

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

OCT 1 2 1983

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MEMORANDUM FOR:

R. F. Warnick, Director, Office of Special Cases

FROM:

J. J. Harrison, Chief, Section II - Midland

SUBJECT:

EVALUATION OF CONSUMERS POWER COMPANY'S (CPCO) CONSTRUCTION COMPLETION PROGRAM

The attached evaluation was performed by the NRC staff of CPCO's CCP to reinspect, status, and complete the construction of the Midland Nuclear Plant. The evaluation included reviewing the program for adequate content, scope and detail. The August 26, 1983, submittal was the final product on which this evaluation was based.

The staff concluded that the CCP is an adequate program to be utilized at the Midland Plant to identify problems, document them, afford corrective action and allow for the plant to be completed in a quality manner.

As you are aware a recent management decision was made to not utilize this evaluation to approve the CCP. The approval mechanism is going to be in the form of "Confirmatory Order". This evaluation therefore will not make the document route to the Public Document Room. I do believe that placement of this document in the Region III files is necessary to historically show such an evaluation was accomplished.

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J. J. Harrison, Chief Section II - Midland

8406020334 840517 PDR FDIA RICE84-96 PDR STAFF EVALUATION OF CONSUMERS POWER COMPANY'S CONSTRUCTION COMPLETION PROGRAM PROPOSAL TO REINSPECT, STATUS, AND COMPLETE THE CONSTRUCTION OF MIDLAND NUCLEAR PLANT, UNITS 1 AND 2

Purpose and Background

The Consumers Power Company (CPCo or licensee) holds Construction Permits No. CPPR-81 (Unit 1) and CPPR-82 (Unit 2) issued by the Atomic Energy Commission in 1972, which authorized construction of the Midland nuclear facility. The Midland nuclear facility is located in Midland, Michigan and consists of two pressurized water reactors of Babcock and Wilcox design and related facilities for use in the commercial generation of electric power.

Since the start of construction, Midland has experienced significant Quality Assurance (QA) problems. Following the identification of each of these problems, the licensee has taken action to correct the problems and to upgrade the QA program. In spite of the corrective actions taken, the licensee has continued to experience problems in the implementation of quality in construction. Corrective actions taken were directed toward each specific problem, and root cause determination and a program to review isolated events for their generic application were ineffective. Significant construction problems identified to date include:

- 1973 cadweld splicing deficiencies
- 1976 rebar omissions
- 1977 bulge in the Unit 2 Containment Liner Plate
- 1977 tendon sheath location errors
- 1978 Diesel Generator Building settlement
- 1980 Zack Company heating, ventilation, and air conditioning (HVAC) deficiencies
- 1980 reactor pressure vessel anchor stud failures
- 1981 piping suspension system installation deficiencies
- 1982 electrical cable misinstallations

In 1980 Consumers Power Company (CPCo) reorganized the existing QA department so as to increase the involvement of high level CPCo management in onsite QA activities. The reorganized QA department was given the title of integrated Midland Project Quality Assurance Department (MPQAD). The responsibility for Quality Control (QC) of HVAC work was removed from the HVAC contractor, Zack, and assigned to MPQAD. In May 1981 the NRC conducted a special indepth team inspection of the Midland site to examine the implementation status and effectiveness of the QA program. Based on this inspection, Region III concluded that the Midland QA program was acceptable (Inspection Report No. 50-329/81-12; 50-330/81-12).

The special team did, however, identify deficiencies in previous QC inspections of piping supports/restraints and electrical cable installations. As a result of staff discussions about the seriousness of these findings and of similar indications of deficiencies identified in the Systematic Assessment of Licensee Performance (SALP) Report issued in April 1982, a special Midland Section in Region III was formed in July 1982. The Midland Section devoted increased attention to inspection of the Midland facility, including upgrading the constructor's (Bechtel) QC program. In September 1982, the licensee integrated the Bechtel QC organization into the MPQAD. This reorganization reflected the recommendations of the NRC staff. As part of this change, the licensee also undertook to retrain and recertify all previously certified Bechtel QC

As a result of Region III findings of significant problems with equipment in the diesel generator building developed from an inspection during the period of October 1982 through January 1983, and the subsequent identification of similar findings by the licensee in other portions of the plant, the licensee, in December 1982, halted the majority of the safety-related work activities. In view of the history of QA problems at the Midland plant and the lack of effectiveness of corrective actions to resolve these problems, the NRC required the licensee to develop a comprehensive program to verify the adequacy of previously installed components and to assure the adequacy of future component installations. On December 2, 1982, Consumers Power Company verbally proposed the concept of the CCP, followed by a formal submittal on January 10, 1983.

Subsequent to the January 10, 1983 submittal, the NRC requested additional information on March 28, 1983. CPCo provided additional responses on April 6 and 22, 1983. The CCP underwent revisions and was resubmitted to the NRC on June 3 and 10, 1983. The NRC issued a final set of comments and questions on the CCP on August 19, 1983. This was followed by a final resubmittal of the CCP by CPCo on August 26, 1983. This evaluation concludes the NRC staff review of the above documents.

CCP Overview

The CCP is CPCo's plan to provide guidance in the planning and management of the construction and quality activities necessary for completion of the construction of the Midland Nuclear Plant. To date the CCP has undergone several alterations in response to comments from the NRC and members of the public. As finally revised and submitted on August 26, 1983, the CCP includes: (1) NRC hold points; (2) the requirement for 100% reinspection of accessible installations; (3) the integration of Bechtel QC with MPQAD; (4) the retraining and recertification of QC inspectors; (5) the general training of licensee and contractor personnel in quality requirements for nuclear work, requirements of the CCP, safety orientation, and inspection and work procedures; (6) the revision, as necessary, of Project Quality Control Instructions; (7) CCP team training; and (8) an independent third party overview of CCP activities.

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The CCP is divided into two phases. Phase 1 is a systematic review of the safety-related systems and areas of the plant. This review will be carried out on an area-by-area basis and will be done by teams with responsibility for particular systems. The purpose of Phase 1 is to provide: (1) a clear identification of remaining installation work, including any necessary rework, and (2) an up-to-date inspection status to verify the quality of existing work.

Phase 2 will take the results of the Phase 1 review and complete the necessary work or rework. The teams organized for Phase 1 activities will continue as the responsible organizational units to complete the work in Phase 2. All new work and rework on pipe hangers and electrical cable will be part of CCP Phase 2.

The CCP is designed to address the generic applicability of the problems identified by the N.C's inspection of the diesel generator building. If other significant problems are identified during the course of the CCP, the CCP will be expanded to track their resolution. The objective of the CCP is to look at the plant hardware and equipment, identify existing problems, correct all the problems, and complete construction of the plant.

The CCP does not include the remedial soils program, nuclear steam supply system installation, HVAC installations, and the reinspection of pipe hangers and electrical cable. The remedial soils activities are being overviewed by an independent third party and closely inspected by the NRC under the conditions of the Construction Permits which implement the Licensing Board's April 30, 1982 order and a Work Authorization Procedure. The staff does not consider it necessary to require further review of the remedial soils activities to be included in the CCF because of separate commitments made to the NRC. Nuclear Steam Supply System (NSSS) installation and HVAC installation were not drawn into question by the diesel generator building inspection due to the fact that the installation and the QC inspection were accomplished by organizations other than Bechtel. The staff has not developed facts to indicate that installation of these systems should be included in the CCP. Reinspection of the pipe hangers and electrical cable were not included in the CCP because that reinspection is being done under a separate commitment to the NRC. See letters from Keppler (NRC) to Cook (CPCo) dated August 30 and September 2, 1982.

Evaluation

The NRC staff has conducted an indepth review of each revision of the CCP. The staff generated comments and questions on each revision, and subsequently, CPCo resolved each issue and resubmitted a final acceptable document. In addition, the NRC conducted several meetings at the staff working levels to better understand the methodology being utilized in the CCP. In addition, comments were received from members of the public, intervenors, and a representative of the Government Accountability Project (GAP). These comments were considered by the NRC in their review and evaluation of the CCP. Public meetings were held in Midland, Michigan on February 8, and August 11, 1983. A meeting was also held with the intervenors, GAP, and members of the Lone Tree Council on August 11, 1983. In addition, the staff has had meetings or telephone conversations with the intervenors and GAP. All views were given due consideration prior to the NRC's final decision to approve the CCP.

Summary and Conclusion

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Based on our review of the program submitted by CPCo, and consideration of comments made by members of the public, we conclude that the CCP is an adequate program to provide for the reinspection, statusing, and proper completion of construction of the Midland Nuclear Plant.

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Warnick



UNITED STATES NUCLEAR REGULATORY COMMISSION REGION III 799 ROOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137 APR 3 1984

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

Consumers Power Company ATTN: Mr. D. L. Quamme Site Manager P. O. Box 1963 Midland, MI 48640

Gentlemen:

The NRC staff has concluded a review of your letter dated March 27, 1984, requesting NRC concurrence with the release of additional portions of the plant for Construction Completion Program (CCP) Phase 1 Status Assessment and Quality Verification activities. In regards to your request for additional modules, we have concluded that the following portions of the plant may be released for CCP Phase 1 Status Assessment and Quality Verification activities.

Module Number

Description

150, 151 160, 161, 162 320 240	EL. 634' Auxiliary Building El. 646' and 652' Auxiliary Building RB II N. D-Ring EL. 659' Control Tower
330	RB II S. D-Ring
820	Diesel Generator Building

This letter, therefore, authorizes Consumers Power Company to proceed with CCP Phase 1 Status Assessment and Quality Verification activities for the above portion of the plant.

Our decision to limit the release of additional portions to those identified above is based on our perception of the progress which you have made in accomplishing Phase 1 activities for these modules previously released and the continuing deficiencies which have been identified in the areas of team training and document control. Further releases of modules will be based on work accomplished and the effectiveness of your QA program in dealing with identified deficiencies.

We have reviewed the clarifications to the CCP process as delineated in your letter, including attachments 3, 4, and 5, and concur in the incorporation of these clarifications into the CCP process.

Finally, we concur that the disposition of inaccessible items is not a restraint for release into Phase 2.

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Consumers Power Company

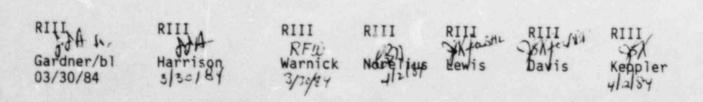
Should you have any questions regarding this matter, please contact me at (312) 790-5635.

Sincerely,

John J. Harrison, Chief Midland Section

Enclosure: Ltr dtd 3/27/84

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 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 P. Garde, Government Accountability Project Lynne Bernabei, Government Accountability Project Stone and Webster Michigan, Inc.



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March 27, 1984

Mr John J Harrison, Chief Midland Section, Region 111 Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, TL 60137

MIDLAND ENERGY CENTER GWO 7020 CONSTRUCTION COMPLETION PROGRAM IMPLEMENTATION ADDITIONAL MODULE RELEASES File: 0655 UFI: 99*08 Serial: CSC-7526

The purpose of this letter is to request NRC concurrence with the release of additional portions of the plant for Construction Completion Program (CCP) Phase 1 Status Assessment and Quality Verification activities. This subject was discussed with you, and members of your staff on March 21, 19984. A copy of the presentation materials used in that discussion is provided in Attachment 1.

As discussed in our meeting, additional module releases are necessary to facilitate a continuation of the logical Status Assessment and Quality Verification Program (QVP) process to support Phase 2 releases for work needed to support system turnover milestones, and to maintain effective utilization of the trained and qualified personnel assembled for Status Assessment and QVP. A listing of additional modules, for which this release is requested, is provided in Attachment 2. This listing is in order of priority, and this specific request is for priority numbers 6 through 21.

In addition, it was noted that clarifications to certain CCP processes are desirable in order to resolve inefficiencies we have encountered while performing Status Assessment and QVP on commodities and Inspection kecords spanning several modules. This is particularly true when a complete determination of the acceptability of the installation depends on attributes that are conside the module boundary. Specifically, we request an extension of these cross over commodities into other modules to allow completion of Phase 1 activities to logical limits. For Installation Status Assessment, the extension would include three categories:

 The completion of all portions of uniquely identified and træcked items that cross boundaries such as conduit and instrument tubing runs.

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- The completion of civil composities that form a single identifiable unit that cross modules boundaries such as a complete block wall or structural steel platform.
- Functionally interrelated items that must be verified as a whole to assess all applicable attributes such as a pipe, pipe hangers and associated in-line devices.

Attachments 3, 4 and 5 provide specific definition for each category. This request for boundary extension applies to both the five (5) modules currently released for Phase 1 activities, and those additional modules requested in this letter.

For the Quality Verification Program (QVP) inspections, this involves allowing reinspections to follow the scope of the existing ("eld") Inspection Records (IR), in order to reinspect all portions covered by the existing IL, even though it may extend beyond the boundary of the module.

Finally, we request your concurrence with regard to the dispositioning of inaccessible items. As discussed earlier with you, and members of your staff, we do not consider this dispositioning to be a restraint for release into Phase 2, since

- 1. the items are already inaccessible, and
- supporting data for these verifications will not be evailable, in most cases, until we have developed a quality history through reinspection of accessible items.

Please contact us should you require additional information in replying to this request.

Attachments

CC EJCook, Midland Resident Inspector DSBood, USERC JCKeppler, Regional Administrator, Region III

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Attachuent 7

MODULE RELEASE SEQUENCE

PRIORITY NUMBER	SCREDULE NUMBER	DESCHIPTIO		
1	340	RE II Outside D-Fing*		
1 340 2 . 500 3 1C2 4 120		Service Water Pump Structure		
3	102	East Wing Wall Auxiliary Building*		
4	120	El. 584' Auxiliary Building		
5	410	E1. 614' Unit 11 Turbine*		
	RE	LEASED		
6 .	150	El. 634' Auxiliary building*		
	(151 included)			
7	160	El. 646' & 652' Auxiliary Building*		
8	(161 & 162 inclu 320			
9	240	RB II K. D-Ling* El 659' Control Tower*		
10	330	RE II S. D-Ring*		
11	820	Diesel Generator Building		
12	280	E1. 655' Unit Il Electrical Fenetration		
13	210	El. 614' Control Tower*		
14	250	El. 674'-6" Control Tower*		
15	170	El. 659' 6 674'-6 Auxiliary Building*		
.,	(175 included)	EI. 659 6 674 -6 AUXILIETY BUILDER		
16	140	El. 614' Auxiliary Building*		
17	230	El. 646' Control Tover*		
18	130	599' Auxiliary Building*		
19	101	Auxiliary Building Pipeway and		
		Valve Gallery*		
20	180	Auxiliary Building Roof*		
21	110	El. 568' Auxiliary Building*		
		FILESTONE		
22	260	El. 685' Control Tower and Eoof		
23	310	RE 11 Fuel Fool		
24	103	Vest Wing Vall		
25	290	Unit I El. 685' W. Penecration		
26	220	El. 634' Labs Control Tover		
27	860	Tank Fare		
28	420	E1. 631' Turbine II		
29	430	El. 655' Surbine Il		
30	440	El. 695' and 715 Turbine Il		
31	190	Redwaste Building		
32	900	Miscelleteous Structure:		
33	850	Bealth Fryster Cel. Fecility		
34	860	River intake Structure		
35	810	Circulating Water Building		
36	890	pond Blowdown Structure		
37	. 530	Guard Louse		
38	870	Oily Waste Building		
39	610	El. 614' Turbine I		
40	620	El. 634' L.rbine 1		
41	630	El. 659' Turbine I		
42	640	E1. 695' Turbine I		
43	540	RS I Outside D-ling		
44	530	RE I S. D-Fing		
45	520	RE I N. D-Ring		
46	510	RE I Juel Pool		
47	700	Eveporator Building		
48	710	Stear Tuppel		
		Con. Return Perphouse		
	Aux. Flush - 28 Mil	estope Revision		

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COMMODITY EXTENSION LIMIT Electrical Slots (floor penetration) Complete uniquely identified unit Cable Tray Complete uniquely identified unit Exposed Conduit Complete uniquely identified unit Vireway Complete uniquely identified unit Ebed Conduit/Ductbeaks Each end Trenches Complete uniquely identified unit Instrumentation Tubing Complete isometric drawing. (To be included with module containing instruzent) Mechanical Equiptent The entire piece of equipment as supplied by the equipment vendor will be assessed on both rotating and LOLTOLATing equippent, even if field work or assembly was performed within the component or skid. Equipment Supports both integral and non-intregral equipment supports will be assessed it their entirety, not including the permanent building fraze or structure. Special Doors & Airlocks Conflete door with herdware and fram.

Uniquely identified and tracked crossover composities that may be status assessed or quality verified as a unit.

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Attachatat 4

Uniquely identified commodities that form a single identifiable unit and may be status assessed or quality verified as a unit.

COMMODITY	DIDISION LIKIT		
Structural Framing	to and including the next connection or support point		
Blockwalls	Both sides of wall, including stack- ments and penetrations to end of the span (tic-in to the most structural support point)		
Structurel Concreté Walls	both sides of the wall, including panetrations, up to the module boundary		
Decontaminable Coatings	any costings on the compdities shown		

Miscellaneous Q Costings

any costings on the compdicies shown on this extension list

Any costings on the compdities shown on this extension list

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COMMODITY	ENTENSION LINIT
Large Pipe	Assess to the point outside the module which represents the boundary of the stress analysis. This will not exceed the first anchor point, is: anchor, pup, teal nottle, etc.
Stall Pipe	Assess to the limits of the signing as shown on the isometric.
	Note: QVP on piping which was accepted on PW-1.00 and PF-1.10 PQCI's must extend to the mext "field break," is: field weld or flange joint, beyond these limits.
In-Line Connodities: Flued Reads Flange Joints Weld Joints Valves (Mechanical and Velded) Orifice Plates	Assess all of these composities which are installed within the boundaries of the piping being assessed (as described above).

Electrical Penetration Assembly

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Manufactured electrical pressure boundary assembly as a complete unit

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

March 27, 1984

Mr John J Harrison, Chief Midland Section, Region III Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

MIDLAND ENERGY CENTER GWO 7020 CONSTRUCTION COMPLETION PROGRAM IMPLEMENTATION ADDITIONAL MODULE RELEASES File: 0655 UFI: 99*08 Serial: CSC-7526

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In addition, it was noted that clarifications to certain CCP processes are desirable in order to resolve inefficiencies we have encountered while performing Status Assessment and QVP on commodities and Inspection Records spanning several modules. This is particularly true when a complete determination of the acceptability of the installation depends on attributes that are outside the module boundary. Specifically, we request an extension of these cross over commodities into other modules to allow completion of Phase 1 activities to logical limits. For Installation Status Assessment, the extension would include three categories:

1. The completion of all portions of uniquely identified and tracked items that cross boundaries such as conduit and instrument tubing runs.

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- The completion of civil commodities that form a single identifiable unit that cross modules boundaries such as a complete block wall or structural steel platform.
- Functionally interrelated items that must be verified as a whole to assess all applicable attributes such as a pipe, pipe hangers and associated in-line devices.

Attachments 3, 4 and 5 provide specific definition for each category. This request for boundary extension applies to both the five (5) modules currently released for Phase 1 activities, and those additional modules requested in this letter.

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Please contact us should you require additional information in replying to this request.

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Attachments

CC RJCook, Midland Resident Inspector DSHood, USNRC JGKeppler, Regional Administrator, Region III

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PRIORITY NUMBER	SCHEDULE NUMBER	DESCRIPTION
1.	340	RB II Outside D-Ring*
• 2	800	Service Water Pump Structure
3	102	East Wing Wall Auxiliary Building*
4	120	El. 584' Auxiliary Building
5	410	El. 614' Unit II Turbine*
		LEASED
6	150	El. 634' Auxiliary Building*
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7	160	El. 646' & 652' Auxiliary Building*
	(161 & 162 inclu	
.8	320	RB II N. D-Ring*
9	240	El 659' Control Tower*
10	330	RB II S. D-Ring*
11	820	Diesel Generator Building
12	288	E1. 659' Unit II Electrical Penetration
13	210	El. 614' Control Tower*
14	250	El. 674'-6" Control Tower*
14	170	El. 659' & 674'-6 Auxiliary Building*
15	(175 included)	art out a ort o nonzeaury portoing
16	140	El. 614' Auxiliary Building*
17	230	El. 646' Control Tower*
	130	599' Auxiliary Building*
18	101	Auxiliary Building Pipeway and
19	101	
	100	Valve Gallery*
20	180	Auxiliary Building Roof*
21	110 2B	El. 568' Auxiliary Building* MILESTONE
22 .	260	El. 685' Control Tower and Roof
23	310	RB II Fuel Pool
24	103	West Wing Wall
25	290	Unit I El. 685' W. Penetration
26	220	El. 634' Labs Control Tower
27	860 .	Tank Farm
28	420	El. 634' Turbine II
29	430	El. 659' Turbine II
30	440	El. 695' and 715 Turbine II
31	190	Radwaste Building
32	900	Miscellaneous Structures
33	850	Health Physics Cal. Facility
34	880	River Intake Structure
35	810	Circulating Water Building
36	890	pond Blowdown Structure
37	830	Guard House
38	870	Oily Waste Building
39 -	610	El. 614' Turbine I
40	620	El. 634' Turbine I
41	630	El. 659' Turbine I
42	640	El. 695' Turbine I
43	540 .	RB I Outside D-Ring
45 .	530	RB I S. D-Ring
	520	RB I N. D-Ring
45		RB I Fuel Pool
46	510	
47	700	Evaporator Building
48	710	Steam Tunnel
49	720	Con. Return Pumphouse estone Revision

Uniquely identified and tracked crossover commodities that may be status assessed or quality verified as a unit.

COMMODITY	EXTENSION LIMIT		
Electrical Slots (floor penetration)	Complets uniquely identified unit		
Cable Tray	Complete uniquely identified unit		
Exposed Conduit	Complete uniquely identified unit		
Wireway	Complete uniquely identified unit		
Embed Conduit/Ductbanks	Each end		
Trenches	Complete uniquely identified unit		
Instrumentation Tubing	Complete isometric drawing. (To be included with module containing instru- ment)		
Mechanical Equipment	The entire piece of equipment as supplied by the equipment vendor will be assessed on both rotating and nonrotating equipment, even if field work or assembly was performed within the component or skid.		
Equipment Supports	Both integral and non-intregral equip- ment supports will be assessed in their entirety, not including the permanent building frame or structure.		

Complete door with hardware and frame

Special Doors & Airlocks

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Uniquely identified commodities that form a single identifiable unit and may be status assessed or quality verified as a unit.

COMMODITY	EXTENSION LIMIT
Structural Framing	to and including the next connection or support point
Blockwalls	Both sides of wall, including attach- ments and penetrations to end of the span (tie-in to the next structural support point)
Structural Concrete Walls	both sides of the wall, including penetrations, up to the module boundary
Decontaminable Coatings	any coatings on the commodities shown on this extension list
Miscellaneous Q Coatings	Any coatings on the commodifies shown

on this extension list

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Functionally interrelated crossover commodities that may be status assessed or quality verified as a whole item.

COMMODITY	ENTENSION LIMIT		
Large Pipe	Assess to the point outside the module which represents the boundary of the stress analysis. This will not exceed the first anchor point, ie: anchor, pump, tank nozzle, etc.		
Small Pipe	Assess to the limits of the piping as shown on the isometric.		
	Note: QVP on piping which was accepted on PW-1.00 and PF-1.10 PQCI's must extend to the next "field break," ie: field weld or flange joint, beyond these limits.		
In-Line Commodities: Flued Heads Flange Joints Weld Joints	Assess all of these commodities which are installed within the boundaries of the piping being assessed (as described above).		

Electrical Penetration Assembly

Orifice Plates

Valves (Mechanical and Welded)

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Manufactured electrical pressure boundary assembly as a complete unit BCC JWCook, P-26-336B SHHowell, M-1180B TABuczwinski, Midland-207 LGraber, LIS JNLeech, P-24-506 DFLewis, Bechtel FJLevandoski, B&W GALow, P-12-237A -DASommers, P-14-106 PPSteptoe, IL&B, Chicago DJVandeWalle, P-24-614B BJWalraven, P-24-517 RAWells, Midland FCWilliams, IL&B, Washington, DC DTPerry, Midland NRC Correspondence File, P-24-517 UFI, P-24-511 CMS-Midland JEKarr, Stone & Webster

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RC DMBudzik, P-24-517A RJErhardt, P-14-113A LSGibson, P-24-618A P-24-505 (Last)

Thorning

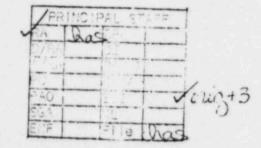


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Midland Project: PO Box 1963, Midland, MI 48640 + (517) 631-8650

March 27, 1984

Mr John J Parrison, Chief Midland Section, Region III Nuclear Regulatory Commission 799 Roorsvelt Road Glen Ellyn, IL 60137



Dean L Quamme Site Manager

Midland Project

MIDLAND ENERGY CENTER GWO 7020 CONSTRUCTION COMPLETION PROGRAM IMPLEMENTATION ADDITIONAL MODULE RELEASES File: 0655 UFI: 99*08 Serial: CSC-7526

The purpose of this letter is to request NRC concurrence with the release of additional porcions of the plant for Construction Completion Program (CCP) Phase 1 Status Assessment and Quality Verification activities. This subject was discussed with you, and members of your staff on March 21, 1984. A copy of the presentation materials used in that discussion is provided in Attachment 1.

As discussed in our meeting, additional module releases are necessary to facilitate a continuation of the logical Status Assessment and Quality Verification Program (QVP) process to support Phase 2 releases for work needed to support system turnover milestones, and to maintain effective utilization of the trained and qualified personnel assembled for Status Assessment and QVP. A listing of additional modules, for which this release is requested, is provided in Attachment 2. This listing is in order of priority, and this specific request is for priority numbers 6 through 21.

In addition, it was noted that clarifications to certain CCP processes are desirable in order to resolve inefficiencies we have encountered while performing Status Assessment and QVP on commodities and Inspection Records spanning several modules. This is particularly true when a complete determination of the acceptability of the installation depends on attributes that are outside the module boundary. Specifically, we request an extension of these cross over commodities into other modules to allow completion of Phase 1 activities to logical limits. For Installation Status Assessment, the extension would include three categories:

1. The completion of all portions of uniquely identified and tracked items that cross boundaries such as conduit and instrument tubing runs.

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- The completion of civil commodities that form a single identifiable unit that cross modules boundaries such as a complete block wall or structural steel platform.
- Functionally interrelated items that must be verified e a whole to essess all applicable attributes such as a pipe, pipe hangers and associated in-line devices.

Attachments 3, 4 and 5 provide specific definition for each category. This request for boundary extension applies to both the five (5) modules currently released for Phase 1 activities, and those additional modules requested in this letter.

For the Quality Verification Program (QVP) inspections, this involves allowing reinspections to follow the scope of the existing ("old") Inspection Records (IR), in order to reinspect all portions covered by the existing IR, even though it may extend beyond the boundary of the module.

Finally, we request your concurrence with regard to the dispositioning of inaccessible items. As discussed earlier with you, and members of your staff, we do not consider this dispositioning to be a restraint for release into Phase 2, since

- 1. the items are already inaccessible, and
- supporting data for these verifications will not be available, in most cases, until we have developed a quality history through reinspection of accessible items.

Please contact us should you require additional information in replying to this request.

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DLQ/BHP/klw

Attachments

CC RJCook, Midland Resident Inspector DSHood, USNRC JCKeppler, Regional Administrator, Region III

PRESENTATION

1. 1. 1

TO

NUCLEAR REGULATORY COMMISSION

ON

ADDITIONAL MODULE RELEASES

CONSUMERS POWER COMPANY MIDLAND PROJECT MARCH 21, 1984

PRESENTATION TO NRC ON ADDITIONAL MODULE RELEASES

I. Introduction - BHPeck

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- II. Current Status of CCP Phase I Activities
 - a. Review logic diagram BHPeck
 - b. Status Assessment TValenzano

Manpower, areas/disciplines being worked, manhours expended, current short-term forecast, training, procedures

c. Quality Verification Program (QVP) - BPalmer

Manpower, manhours expended, current short-term forecast, training, procedures

- III. Results Achieved to Date
 - a. Status Assessment TValenzano

Summary statement

b. QVP - BPalmer

Summary statement

- c. Summary of NCRs written BPalmer
- d. Management Evaluations BHPeck

Describe how Management is overviewing the CCP

IV. Lessons Learned

a. Status Assessment - TMinor

Review SAT packages, changes made, difficulties encountered and resolutions recommended.

b. QVP - BPalmer

Review QVP packages, changes made, difficulties encountered and resolutions recommended.

- V. Third Party Observations BHPeck
- VI. Additional Module Releases BHPeck

Priority Listing

VII. Summary - BHPeck

BHPeck 3/14/84 SECTION I

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INTRODUCTION

SECTION II

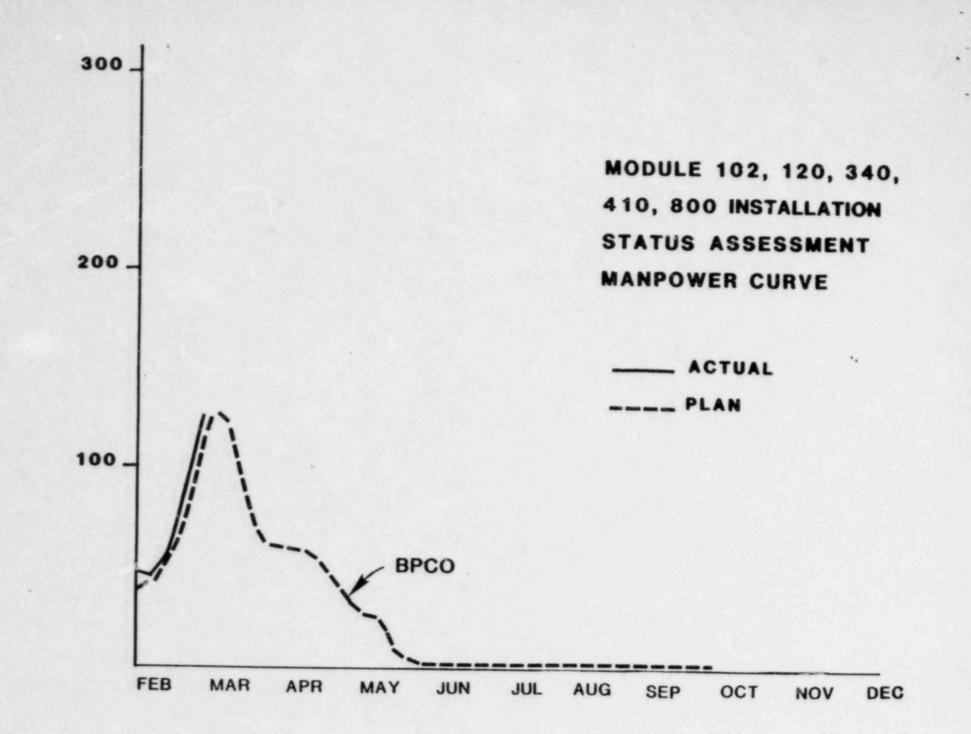
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CURRENT STATUS OF CCF PHASE I

INSTALLATION STATUS ASSESSMENT MANHOURS* 1ST FIVE MODULES

	CIVIL	MECH	ELECT	INSTR	TOTAL
MODULE					
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 3/6				15,000

* ROUNDED



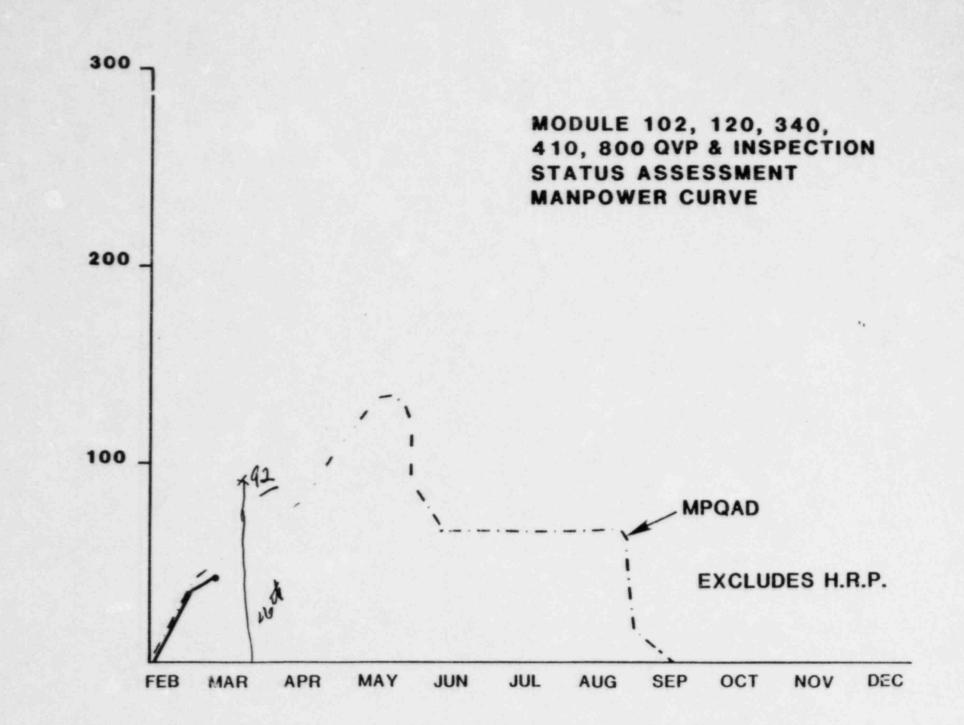
TRAINING PHASE I

	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
	310	

QVP/SA MANHOURS* 1ST FIVE MODULES

	CIVIL	MECH.	ELECT.	TOTAL
MODULE				
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

* ROUNDED



MPQAD TRAINING

TRAINED THRU 3/9

QVP (N-SERIES)

300

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INSPECTION STATUS ASSESSMENT (T-SERIES)

83

MPQAD

INSPECTOR CERTIFICATION STATUS

CERTIFICATION GOAL (ALL WORK): 1,239 (ESTIMATE AS OF 2/22/84) angu flamp.

TOTAL NO. CERTIFICATIONS ACCOMPLISHED: 688 (AS OF 2/22/84)

% GOAL ACCOMPLISHED = 688 × 100 = 55.5% 1239

QUALITY VERIFICATION PROGRAM (QVP) PROCEDURES

- ELEVEN PROCEDURES REQUIRED (N-SERIES)
- ALL REQUIRED PROCEDURES ISSUED

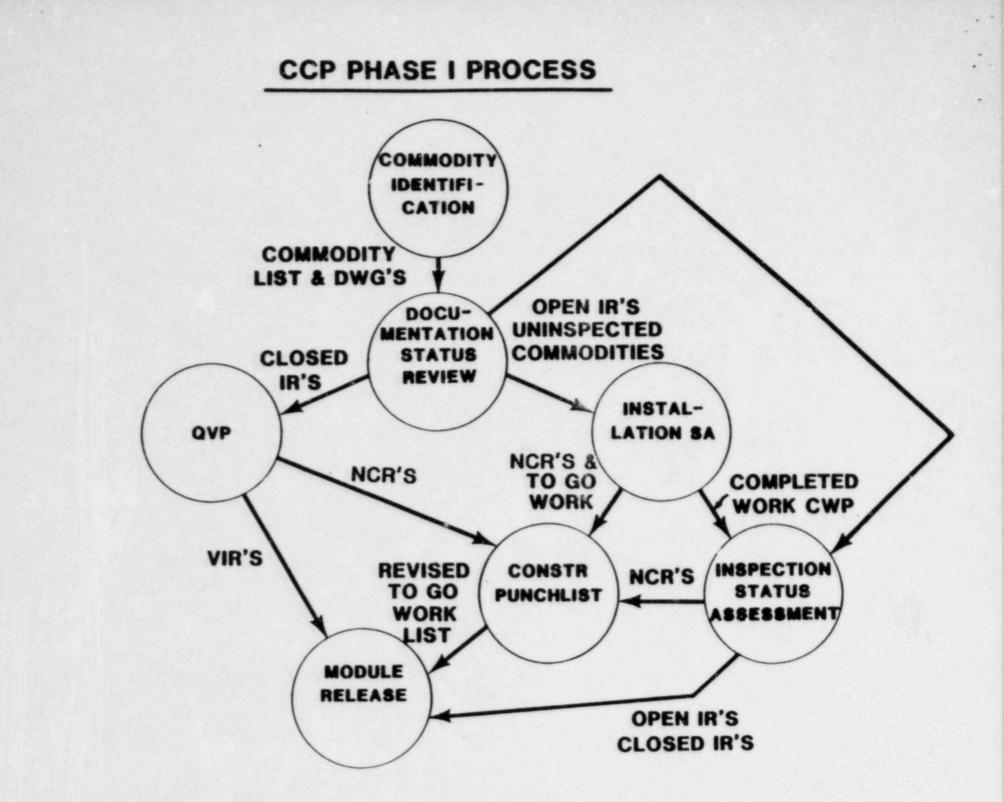
INSPECTION STATUS ASSESSMENT PROCEDURES

- FOUR PROCEDURES REQUIRED (T-SERIES)
- ALL REQUIRED PROCEDURES ISSUED.

SECTION III

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RESULTS ACHIEVED TO DATE



INSPECTIONS INITIATED (BY COMMODITY)

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COMMODITY

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FE STATUS ASSESSMENT

Mechanical Instrumentation	x
Electrical Instrumentation	X
Mechanical Equipment (M-485)	X
Electrical Equipment (E-62)	x
Pipe Supports	Х
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	х
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)

COMMODITY

FE STATUS ASSESSMENT

1.20

Concrete & Masonry Openings	х
Decontaminable Coatings on	x
Concrete	
Miscellaneous Q Coatings	х
Cable Tray	X
Conduit	x
Conduit Supports	x
Wireways & Supports	-
Trenches for Cable	-
Boxes & Supports	х
Cable Tray Supports	х
Slots	-

NCR'S IDENTIFIED 184

DOCUMENTATION ELEMENTS OF S/A

- BASE DOCUMENTS
 - DRAWINGS
 - SPECIFICATIONS
 - FIELD PROCEDURES AND INSTRUCTIONS
- . COMMODITY LISTS WITH QC MARKUP
- NCR'S
- FIELD CHANGE NOTICES AND REQUESTS
- CONSTRUCTION PUNCHLISTS
- UPDATE OF DATA BASE
 - FOR INSTALLATION INSPECTION CREDIT AND IDENTIFICATION OF "TO GO WORK"
- CWP'S

INSPECTIONS INITIATED (BY COMMODITY)

COMMODITY

Flued Heads

Pipe Welds

Platform

Fuel Racks

Air Locks

Concrete

Pipe

Mechanical Instrumentation Electrical Instrumentation Mechanical Equipment (M-485) Electrical Equipment (E-62) Pipe Supports Valves (Welded) Valves (Mechanical) Concrete Pipe Cable Terminations Electrical Containment Penetration Assemblies Feed-Thru Adapter Modules Batteries/Racks Structural Steel & Framing Equipment Supports Shield Plates Whip Restraints Jet Impingement Barriers Liner Plate Liner Plate Attachments Special Doors Block Walls

X

-

X

-

X

x

x

X

х

X

X

X

X

X

X

-

X

X

-

X

COMMODITY

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Concrete & Masonry Openings Decontaminable Coatings on Concrete Miscellaneous Q Coatings Cable Tray Conduit Conduit Supports Wireways & Supports Trenches for Cable Boxes & Supports Cable Tray Supports Slots

NCR'S IDENTIFIED 133 NCR'S RECV'D BY CONSTR. 86

QVP

X

X

X

X

X

X

X

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X

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QVP

A "PRODUCT" OF THE QVP PROCESS WILL INCLUDE:

- · COMMODITY LIST, SHOWING OPEN /CLOSED INSPECTION RECORDS
- REQUEST FOR VERIFICATION
- VERIFICATION INSPECTION RECORD (VIR)
- DISPOSITION OF INACCESSIBLE ITEMS/ATTRIBUTES (DIIA)
- NONCONFORMANCE REPORT (NCR)

NCR'S REC'D BY CONSTRUCTION THRU 3/9/84

	S/A	QVP
DAMAGE	10	31
DIMENSIONS	90	17
MATERIAL		
WELDING	25	
OTHER	. 59	38
	184	86*

*EXCLUDES: HANGER VERIFICATION AND CABLE VERIFICATION

QVP NCR'S

TOTAL ISSUED AS OF 3/2/84 = 133

BREAKDOWN BY POCI AND MODULE

PQCI NO.

MODINE 340.

TITLE

NCR'S ISSUED

MUDULE 340:		
C-1.10	GROUTING + DRY PACKING	2
C-8.50	STEEL COATINGS	18
C-8.51	CONCRETE COATINGS	8
E-5.0	CABLE TERMINATIONS	31
P-1.90	PIPING	0
		0 59
MODULE 800:		
C-1.10	GROUTING + DRY PACKING	4
C-1.40	CONCRETE POST-PLACEMENT	0
E-1.2	CONDUIT/BOX SUPPORTS	1
E-5.0	CABLE TERMINATIONS	37
E-6.0	ELECTRICAL EQUIPMENT	0
E-6.1	MODS TO ELEC. EQUIP.	0
E-6.3	ELECTRICAL INSTRUMENTS	8
CW-1.00	WELDING + NDE - Q - NON - ASME	6
P-1.90	PIPING	18
PH-1.90	Q PIPING - RELATED INSTRUMENTS	0
		74

MANAGEMENT EVALUATIONS

MANAGEMENT IS OVERVIEWING THE CCP THROUGH THE FOLLOWING PROCESSES:

- A. PERIODIC WRITTEN REPORTS
 - WEEKLY STATUS ASSESSMENT REPORT TO SITE MANAGER
 - WEEKLY QVP REPORT TO EXECUTIVE MANAGER MPQAD
 - BI-WEEKLY QVP REPORT TO VP P,E & C
 - · MONTHLY REPORT
- **B. REGULAR MEETINGS**
 - WEEKLY STATUS ASSESSMENT/QVP PROGRESS MEETING
 - BI-WEEKLY QUALITY MEETING
- C. MANAGEMENT MEETINGS
 - BI-WEEKLY REVIEWS WITH CPCO PRESIDENT/CHAIRMAN OF THE BOARD
 - MANAGEMENT STATUS MEETING FEBRUARY 28, 1984
 - EXECUTIVE REVIEW MEETING MARCH 2, 1984

MANAGEMENT EVALUATIONS (CONT'D)

MANAGEMENT EVALUATIONS HAVE RESULTED IN THE FOLLOWING ACTIONS:

- READINESS STATEMENT FOR TURBINE ROLL MILESTONE
- REVIEW OF PLANS TO PROCEED FROM PHASE I TO PHASE II
- DEVELOPMENT OF A PLAN FOR ADDITIONAL MODULE RELEASES FOR PHASE I
- SELECTION OF MODULE 120D AS THE FIRST MODULE (OTHER THAN TURBINE ROLL MODULES) TO-GO TO PHASE II

SECTION IV LESSONS LEARNED

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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) SELECTS/DIRECTS SAT
 - MONITOR STATUS ASSESSMENT TEAMS PROGRESS
 - PRIMARILY MODULE 340
 - 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)

SAT OBSERVATIONS

FIELD ENGINEERING/MPQAD INTERFACE 4 FORM COMPLETION 2 **PROCEDURAL RE-EMPHASIS / CLARIFICATIONS** 15 PROCESS EFFICIENCY/RECORD RETENTION 3

LESSONS LEARNED -STATUS ASSESSMENT

(AS OF 3/5/84)

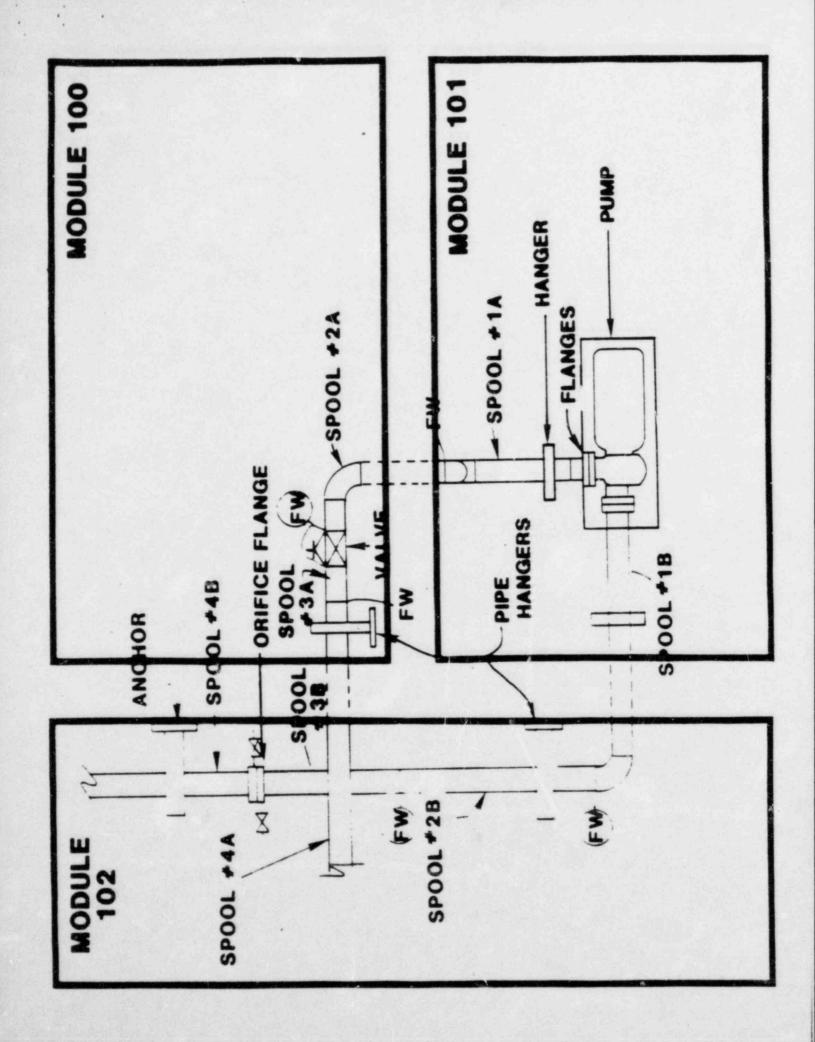
5 PROCEDURE CHANGES

11 WRITTEN REMINDERS/CLARIFICATIONS

SAT CONCLUSIONS

1. STATUS ASSESSMENT PROCEEDING SATISFACTORILY

2. SITE MANAGEMENT WILL CONTINUE SAT MONITORING OF STATUS ASSESSMENT TEAM ACTIVITIES



RECOMMENDED RESOLUTION

INCLUDE WITH FUTURE PHASE I MODULE RELEASES, AN EXTENSION OF CROSSOVER COMMODITIES INTO OTHER MODULES TO ALLOW COMPLETION OF PHASE I TO LOGICAL LIMITS.

QVP ASSESSMENT TEAM

- 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
- COMPLIANCE WITH QVP DOCUMENT.
- REPORTS
- COMMUNICATION AND INTERFACES
- CONTROL OF ACTION ITEMS

QVP ASSESSMENT TEAM RESULTS

IN GENERAL ITEMS WERE MINOR AND REQUIRED MINOR PQCI AND PROCEDURAL REVISIONS.

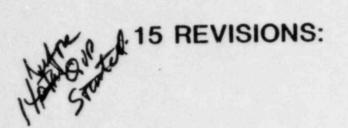
THE FOLLOWING PROGRAM AREAS WERE ADDRESSED:

- CRAFT SUPPORT SCAFFOLDING, CLEANING, LIGHTING, ACCESS
- DRAWING DOCUMENT CONTROL ISSUANCE OF WORK PRINTS TIMELINESS OF OBTAINING DOCUMENTS, FCR INCORPORATION
- MINOR PQCI REVISIONS TO CORRECT INCONSISTANCIES
- MINOR PROCEDURE REVISIONS TO CLARIFY DATA PROCESSING AND VIR LOGGING, NUMBERING AND PROCESSING
- INSPECTION EVALUATION PROCEDURES (N-19/M-15) EFFECTIVITY DATE

LESSONS LEARNED QVP/SA

AS OF 3/9/84

N-SERIES (QVP)



- DELETE SAMPLING APPROACH
 - UPDATE ORGANIZATIONAL TITLES
 - CLARIFICATION OF REQUIREMENTS

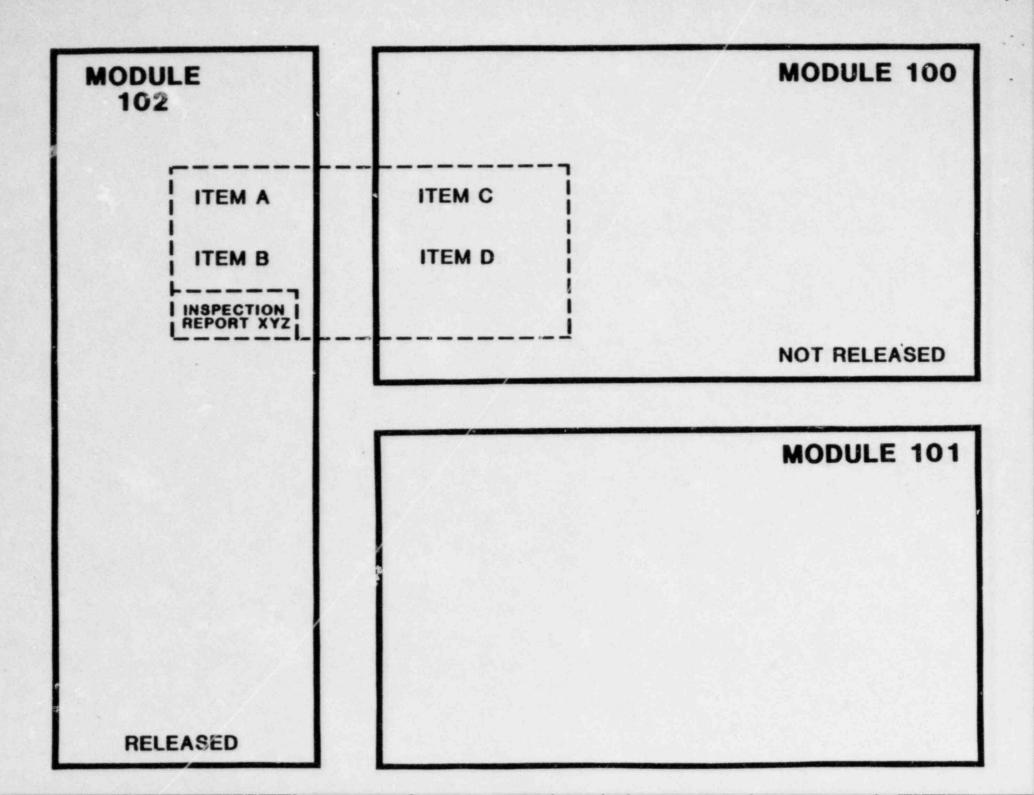
T-SERIES (STATUS ASSESSMENT)

5 REVISIONS: UPDATE ORGANIZATIONAL TITLES REFLECT CHANGES IN SYSTEM CLARIFY REQUIREMENTS

QVP ASSESSMENT TEAM CONCLUSIONS

1. QVP PROCESS IS PROCEEDING IN A SATISFACTORY MANNER

2. QVP ASSESSMENT TEAM REVIEWS WILL CONTINUE



RECOMMENDED RESOLUTIONS

- ALLOW REINSPECTION TO FOLLOW SCOPE OF PQCIs
- ALLOW REINSPECTION OF MULTIPLE ITEMS WHICH ARE COVERED BY ONE "OLD" IR

SECTION V

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THIRD PARTY OBSERVATIONS

THIRD PARTY OBSERVATIONS

- STATUS ASSESSMENT ACTIVITIES, IN THE PLANT, ARE BEING PERFORMED IN A SATISFACTORY MANNER.
- QVP ACTIVITIES ARE ALSO BEING PERFORMED IN A SATISFACTORY MANNER. SOME MINOR DEFICIENCIES HAVE BEEN NOTED, BUT THESE ARE NOT CONSIDERED SERIOUS.
- CIO HAS SOME CONCERNS REGARDING THE INTEGRATION OF STATUS ASSESSMENT AND QVP ACTIVITIES. CPCO IS WORKING WITH CIO TO RESOLVE THESE CONCERNS.
- CIO HAS A CONCERN REGARDING THE METHODS TO BE USED TO TIE ALL PHASE I ACTIVITIES TOGETHER PRIOR TO PROCEEDING TO PHASE II. CPCO IS WORKING WITH CIO TO RESOLVE THIS CONCERN.

SECTION VI

- 1. · ·

ADDITIONAL MODULE RELEASES

MODULE RELEASE SEQUENCE

1.	340	RB II Outside D-Ring*
2.	800 .	Service Water Structure .
3.	102	East Wing Wall Aux* 45 4
4.	120	584' Aux*
5.	410	614' Unit II Turbine*
		RELEASED
6.	150	634' Aux*
(1	51 incl)
7.	160	646' & 652' Aux*
(16	1 & 162	incl) .
8.	(320)	RB II N. D-Ring*
9.	240	659'Control Tower*
10.	280	659' Unit II Elect Penetration
11.	330	RB II S. D-Ring*
12.	210	614' Control Tower*
13.	820	Diesel Generator Bldg
14.	250	674'-6" Control Tower*
15.	170	659' & 674'-6 Aux* 614' Aux* 100 K. SA.
(17	75 incl)	IND K.
16.	140	614' Aux* 10
17.	230	646' Control Tower*
18.	130	599' Aux*
19.	101	Aux Bldg Pipeway &
		Valve Gallery*
20.	180	Aux Building Roof *
21.	110	568' Aux*
		2B MILESTONE

23.	310	RB II Fuel Pool
24.	103	West Wing Wall
25.	290	Unit I 685' W. Penetration
26.	220	634' Labs Cont:rol Tower
27.	860	Tank Farm
28.	420	634' Turbine II
29.	430	659' Turbine II
30.	440	695' & 715 Turbine II
31.	190	Radwaste Buildiing
32.	900	Misc Structures:
33.	850	Health Physics Cal Facility
34.	880	River Intake Schructure
35	810	Circ Water Buillding
36.	890	Pond Blowdown Sitructure
37.	830	Guard House
38	870	Oily Waste Building
39	610	614' Turbine I
40	620	634' Turbine I
41.	630	659' Turbine I
42.	640	695' Turbine I
43.	540	RB I Outside DRing
44.	530	RB I S. D-Ring
45.	520	RB I N. D-Ring
46.	510	RB I Fuel Pool
47.	700	Evaporator Building
48.	710	Steam Tunnel
49.	720	Con. Return Purphouse

22. 260 685' Control Tower & Roof

* = Require for Aux Flush - 2B Milestone

PRELIMINARY

SECTION VII

SUMMARY

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SUMMARY

- 1. THE INITIAL IMPLEMENTATION OF THE CCP PHASE I HAS PROCEEDED IN A DELIBERATE AND CAUTIOUS MANNER USING SELF-APPRAISAL PROCESSES TO DEVELOP FEEDBACK FROM LESSONS LEARNED.
- 2. TO-DATE PHASE I RESULTS FROM BOTH STATUS ASSESSMENT AND QVP HAVE BEEN SATISFACTORY.
- 3. REGULAR MANAGEMENT EVALUATIONS OF PHASE I ACTIVITIES HAVE BEEN HELD TO ASSURE THAT PROCESS CONTROLS ARE IN PLACE.
- 4. ADDITIONAL MODULE RELEASES ARE NECESSARY TO:
 - FACILITATE A CONTINUATION OF THE LOGICAL STATUS ASSESSMENT AND QVP PROCESS TO SUPPORT EVENTUAL PHASE II RELEASES FOR MILESTONE 2B (AUX FLUSH).
 - MAINTAIN THE PLANNED MANPOWER BUILDUP FOR STATUS ASSESSMENT AND QVP.
 - 5. RECOMMENDED RESOLUTIONS ON COMMODITIES SPANNING SEVERAL MODULES ARE NEEDED TO FACILITATE EFFICIENT COMPLETION OF STATUS ASSESSMENT AND QVP ACTIVITIES.

MODULE RELEASE SEQUENCE

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PRIORITY NUMBER SC	CHEDULE NUMBER	DESCRIPTION
1	340	RE II Outside D-Ring*
2	800	Service Water Pump Structure
3	102	East Wing Wall Auxiliary Building*
4	120	El. 584' Auxiliary Building
5	410	E1. 614' Unit II Turbine*
		LEASED
6	150	El. 634' Auxiliary Building*
()	151 included)	
7	160	El. 646' & 652' Auxiliary Building*
	161 & 162 inclu	
8	320	RB II N. D-Ring*
9	240	El 659' Control Tower*
10	330	WB II S. D-Ring*
11	820	Diesel Generator Building
12	280	El. 639' Unit II Electrical Penetration
13	210	Ei. 614' Control Tower*
14	250	El. 674'-6" Control Tower*
15	170	El. 659' & 674'-6 Auxiliary Building*
	175 included)	bi, 055 d 074 -0 nuxistary building.
16	140	El. 614' Auxiliary Building*
17	230	El. 646' Control Tower*
18	130	599' Auxiliary Building*
19	101	Auxiliary Building Pipeway and
.,	101	Valve Gallery*
20	180	
21	110	Auxiliary Building Roof*
21		E1. 568' Auxiliary Building* MILESTONE
22	260	E1. 685' Control Tower and Roof
23		RB II Fuel Pool
	310	
24	103	West Wing Wall
25	290	Unit I El. 685' W. Semetration
26	220	EL. 634' Labs Control Tower
27	860	Tank Farm
28	420	El. 634' Turbine II
29	430	El. 659' Turbine II
30	440	El. 695' and 715 Turbine II
31	190	Radwaste Building
32	900	Miscellaneous Structures
33	850	Health Physics Cal. Facility
34	880	River Intake Structure
35	810	Circulating Water Building
36	890	pond Blowdown Structure
37	830	Guard House
38	870	Cily Waste Building
39	610	El. 614' Turbine T
40	620	El. 634' Turbine I
41	630	El. 659' Turbine 1
42	640	E'. 695' Turbine I
43	540	RB I Cotside D-Ring
44	530	RB I S. D-Ring
45	520	RB I N. D-Fing
46	510	RB I Fuel Pool
	the second se	
	700	EVADOTATOT (11) 1000
67	700	Evaporator Building
	700 710 720	Steam Tundel Cou. Return Pumphouse

3/27/81 BHPeck

Uniquely identified and tracked assessed or quality verified as	commodities that m	ay be status
COMMODITY	EXTENSION	LIMIT

Electrical Slots (floor penetration)	Complete uniquely identified unit
Cable Tray	Complete uniquely identified unit
Exposed Conduit	Complete uniquely identified unit
Wireway	Complete uniquely identified unit
Embed Conduit/Ductbanks	Each end
Trenches	Complete uniquely identified unit
Instrumentation Tubing	Complete isometric drawing. (To be included with module containing instru- ment)
Mechanical Equipment	The entire piece of equipment as supplied by the equipment vendor will be assessed on both rotating and nonrotating equipment, even if field work or assembly was performed within the component or skid.
Equipment Supports	Both integral and non-intregral equip- ment supports will be assessed in their entirety, not including the permanent building frame or structure.
Special Doors & Airlocks	Complete door with hardware and frame

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Uniquely identified commodities that form a single identifiable unit and may be status assessed or quality verified as a unit.

COMMODITY	EXTENSION LIMIT
Structural Framing	to and including the next connection or support point
Blockwalls	Both sides of wall, including attach- ments and penetrations to end of the span (tie-in to the next structural support point)
Structural Concrete Walls	both sides of the wall, including penetrations, up to the module boundary
Decontaminable Coatings	any coatings on the commodities shown on this extension list
Miscellaneous Q Coatings	Any coatings on the commodities shown on this extension list

CCP0384-0001A-CN02

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Functionally interrelated crossover commodities that may be status assessed or quality verified as a whole item.

COMMODITY	EXTENSION LIMIT
Large Pipe	Assess to the point outside the module which represents the boundary of the stress analysis. This will not exceed the first anchor point, ie: anchor, pump, tank nozzle, etc.
Small Pipe	Assess to the limits of the piping as shown on the isometric.
	Note: QVP on piping which was accepted on PW-1.00 and PF-1.10 PQCI's must extend to the next "field break," ie: field weld or flange joint, beyond these limits.
In-Line Commodities: Flued Heads Flange Joints Weld Joints Valves (Mechanical and Welded) Orifice Plates	Assess all of these commodities which are installed within the boundaries of the piping being assessed (as described above).
Orifice Plates	

Electrical Panetration Assembly

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Manufactured electrical pressure boundary assembly as a complete unit BCC JWCook, P-26-336B SHHowell, M-1180B TABuczwinski, Midland-207 LGraber, LIS JNLeech, P-24-506 DFLewis, Bechtel FJLevandoski, B&W GALow, P-12-237A DASommers, P-14-106 PPSteptoe, IL&B, Chicago DJVandeWalle, P-24-614B BJWalraven, P-24-517 RAWells, Midland FCWilliams, IL&B, Washington, DC DTPerry, Midland NRC Correspondence File, P-24-517 UFI, P-24-511 CMS-Midland JEKarr, Stone & Webster

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RC DMBudzik, P-24-517A RJErhardt, P-14-113A LSGibson, P-24-618A P-24-505 (Last)

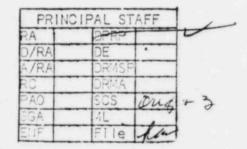


James W Cook Vice President - Projects, Engineering and Construction

General Offices: 1945 West Pernall Road, Jackson, MI 49201 + (517) 788-0453 November 10, 1983

Harold R Denton, Director Office of Nuclear Reactor Regulation Division of Licensing US Nuclear Regulatory Commission Washington, DC 20555

MIDLAND ENERGY CENTER MIDLAND DOCKET NOS 50-329, 50-330 SUPPLEMENTAL RESPONSE TO GENERIC LETTER 82-33 FILE: B13.3 SERIAL: 26468



REFERENCE: (1) CPCO LETTER, SERIAL 21649, DATED APRIL 13, 1983, RESPONSE TO GENERIC LETTER 82-33
(2) CPCO LETTER, SERIAL 26237, DATED OCTOBER 28, 1983, CONSTRUCTION COMPLETION SCHEDULE

This letter provides Revision 1 to the Midland Emergency Response Capabilities (ERC) Schedule (see attached). In accordance with our previous commitment, provisions for this schedule revision were documented per Reference 1.

As you may be aware, the impact of the Dow termination and the delays in the approval of the CCP has changed many of the wajor schedule assumptions in the Midland Plant Schedule. As a result, we are presently re-evaluating that schedule for the completion of Unit 2. Where possible, we have given dates in the ERC Schedule for information submittal, completion of construction, implementations of procedures and personnel training. As the schedule for plant completion is established, it may become necessary to adjust these dates. Wherever completion dates are not given, "prior to fuel load" has been provided. Within six months following our new schedule announcement, we will submit a subsequent revision to this table modifying any dates as necessary.

amer W. Cook

JWC/CLH/mdb

CC RJCook, Midland Resident Inspector JGKeppler, Administrator, NRC Region III



oc1183-0658a100

CONSUMERS POWER COMPANY Midland Units 1 and 2 Docket No 50-329, 50-330

Letter Serial 26468 Dated November 10, 1983

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits Revision 1 to the Midland Emergency Response Capabilities (ERC) Schedule.

CONSUMERS POWER COMPANY

By /s/ J W Cook J W Cook, Vice President Projects, Engineering and Construction

Sworn and subscribed before me this 14 day of November, 1983

/s/ Barbara P Townsend Notary Public Jackson County, Michigan

My Commission Expires September 8, 1984

TABLE 1: REVISION 1

MIDLAND ERC SCHEDULE

FORECAST DATE

Completed January 15, 1983 Completed March 31, 1983

Prior to fuel load

Prior to fuel load

February 1984

SPDS

Α.	Safety Analysis Submittal	March	19	84	
	System Operational	March			
C.	Operators Trained	Prior	to	fuel	load
DCR	DR				

Α.	Submittal d	of	Program Plan	
Β.	and the second se			

	Control	Room	Improvements
C.		1.00	

Recommendations

R.G. 1.97

Α.	Implementation	Report
Β.	Implementation	of
	Recommendations	S

EOPs

A.	Submittal of Technical	June 1984
	Guidelines	
Β.	Submittal of Procedures	June 1984
	Generation Package	
с.	EOP Implementation	Prior to fuel load

Integrated Training Plan

A. Training Completion Prior to fuel load*

ERFs

A. Submittal of Plan

1.	NUREG - 0814 Response	Completed	Feb	19,	1982
2.	Staffing Information	Completed			
	& GOCC Description				

B. Completion date for fully functional

1.	TSC	Prior to NRC Emergency Planning Appraisal
2.	OSC	Prior to NRC Emergency Planning Appraisal
3.	EOF	Prior to NRC Emergency Planning Appraisal
4.	GOCC	Prior to NRC Emergency Planning Appraisal

*Training completion dependent upon final resolution of the SPDS/DCRDR/ EOF's/Accident Monitoring Instrumentation/ERF submittals

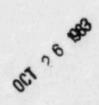
INTEROFFICE MEMORAN	DUM			J.O. OR W.O. NO.	14509
SUBJECT CPCO TRAINING					October 21, 1983
	PRIN	IPAL STA	FF	FROM	S. W. Baranow
MR. D. QUAMME	VA TA	1 OPRP		CC : J	CKeppler, Administrator
	D/RA	DE	•		Region III
	1/RA	DRISP		J	JHarrison, US NRC
	10	DRMA		D	Cook, US NRC
	-A0	SCS	Vorig+?	7 RE	SKelly, S&W
	SGA	ML	0	AF	Amoruso, S&W
	ENF	File		CC	Richardson, S&W

Subsection 4.2.3 of the Construction Completion Program (CCP) forwarded by the letter of August 26, 1983 to Mr. J. G. Keppler from Mr. J. W. Cook discusses training for each organization, management, and staff level. The CIO understands that a separate training program exists for CPCo staff members. An assessment of that program by the CIO has been planned. Preliminary contact with your staff, however, indicates that this training program may not be structured as an auditable activity but setup as more of an informal informational program.

Your comments on this matter would be appreciated.

SuBurgend

S. W. Baranow



ULTED STATES NUCLEAR REGULATURY COMMISSION REGION III 199 FOOSEVELT ROAD GLEN ELLYN, ILLINOIS 60137

OCT 2 1 1983

PFL

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

Consumers Power Company ATTN: Mr. D. L. Quamme Site Manager P. O. Box 1963 Midland, MI 48640

Dear Mr. Quamme:

SUBJECT: CONSTRUCTION COMPLETION PROGRAM (CCP), NRC HOLD POINT RELEASE

The staff has reviewed your letter dated October 20, 1983, requesting the NRC to release designated areas of the plant to allow Consumers Power Company (CPCo) to initiate Phase 1 of the CCP (status assessment and verification of completed work) for those areas.

As a basis for granting authorization, the staff, as part of its inspection effort, has reviewed/observed the following documents/activities: (1) the CCP program, (2) CPCo and Bechtel procedures related to the CCP, (3) the retraining and recertification of QC Inspectors, (4) the training of CCP teams, (5) revised Project Quality Control Instructions (PQCI's), (6) Third Party Program, Stone and Webster Construction Implementation Overview (CIO), (7) CIO implementation, (8) CIO Hold Point usage, (9) CCP Management Reviews, and (10) problem identification and corrective action.

The results of these NRC inspections are documented in the NRC Midland Monthly Inspection Reports.

The staff, based on these reviews, has concluded that CPCo has completed the requirements to enter Phase 1 for the requested areas. This letter, therefore, authorizes CPCo to proceed with Phase 1 activities for the CCP for the following plant modules:

340 - Balance of Unit 2 Containment
102 - Unit 2 Pipeway and Valve Galleries
120 - Elevation 584 Auxiliary Fuilding
410 - Elevation 614 Unit 2 Turbine Building
800 - Service Water Building

8310270165 -

D. L. Quamme

OCT 2 1 1983

Should you have any questions regarding this matter, please call me at (312) 790-5635.

2

Sincerely,

Original signed by Q.Q. Harrison

J. J. Harrison, Chief Section 2, Midland

Enclosure: Ltr dtd 10/20/83

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 P. Garde, Government Accountability Project Lynne Bernabei, Government Accountability Project Stone and Webster Michigan, Inc. James W. Cook, CPCo

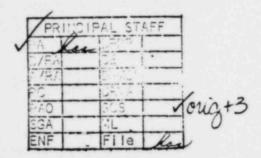
RIII Gardner/1s 10/21/83

Harrison

RFW Warnick

Davis 1 10/21





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

October 20, 1983

Mr John J Harrison Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137

MIDLAND ENERGY CENTER MIDLAND DOCKET NOS 50-329 and 50-330 CONSTRUCTION COMPLETION PROGRAM RELEASE OF PHASE 1 ACTIVITIES File: 0655 UFI: 99*08 Serial: CSM-0694

References: 1) Letter to Mr J G Keppler dated August 26, 1983 from Mr J W Cook regarding Construction Completion Program

> Letter to Mr J W Cook dated October 6, 1983 from Mr Richard C DeYoung regarding Confirmatory Order for Modification of Construction Permits for the Midland Plant

The initiation of status assessment and verification of completed work (Phase l of the Construction Completion Program) requires a release from NRC as defined in References 1 and 2. This is to inform you that Consumers Power Company has completed its preparation and required Management Reviews for Phase 1 and is requesting NRC release to initiate Phase 1 in a portion of the plant defined herein. The Construction Implementation Overview (CIO) has released their hold points on Phase 1 activities. (See Attachments)

We have planned an initial implementation of Phase 1 that is restricted to specific areas of the plant as defined in Attachment 2. The initial activities will be restricted to five modules which represent approximately 10 percent of the total number of modules covered by the CCP. During the initial effort, all team activities and elements of the Quality Verification Program (QVP) will be exercised in a slow, controlled manner. Frequent internal review and assessment will be carried out to ensure all objectives and commitments of the CCP are being met during this initial effort. Full NRC release for Phase 1 will be requested after this initial effort has demonstrated effective implementation of the CCP. We are prepared to support any additional reviews above those already conducted on our procedures and training that the NRC may require.

Site Manager

DLQ/pp

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OCT 2 1 1983

Page 2

CC: OL/OM Service List DSHcod, US NRC RJCook, Midland Resident Inspector

Page 3

BCC: SHHowell, P26-336B TABuczwinski, Midland-207 JNLeech, P24-507 DFLewis, Bechtel DJVandeWalle, P24-614B GALow, P12-237A NRC Correspondence File, P24-517 UFI, P24-517 BJWalraven, P24-517 Hearings File, P24-517 RAWells, Midland RJErhardt, P14-113A Stan Baranow, S&W (CIO)

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Mr D F Judd Babcock & Wilcox PO Box 1260 Lynchburg, VA 24505

Mr Steve Gadler, Esq 2120 Carter Avenue St Paul, MN 55108

9/3/83 mi0583-0429a100 ATMS # Atomic Safety & Licensing Appeal Board U S Nuclear Regulatory Commission Washington, DC 20555

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Ms Mary Sinclair 5711 Summerset Street Midland, MI 48640

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Ms Barbara Stamiris 5795 North River Road Rt 3 Freeland, MI 48623

Mr Jerry Harbour Atomic Safety & Licensing Board Panel U S Nuclear Regulatory Commission Washington, DC 20555

Mr M I Miller, Esq Isham, Lincoln & Beale Three First National Plaza 52nd Floor Chicago, Il 60602

Mr John DeMeester, Esq Dow Chemical Building Michigan Division Midland, MI 48640

Ms Lynne Bernabei Government Accountability Project 1901 Q Street, NW Washington, DC 20009

MI0983-0002A-MP04 IBM 5520

STONE & WEBSTER MICHIGAN, INC. RECEIVED



P.O. BOX 2325. BOSTON. MASSACHUSETTS 02107 OCT 1 ? 1983

Site Mgr.

Midland Project

Mr. J. G. Keppler, Administrator, Region III Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, IL 60137 October 12, 1983 J.O. No. 14509 NRC File #83-10-12

RE: DOCKET NO. 50-329/330 MIDLAND PLANT - UNITS 1 AND 2 OVERVIEW OF THE CONSTRUCTION COMPLETION PROGRAM

The purpose of this letter is to indicate the status of CIO approval of QVP, BHO and Status Assessment.

QVP was conditionally approved by CIO letter, NRC File #83-06-17 dated June 17, 1983. The conditions were satisfied as reported in weekly reports No's 5 and 6. Status Assessment was conditionally approved by CIO letter, NRC File #83-06-30 dated June 30, 1983 and the conditions were satisfied as reported in weekly report No. 12.

BHO and CIO reported 5 observations resulting from the Management Review Committee meeting on May 18, 1983. These observations were satisfactorily responded to in CPCo letter, Serial CSM-0656 dated July 1, 1983. CIO weekly report No. 4 dated July 12, 1983 closes this item.

CIO considers QVP, BHO and Status Assessment ready for implementation.

CIO requires NIRs #002. 003, 004 and 005 to be dispositioned prior to assignment of the referenced 45 MPQAD personnel to QVP. A "Hold Point," has been established against the use of the 45 personnel to perform QVP.

CIO report No. 16 identifies the review of "Vendor Equipment Program" as a Hold Point to Phase II of CCP.

Very truly yours,

des Baranno

S. W. Baranow Program Manager

SWB/ka

cc: JJHarrison, US NRC, Glen Ellyn, IL RCook, US NRC Midland (site) DBMiller Jr., CPCo Midland (site) RBKelly, S&W APAmoruso, S&W CORichardson, S&W

310270176

MODULES REQUESTED FOR RELEASE

- 340 Balance of Unit #2 Containment
- 102 Unit #2 Pipeway & Valve Galleries
- 120 Elevation 584 Auxiliary Building
- 410 Elevation 614 Unit #2 Turbine Building
- 800 Service Water Building

NOTE: Drawings describing the modules are attached.

