQ

<u>STATUS</u>	<u>PROPOSED ACTION</u>
● REV. 1 OF EQ REPORT ISSUED 12/82	● NO CHANGE TO PROGRAM ASSUMING LAST PACKAGE IS AVAILABLE
● REV. 2 IS PLANNED	● REVIEW QUALIFICATION PROGRAM FOR PACKAGE IF RESULTS NOT AVAILABLE
● 3 PACKAGES WERE NOT COMPLETE, BUT 2 NOW ARE AND THE LAST ONE IS SCHEDULED PRIOR TO 3/31	● REVIEW TESTING PROGRAM
● ONE OTHER ITEM IS IN TESTING AND IS SCHEDULED FOR MID-YEAR COMPLETION	



REVIEW AREA STATUS

FIRE PROTECTION

<u>STATUS</u>	<u>PROPOSED ACTION</u>
<ul style="list-style-type: none">● FIRE HAZARDS STUDY BEING REVISED	<ul style="list-style-type: none">● REVIEW PROGRAM FOR COMPLETION OF FIRE HAZARDS STUDY
<ul style="list-style-type: none">● AFFECTS MULTIPLE AREAS OF PLANT	
<ul style="list-style-type: none">● OUTSIDE CONTRACTOR	
<ul style="list-style-type: none">● TERA ATTENDED NRC/CPC/ CONTRACTOR MEETING	
<ul style="list-style-type: none">● CONTRACTOR REVIEWING AREAS THAT OUR OCRs INDICATED NEEDED REVIEW	

Tera essentially completed their planned review. Found some problems but these had been identified previously by the licensee. F.P. contractor is looking at these problem areas



REVIEW AREA STATUS

SYSTEMS INTERACTION

<u>STATUS</u>	<u>PROPOSED ACTION</u>
● PROGRAM HAS BEEN STARTED	● REVIEW PROGRAM IN DETAIL
● TERA HAS REVIEWED PORTIONS OF PROGRAM	● USE ICVP TO VERIFY OF RESULTS
● PROGRAM BEING PERFORMED BY CONTRACTOR	
● FIELD ACTIVITIES IN PROGRESS	



INDEPENDENT CONSTRUCTION VERIFICATION PROGRAM (ICVP)

- ORIGINAL PLAN FOR ICVP EXECUTION
- INFLUENCE OF MIDLAND PROJECT ENVIRONMENT UPON ICVP COMPLETION
- ALTERATIONS TO ICVP EXECUTION PLAN NECESSARY TO RETAIN PRINCIPAL GOALS AND OBJECTIVES



ORIGINAL PLAN FOR ICVP EXECUTION

- **PRINCIPAL OBJECTIVE:** VERIFICATION OF THE QUALITY OF END PRODUCTS I.E.,
 - DOCUMENTATION/PROCEDURES
 - QUALITY VERIFICATION PACKAGES
 - INSTALLED COMMODITIES AND COMPONENTS

- **SCOPE**

<u>REVIEW CATEGORY</u>	<u>AFW SYSTEM</u>	<u>SEP SYSTEM</u>	<u>CRHVAC SYSTEM</u>
1. VENDOR DOCUMENTATION	X	X	X
2. STORAGE AND MAINTENANCE	X	X	X
3. CONSTRUCTION/INSTALLATION DOCUMENTATION	X	X	X
4. PHYSICAL VERIFICATION	X	X	X
5. VERIFICATION ACTIVITIES	X	X	X

- **PLAN FOR EXECUTION OF SCOPE**
(REVIEWS CONDUCTED IN LOGICAL GROUPINGS)

1. CONSTRUCTION/INSTALLATION DOCUMENTATION AND PHYSICAL VERIFICATION
2. VERIFICATION ACTIVITIES
3. VENDOR DOCUMENTATION AND STORAGE AND MAINTENANCE



**INFLUENCE OF MIDLAND PROJECT ENVIRONMENT
UPON ICVP COMPLETION**

- FACTORS AFFECTING ICVP EXECUTION
 - PROGRAMMATIC CHANGES TO COMPLETE PROJECT
 - + RECERTIFICATION OF "Q"-RELATED WORK
 - + CONSTRUCTION COMPLETION PROGRAM (CCP)
 - + QUALITY VERIFICATION PROGRAM (QVP)
 - + DOCUMENT/RECORD HANDLING PRACTICES
 - DELAYS TO PROGRAM EXECUTION
 - + APPROVAL OF CCP/QVP
 - + STOP WORK ORDERS (FCR/FCN)
 - + COMPLETION STATUS OF ZACK WORK

- INFLUENCE UPON ICVP SCOPE

<u>REVIEW CATEGORY</u>	<u>AFW SYSTEM</u>	<u>SEP SYSTEM</u>	<u>CRHVAC SYSTEM</u>
1. VENDOR DOCUMENTATION	X	X	X
2. STORAGE AND MAINTENANCE	X	X	X
3. CONSTRUCTION/INSTALLATION DOCUMENTATION	●	●	⊗
4. PHYSICAL VERIFICATION	●	●	⊗
5. VERIFICATION ACTIVITIES	X	X	X



**INFLUENCE OF MIDLAND PROJECT ENVIRONMENT
UPON ICVP COMPLETION**

- PHYSICAL VERIFICATION - HOW AFFECTED
 - WITH THE EXCEPTION OF ZACK, SELECTED COMMODITIES AND COMPONENTS WITHIN SYSTEM SAMPLE BOUNDARIES WILL BE RECERTIFIED (END PRODUCT UNAVAILABLE)
 - INSTALLED COMMODITIES AND COMPONENTS NOT CONSIDERED PROPERLY STATUSED PENDING COMPLETION OF CCP PHASE I
 - + REINSPECTION (ACCESSIBLE)
 - + RECERTIFICATION (INACCESSIBLE)
 - + "TO DO" PUNCH LIST

- CONSTRUCTION/INSTALLATION DOCUMENTATION - HOW AFFECTED
 - REVIEWED INSTRUCTIONS AND PROCEDURES UNDERGOING REVISION (END-PRODUCT DIFFICULT TO DISCERN)
 - FINAL QUALITY VERIFICATION DOCUMENTATION NOT COMPLETE/COLLATED (END-PRODUCT DIFFICULT TO OBTAIN AND VERIFY AS BEST AND FINAL)
 - INSPECTION RECORDS FOR ACCESSIBLE ITEMS TO BE SUPERCEDED BY CCP/QVP RECERTIFICATION PROCESS (END PRODUCT NOT AVAILABLE)



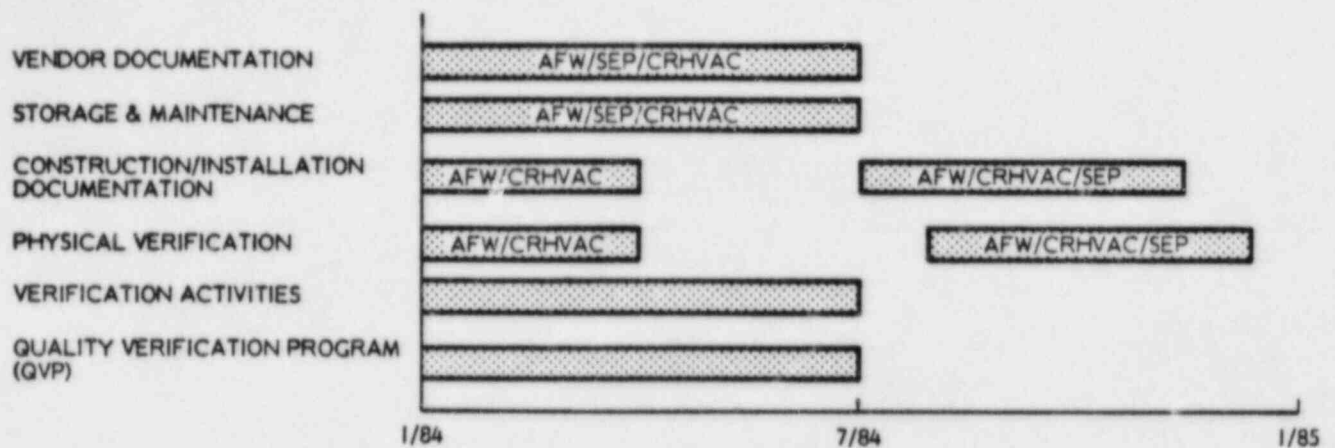
**ALTERATIONS TO ICVP EXECUTION PLAN NECESSARY TO
RETAIN PRINCIPAL GOALS AND OBJECTIVES**

- PRINCIPAL OBJECTIVE: VERIFY THE QUALITY OF END PRODUCTS
- SCOPE

<u>REVIEW CATEGORY</u>	<u>AFW SYSTEM</u>	<u>SEP SYSTEM</u>	<u>CRHVAC SYSTEM</u>
1. VENDOR DOCUMENTATION	X	X	X
2. STORAGE AND MAINTENANCE	X	X	X
3. CONSTRUCTION/INSTALLATION DOCUMENTATION	X	X	X
4. PHYSICAL VERIFICATION	X	X	X
5. VERIFICATION ACTIVITIES	X	X	X
6. QUALITY VERIFICATION PROGRAM	X	X	X



- PLAN FOR EXECUTION OF SCOPE



7/84 = ASSUMED DATE FOR CCP PHASE I COMPLETION ON SELECTED COMPONENTS AND COMMODITIES

- NEAR TERM 1-7/84

- OCR/FINDING DISPOSITION
- VERIFICATION OF REVIEW RESULTS
- REVIEW OF QVP PROCESS
 - + INTERFACE WITH STATUS ASSESSMENT TEAMS
 - + REVIEW, IDENTIFY, AND UNDERSTAND ELEMENTS OF DOCUMENTATION (CONSIDERED) IMPORTANT TO ACCESSIBLE AND INACCESSIBLE ITEMS

- LONG TERM (7/84 - 1/85)

- SITE MOBILIZATION
- CONSTRUCTION/INSTALLATION DOCUMENTATION AND PHYSICAL VERIFICATION REVIEWS



SUMMARY OF IDCVP ENHANCEMENTS

PRIMARY

- AID EXTRAPOLATION OF RESULTS AND INTEGRATED ASSESSMENT
- IMPROVED EXECUTION
 - COHESIVE REVIEW
 - LESS SENSITIVE TO EXTERNAL CONSTRAINTS
- TIMELY RESULTS

SECONDARY

- IMPROVED RESOURCE USAGE/SCHEDULE



MIDLAND NUCLEAR PLANT COMPLETION PLAN
REGULATORY CONSIDERATIONS

CONSUMERS POWER COMPANY

MARCH 22, 1984

MIDLAND ENERGY CENTER COMPLETION PLAN
REGULATORY CONSIDERATIONS

AGENDA

- I. INTRODUCTION (J.W. COOK)**
- II. STATUS ASSESSMENT/QUALITY VERIFICATION PROGRAM (QVP)
UPDATE (J.T. MINOR AND B. PALMER)**
Tina Brian
- III. ISSUES (D.L. QUAMME)**
- IV. POTENTIAL SOLUTIONS (D.L. QUAMME)**
- V. PROCESS CONTROLS (T. VALENZANO)**
Terry Bertel
- VI. CONCLUSIONS (J.W. COOK)**

SECTION I

INTRODUCTION

MIDLAND NUCLEAR PLANT COMPLETION PLAN

BACKGROUND

- NEW SCHEDULE REQ'D -FALL '83 *revised
integrate*
- PROJECT STATUS CHANGED:
 - CCP PROCEDURES
 - UNIT 1 DECOUPLING
- PROJECT PLANNING TEAM FORMED *to come up with master plan*

- **DATA BASE EXTENSIVE**
 - TO-GO QUANTITIES
 - REWORK ASSUMPTIONS
 - UNIT RATES

- **PROJECT SCHEDULE**
 - BOTTOMS UP
 - INTEGRATED

- **MAJOR UNCERTAINTIES**
 - CCP ASSUMPTION VERIFICATION
 - FINANCIAL LIMITATIONS

CONSTRUCTION COMPLETION PROGRAM

BASIC PRINCIPLES:

- A. MANAGEMENT REVIEWS ARE SCHEDULED AND HELD OF (1) ACTIVITY PLANNING FOR VERIFICATION AND STATUS ASSESSMENT AND (2) RESULTS OF STATUS ASSESSMENT AND PLANNING PRIOR TO NEW WORK ACTIVITY.
- B. A PROCESS IS IN PLACE TO ENSURE THAT NO EXISTING NON CONFORMANCES WILL BE COVERED UP BY NEW WORK ACTIVITIES.
- C. PROCEDURES TO CONTROL WORK DEFINITION AND RELEASE INCLUDING DEFINITION OF INSPECTION REQUIREMENTS AND INSPECTION HOLD POINTS ARE IN PLACE.
- D. INSPECTION AND CONSTRUCTION PERSONNEL INVOLVED MUST HAVE RECEIVED ALL REQUIRED TRAINING.

SECTION II

STATUS ASSESSMENT / QUALITY VERIFICATION PROGRAM (QVP) UPDATE

ACTUAL START OF
PHASE 1
STATUS ASSESSMENT ACTIVITIES

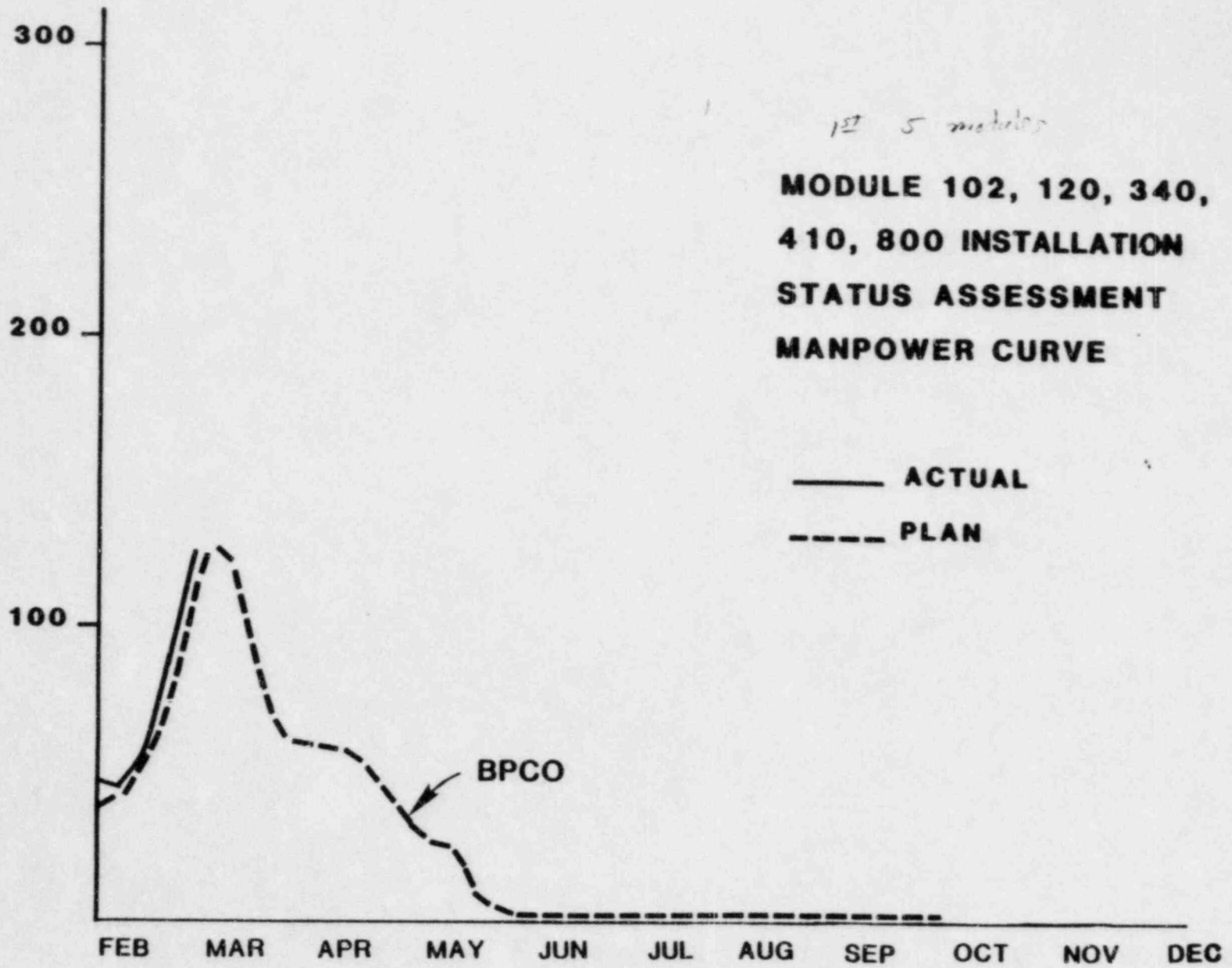
DECEMBER 13, 1983

ARCHITECTURAL S/A MODULE 340

**INSTALLATION STATUS ASSESSMENT MANHOURS *
1ST FIVE MODULES**

<u>MODULE</u>	<u>CIVIL</u>	<u>MECH</u>	<u>ELECT</u>	<u>INSTR</u>	<u>TOTAL</u>
102	1080	5480	1800	180	8540
120	4090	5980	4080	710	14,860
340	11,490	4730	2470	990	19,680
410	20	0	0	0	20
800	750	30	1710	0	2490
TOTAL	17,430	16,220	10,060	1880	45,590
EXPENDED THRU 3/9					15,000

* ROUNDED



INSPECTIONS INITIATED
(BY COMMODITY)

<u>COMMODITY</u>	<u>FE STATUS ASSESSMENT</u>
Mechanical Instrumentation	X
Electrical Instrumentation	X
Mechanical Equipment (M-485)	X
Electrical Equipment (E-62)	X
Pipe Supports	X
Valves (Welded)	X
Valves (Mechanical)	-
Flued Heads	-
Pipe Welds	X
Pipe	X
Concrete Pipe	-
Cable Terminations	X
Electrical Containment	X
Penetration Assemblies	
Feed-Thru Adapter Modules	-
Batteries/Racks	-
Structural Steel & Framing	X
Platform	X
Equipment Supports	X
Shield Plates	X
Whip Restraints	X
Jet Impingement Barriers	X
Fuel Racks	-
Liner Plate	X
Liner Plate Attachments	X
Special Doors	X
Block Walls	X
Air Locks	-
Concrete	X

INSPECTIONS INITIATED (CONT.)
(BY COMMODITY)

<u>COMMODITY</u>	<u>FE STATUS ASSESSMENT</u>
Concrete & Masonry Openings	X
Decontaminable Coatings on Concrete	X
Miscellaneous Q Coatings	X
Cable Tray	X
Conduit	X
Conduit Supports	X
Wireways & Supports	-
Trenches for Cable	-
Boxes & Supports	X
Cable Tray Supports	X
Slots	-

THRU 3/9

NCR'S IDENTIFIED 184
in status assessment

TRAINING
PHASE I

	APPROX. NO. OF PEOPLE	APPROX. NO. OF PROC., DWG. & SPECS
MECHANICAL	100	80
INSTRUMENTATION	10	60
ELECTRICAL	90	70
CIVIL	70	70
WELDING	40	40
	<hr/> 310	

TOOL BOX REVIEW SESSIONS FOR THE CRAFTS 6

BECHTEL SELF-APPRAISAL TEAM (SAT)

- CONCEPT INITIATED OCTOBER 1983

- PURPOSE:

TO PROVIDE ADDITIONAL ASSURANCE TO BECHTEL MANAGEMENT THAT BECHTEL RESPONSIBILITIES ARE BEING PROPERLY CARRIED OUT

- SAT OPERATIONS:

- PROJECT FIELD ENGINEER (PFE) ^{Time Minor} SELECTS/DIRECTS SAT
- MONITOR STATUS ASSESSMENT TEAMS PROGRESS
- PRIMARILY MODULE 340 ^{Cont. PFE}
- ADDITIONAL AREAS AS DETERMINED BY PFE OR HIGHER AUTHORITY

SAT AREAS REVIEWED

(AS OF 3/5/84)

- 1. CIVIL/ARCHITECTURAL (COATINGS)**
- 2. CIVIL (PIPE WHIP RESTRAINTS)**
- 3. ELECTRICAL (TERMINATIONS)**
- 4. ELECTRICAL (RACEWAY)**
- 5. INSTRUMENTATION**
- 6. MECHANICAL (HANGERS)**
- 7. MECHANICAL (PIPING)**
- 8. WELDING (PIPING AND HANGERS)**

2 people per team

SAT OBSERVATIONS

FIELD ENGINEERING/MPQAD INTERFACE

4

FORM COMPLETION

2

PROCEDURAL RE-EMPHASIS /CLARIFICATIONS

15

PROCESS EFFICIENCY/RECORD RETENTION

3

SAT CONCLUSIONS

- 1. STATUS ASSESSMENT PROCEEDING SATISFACTORILY**
- 2. SITE MANAGEMENT WILL CONTINUE SAT MONITORING OF STATUS ASSESSMENT TEAM ACTIVITIES**

Brian Patnor - MPOQU manager

Quality verification of those components that have been inspected.

**QVP/SA MANHOURS *
1ST FIVE MODULES**

<u>MODULE</u>	<u>CIVIL</u>	<u>MECH.</u>	<u>ELECT.</u>	<u>TOTAL</u>
102	5270	8930	7800	22,000
120	5270	9730	7770	22,770
340	31,170	30,430	7170	68,770
410	3550	2120	8200	10,930
800	880	2270	3930	7080
TOTAL	46,140	53,480	31,930	131,550

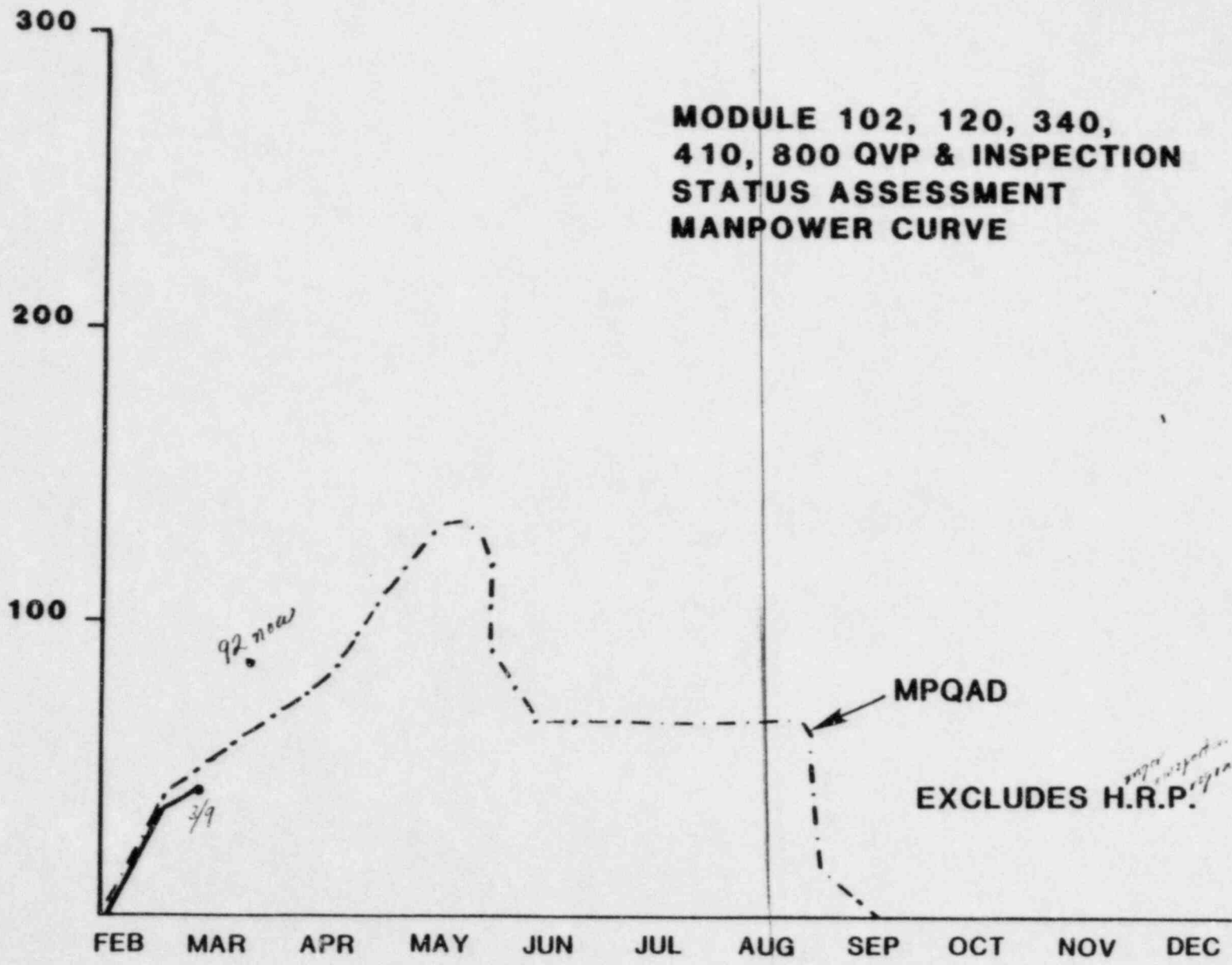
EXPENDED THRU 3/9

5300

~ 10,000 hrs now 3/22/84

* ROUNDED

**MODULE 102, 120, 340,
410, 800 QVP & INSPECTION
STATUS ASSESSMENT
MANPOWER CURVE**



INSPECTIONS INITIATED
(BY COMMODITY)

<u>COMMODITY</u>	<u>QVP</u>
Mechanical Instrumentation	-
Electrical Instrumentation	X
Mechanical Equipment (M-485)	-
Electrical Equipment (E-62)	X
Pipe Supports	-
Valves (Welded)	X
Valves (Mechanical)	X
Flued Heads	X
Pipe Welds	X
Pipe	X
Concrete Pipe	-
Cable Terminations	X
Electrical Containment	-
Penetration Assemblies	-
Feed-Thru Adapter Modules	-
Batteries/Racks	-
Structural Steel (Framing	X
Platform	X
Equipment Supports	X
Shield Plates	-
Whip Restraints	X
Jet Impingement Barriers	X
Fuel Racks	-
Liner Plate	-
Liner Plate Attachments	-
Special Doors	X
Block Walls	X
Air Locks	-
Concrete	X

<u>COMMODITY</u>	<u>QVP</u>
Concrete & Masonry Openings	X
Decontaminable Coatings on Concrete	X
Miscellaneous Q Coatings	X
Cable Tray	X
Conduit	X
Conduit Supports	X
Wireways & Supports	X
Trenches for Cable	-
Boxes & Supports	X
Cable Tray Supports	-
Slots	-

THRU 3/9

NCR'S IDENTIFIED

133

*out of 544 reinspections of
closed inspections*

MPQAD

INSPECTOR CERTIFICATION STATUS

CERTIFICATION GOAL (ALL WORK):

1,239 (ESTIMATE AS OF 2/22/84)

TOTAL NO. CERTIFICATIONS ACCOMPLISHED:

688 (AS OF 2/22/84)

% GOAL ACCOMPLISHED = $\frac{688}{1239} \times 100 = 55.5\%$

QVP ASSESSMENT TEAM

*internal QA function of
QVP assessing themselves*

- INITIATED DECEMBER 1983
- ESTABLISHED TO ASSESS ADEQUACY OF QVP CONTROLS
- TEAM COMPOSITION
 - QUALITY CONTROL
 - VERIFICATION PROGRAM MGMT GROUP
 - INSPECTION EVALUATION
 - QUALITY ADVISORS STAFF
 - PROJECT ASSURANCE ENGINEERING

AREAS REVIEWED

- INSPECTION METHODS AND PROCEDURES
- USE AND CONTROL OF FORMS
- PROGRAM PROCEDURES (*QVP program*)
- COMPLIANCE WITH QVP DOCUMENT.
- REPORTS
- COMMUNICATION AND INTERFACES
- CONTROL OF ACTION ITEMS

QVP ASSESSMENT TEAM CONCLUSIONS

- 1. QVP PROCESS IS PROCEEDING IN A SATISFACTORY MANNER**
- 2. QVP ASSESSMENT TEAM REVIEWS WILL CONTINUE**

SECTION III

ISSUES

ISSUES

1. MPQAD PHASE I WORKLOAD MUCH GREATER THAN COMPLETION TEAM PHASE I SCOPE
2. LACK OF Q-RELATED WORK IN 1984
3. RELEASE BY MODULE DOES NOT TOTALLY SUPPORT SYSTEM TURNOVER LOGIC

SCHEDULE BASES PHASE I QUANTITIES/MANHOURS

STATUS ASSESSMENT (BECHTEL SCOPE)	<u>QUANTITIES</u>	<u>HOURS</u>
MECHANICAL		
LARGE PIPE	26,000 L.F.	6,500
LARGE PIPE HANGERS	3,500 EA.	23,000
SMALL PIPE	39,800 L.F.	9,500
SMALL PIPE HANGERS	6,200 EA.	27,000
MISC		<u>4,000</u>
		S/T 70,000
ELECTRICAL		
TERMINATIONS	44,200 EA.	12,200
EQUIPMENT	300 EA.	<u>3,800</u>
		S/T 16,000
INSTRUMENTATION		
TUBING	35,200 L.F.	7,000
RACEWAY		
SUPPORTS	6,700 EA.	40,000
COMMODITY LISTS DEVELOPMENT	-	<u>11,000</u>
		51,000
AREA		
STRUCTURAL STEEL	1,340 TONS	20,100
PLATFORMS	460 TONS	18,300
WHIP RESTRAINTS & JET BARRIERS	320 EA.	6,500
BLOCKWALLS	290 EA.	6,900
MISC.		<u>27,400</u>
		<u>79,200</u>
	TOTAL	223,200

**SCHEDULE BASES
PHASE I QUANTITIES/MANHOURS**

	<u>TOTAL IR'S</u>	<u>TOTAL HOURS</u>
STATUS ASSESSMENT (MPQAD SCOPE)		
ELECTRICAL	4,500	44,000
MECHANICAL	2,800	80,600
CIVIL	2,500	110,600
HANGERS	<u>1,500</u>	<u>14,500</u>
SUBTOTAL	8,500	249,700
QUALITY VERIFICATION PROGRAM (MPQAD SCOPE)		
ELECTRICAL	30,750	211,500
MECHANICAL	64,000	147,000
CIVIL	<u>26,500</u>	<u>84,300</u>
SUBTOTAL	128,250	442,800
HANGER REINSPECTION PROGRAM (MPQAD SCOPE)		
HANGERS	<u>5,800</u>	<u>110,600</u>
GRAND TOTAL	142,550	803,100

SECTION IV

POTENTIAL SOLUTIONS

POTENTIAL SOLUTIONS

1. MPQAD PHASE I WORKLOAD MUCH GREATER THAN COMPLETION TEAM SCOPE
 - DESTATUS INSPECTION RECORDS DUE TO DESIGN CHANGES TO AVOID DUPLICATE REINSPECTIONS
 - DECOUPLE AREA COMMODITIES AND VERIFY INDEPENDENTLY FROM PHASE II SYSTEM RELEASE TO LEVELIZE WORK LOAD
 - QVP ON TURNED-OVER SYSTEMS DONE PRIOR TO FUNCTIONAL TESTING

POTENTIAL SOLUTIONS

(CONTINUED)

2. LACK OF Q-RELATED WORK IN 1984

- PIPE HANGER COMPLETION FOLLOWING THE HANGER REINSPECTION EFFORT
- INSTALLATION OF WATER TIGHT DOORS
- COMPLETION OF ELECTRICAL PANELS AND TERMINATIONS
- COMPLETION OF ELECTRICAL RACEWAY AND SUPPORTS
- COMPLETION OF INSTRUMENT TUBING
- REPAIR/REWORK/REPLACE ITEMS RELATING TO DISPOSITION OF NCR'S

POTENTIAL SOLUTIONS

(CONTINUED)

3. RELEASE BY MODULE DOES NOT SUPPORT SYSTEM TURNOVER LOGIC

- UTILIZE SPECIAL PROCEDURES OF CCP FOR SYSTEM RELEASES TO SUPPORT NEAR-TERM MILESTONES
- TOTAL SYSTEM APPROACH

Next - AFW flush to vessel

POTENTIAL SOLUTIONS

SUMMARY

- **SOME ITEMS ARE ALREADY ADDRESSED IN THE CCP**
- **SOLUTIONS IDENTIFIED CONFORM TO THE BASIC PRINCIPLES OF THE CONSTRUCTION COMPLETION PROGRAM (CCP)**
- **PROCESS CONTROLS ARE IN PLACE TO ACCOMPLISH THESE ADDITIONAL WORK ITEMS IN ACCORDANCE WITH THE CCP**

Terry Valanzano

SECTION V

PROCESS CONTROLS

PROCESS CONTROLS

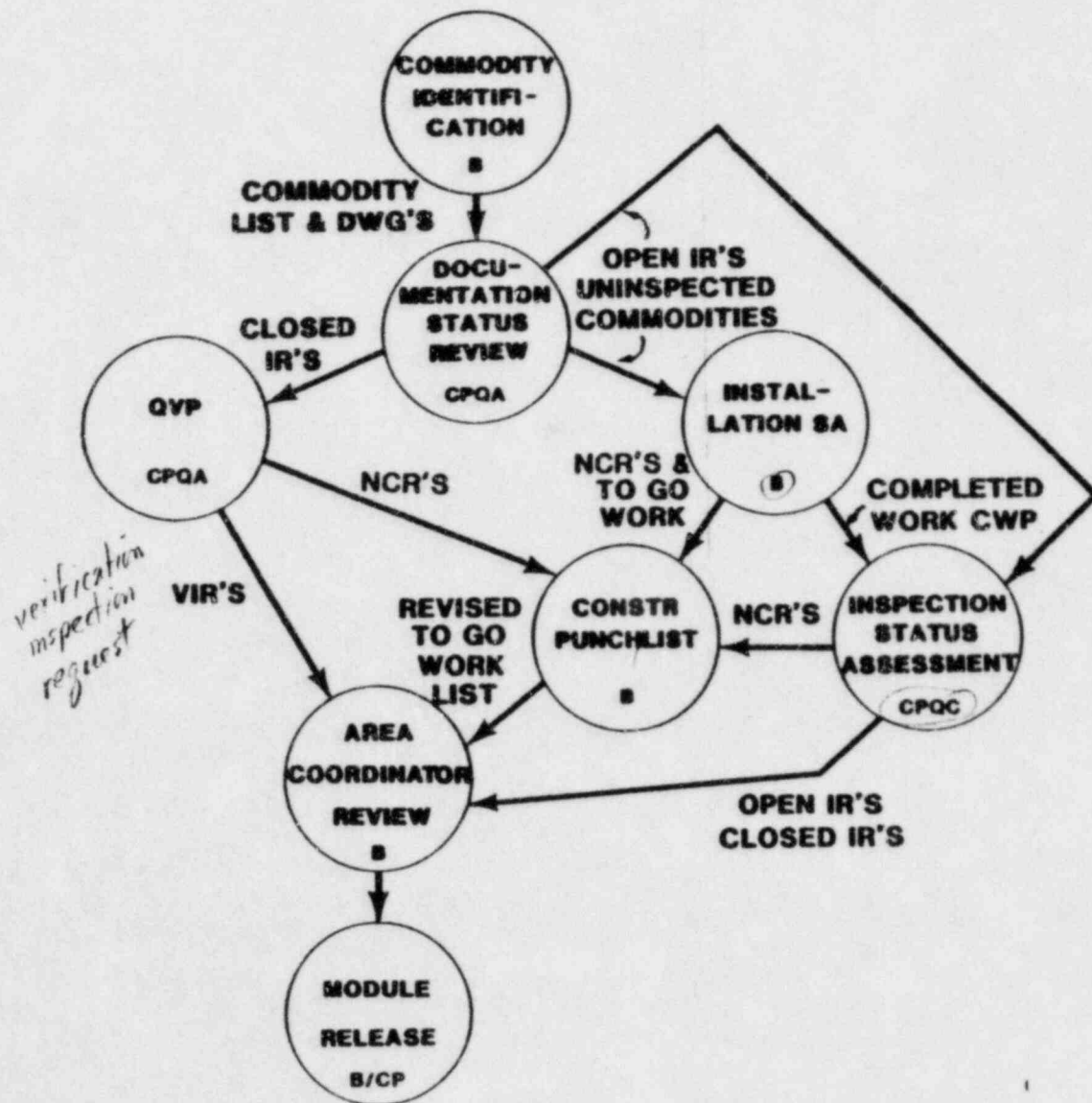
PHASE I PROCESS

- SCOPE
- STATUS
- PRODUCT

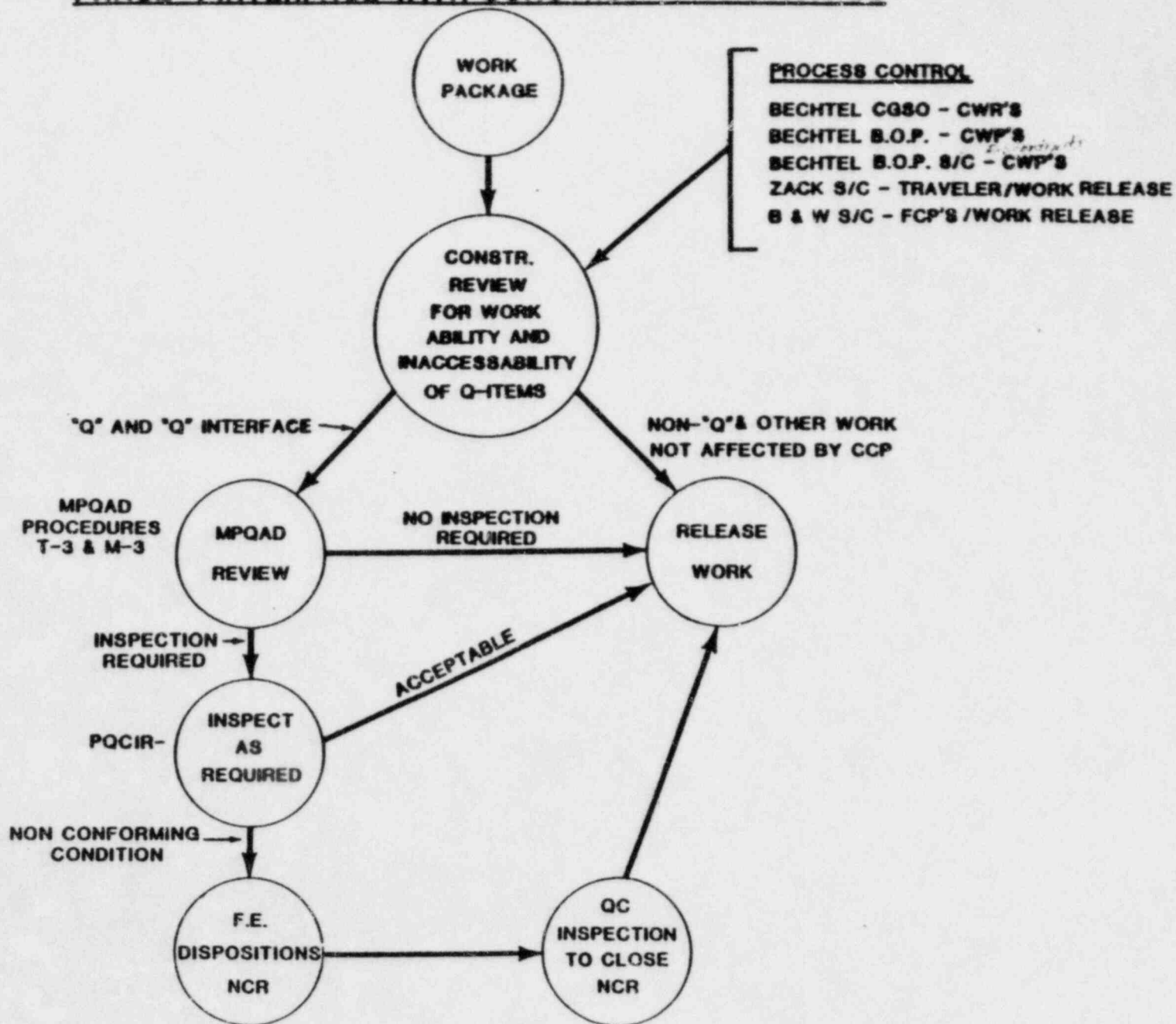
PHASE I INTERFACE WITH CONSTRUCTION ACTIVITIES

- IN ACCESSABILITY REVIEW
- NON CONFORMANCE INSPECTION

CCP PHASE I PROCESS



PHASE I INTERFACE WITH CONSTRUCTION ACTIVITIES



CONCLUSIONS

**THE CONTROL PROCESS AND PROCEDURES AS THEY CURRENTLY EXIST
WITH MINOR ADJUSTMENTS ARE ADEQUATE TO ACCOMPLISH THE
PROPOSED ACTIVITIES WITHIN THE FRAMEWORK OF CCP**

SECTION VI

CONCLUSIONS

CONCLUSIONS

SHORT TERM PROGRAM :

- CARRY OUT ALL ACTIVITIES UNDER PRESENT PROGRAMS, TRAINING & PROCEDURES
- DEVELOP BASIS OF NRC, 3RD PARTY CONFIDENCE BY PROJECT PERFORMANCE
- COMPLETE EVALUATION & DEVELOP CONCLUSIONS FROM PROJECT PLANNING REVIEW
- CONTINUE TO REVIEW INITIATIVES INDIVIDUALLY IN DETAIL WITH NRC

CONCLUSIONS

ALL CHANGES TO EXISTING PROCEDURES WILL BE SUBJECT TO:

CAREFUL TRANSITION:

- MANAGEMENT REVIEW
- PROCEDURE REVISION
- TRAINING
- PROCESS CONTROLS

CHANGES WILL BE RECOMMENDED AS NECESSARY - TWO CRITERIA:

- MEET CCP BASIC PRINCIPLES
- RUN PROJECT WITH MAXIMUM EFFECTIVENESS

CONCLUSIONS

SHORT TERM MILESTONES:

- APRIL 10, 1984 BOARD OF DIRECTORS MEETING:
SCHEDULE & COST CONCLUSIONS
- COST DETAILS MID-JUNE 1984:
- CASE LOAD FORECAST PANEL REVIEW
will be ready after some time in May



**CONSUMERS
POWER
COMPANY**

Warnick

Dean L Quamme
Site Manager
Midland Project

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

March 15, 1984

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

PRINCIPAL STAFF	
QA	DRP
D/RA	DE
A/RA	DR/ASP
RC	DR/A
PAO	CCS
SR	MP
	FILE

orig + 3

MIDLAND ENERGY CENTER GWO 7020
STONE & WEBSTER LETTER SWMCP-008, DATED JANUARY 10, 1984
File: B1.1.7, 0655.3 UFI: 53*50*04, 99*08 Serial: CSC-7457

REFERENCE: CCo letter CSC-7189, dated January 19, 1984.

In pursuance of your letter dated January 10, 1984, SWMCP-008, discussions of the Hanger Reinspection Program (HRP) between Stone & Webster, CCo Site Management and MPQAD have established the following resolutions to the concerns addressed in your letter.

A gross listing of hangers has been given to your staff in the form of a MIRs computer printout. This listing is based on all large and small bore hangers with closed P2.10 reports. In some cases, duplication exists where hangers have more than one closed P2.10. After evaluating this list against the commodity list, the hangers that fall into CCP were deleted. This is how the base number of hangers in the HRP has been determined.

The base number of hangers in the HRP at this time, as determined above, is 6064. This includes the spray ring header supports. Please note that this amount is subject to decrease due to "destatusing" of supports. A hanger is destatused from the program and placed in status assessment for the following reasons; design changes, deletion of a support, seismic re-analysis or changes to a support which subsequent rework is required.

At the present, a weekly "Hanger Reinspection Program" meeting is held. This is on Tuesday, at 8:00 am located in the MPQAD Conference Room, trailer 125. This meeting is chaired by Frank Schulmeister (x6341) and will status inspections completed and forecasted as well as other related HRP Action Items. Frank is responsible for and will be the contact for information regarding the total number of hangers involved in the HRP.

In addition, through Mark Plum (MPQAD), arrangements can be made to accompany an engineer during field inspection or review records of field inspections.

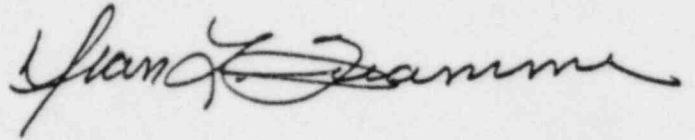
At this time, a "short term" (three week) schedule projection is being developed as well as a "long term" schedule and will be available in the near term. This projection assumes that drawings and access to inspection areas are available.

MAR 22 1984

8403270189

Page 2
CSC-7457

Should you or your staff have any questions on the subject, contact John Berry at extension 6405.

A handwritten signature in cursive script, appearing to read "Frank J. Zammone".

DLQ/JPB/klp

cc: DDJohnson
BHPeck
NReichel
TASpelman
JGKeppler, Regional Administrator, Region III
JHarrison, Chief, Midland Section, Region III
RJCook, NRC Resident Inspector
RAWells, MPQAD



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

MAR 19 1984

Warnick

MEMORANDUM FOR: James G. Keppler, Regional Administrator
FROM: R. F. Warnick, Director, Office of Special Cases
SUBJECT: MONTHLY STATUS REPORT FOR FEBRUARY, 1984

Attached is the status report for the Midland Project for the period of
February 1 - February 29, 1984.

RFWarnick

R. F. Warnick, Director
Office of Special Cases

Attachment: As stated

cc w/attachment:
D. G. Eisenhut, NRR
J. M. Taylor, IE
A. B. Davis, RIII
DMB/Document Control Desk (RIDS)

4403230043



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

March 15, 1984

MEMORANDUM FOR: R. F. Warnick, Director, Office of Special Cases
FROM: R. J. Cook, Senior Resident Inspector, Midland Site
SUBJECT: MONTHLY STATUS REPORT

Attached is the status report for the Midland Nuclear Construction Site covering the period of February 1, 1984, through February 29, 1984.

The status report contains the input from each member of the Midland Inspection Site Team of the Office of Special Cases.

R. J. Cook
Senior Resident Inspector
Midland Site Resident Office

cc/attachments
J. J. Harrison
R. B. Landsman
R. N. Gardner
B. L. Burgess

~~8403230046~~

SUMMARY OF SIGNIFICANT MIDLAND ISSUES

1. Document Control Stop Work Orders

During the reporting period, the licensee completely lifted the nine Stop Work Orders imposed because of irregularities encountered in the handling of Field Change Requests (FCRs) and Field Change Notices (FCNs). The mechanical discipline, which was the last remaining discipline affected by the Stop Work Orders, was released for work upon the complete lifting of the orders.

2. Heating, Ventilation, and Air Conditioning (HVAC)

The Stop Work invoked against installation of HVAC systems because of irregularities in handling Field Change Notices (FCNs) and Field Change Requests (FCRs) was lifted on February 9, 1984. Since then, the licensee has embarked on a re-familiarization training program for those welders who were previously qualified. The program involves two days of classroom instruction and three days of welding demonstrations. There are presently 14 welders authorized to work and six additional welders are in training. Work is progressing in the control room and fabrication shop. The backlog of Receipt Inspections are being updated.

3. Babcock & Wilcox

The Stop Work for Class 1 hangers placed in October, 1983, is still in effect and corrective action implementation for work resumption is continuing. Corrective action includes 100% hanger reinspection and personnel retraining. Work not affected by the Stop Work includes the completion of various Field Change Authorizations (FCAs) and upgrading the Field Control Procedures (FCPs) expected to be completed sometime in mid-April.

4. Remedial Soils Work Authorization

The following remedial soils work activity was authorized by RIII during the report period utilizing the CPCo/NRC Work Authorization procedure.

- Installation of additional vertical monitoring instrumentation on Control Tower wall.

5. Status Assessment (S/A) and Quality Verification Program (QVP)

Status Assessment (S/A) and Quality Verification Program (QVP) continued during the report period in the five modules released late October, 1983. In Module 410 (Turbine Building El. 614') S/A was considered complete since all "Q" commodities appeared on closed QC inspection records. The five modules represent approximately 10% of total plant modules. QVP activities have resulted in the generation of Nonconformance Reports (NCRs) in virtually every discipline inspected.

UNITED STATES GOVERNMENT
memorandum

DATE:

REPLY TO
ATTN OF:

SUBJECT:

TO:

extra copy.
Already copied.

OPTIONAL FORM NO. 10
(REV. 1-80)
GSA FPMR (41 CFR) 101-11.6
5010-114

FROM: Leo R. Romo Lone Tree Council	ACTION CONTROL		CONTROL NO.																								
	COMPL DEADLINE	2/17/84	14032																								
	INTERIM REPLY		DATE OF DOCUMENT																								
	FINAL REPLY		1/30/84																								
	FILE LOCATION		PREPARE FOR SIGNATURE OF:																								
TO: Chairman Palladino			<input type="checkbox"/> CHAIRMAN <input type="checkbox"/> EXECUTIVE DIRECTOR OTHER: <u>DeYoung</u>																								
DESCRIPTION <input checked="" type="checkbox"/> LETTER <input type="checkbox"/> MEMO <input type="checkbox"/> REPORT <input type="checkbox"/> OTHER		SPECIAL INSTRUCTIONS OR REMARKS																									
Request NRC increase the number of NRC inspectors at Midland		<table border="1"> <tr><th colspan="3">PRINCIPAL STAFF</th></tr> <tr><td>RA</td><td>DRP</td><td></td></tr> <tr><td>D/RA</td><td>DE</td><td></td></tr> <tr><td>A/RA</td><td>DRMSP</td><td></td></tr> <tr><td>RC</td><td>DRMA</td><td></td></tr> <tr><td>PAO</td><td>SCS</td><td>✓ orig</td></tr> <tr><td>SGA</td><td>ML</td><td></td></tr> <tr><td>ENF</td><td>File</td><td>✓ +3</td></tr> </table>		PRINCIPAL STAFF			RA	DRP		D/RA	DE		A/RA	DRMSP		RC	DRMA		PAO	SCS	✓ orig	SGA	ML		ENF	File	✓ +3
PRINCIPAL STAFF																											
RA	DRP																										
D/RA	DE																										
A/RA	DRMSP																										
RC	DRMA																										
PAO	SCS	✓ orig																									
SGA	ML																										
ENF	File	✓ +3																									
ASSIGNED TO	DATE	INFORMATION ROUTING																									
DeYoung, IE	2/3/84	B. Keppler Stello																									

SECY-84-0116

NUMBER: 84-0116

LOGGING DATE: 2/2/84

OFFICE OF THE SECRETARY

ACTION OFFICE: EDO
AUTHOR: Leo R. Romo
AFFILIATION: Lone Tree Council
LETTER DATE: 1/30/84 FILE CODE:
ADDRESSEE: Palladino
SUBJECT: Req the NRC to increase the number of inspectors at
the Midland facility

ACTION: Direct Reply....Suspense: Feb 10

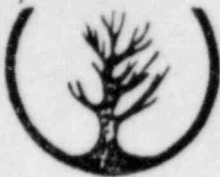
DISTRIBUTION: Docket

SPECIAL HANDLING: None

Rec'd Off. EDO
Date... 2-4-84
Time... 2:27

FOR THE COMMISSION: Billie

FEB 8 1984



LONE TREE COUNCIL

P. O. Box 421

Essexville, Michigan 48732

Advisory Board

CONSTANCE SMITH, PRESIDENT
COMMUNICATION WORKERS OF AMERICA
LOCAL 4108

QUINTER BURNETT, M.D.

*FATHER JOHN GUSSENBAUER

JOSEPH SHEERAN, ATTORNEY

JACK WESTON NASH, D.D.S.

JOAN SABOURIN, ASSOCIATE

PROFESSOR OF CHEMISTRY, DELTA

DR. DAVID DALGARN, ASSOCIATE

PROFESSOR OF BIOLOGY, SVSC

PATRICIA HEARRON, CHILD
DEVELOPMENT SPECIALIST

BARBARA KLIMASZEWSKI, ATTORNEY

*TERRY MERCER, PRESIDENT
LAW - CAP COUNCIL

January 30, 1984

Nunzio Palladino
United States
Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Palladino,

I read with great dismay the enclosed article in our local press. Mr. Marabito of Region III says the "extent of the quality assurance problems at Midland are not as pervasive as they were at Zimmer." This certainly is not encouraging for the many citizens who for years have wanted increased NRC involvement at Midland.

Mr. James Keppler, Region III administrator, reviewed a partial list of the Quality Assurance problems at Midland before the Subcommittee on Energy and the Environment on June 16, 1983. This, and the fact that the Construction Completion Program (which will identify problems) make Mr. Marabito's statement a bit premature.

On January 20, 1984, I spoke with an official in Mr. Richard DeYoung's office on the subject of increased NRC inspectors. I was referred to a response Mr. DeYoung made to a citizen's petition on October 6, 1983. In it he indicated that this would be determined by "the Commission budget process." (Docket No. 50-329, 50-330, 10CFR 2206, p.3)

With the recent decisions at Byron, Marble Hill, Zimmer and Limerick, it would seem that additional inspectors could be added without expanding the budget. There are only five inspectors working on 15 years of errors. Indeed, it would seem foolish for the NRC not to do this.

My request is simple. Will you please increase the number of NRC inspectors at Midland?

I look forward to your response.

Sincerely,

Leo R. Romo

Leo R. Romo

Corresponding Secretary

*ORGANIZATIONS LISTED FOR IDENTIFICATION PURPOSES ONLY

4404050484

More NRC inspectors sought

Group wants staff shifted from nuke plants that floundered

BY KEITH NAUGHTON
News Staff Writer

A nuclear power watchdog group is pressuring the U.S. Nuclear Regulatory Commission to beef up its staff inspecting the Midland Nuclear Plant.

Government Accountability Project, a Washington-based citizens group, will send a letter to the commission Friday urging it to shift inspectors who had been assigned to nuclear projects that have floundered recently to the Midland team.

In the past two weeks, two Midwestern nuclear plants have halted construction — the Zimmer Nuclear Plant in Ohio and the Marble Hill Nuclear Plant in Indiana.

The three Ohio utilities that own Zimmer announced Saturday the plant will be converted to a coal-fired operation. Public Service of Indiana closed Marble Hill Jan. 16 because the utility ran out of money to complete it.

Billie Garde, an investigator for the citizens group, said Midland needs a larger NRC staff because of the "comprehensive" completion program the plant is undergoing.

"The construction completion program is the most stringent, most comprehensive and most dif-

ficult reinspection in the nuclear industry today," Ms. Garde said. "It would take a minimum of a dozen people to effectively monitor the (construction completion program). Less than that jeopardizes the integrity of the program."

A five-man NRC team monitors the Midland plant now, with two members of the team at the plant-site full-time.

The NRC has not determined what it will do with the inspectors from Zimmer and Marble Hill, NRC spokesman Russ Marabito said.

"Some of them may be shifted over to possibly the Midland (plant)," Marabito said.

Zimmer had a staff of eight full-time inspectors with three inspectors on call whenever needed, Marabito.

But Midland does not need as large a staff because it is not as troubled as Zimmer was, he said.

"The extent of the quality assurance problems (at Midland) are not as pervasive as they were at Zimmer," Marabito said.

Marble Hill is not similar in any way to Midland because it was not a troubled plant, Marabito claimed.

But the NRC stopped all safety-related construction at Marble Hill

in 1979 because it found quality assurance and management problems at the plant.

If the Midland staff is not increased in size, it will slow the plant's construction program and eventually delay the completion of the project, Ms. Garde claimed.

"You could have a situation where people are sitting around twiddling their thumbs, waiting for an NRC inspector," she said.

The utility does not believe the size of the NRC team will have an impact on implementation of the construction program, Consumers spokesman James Storey said.

"The NRC is not scheduled, under the plan we drafted, to get that involved in the day-to-day process," Storey said.

The NRC ordered Consumers Power Co. to draft a formal completion plan for its plant after federal inspectors found several quality assurance problems at the plant in 1982.

Storey would not say if the utility is pleased with the performance of the present NRC staff or if additional staffing is necessary.

"That's really a question the NRC has to determine. It's their role and responsibility to determine the staff that is needed here," Storey said.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAR 12 1984

Docket Nos. 50-329
50-330

Mr. Leo R. Romo
Corresponding Secretary
Lone Tree Council
P. O. Box 421
Essexville, MI 48732

Dear Mr. Romo:

This refers to your letters of January 30, 1984, to the Commissioners requesting an increase in the number of NRC inspectors at the Consumers Power Company's (CPCo) Midland facility.

The NRC now has three resident inspectors located at the Midland site, an additional three individuals in the Region III office assigned full time to the Midland project, and additional inspection specialists from the Region III Division of Engineering who spend time onsite as needed. Additionally, an NRC Resident Site Supervisor has been selected for Midland and will report to the site in the near future. Currently allocated resources for Midland substantially exceed the 1.5 manyears/year that have been allocated for a normal nuclear plant construction site.

NRC is in the process of approving a contract with a national laboratory for assistance with the technical inspection program at Midland, approximately two man-years of effort. In the interim, two Argonne contract engineers, formerly assigned to Zimmer, have been temporarily assigned to provide inspection assistance at Midland.

In addition, the NRC required CPCo to have an independent third party overview the remedial soils work activities and an independent third party overview the Construction Completion Program (CCP) activities. On February 24, 1983, Stone and Webster (S&W) was approved by the NRC to overview the remedial soils activities. S&W currently has eight individuals onsite involved in this effort. On September 29, 1983, S&W was approved by the NRC to overview the CCP activities. S&W currently has 32 individuals (completely different from those involved in the remedial soils overview) onsite involved in over-viewing CCP activities. The S&W overview staffs can be increased as the workload increases.

The NRC inspection effort is further augmented by the NRC initiated and approved Independent Design and Construction Verification Program being performed by approximately 10 professionals from the TERA Corporation. This program is currently ongoing and is to provide additional assurance regarding the adequacy of design and construction for Midland.

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Mr. Leo R. Romo

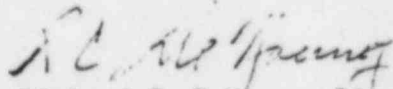
- 2 -

Also, for your information, this office issued a Confirmatory Order on January 12, 1984 to the licensee. The order basically requires a review to be performed by an independent consultant of the Midland corporate and site management structure and supervisory personnel. We expect the licensee to submit his plan on this matter in accordance with the order in the near future.

The recent 10 CFR 2.206 petition on behalf of the Lone Tree Council by Billie Pirner Garde, Government Accountability Project, also addresses the issue of NRC inspection personnel at Midland, as well as other issues. A decision in this regard will be issued by me in a reasonable time.

In regard to your question on the utilization of resources which have been allocated to other facilities, this matter is currently under review by the NRC and your suggestions will be given appropriate consideration.

Sincerely,



Richard C. DeYoung, Director
Office of Inspection and Enforcement

Warnick



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

JUN 28 1983

Lone Tree Council
ATTN: Mr. Leo R. Romo
Corresponding Secretary
P. O. Box 421
Essexville, MI 48732

Dear Mr. Romo:

This is in response to your letter dated May 31, 1983, in which you expressed your thoughts about Consumers Power Company's independent third party design and construction verification program (IDCV) and the construction completion program (CCP) including the independent third party construction implementation overview (CIO).

The IDCV at Midland is a detailed examination of design adequacy and construction quality using as a basis three safety-related systems. A copy of TERA's plan for the IDCV is attached for your information (Attachment 1). The IDCV proposed for Midland is similar to, but more extensive than, independent reviews conducted at other plants. TERA selected the auxiliary feedwater system using the selection criteria on pages 14 and 15 of Attachment 1. The NRC agrees that these are appropriate selection criteria. The NRC selected a second system, standby electrical power, for the IDCV from the three candidate systems identified by Consumers Power Company. The three candidate systems were selected by Consumers Power Company based on systems important to probabilistic risk assessment analysis. The third system, control room heating, ventilation, and air conditioning, was selected independently by the NRC, not from the candidate systems. Our choice of the second and third systems was made in part after considering suggestions made by members of the public. A copy of TERA's first status report (Attachment 2), is also attached for your information and as you can see, the TERA team already has identified and confirmed items on the auxiliary feedwater system which may become significant findings. The extent to which TERA will examine construction is detailed in Section 3.2 of Attachment 1. The program scope for the three selected systems will concentrate on the criteria of the as-built conditions versus the design criteria. Additional sampling and verification, however, will be conducted on other systems if discrepancies or problems are found allowing program flexibility as discussed in Section 3.2.7 of Attachment 1.

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JUN 28 1983

You have also raised a concern regarding the NRC's permitting Stone and Webster Engineering Corporation (SWEC) to start the CIO prior to the NRC having completed its review of the Consumers Power Company proposal for the third party overview. Region III felt it was desirable to have the overview program begin in order to assure that Consumers Power Company CCP systems are working properly. The SWEC overview presently involves nine people onsite performing the CIO. These activities started on April 28, 1983. The CIO is not a 100% inspection, rather it is an audit of Consumers Power Company's implementation of the CCP. In addition, the NRC Midland team will be reviewing the quality of the CPCo CCP and the SWEC CIO to assure adequate implementation. It should also be noted that the CCP has not been approved to date by the NRC. CPCo CCP activities have been limited to program preparation and some training.

We believe the actions being taken should provide assurance to the community that the plant has been constructed safely. We believe the intent of the three actions you suggest will be accomplished by the CCP and the third party programs in place.

We hope this is responsive to your concerns. If you have further questions, please do not hesitate to contact us.

Sincerely,

Original signed by
A. Bert Davis

James G. Keppler
Regional Administrator

Attachment: As stated

cc w/attachment and ltr dtd 5/31/83:
See attached distribution list

NRC Concure
per telecon
D. Hood
6/28/83

OFFICE	RIII						
SURNAME	Gardner/Is	Harrison	Warnick	Strasma	Lewis	Davis	Keppler
DATE	6/27/83	6/27/83	6/27/83	6/27/83	6/27	6/27	6/28

JUN 28 1983

cc w/attachment and ltr dtd 5/31/83:
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ACTION ITEM CONTROL FORM

A. INITIATING OFFICE

ASSIGNED TRACKING NUMBER		03. PRIORITY	04. A/I TYPE	05. DATE OF REPORT			06. DATE OF TRANSACTION		
01. SENDING OFFICE	02. SEQUENCE NUMBER			MONTH	DAY	YEAR	MONTH	DAY	YEAR
F03	026583	N	AG	06	07	83			

07. FACILITY				08. REQUESTED COMPLETION DATE			09. REQUESTER			
				MONTH	DAY	YEAR				
				062083			KEPPLER			

10. DESCRIPTION									
LETTER FROM LONE TREE COUNCIL CONCERNING MIDLAND									

E. ACTION OFFICE

01. RECEIVING OFFICE <small>(Check appropriate office code)</small>					FO1	FO2	FO3	FO4	FO5	HOE	HO7	HOE	HO5	H10	H11	H12
							X									

02. PERSON ASSIGNED										ESTABLISHED COMPLETION DATE			04. CHANGE NUMBER
WARNICK										MONTH	DAY	YEAR	
										062083			

01. TRANSFER ACTION										06. TRANSFER CODE			07. TRANSFER DATE		
													MONTH	DAY	YEAR

08. CLOSEOUT ACTION										09. MAN-HOURS	10. CLOSE-OUT CODE	11. CLOSEOUT DATE			12. REQUEST ACKNOWLEDGED
LTR TO RCMO Fern JGK											C	MONTH	DAY	YEAR	
												062083			

Jim RFD has a draft 6/17/83.



LONE TREE COUNCIL

P. O. Box 421
Essexville, Michigan 48732

Advisory Board

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May 31, 1983

James Keppler
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

PRINCIPAL STAFF	
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OL	FILE

Dear Mr. Keppler,

Thank you for the prompt reply regarding an independent audit of the planned Midland Nuclear Power Plant. Unfortunately, we are disturbed by your ending paragraph in which you imply that letting Consumers Power Company reinspect its own work does not make a mockery of the NRC's commitment to ensuring safe construction. You add, "particularly in view of third party inspections and other actions being taken under the Construction Completion Plan."

Let us look at these "third party" inspections and the CCP. As we understand it, an audit is an examination for the purpose of verification--in this case a safely constructed nuclear plant. Our understanding, and please correct us if we are wrong, is that Consumers Power selects what TERA Corporation will inspect (with NRC approval). To use an analogy, if we are audited by the Internal Revenue Service we get to choose those parts of our finances we would like disclosed. Of course, this is ludicrous. Yet Consumers seemingly has that power. In addition, it has selected, and the NRC has approved, the Auxiliary Feedwater System, which has been reviewed and approved recently.

An audit is usually thought to be complete and very thorough. While it is reassuring that the heating, ventilation, and air conditioning system, and the emergency power system might be reviewed, it appears that TERA will be focusing mainly on the design of these systems rather than the construction--a very distinct difference.

Concerning the CCP, your letter disguises the fact that there would probably be no CCP had it not been forcibly suggested by the NRC. The plan was not a result of the utility's initiative. This does not create a feeling of confidence in the

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utility's commitment to do the job properly. In a related matter, Consumers Power announced that, unless told otherwise by the NRC, they would begin their Construction Implementation Overview (CIO) on April 18, 1983. Publicly, the NRC has remained silent.

Regarding the selection of outside firms as third party inspectors and citizen input, you have previously stated that the public will not have a vote in this since you "don't believe in the shared process of decision making." (Midland Daily News, May 4, 1983) We find it ironic that the licensee has chosen the areas for re-inspection as well as the inspectors, and obviously is able to share in this process, yet citizens are denied it.

In summary, there are several questions that are raised:

1. What new light will be shed by a re-evaluation of the Auxiliary Feedwater System?
2. Would you explain the extent to which TERA Corporation will examine construction as well as design?
3. Regarding the CIO--
 - a. Did it begin April 18, 1983, as announced by Consumers?
 - b. If so, have you approved of the plan?
 - c. Has Stone and Webster, therefore, been approved?
 - d. If so, will it include a 100% review as promised by Consumers in December, 1982?

We have different ideas on what a third party audit should encompass. It does not seem unreasonable that a truly independent audit should:

1. Include a full scope overview of completed construction done by the third party rather than the utility.
2. Consist of a thorough inspection of as-is construction, as well as the design of the plant.
3. Be selected solely by the NRC (or allow the public the same voice as the utility)

It would seem that this approach would totally assure our community that the plant has been constructed safely. Would you explain why this method is not possible?

Mr. Keppler, we know that the Midland plants have become an albatross for you. You have indicated several times that your role is that of regulator, not builder. We understand your position, but one cannot ignore the many quality assurance breakdowns and poor construction record of Consumers Power. To use your own words, "You wonder after so many screw-ups whether the utility is capable of doing the job right." (Interview, WXYZ-TV, Fall, 1982)

We hope our comments are seriously considered. Again, thank you for the quick response. Further detailed information, especially regarding the CIO, would be most welcomed.

Sincerely,

Leo R. Romo

Leo R. Romo
Corresponding Secretary

cc: V. Stello, EDO
H. Denton, IE
R. DeYoung, NRR
D. Eisenhut, NRR
DMB/Document Control Desk (RIDS)
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