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Mr. J. J. Harrison
 Nuclear Regulatory Commission
 799 Roosevelt Road
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May 22, 1984

J.O. No. 14509

DOCKET NO. 50-329/330
 MONTHLY THIRD PARTY ASSESSMENT MEETING
 MIDLAND NUCLEAR COGENERATION PLANT

The protocol governing communications for the Remedial Soils and Construction Completion Programs at the Midland Plant specifies a monthly meeting to discuss third party assessment activities and assigns preparation of the minutes of those meetings to Stone & Webster.

Enclosed are minutes of the meeting held on May 10, 1984.

A. P. Amoruso
 A. P. Amoruso
 Project Manager
 CIO

A. S. Lucks
 A. S. Lucks
 Project Manager
 Underpinning and Remedial Soils

Enclosures

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 DLQuamme, CPCo
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MINUTES OF THE MEETING OF MAY 1984
STATUS OF INDEPENDENT ASSESSMENT
OF UNDERPINNING AND REMEDIAL SOILS WORK

PURPOSE

The purpose of the public meeting was to report the status of the Stone & Webster Assessment Team activities and observations regarding underpinning and remedial soils work.

SUMMARY

Mr. Lucks opened the meeting by stating that this meeting covers Weekly Reports 81 through 84 which corresponds to April 1, 1984, through April 28, 1984. Mr. Lucks then stated that W. Kilker would summarize the construction status and Assessment Team activities that occurred during this period.

Mr. Kilker began the summary with a brief update of the underpinning construction. The major areas of activity included the Auxiliary Building, the Service Water Pump Structure (SWPS), and recently the Borated Water Storage Tanks (BWST).

For the Auxiliary Building Units 1 & 2, piers E/W16, CT 1/12, and the drifts along the KC piers were completed. These drifts now open into the UATs and the CT pier areas. Progress for the SWPS included completion of upper level strut installation for the access area along the east side while installation continues along the north and west sides.

The major Assessment Team activities are listed below:

- o Auxiliary Building Underpinning Construction Observations
- o SWPS Underpinning Construction Observations
- o BWST Construction Observations
- o Review of MPQAD Performance
- o Work Activity Packages
- o Update of the 90-Day Report

Observed activities for the Auxiliary Building include four pier load transfers, grouting near piers CT 1/12, soil stabilization pressure grouting near piers CT 3/10, flowable grouting near pier WI7, drift excavations and pier excavations. Observation of the pier load transfer activities indicated that good planning and coordination by the subcontractor resulted in an efficient well-controlled transfer of the load. Preparations for the operation included pre-load reviews with the appropriate field personnel. During the operation, load increments, durations and the resulting movements were properly monitored and/or recorded.

All activities conformed to the procedural requirements.

The SWPS activities observed by the Assessment Team included continued installation of access area wales, struts, plates, and anchor bolts. The underwater inspection and repair of the SWPC/CWIS seal was also observed. All installation activities were overviewed for procedural compliance and no discrepancies were observed. The inspection revealed leakage of the SWPS/CWIS seal. The contractor performed a thorough evaluation of the seal and made repairs.

BWST construction on the ring beam foundation additions resumed in the middle of April. The Assessment Team made the following observations during this activity:

- o The contractor assessed the work status before resuming reinforcing steel and framework activities or concrete placement.
- o The Assessment Team raised questions concerning the 6 month deferral of work, design drawings, and procedural requirements. The details of these questions are identified in Daily Meeting Items 84-20 through 84-24 and listed on the Open Item Summary List. By May 8 all of these questions or concerns had been satisfactorily addressed.

The Assessment Team evaluated MPQAD performance by observing:

- o Quality Control and U.S. Testing personnel perform inspections of bolt torquing, grout test sample preparation, expansion/rock bolt anchor installation, and QC receipt of the off-site fabricated

CT3/10 transfer frames. All inspections were performed satisfactorily.

- o The verification process for the Nelson stud welding machine and the operator. The verification was completed satisfactorily.
- o Concrete cylinder breaks for piers CT1/12. The tests were performed in accordance with the applicable procedures.
- o One of the subcontractor's crack mapping activities. The crack mapping activities were performed according to procedural requirements.
- o An MPQAD audit of their own document control files. The Assessment Team found the audit to be satisfactory.

The Assessment Team performed an independent pre-concrete placement verification and the conditions were satisfactory and in agreement with MPQAD findings.

The Assessment Team reviewed one Work Activity Package (WAP) 83, "Excavate, Install and Backfill Electric Ductbank and Equipment PAD for HVAC Fans." It was found to be complete.

Mr. Kilker summarized the current NIRs and their status:

NIR 22 Resident Engineering Document Control Stations Open

NIR 24 Subcontractor Work Print Stations Closed

NIR 25 Compressive Strength Testing of Concrete Open

Mr. Kilker concluded his presentation by identifying the open items from daily meetings:

64-10 Trend Analysis

71-17 Computerized Civil Drawing Register

74-21 US Testing Corrective Action

79-26 Upper Leveling Plates

79-28 SWPS Backpacking Material

79-34 SWPS Backpacking Placement

81-21 BOP Construction Verification of Soils Work

82-83 Surface Voids in Grout

82-9 Trend Analysis Update

84-12 Diesel Fuel Oil Lines

- 84-13 SWPS Phase II Cofferdam

- 84-20 Design Drawing Requirements for BWST Ring Beam Addition

- 84-21 Repair of BWST Ring Beam Cracks

- 84-22 BWST Concrete Reinforcing Steel

- 84-23 BWST Corrosion Protection and Waterproofing

- 84-24 Repair of Concrete Surface Imperfections of the BWST

The final Assessment Team activity, the Update of the 90-Day report was summarized by Mr. Lucks. The 90-Day Report, issued approximately one year ago by the Assessment Team, contained several observations in the Conclusions and Recommendations Sections delineating areas of concern where the Assessment Team believed improvements should be made. The Assessment Team recently reviewed these areas, considering in particular, the work performed in the past three months. Mr. Lucks commented on the following specific conclusions and recommendations.

Availability of Fabricated Materials

During the first 90 days of construction, the Assessment Team observed that construction was sometimes delayed because fabricated materials were not available when required. Good underpinning practice requires that work proceed as quickly as possible. One of the contributing factors regarding

the availability of materials was the number of nonconformances in the area of welding. In addition, the Team noted that additional backup tools and equipment should be on hand to prevent delays at critical stages of construction in the event that malfunction occur.

Subsequent to the 90 Day Report, the Assessment Team investigated in detail the welding issue. Actions by engineering, such as furnishing tolerances; by FSO, such as instituting procedural changes; and by the subcontractor, such as providing welders with additional orientation to the high quality standards expected by MPQAD; have resulted in a reduction in nonconformances.

Since the resumption of construction in January, the Assessment Team has not observed any significant delays due to lack of fabricated materials. In addition, adequate backup tools and equipment have been available during critical operations, such as concrete placement. To provide added assurance that delays will not occur, additional interfacing has recently been established between the engineering and procurement personnel to set current "need dates" so that timely adjustments to the procurement process can be made. The Assessment Team believes that this concern has been adequately addressed.

Lagging Spacers

The Assessment Team expressed a concern that the spacing between individual pieces of lagging should be a minimum of 1 1/2 inches in order to facilitate installation and inspection of backpacking material. The

Contractor has addressed this concern by requiring that spacers be greater than 1 1/2 inches in thickness except in special design or construction situations, where the spacer thickness must be reduced.

Use of Excelsior

The Assessment Team recommended that the use of excelsior between the lagging be limited to those areas where seepage is occurring. Over the past year, the use of excelsior has been limited to those areas where loss of ground could occur.

Timely Completion of Pier Construction

Since time is of the essence in underpinning work, the Assessment Team expressed a concern that during the first 90 days, the time required to complete piers was often excessive. Delays, subsequent to bell excavation, but prior to concrete placement, were of particular concern although this has not resulted in problems. The work activities associated with construction of CT 1 and CT 12 demonstrated a much improved process for excavating, concrete placement and pier loading. For the past year, the Contractor has been particularly diligent in not leaving a pier bell open for excessive amounts of time. The Assessment Team is satisfied with the rate of progress demonstrated during the last three months.

Timely Disposition of NCRs

During the construction of the first underpinning pier, the Assessment Team observed that construction was often held up awaiting the disposition of NCRs. This concern was addressed in the 90-Day Report. Since that time the average time to disposition NCRs has been significantly reduced. There have been no significant delays of critical work during recent months.

Mix Design and Testing for Superplasticized Concrete

The Assessment Team had identified deficiencies in the mix design testing for the superplasticized concrete. The contractor retested the mix design in strict accordance with the design code. However, superplasticized concrete is no longer being used.

Application of Lessons Learned

The Assessment Team recommended that lessons learned during the early construction work should be incorporated into the future work. The Contractor has prepared a formal summary of "lessons learned" in the Auxiliary Building Underpinning and incorporated the applicable aspects of the report into the design documents and for ongoing work at the Auxiliary Building and at the Service Water Pump Structure. In addition, biweekly meetings between Construction and Engineering serves as a forum to discuss "lessons learned" on an ongoing basis.

Role of Project Engineering

The Assessment Team indicated in the 90-Day Report that there was a need for increased on-site participation by Project Engineering in order to facilitate the construction and inspection processes. There has been an overall strengthening of Project Engineering's role at the jobsite. Project Engineering has provided improved definitions of standards to be applied to the various aspects of the work and has provided more comprehensive data on tolerances thus facilitating installation and inspection operations. They participate in the biweekly meetings with construction and MPQAD personnel. This facilitates FCR and NCR processing and provides input to the design of future work.

Resident Engineering has been reorganized to increase efficiency. They have been allowed more autonomy from Project Engineering to disposition FCRs and NCRs and have increased their staff appropriately. Their participation in the weekly interorganizational Meeting and the QAP task force has been helpful in resolving problems.

The Assessment Team believes that the current level of Engineering involvement is satisfactory.

Improvements to Drawings

The Assessment Team concluded in the 90-Day Report that cross referencing and detail improvements were required to facilitate use of the drawings. Since the issuance of the 90-Day Report, drawings have been developed which

depict construction logic, describe various activities and correlate these activities with drawing numbers. The constructability review and Work Activity Package preparation and other activities have resulted in detail improvements that enhance the drawings. The Assessment Team is satisfied with the degree of cross referencing and detailing currently being used on the drawings.

In summary we have concluded that the organizations within Remedial Soils have taken effective action in all areas of concern. From an overall standpoint, the Remedial Soils Organization is functioning properly, resulting in installed construction of high quality. Moreover, the work performed since the lifting of the Stop Work Order had not only met the required high quality standards but has demonstrated effective management control which keeps critical work activities on schedule.

QUESTIONS AND

The NRC asked the following questions concerning items included in Weekly Reports 81 through 84.

1. An NIR written against Resident Engineering document control stations was recently closed by Stone & Webster. What steps has CPCO taken to prevent future document control problems in this area?

The specific deficiencies identified in the NIR were corrected and the Resident Engineering document control activities have been audited by MPQAD and were found to be properly maintained. However, CPCO

indicated that the QAR that was written remains open. The conditions for closing this QAR are the steps for corrective action beyond correcting the specific deficiencies identified in the NIR. Those conditions are:

- o All Resident Engineering document control procedures revised to be consistent with site document control policy.
 - o A long-term corrective action will be provided by implementing system 38 (computerized document control) and providing general access through computer terminals.
2. Item 81-25 of Weekly Report 81 requests MPQAD to address trend analysis for the underpinning effort. Could CPCO update the status of implementing a new trend analysis system?

CPCO stated that since the proposed computerized trend analysis system was based on normal construction activities, and the underpinning activities are somewhat different from the normal construction activities, the proposed system is not appropriate for trending the underpinning effort. Therefore, it has been determined that the trending of certain underpinning activities (e.g. NCRs vs IRs) will be done manually. This amended manual system is being implemented now and will be addressed when the 1st trending reports are available.

3. Item 83-25 of Weekly Report 83 addresses a CPCO summary of an MPQAD welding report. Could CPCO discuss the details of this report?

CPCO stated that the report resulted from a welding audit of the total site and that they would make a presentation of the details at the June public meeting. - Open Item.

4. Item 84-21 of Weekly Report 84 concerns cracks in the BWST ring beam that have been mapped and repaired. Has the ring beam been reexamined for any new cracks since the repair?

CPCO indicated that the ring beam would be reexamined and the findings will be reported. - Open Item.

5. Item 84-25 of Weekly Report 84 addresses an MPQAD report summarizing the results of an audit of the crackmapping subcontractor. Could CPCO discuss the details of this report?

CPCO stated that a presentation on the report will be given at the June public meeting. - Open Item.

REQUIRED ACTION

No open action items are required for the Assessment Team from this meeting.

Three open action items are required for CPCO from this meeting.

1. A presentation of the MPQAD Welding Report.
2. A report on the re-examination of the repaired cracks and any new cracks that may exist in the BWST ring beams.
3. A presentation on the MPQAD audit of the crackmapping subcontractor.

MINUTES OF THE MEETING ON MAY 10, 1984

STATUS OF CONSTRUCTION IMPLEMENTATION OVERVIEW (CIO) PROGRAM

PURPOSE

To discuss Third Party Overview activities of Stone & Webster (S&W) and problems encountered regarding the Construction Completion Program (CCP) during April of 1984.

SUMMARY

Mr. A. P. Amoruso, Project Manager for the CIO Program, opened the discussion with a summary of CIO activity during April, 1984.

Mr. J. E. Karr reviewed the results of CIO assessments, during April, of the CCP, the Nuclear Steam Supply System (NSSS) Program, the Heating, Ventilating and Air Conditioning (HVAC) Program and the Diesel Generator (DG) Program.

In the Diesel Generator Program, pipe removal on the Unit 2 diesels was completed in April, and reinstallation should begin during mid May. Also an ASME survey is scheduled for the end of June which will be to obtain a certificate for further work. In general, activities proceeded satisfactorily during the month. However, as part of the CIO review of the diesel generator program, two nonconformances were identified. These were not specifically related to the Diesel Generator Program but were detected during the review of that program. NIR 029 related to the use of memoranda during the process of receiving inspection. Material was received and, prior to the formal receipt inspection, an interoffice memo was generated requesting changes to the purchase order requirements since the material as received did not meet those requirements. We do not have a

response yet. If this is going to be a standard practice, it should be a part of the program and procedurally described. NIR 030 addressed the purchase of material for ASME applications from suppliers who were not qualified for ASME material supply.

CIO also reviewed the Diesel Generator Program at Midland relative to similar work being performed at other facilities. Considerations which may result from the "Owners Group" evaluations have been reviewed by Consumers Power and it has been determined that work at Midland will not preclude any future corrective action.

Since there has been some concern expressed at other public meetings relative to the interaction between corporate groups working on the same project, it was noted that the owners group reinspection is being performed by Stone & Webster's Quality Control personnel so some interaction at this site will occur.

In the HVAC program, the installation work is currently proceeding in the control room area and the components for that installation are being fabricated in the onsite shop.

During April, CIO continued to monitor the work activity itself. We also continued an ongoing evaluation of welder qualifications and conducted training and training record evaluations. Based on satisfactory responses we were able to close CIO Item Numbers 065, 066 and 067 which related to administrative procedural discrepancies. No new items were opened. There are no open items related to HVAC at this time, and work is proceeding satisfactorily.

In the NSSS Program, there was very little activity. Hanger reinspection is being performed at this time and NCRs are being closed that had existed

from the past. CIO conducted program and procedural reviews and looked at the work that was being done on reinspection. The work is proceeding satisfactorily. Two items relative to procedural discrepancies were identified. Item 072 was a combination of typos and administrative discrepancies within a procedure. Item 073 addressed the lack of an Authorized Nuclear Inspector's signoff of a magnetic particle inspection procedure. During the preparation for this review, two other items were identified. Item Number 071 addressed a discrepancy between the Final Safety Analysis Report, the specifications for welding on the project, and the welding code which is AWS D1.1. This issue was identified previously by MPQAD, but it is not clear that the resultant information was reviewed, approved, and incorporated into the FSAR. Item Number 075 concerns the lack of a procedural description of the material certification Bechtel Power Company (BPCo) uses when supplying ASME material to subcontractors.

Addressing the CCP during April, CIO reviewed three specific areas in addition to status assessment and quality verification. These were document control, further processing of NRC commitment lists, and an evaluation of the Consumers Power QA program implementation against 10CFR50, Appendix B.

Last month it was reported that three NIRs had been written as a result of the first part of an inprocess evaluation of document control. At the conclusion of the evaluation, three additional NIRs and one CIO Item were issued. The NIRs documented specific discrepancies at document control stations and the item addressed generic issues relative to the document control process; most significantly, the number of methods for changing documents on the site and the number of different kinds of drawings available for use.

During April, several meetings were held with Consumers Power to discuss

their methodology for resolving the document control issue. CIO is also attending weekly meetings to apprise ourselves of the status of the ongoing actions to resolve all the identified problems. CIO is satisfied with the CPCo approach and it appears at this point in time that the document control situation will be resolved.

The NRC commitment list, a topic that CIO has followed for several months, is still on schedule, and the target date in July for incorporation of all NRC commitments relative to the CCP into the Correspondence and Commitment Management Control System appears achievable.

CIO initiated an evaluation of the overall CPCo QA program versus 10CFR50, Appendix B using, principally, the NRC Standard Review Plan as a basis. CIO is not evaluating the program itself, since this was reviewed by the NRC, but following through implementation of each of the 18 criteria. To date, nine criteria have been completed and three are partially completed. So far, CIO has identified eight administrative recommendations which we intend to make. Nothing programmatically significant has resulted to date.

There are four additional items in the miscellaneous category that were opened in April. NIR Number 028 was initiated because the response to an earlier NIR (Number 015) was unacceptable. Item Number 076 related to the use of whiteout. Item Number 078 related to records which had been completed using pencil. This is a recommendation item noting that this practice can cause difficulties in the future. NIR 032 was issued right at the end of April. This had to do with separation between electrical conduit and uncovered electrical tray. We have been informed, although we have not received a response to this, that the tray is intended to be covered and will be in conformance with separation criteria upon completion.

In the CCP there have been no additional modules released for CCP Phase 1 work. The areas that have been released are the Auxiliary Building (which also includes the east pipeway and the control tower), the Reactor Building, Turbine Building Units 1 and 2, the Diesel Generator Building and Service Water Pump House. The areas that were active during the month were described.

CIO activities relative to the Status Assessment and the Quality Verification Program during the month included continued monitoring of the planning activities, work in process, and resultant documentation.

For Status Assessment and the Quality Verification Program, four Items/NIRs were open during the month. Number 070 documented a concern developed by CIO relative to the use of memoranda clarifying or providing instructions for the performance of Status Assessment. Number 077 dealt with the information on Construction Work Packages (CWPs) sent to MPCAD. This item was also closed during April. Item Number 079 had to do with inspection of the surface repair of concrete and NIR Number 031 related to the use of the Disposition of Inaccessible Items and Attributes (DIIA) Program.

In the Hanger Reinspection Program, about 160 hangers had been reinspected. CIO is conducting an ongoing overinspection (physical verification) of the results. No discrepancies have been identified with the hanger program.

For CCP Phase 2 activities, CIO went through a sequence of events, beginning about the middle of April, which led to partial lifting of CIO Hold Point Number 007 and release of Phase 2 work in support of turbine roll activities. These are approximately in chronological sequence, although some occurred virtually on the same day.

° Hold Point 005 was lifted by CIO after review of the CPCo Vendor

Workmanship Verification Program. This is an extensive program which will give results that are intended.

- CIO attended the Executive Management Review Committee on April 17th. Our evaluation of that meeting is that it was conducted in a professional manner and issues necessary to proceed with Phase 2 for the turbine roll were addressed. Open items were identified and responded to, and the closeout was satisfactory.
- CIO reviewed the documentation packages for the work scope and identified no discrepancies. Based on the documentation packages, CIO conducted a physical verification of the hardware that was going to be released. We selected Module 800 and reviewed in detail the results of the CCP Phase 1 versus hardware in that module, and again, identified no discrepancies.
- CIO reviewed the statement of the integrated scope of work and verified that against inplant hardware. For the portion reviewed, no discrepancies were identified.
- CIO also confirmed that there were no open document control items which presented any problems with proceeding into Phase 2 work.

Based on these items, CIO lifted Hold Point 007 for turbine roll on May 2nd and, the same day, the NRC also released the work.

CIO also closed several items during April:

- Item Number 030 relative to the Vendor Equipment Verification Program, which was associated with Hold Point Number 005.
- Item Number 049 on the handling of uncontrolled specifications.
- Item Number 058 on the review of past audits to insure that the appropriate criteria of Appendix B, 10CFR50 had been covered.
- Item Number 062 relative to training.
- Item Numbers 065, 066 and 067 on Zack procedures.
- Item Number 069 on PQCIs.

- Item Number 077 relative to Construction Work Packages.

CIO closed two Hold Points, Number 005 and Number 015. Number 005 addressed the Vendor Equipment Verification Program and Number 015 which had to do with the use of calibrated thermal couplings during post weld heat treatment.

CIO closed the following NIRs during April:

- NIR 014 relative to vendor documents
- NIR 015 on the use of correction fluid
- NIR 017 relative to the MPQAD audit program
- NIR 021 on the training matrix for construction.

An overall summary of CIO Items, Hold Points, and NIRs was presented. As of the last meeting, there were 20 open Items, 3 open Hold Points, and 10 open NIRs. During April, CIO opened 10 Items, no Hold Points, and 7 NIRs and closed 9, 2 and 5 respectively. At the end of this reporting period there were 21 open Items, 1 open Hold Point and 12 open NIRs.

Last month CIO began reporting on CCP performance using a bar chart trend report. From November until March, overall performance, based on CIO observations, was well below the five percent defect level. In April, the percent defect rate rose to approximately 6.4 percent based on the total number of attributes checked versus the number of unsatisfactory attributes identified. There were three contributors to that average. The largest one was the single NIR on concrete post placement inspection. This was an isolated instance (affected only Module 800) and is not a significant finding relative to the overall plant.

The next largest contributor was MPQAD audit program evaluation findings. As these were principally areas which existed prior to October of 1983 and

have since been corrected, there is no current significance to these deficiencies. Additionally, the six NIRs in the document control area also contributed to the overall rate being above five percent during the month.

Mr. Amoruso then summarized the month's activities. The CCP continues to be conducted in a satisfactory manner. There were no significant hardware items identified by CIO. Most of the problems that CIO identified were administrative in nature. The correction of the document control problems is progressing satisfactorily.

QUESTIONS AND ANSWERS

DURING THE PRESENTATION

Mr. Livermore, USNRC, asked for CPCo comments on NIR Number 029.

Mr. Wells of MPQAD responded indicating that a response to CIO was in review at that time and that use of memoranda to document discrepancies was not a part of the CPCo Program. He further indicated that the memorandum cited in NIR 029 was issued prior to receipt inspection taking place.

Mr. Hyland of the NRC then asked how were document deficiencies normally handled. Mr. Wells responded that for required attributes a nonconformance report would be issued.

AFTER THE PRESENTATION

Q-1 Mr. Gardner, USNRC - I'd like a brief description of the involvement of Stone & Webster in the Diesel Generator Program Owners Group activity and any assurance you can give of the separation between that group and CIO.

A-1 Mr. Burns, S&W- Duke Power Company is now managing the owners group. Stone & Webster's involvement in the reinspection program is the

administration and supervision of 10 to 16 certified quality inspectors under the direct surveillance of the Owners Group Manager and the participating utility. The inspection group provides data to the owners group, which will also consist of Consumers Power, will then analyze that data, assisted by some technical services, such as FAA, which is Failure Analysis Associates and others. They will make the ultimate decision as to what to do.

The CIO program would only review the use of that data and the utilization of the owners group by Consumers Power Company. We would not engage in reviewing the work by Stone & Webster personnel, so the separation is quite clear.

Q-2 Mr. Gardner - Are members of the CIO organization involved in the owners group inspection?

A-2 Mr. Burns- No, they would not be. The only person that has any real contact with that owners group is myself, and that's through a Boston sponsor.

Q-3 Mr. Gardner - Is the item still open as far as Stone & Webster is concerned, as the CPCo integrated program for the review for the total package for the transition from Phase 1 to Phase 2?

A-3 Mr. Karr, S&W - We're satisfied with the integrated scope statement for the turbine roll. Some modifications are under way at this time relative to the conduct of that program and the methodology to be used in the future. CIO is not going to close out our item of concern relative to program integration until we receive the final program and verify that it is working.

Q-4 Mr. Lansman, USNRC - Would you please explain the NIR on inaccessible attributes?

A-4 Mr. Karr - In Module 800, there are a number of sizable bolt-on plates on the walls of the structure. The quality verification program identified those areas as being inaccessible because they were behind the plates. Those items had not, however, been entered into the DIIA program.

Q-5 Mr. Gardner - Would Consumers Power care to make any statements or presentation to answer this?

A-5 Mr. Wells, MPQAD - First, the items identified indicate to us that the process isn't quite clear. Our people interpreted them differently than Stone & Webster. We're resolving that now. About a third of what CIO found were areas of an administrative nature. The others generally relate to the use of the process that was required. I have a draft response and expect that we will be closing that with Stone & Webster next week.

Mr. Wells also clarified an item noted by S&W during the CIO presentation. The NIR issued by CIO during April was not recurrence of the use of correction fluid on records. CIO, based on the previous NIR (015), indicated that the prohibition against use of the correction fluid wasn't clearly enough identified by procedure. We have since modified our procedure and closed that out.

Q-6 Mr. Lansman - What area was the whiteout issue found in?

A-6 Mr. Karr - The whiteout issue was identified as a result of a review of past audit reports. The report in particular was the report of a

audit done in 1981, by the audit organization at the time.

Q-7 Mr. Lansman - Was your corrective action across the board?

A-7 Mr. Wells - Yes, over the next few months, MPQAD will look at a number of areas, and that's one of them, to make sure that it wasn't something consistent.

Q-8 Mr. Lansman - Please explain what the actual problem on concrete inspection is?

A-8 Mr. Wells - This was in the QVP reinspection of previously inspected concrete surfaces. It relates to the process of identifying what is or is not accessible.

There were some areas that we hadn't appropriately used the DIIA program and some that were clearly administrative as to what the program criteria really is.

Q-9 Mr. Hyland - Please give a brief description of Action Item 063.

A-9 Mr. Karr - Item 063 related to the proper use of status assessment prints. At the last meeting, I was aware of the proposed response to the item and indicated that CIO had received this response which we had not. The documents were reference prints and were reviewed in conjunction with status assessment prints, but the intention was not to stamp and control them as Status Assessment Prints. We have not yet recieved a final answer from Consumers.

Q-10 Mr. Hyland - Will Consumers give an update on what the practice is today in the field.

A-10 Mr. Reichel, CPCo - We are not satisfied with the response from BPCo and it's being revised. It should be available within the next week.

The current practice was discussed and CPCo indicated that they would prefer to wait for approval of a final response prior to discussing the item. The NRC asked how long this item had been open and CPCo indicated that it had been open since March 15, 1984.

Q-11 Mr. Burgess - CIO Report Number 43 identified the use of memoranda. In the past, NRC identified similar practices using interoffice memoranda to clarify procedure as nonconformances. I'd like Consumer's response.

A-11 Mr. Quamme, CPCo- This resulted from the contractor issuing some memoranda of clarification to the field. We have had several meetings with the contractors since then and have developed two procedures to treat clarifications to procedures where changes need to be made, and also control information type items.

Q-12 Mr. Burgess- Were the memoranda administrative only or non-quality?

A-12 Mr. Reichel- There was one memo that was written that did clarify procedure and we rescinded it.

Q-13 Mr. Livermore, USNRC- What were the differences between AWS D-1.1, the specification and the welding procedure?

A-13 Mr. Karr - The specification had tolerances for welds, which exceeded the tolerances that are allowed by D-1.1. Reviewing the FSAR, the text does allow some discretion, based on engineering judgement to

revise tolerances where the quality of the product will not be affected.

This originally was identified about a year ago, I believe, on an NCR by Consumers Power. The disposition of the NCR included requirements that the FSAR text be modified to include, among other things, the results of a consultant's review to confirm that the actual tolerances specified would not be detrimental to the product.

However, CIO found no link between the report of the consultant, the acceptance of the report by Consumers Power, and the FSAR. We have received an answer which identifies a change notice that was issued to incorporate those results in FSAR. It is still not clear entirely that there is a link between the consultants report and the commitment made within the FSAR.

The specific tolerances that were in excess of AWS D-1.1 were discussed and CIO indicated that none of these related to weld penetration or the use of partial versus full penetration welds.

Q-14 Mr. Livermore - On electrical tray separation, was the intention to cover the trays as a result of CIO finding it?

A-14 Mr. Karr - We have not received a response. I have been told there is a drawing change notice that covers that area but that kind of information will have to come from Consumers.

Mr. Wells - We just started looking into this for details. There is a general question on separation that gets involved with the ultimate final walkdown, looking at separation criteria that has to be worked into the specifications.

Mr. Quamme - There is a program of corrective action and we need to resurrect that whole program. Walkdowns have already started on electrical separation on some turned over areas, and that was done before Stone & Webster brought this concern to us. It's the intent to look at the whole topic, not just some of the pieces.

Mr. Gardner - I don't have any further questions. So at this time, if there are no other statements to be made by the principal parties, we'll entertain questions by the public to be directed as such.

There being no questions, the meeting was concluded.

ACTION ITEMS

None