

RFW —
Copy you requested

SEP 15 1983

Docket No. 50-329
Docket No. 50-330

Mr. J. W. Cook
Vice President
Consumers Power Company
1945 West Parnall Road
Jackson, MI 49201

Subject: Protocol Governing Communications for Stone and Webster
Independent Third Party Overviews on Midland Plant, Units 1 and 2

As you are aware, we are in the process (nearing completion) of reviewing your proposed Construction Completion Program, (CCP) including its provision for Stone and Webster to serve as a third party overseer. As a condition for accepting the CCP, and to provide the necessary confidence that the third party is of sufficient independence, we propose that you adopt the attached Protocol to govern communications with the third party.

A key aspect of the enclosed Protocol is a monthly meeting between Consumers Power Company, the independent third party overseer and the NRC to discuss the previous month's third party overview activities and any problems encountered during the overview. The initial monthly meeting is scheduled for October 13, 1983.

Please confirm in writing that Consumers Power Company and Stone and Webster adopt the Protocol. This confirmation is a prerequisite to the NRC staff's approval of the CCP.

Should you have any questions regarding this letter, please contact Mr. R. F. Warnick of my staff.

Sincerely,
Original signed by
J. G. Keppler
James G. Keppler
Regional Administrator

Enclosure: As stated

cc w/encl: See attached distribution list

RIII	RIII	RIII	RIII	IE	NRR	RIII	RIII	ELD
Gardner/l	Harrison	Warnick	Lewis	Stone	Hood	Davis	Keppler	Cuoco

09/15/83

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James G. Keppler

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Enclosure: As stated

RIII
RFD
Gardner/lr
9/14/83

RIII
Harrison
9/14/83

RIII
RFD
Warnick
9/14/83

RIII
Lewis

IE/LWR
Davis
9/14/83
J. Stone
L. C. Cook
9/14/83

RIII
Keppler
9/15/83

ELD

with corrections
noted
JH for
L. C. Cook
9/14/83

cc w/encl:

DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
The Honorable Charles Bechhoefer, ASLB
The Honorable Jerry Harbour, ASLB
The Honorable Frederick P. Cowan, ASLB
The Honorable Ralph S. Decker, ASLB
William Paton, ELD
Michael Miller
Ronald Callen, Michigan
Public Service Commission
Myron M. Cherry
Barbara Stamiris
Mary Sinclair
Wendell Marshall
Colonel Steve J. Gadler (P.E.)
Howard Levin (TERA)
Billie F. Garde, Government
Accountability Project
Lynne Bernabei, Government
Accountability Project

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PROTOCOL GOVERNING COMMUNICATIONS BETWEEN CONSUMERS POWER COMPANY
AND STONE AND WEBSTER (S&W) IN THE REMEDIAL SOILS AND
CONSTRUCTION COMPLETION PROGRAMS

1. This protocol governs communications between Consumers Power Company (CPCo) and Stone and Webster (S&W) in its capacities as the Construction Implementation Overviewer in the Midland Construction Completion Program (CCP) and the third party overviewer of the underpinning activities and the Remedial Soils Program.
2. All exchanges of correspondence, including drafts, between S&W and CPCo will be submitted to the Administrator of NRC Region III at the same time as they are submitted to CPCo.
3. S&W has a clear need for prompt access to information and activities required to fulfill its role. To this end, S&W may request documents, meet with and interview individuals, conduct telephone conversations, conduct audits and inspections, establish and witness program hold points, review work and inspection activities, and undertake similar activities without prior notification to the NRC staff.
4. As a normal program function, S&W may meet with CPCo daily, or as necessary, to discuss program activities such as licensee work schedule, licensee activities overviewed, action items identified, action taken on identified items, resolution and close-out of these actions, audits conducted, and hold points witnessed. A weekly report shall be issued to document these meetings. These meetings shall be open to NRC staff attendance.
5. CPCo and S&W shall meet with the NRC staff monthly to discuss the previous month's activities. Topics to be addressed will include the status of action items and any problems encountered. The meetings shall be open to public observation and shall normally take place on the second Thursday of each month at 9:00 a.m. and shall normally be held at Consumers Power Company Service Center located at 1100 S. Washington St., Midland, Michigan. Minutes of the monthly meetings shall be prepared by the third party and transmitted to the NRC and CPCo.

6. All documents submitted to, or transmitted by the NRC subject to this Protocol, will be placed in the NRC Public Document Rooms in Midland, Michigan and Washington, D.C., and will be available there for public examination and copying.

RFW

JAN 25 1984

Mr. P. Amoruso, Project Manager
Construction Implementation Overview Program
Stone and Webster Michigan, Inc.
P. O. Box 1963
Midland, MI 48640

Mr. S. Lucks, Project Manager
Underpinning and Remedial Soils Overview
Program
Stone and Webster Michigan, Inc.
P. O. Box 1963
Midland, MI 48640

Gentlemen:

The purpose of this letter is to request Stone and Webster to furnish one copy of the weekly reports to the local public document room located at the Grace Dow Memorial Library, 1710 W. St. Andrews Rd., Midland, Michigan 48640, at the same time copies are furnished to the NRC and Consumers Power Company.

The availability of these documents will allow members of the public proper time to prepare for the monthly meetings.

Your cooperation in this matter is appreciated.

Sincerely,

J. J. Harrison, Chief
Section 2, Midland

cc: See attached distribution list

RIII
Harrison/lr
01/24/84

RIII
RFW
Warnick
1/24/84

84-01270252

JAN 25 1964

cc: DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
The Honorable Charles Bachhoefer, ASLB
The Honorable Jerry Harbour, ASLB
The Honorable Frederick P. Cowan, ASLB
William Paton, ELD
Michael Miller
Ronald Callen, Michigan
Public Service Commission
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Billie P. Garde, Government
Accountability Project
Lynne Bernabei, Government
Accountability Project
Stone and Webster Michigan, Inc.

CC DMB/Document Control Desk (RIDS)
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Billie P Garde, Government
Accountability Project
Lynne Bernabei, Government
Accountability Project
APamaroso, Stone & Webster
NRC Correspondence File, P-24-517
UFI, P-24-517
BJWalraven, P-24-517
Hearings File, P-24-517
JWCook, P-26-336B
DBMiller, Midland
TABuczynski, Midland-207
JNLeech, P-24-507
DASommers, P-14-106 (For SER Related Issues)
DFLewis, Bechtel
DJVandewalle, P-24-614B
FCWilliams, IL&F, Washington, DC
GALow, P-12-237A
SHHowell, P-14-113B
RAWells, Midland
PHolt, Midland

TEAM EXPERIENCE

S. BARANOW

PROGRAM MANAGER

**15 YEARS NUCLEAR EXPERIENCE
10 YEARS NUCLEAR SITE EXPERIENCE
5 DIFFERENT SITES**

F. BEARHAM

SUPERVISOR OF PROGRAM EVALUATION

**25 YEARS OF NUCLEAR EXPERIENCE
13 YEARS NUCLEAR SITE EXPERIENCE
8 DIFFERENT SITES**

J. THOMPSON

SUPERINTENDENT OF PHYSICAL VERIFICATION

**14 YEARS NUCLEAR EXPERIENCE
12 YEARS NUCLEAR SITE EXPERIENCE
4 DIFFERENT SITES**

**CONSTRUCTION
IMPLEMENTATION
OVERVIEW**

PROGRAM - CIO

BACKGROUND

**CONSTRUCTION COMPLETION
PROGRAM-CCP**

**STONE & WEBSTER PROPOSED AS
INDEPENDENT THIRD PARTY**

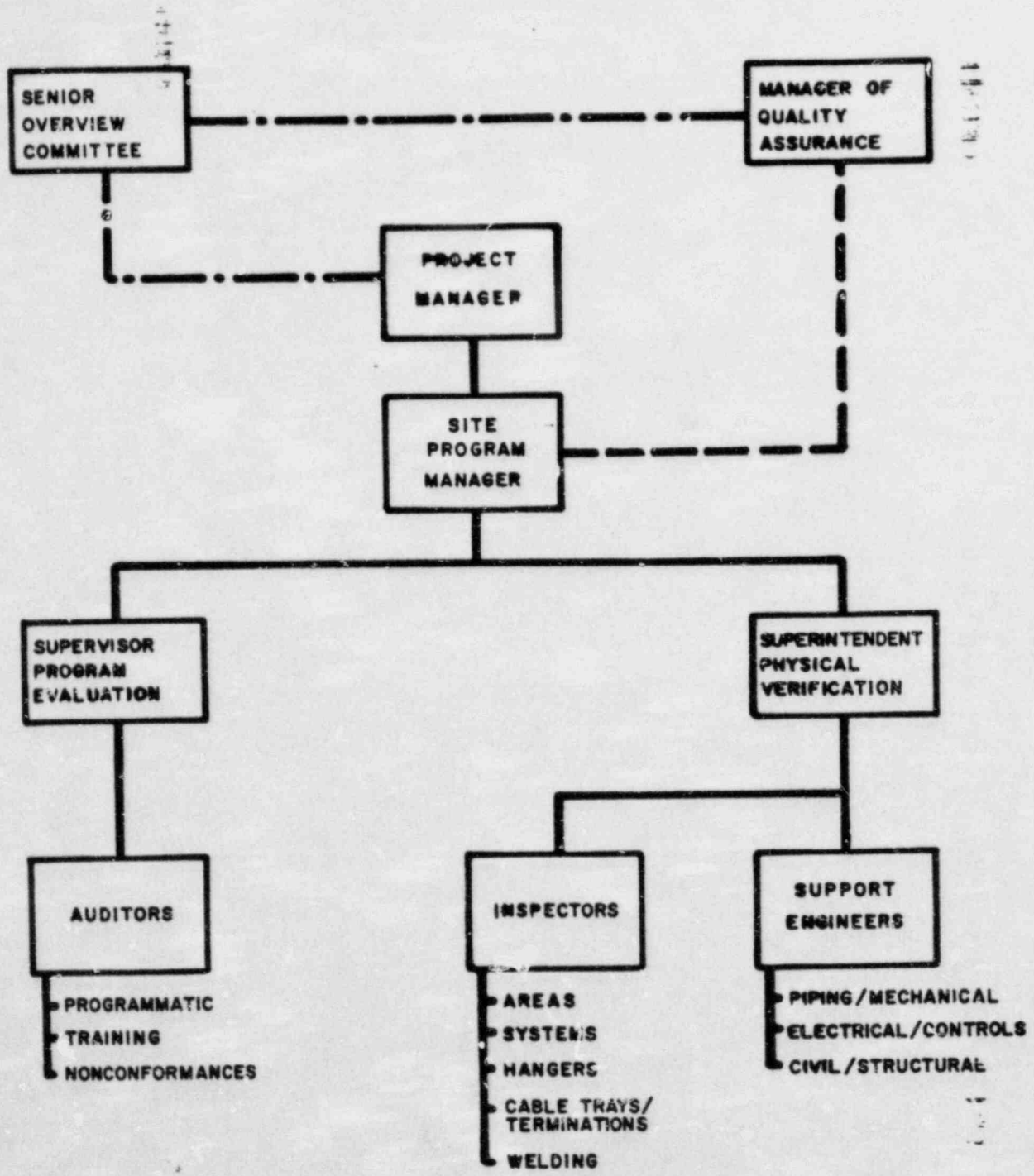
SCOPE

INDEPENDENTLY ASSESS IMPLEMENTATION OF CCP

ACTIVITIES:

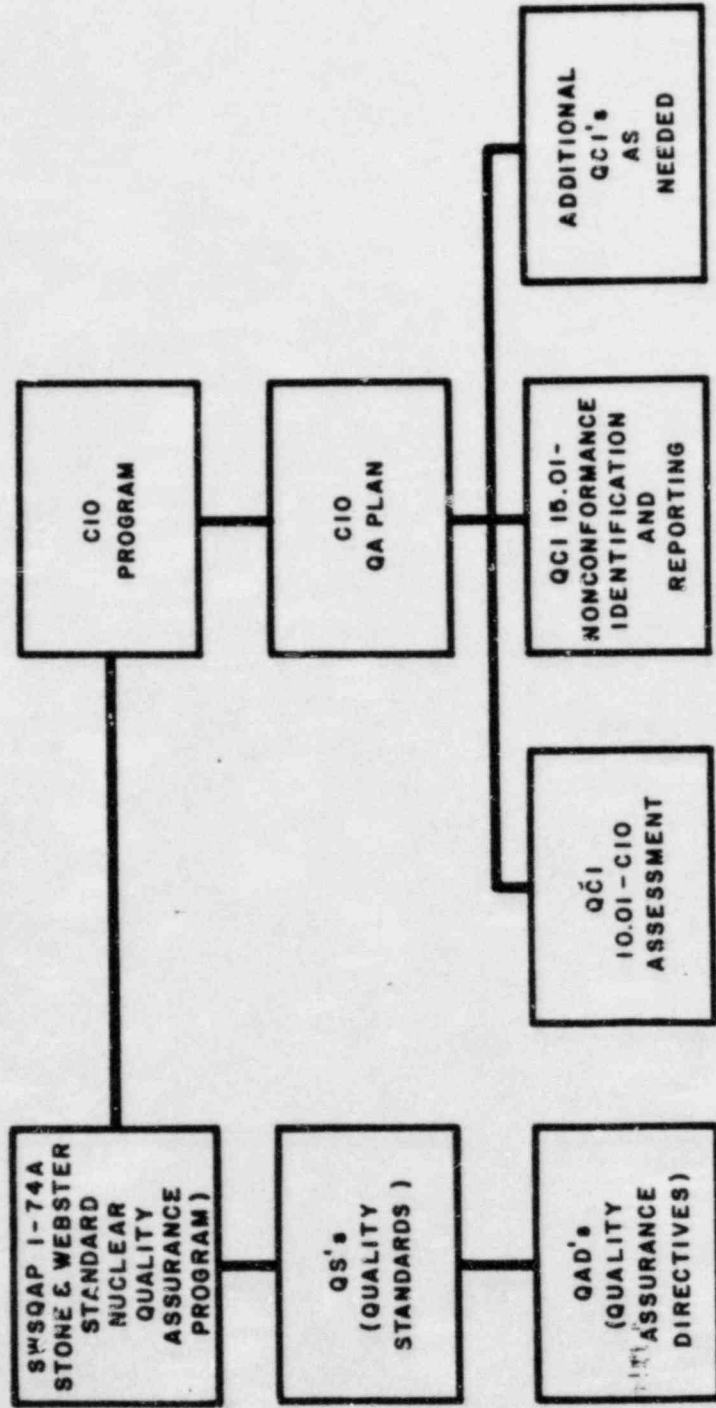
- ✓ **PHASE I PLANNING**
- ✓ **MANAGEMENT REVIEWS**
- ✓ **INSTALLATION AND INSPECTION STATUS**
- ✓ **VERIFICATION OF COMPLETED
INSPECTIONS (QVP)**
- ✓ **HVAC/ZACK**
- ✓ **NSSS**
- ✓ **SPATIAL SYSTEM INTERACTION
PROGRAM (SSIP)**
- ✓ **PHASE II**

CIO ORGANIZATION



- - - - - TECHNICAL DIRECTION
 - - - - - OVERVIEW

DOCUMENT TREE



SWEC CIO PROGRAM

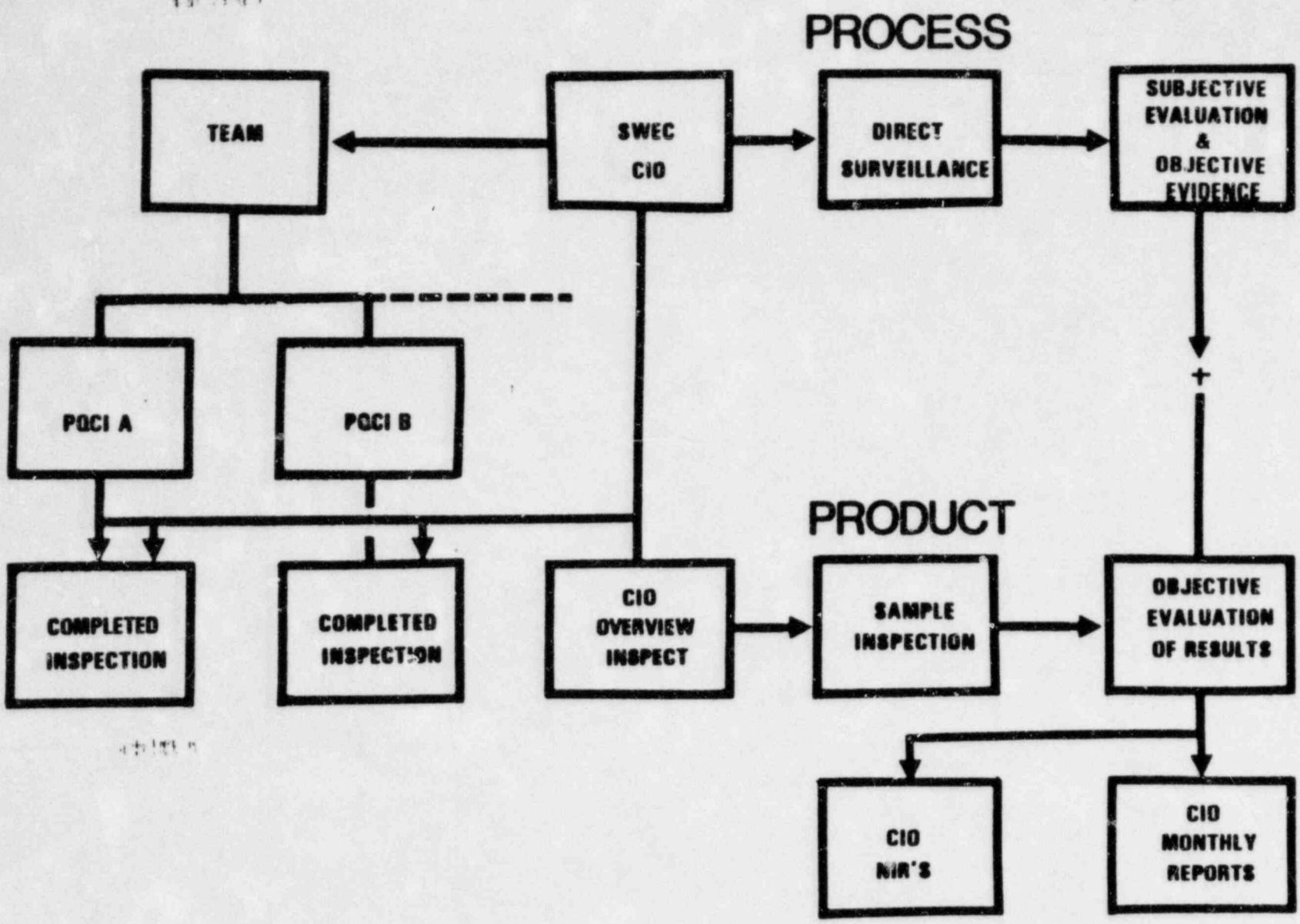
- **OBJECTIVE IS TO ASSESS QVP AND CCP RESULTS TO ESTABLISH THE PROGRAM'S EFFECTIVENESS.**
- **KNOWN STATISTICAL METHODS WILL BE USED TO ESTABLISH THE NUMBER OF INSPECTIONS/ASSESSMENTS.**
- **TECHNICAL EVALUATIONS WILL BE MADE TO ESTABLISH THE SIGNIFICANCE OF NONCOMPLYING CONDITIONS.**
- **CORRECTIVE MEASURES WILL BE REQUIRED IF CPCo PROGRAMS PERSONNEL OR IMPLEMENTATION ARE TURNING OVER LOTS WHICH CONTAIN SIGNIFICANT DEFICIENCIES.**

ASSESSMENT MATRIX FOR PHYSICAL VERIFICATION GROUP

ASSESSMENT ELEMENTS	REVIEW OF POCis	REVIEW OF SUPPORTING DOCUMENTS	CHECKLIST DEVELOPMENT	EVALUATION	VERIFICATION
1. STATUS					
INSTALLATION		★	★	★	★
INSPECTION	★	★	★	★	★
2. QUALITY VERIFICATION PROGRAM					
ACCESSIBLE	★	★	★		★
INACCESSIBLE	★	★	★	★	
3. PHASE II	★	★	★	★	★

ASSESSMENT MATRIX FOR PROGRAM EVALUATION GROUP

ASSESSMENT ELEMENTS	REVIEW OF IMPLEMENTING DOCUMENTS PROCEDURES	CHECKLIST DEVELOPMENT	EVALUATION	VERIFICATION
1. PROGRAMMATIC				
MANAGEMENT REVIEW MEETINGS	★	★	★	
CCP ORGANIZATION	★	★	★	
MPQAD ORGANIZATION	★	★	★	
INSPECTION PLANS	★	★	★	
NRC AND CIG HOLD POINTS		★		★
COMMITMENTS TO NRC		★		★
2. PROCEDURES				
CONSTRUCTION PROCEDURES	★	★	★	★
MPQAD PROCEDURES	★	★	★	★
3. TRAINING				
CCP TEAMS	★	★	★	
MPQAD INSPECTORS	★	★	★	
CONSTRUCTION CRAFT	★	★	★	
4. RESOLUTION OF NONCONFORMANCES	★		★	★



TEAM MONITORING

INITIAL

- ▶ FULL TIME CIO MONITOR ASSIGNED TO OVERVIEW EACH TEAM'S ACTIVITIES AND ALL INSPECTIONS WITHIN THE PERVIEW OF THE TEAM.
- ▶ A STATISTICAL SAMPLE OF MPQAD INSPECTIONS WILL BE TAKEN AND EVALUATED BY INDEPENDENT CIO INSPECTION.

SUBSEQUENT

- ▶ IF TEAM PERFORMANCE AND INSPECTION RESULTS ARE DEEMED SATISFACTORY - FULL TIME CIO MONITORING WILL BE ADJUSTED DOWNWARD. INDEPENDENT SAMPLING INSPECTIONS WILL BE MAINTAINED.
- ▶ IF TEAM PERFORMANCE OR INDEPENDENT INSPECTION RESULTS REVEAL UNSATISFACTORY, CPCO CCP/QVP FULL TIME CIO MONITORING WILL BE MAINTAINED.

AREAS TO BE CLOSELY MONITORED

TRAINING

WELDER QUALIFICATION

PRODUCTION WELDING

DOCUMENT CHANGE CONTROL

CABLE PULLING

CONTROL OF PURCHASE MATERIAL

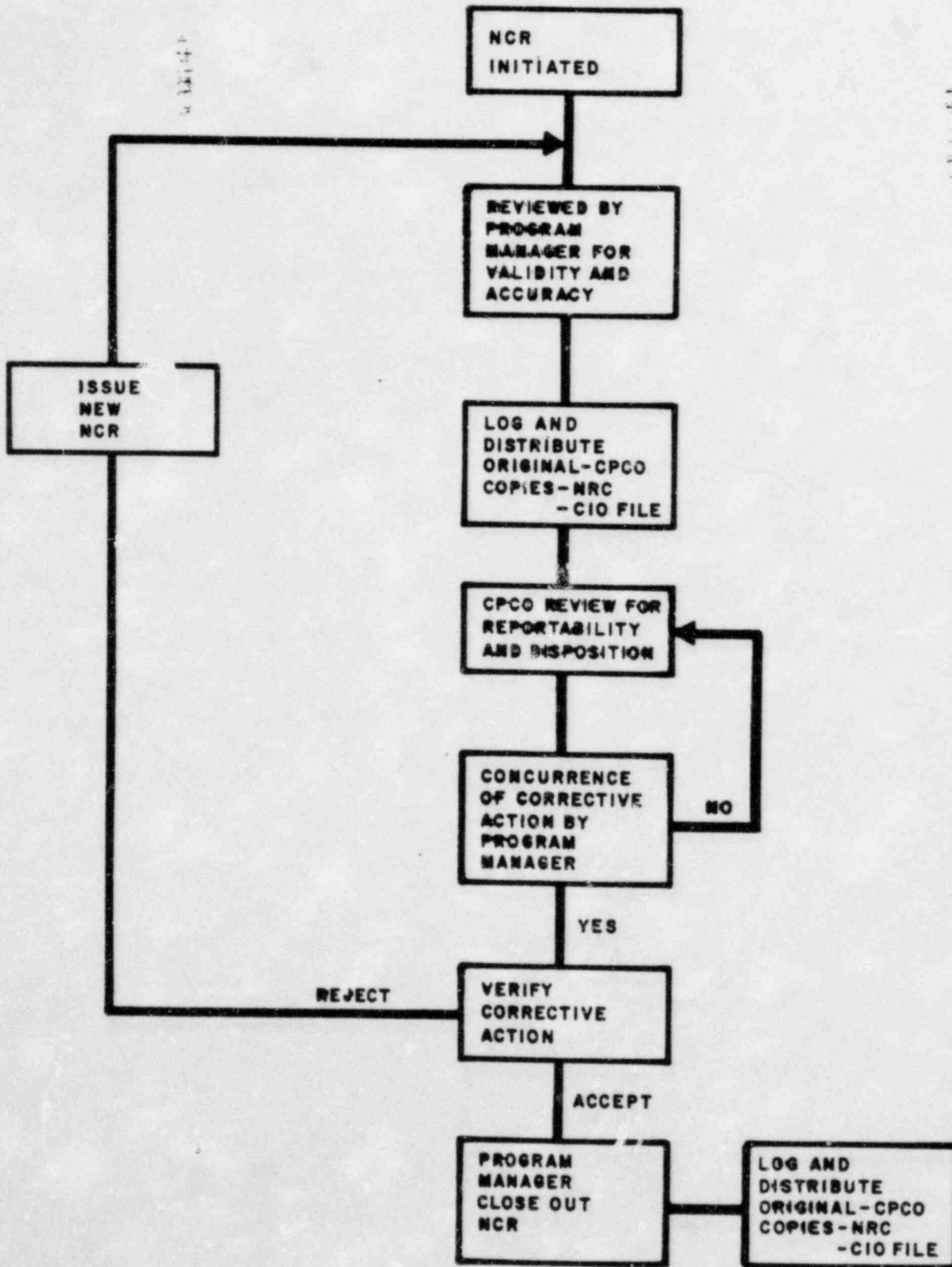
QA RECORDS

STORAGE / PREVENTIVE MAINTENANCE

CORRECTIVE ACTION FOR NONCONFORMANCE

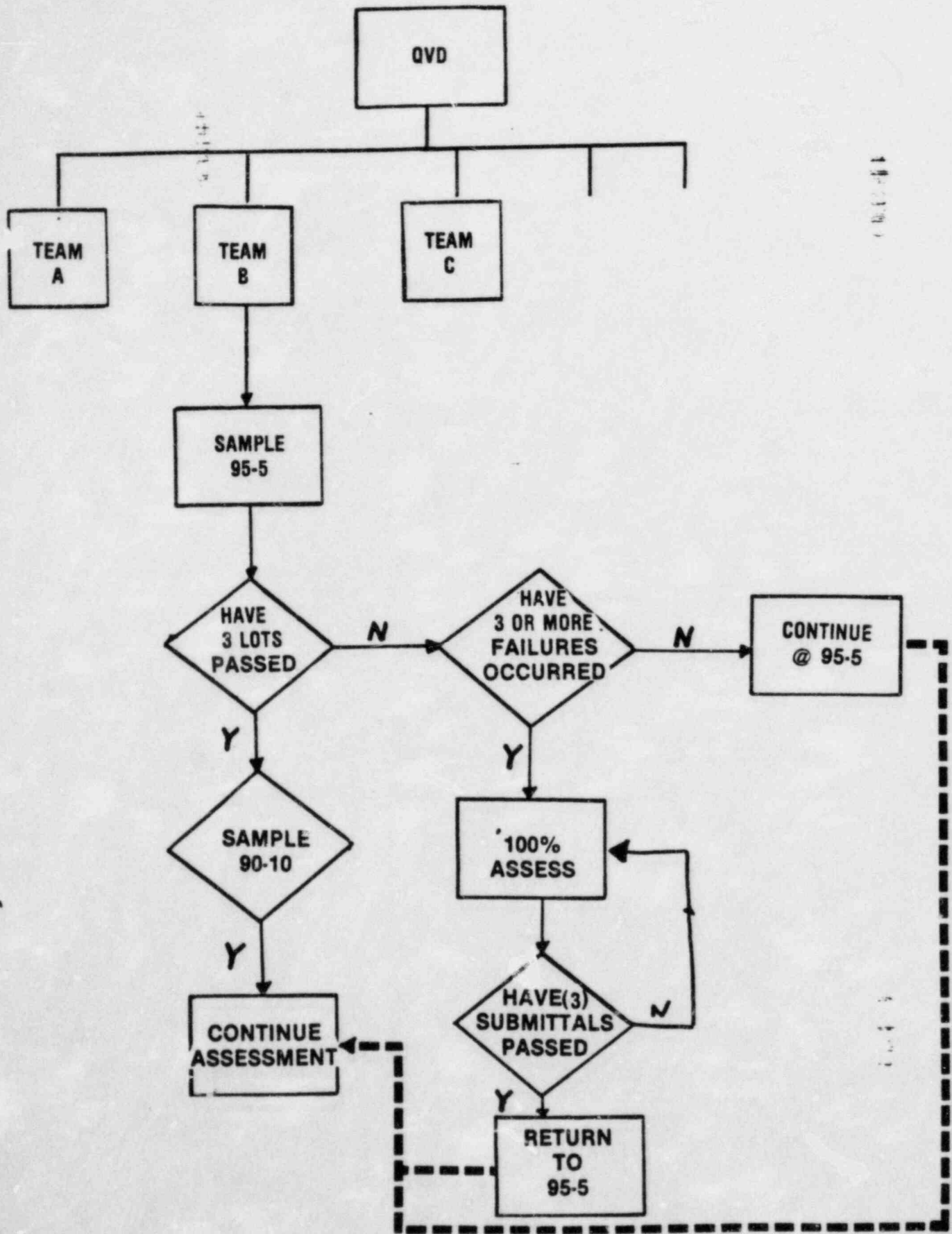
TRENDING & ROOT CAUSES

FLOW CHART FOR NONCONFORMANCE REPORTS



SAMPLING OVERVIEW

- **SWEC WILL USE MIL-STD-105D AS THE BASIC STATISTICAL METHOD.**
- **COMPLIANCE BASELINE WILL BE ESTABLISHED AS FOLLOWS:**
 - **EACH QVP TEAM'S WORK WILL BE SAMPLED USING 95-5 CONFIDENCE FOR 1ST (3) SUBMITTALS**
 - **IF ALL PASS THEN SAMPLING WILL BE REDUCED TO 90-10 CONFIDENCE**
 - **IF A TEAM HAS SINGLE FAILURE BASED ON SIGNIFICANT ATTRIBUTE THEN RETURN TO 95-5. THIS WILL CONTINUE UNTIL (3) CONSECUTIVE PASSES ARE ACHIEVED.**
 - **ANY TEAM SUBMITTING (3) CONSECUTIVE FAILED LOTS WILL BE SUBJECT TO RETRAINING AND 100% INSPECTION UNTIL IT IS JUDGED SAFE TO RETURN TO SAMPLING - NORMALLY THIS WILL BE (3) CONSECUTIVE PASSED LOTS WITH NO SIGNIFICANT CONDITIONS OBSERVED.**

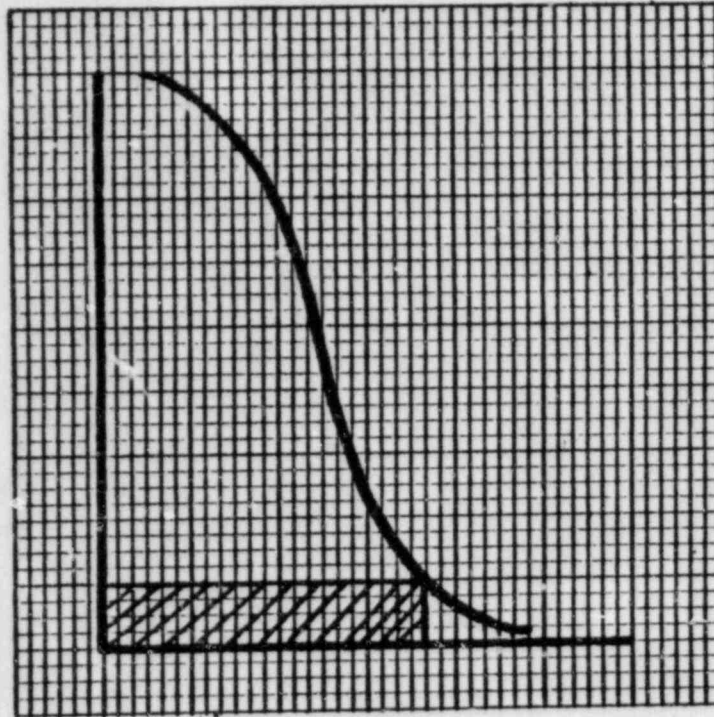


A COMPARISON BETWEEN SAMPLE SIZES

MS-105D LOT SIZE (N)	SAMPLE SIZE (n)		
	@ 95-5	@ 90-10	@ 20%*
2 to 8	ALL	ALL	1 / 2
9 to 15	ALL	ALL	2 / 3
16 to 25	ALL	ALL to 20	4 / 5
26 to 50	ALL	20	6 / 10
51 to 90	50	20	11 / 18
91 to 150	50	20	19 / 30
151 to 280	50	32	21 / 56
281 to 500	50	50	57 / 100
501 to 1200	80	80	101 / 240
1201 to 3200	125	125	241 / 640
3201 to 10,000	200	200	641 / 2000

*Values rounded up to the nearest
integer for greater confidence

LIMITING QUALITY



- Designed for "isolated" lot vs. continuous sampling
- Provides protection by "fixing" risk of accepting "bad" products
- Provides greater discrimination by designating AQL to avoid greater than allowable proportion defective

SAMPLING OVERVIEW

- **SWEC APPROACH WILL ENSURE**
 - **OBJECTIVE ASSESSMENT**
 - **REPORTS TO NRC, CPCo, PUBLIC**
 - **CORRECTIVE ACTION**
- **PERFORMANCE WILL BE REWARDED AND ENCOURAGED BY SAMPLE REDUCTIONS, WHEN JUSTIFIED.**

SAMPLING OVERVIEW

- ▶ **UPON COMPLETION OF CIO, SWEC WILL STATE:**
 - ▶ **THAT CPCO's, QVP AND CCP HAVE BEEN ASSESSED AND FOUND ACCEPTABLE.**
 - ▶ **THAT ALL SIGNIFICANT CONDITIONS ADVERSE TO QUALITY HAVE BEEN IDENTIFIED AND RESOLVED.**

A CONCLUSION THAT MIDLAND STATION MEETS OR EXCEEDS ALL APPLICABLE REGULATIONS, CODES AND STANDARDS.