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50-330 DMB

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC-7810

Date: May 29, 1984

To: Stone & Webster
P O Box 1963
Midland, MI 48640

PRINCIPAL STAFF			
RA	ltr	DPRP	
D/RA		DE	
A/RA		DRMSP	
PC		DRMA	
PAO		SCS	
SGA		ML	
ENF		File	ltr

orig+3

Attached Is:
- [ ] Partial Response To
- [X] Complete Response To
- [ ] For Your Information
- [ ] Other

Description:

Tracked Action Item 086.

Signature:

cc: JGKeppler, NRC Region III w/a
JJHarrison, NRC Region III w/a
RJCook, NRC Site w/a
RAWells, MPQAD w/a
BHPeck, MEC w/a
NIReichel, MEC w/a
DDJohnson, MEC w/a
LWorley, MPQAD w/a
DEHorn, MEC w/a

IE01
1/1

MAY 31 1984

ITEM/HOLD POINT NOTIFICATION FORM

STONE & WEBSTER
CONSTRUCTION IMPLEMENTATION OVERVIEW
MIDLAND NUCLEAR PLANT J.O. NO. 14509

ITEM NUMBER	HOLD POINT NUMBER
086	

- [X] TRACKED ACTION ITEM
- [ ] TRACKED INFORMATION ITEM
- [ ] TRACKED RECOMMENDATION ITEM
- [ ] UNTRACKED ITEM
- [ ] HOLD POINT NOTIFICATION

REFERENCE(S)
QAR RA-00155/QAR RA-00157

CONDITION DETAILS

Due to the conflicting responses received from Bechtel and that of MPQAD (See Reference below) concerning NIR 022/NIR 023, we request one reply clarifying our initial findings. Current replies provide inaccurate and conflicting information.

Reference: 1. Stone & Webster NIR No. 022
CPCo Letter #CSM-0768
QAR RA-00157

2. Stone & Webster NIR No. 023
CPCo Letter #CSM-0769
QAR RA-00155

[ ] YES (PAGE NO'S) [X] NO
ATTACHMENTS

DATE RESPONSE REQ'D.	INITIATOR/DATE	INITIATION APPROVED/DATE
5-24-84	Rich Scallon 5/22/84	5-22-84

RESPONSE (SEE NOTE)

Attachments 1 and A provide a complete response to NIR-022.

Attachments 2 and B provide a complete response to NIR-023.

[X] YES (PAGE NO'S) 7 [ ] NO
ATTACHMENTS 1, A, 2 & B

EST. CORRECTIVE ACTION COMPLETION DATE	RESPONDENT	TITLE	DATE
N/A		Const Supt	5/29/84

RESPONSE ACCEPTED	DATE	RESPONSE VERIFIED/CLOSED	DATE

NOTE - FOR TRACKED ACTION ITEMS ONLY, EXPLAIN CLEARLY OR REFERENCE ATTACHMENTS FOR:
1) CAUSE OF OBSERVED CONDITION 2) CORRECTIVE ACTION TAKEN 3) PREVENTIVE ACTION TAKEN

(KA)

The following response is to clarify the response to your initial findings in NIR No. 22 as requested in Tracked Action Item 086.

Note: For ease of reading, the findings have been numbered per attachment A and have been grouped by subject.

Workprint station 219 is located with team 19. Distribution was done by Document Control and maintenance of the station was the responsibility of the team receiving the documents at the time of the audit. This workprint station has been transferred to a controlled satellite station (main library) and placed under the responsibility of document control for maintenance as well as distribution. All workprints audited were new workprints (either distributed after the stop work order or reviewed in the conversion/verification process). This program is in line with our corrective action plan submitted in response to MCARR-DAT-1.

1. Missing Documents (findings 1 and 11)

   Documents were found to be missing at the workprint station. These have been corrected.

2. In-Process Work Activities (findings 2, 9, 17)

   In all cases, distribution (distribution may include new documents or pullbacks) had been made from document control and the distribution date (distribution date of pullbacks are not given on the register but were obtained from a pullback call up from the computer) was noted on the register. In some cases, the attachments in question were pullbacks which had not been received by the station. Therefore, even though the register indicated an update, the station logs and documents had not been updated. The changes had not been posted by the personnel at the workprint station. Therefore, the amendment stamp on the front of the drawing and the logs were not updated accordingly. No unreasonable time delays were found. A procedure to clarify posting requirements (FPD-1.000) was issued on March 23, 1984. These findings would all be in compliance with the new procedural requirements of FPD-1.000 which requires posting be completed within three working days of the distribution date. Construction assistants were reminded that changes must be completed in three working days per new procedural requirements (FPD-1.000). Discrepancies listed have been corrected.

3. Update of Work Station logs and/or Amendment Stamps on front of drawing to reflect conversion/revision (findings 3, 4, 5, 6, 7, 8, 9, 10, 14, 16, 18)

   Workprint station logs and/or amendment stamps on front of drawings were not updated to reflect workprints that had been converted/verified. Personnel were reminded of the need to update logs. Workprint maintenance requirements were reviewed with team personnel responsible for maintaining workprints.

   This workprint station has been transferred to a controlled satellite document station (main library). Workprint station logs/cards have been standardized. Discrepancies listed have been corrected.

4. Conversion/Verification Errors (finding 12, 13)

Change paper had not been removed, therefore, the workprint station log and amendment stamp on the front of these drawings had not been revised. The change paper has been removed from these drawings and the amendment stamp on the front of the drawings and the workprint station log have been corrected.

5. Legibility (findings 19, 20)

Drawings were replaced. Workprint personnel were reminded of the need to check drawing legibility.

6. Miscellaneous (findings 3, 10, 15)

Finding 3 - FRL-1 was incorporated in drawing M-652-1-H130 Revision 1 and is presently not listed on the front of the drawing as indicated on the Audit Report.

Finding 10 - Drawing M-18-176 is revision 1 per the register and the sepia.

Finding 15 - Drawing M-18-370; there are 1064 pages including alpha and numeric pages. This total page count is used for microfilming.

Attachment A

DISCREPANCIES @ STATION 219

FINDING NO.	DOCUMENT NUMBER	REV DWG	REV REG.	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER COMMENTS	IN STA. LOG
①	RIBD-572-1	4	4	FCR M10265	YES	YES	No		YES
②	M652-1-H6	0	0	IDCN 20123	No	YES	YES		YES
③	M652-1-H130	1	1	FRL 1	No	YES	No		YES
④	M-652-2	3/F1	3/F1	ICS #8	No	~~YES~~ NO	~~#~~ No		YES
⑤	M-652-2-H22	2	2	IDCN 20040	No	No	No		YES
⑥	M18-151	5	5	FCR 22211 22292	~~X~~No	YES	No		YES
⑦	M18-152	5	5	FCR 22211 22292	No	YES	No		YES
⑧	M-652-1	11/F1	11/F1	ICS 3,8,13,14	YES	YES	YES		No
⑨	M-652-1-H16	0	0	FCR 3942	No	No	No		YES
⑨	" " " "	0	0	IDCN 20133	No	YES	YES		YES
⑩	M18-176	7	~~1~~ 8	FCN M1295 OR 2195	No	YES AS FCN M1295	No	TRANSPOSED NUMBERS CONFUSE ISSUE	YES AS FCN M-2195
⑪	M18-175	7	8	—	—	—	—		—
⑫	M18-310-3	9	9	M-4139	No	YES	YES	DRAWING HAS NEW WORKPRINT STAMP ATTACHMENT HAS OLD WORKPRINT STAMP	YES
⑬	M18-310-4	5	5	E-7551	No	YES	YES	SAME AS ABOVE	YES
⑭	M18-348-2	4	4	E-2613	No	YES	No		YES
⑮	M18-370	7	7	—	—	—	—	TITLE PAGE SHOWS 1064 AS LAST PAGE. LAST PAGE IS 1031	—
⑯	M652-1-H2	0	0	IDCN 20119	~~YES~~ No	NO	No		YES
⑰	M652-1-118	0	0	IDCN 20125	No	YES	YES		YES
⑱	M652-1-H18	—	—	FCN-8000	No	YES	YES		YES
⑲	M652-1-H-145	2	2	—	—	—	—	AREA'S NOT LEGIBLE	—
⑳	M-652-1-H-147	1	1	—	—	—	—	AREA'S NOT LEGIBLE	—

ATTACHMENT A

The following response is to clarify the response to your initial findings in NIR No. 23 as requested in Tracked Action Item 086.

Note: For ease of reading, the findings have been numbered per attachment B and have been grouped by subject.

Workprint station 209 is located with team 9. Distribution was done by Docu-Control and maintenance of the station was the responsibility of the team receiving the documents at the time of the audit. This workprint station has been transferred to a satellite controlled document station (main library) and placed under the responsibility of Document Control for maintenance as well as distribution. This program is in line with our corrective action plan submitted in response to MCARR-DAT-1. Workprints that had not completed the conversion/verification process or been distributed as new workprints since the lifting of the stop work orders had not been released by MPQAD for Q-work.

1. Old Workprints versus New Workprints

   "Old" workprints were eliminated by April 14, 1984 in the field. The Document Control Assurance Group has not found any "old" workprints since April 14, 1984 and will continue to monitor. The new workprint process and copies of the workprint stamp are described in FPD-3.000.

2. Discrepancies between Registers and Information on Sticks (findings 5, 6, 7, 8, 9, 10, 11, 13, 15, 16)

   In all drawings identified in these findings, the register reflects the new revision status which has been processed. However, none of these drawings (or change paper) had been distributed. The sticks should reflect previously distributed information. This "historical" information is available in System 38 and can be provided to the auditors upon request. This processing cycle information was reviewed in the audit entrance meeting.

   Document Control has verified that all drawings and change paper that were noted on the audit report are correct on the sticks according to current distribution status. No further action is deemed necessary.

3. Misinterpretation of Register Revision Information and Miscellaneous Discrepancies (findings 21, 22, 23, 24)

   The auditors reviewed the home office revision information as opposed to the field status which is the revision constructed to. (These are large bore isometrics which are revised in the field to add additional welding information. (See procedure FPP-1.000). Therefore the wrong information was reviewed in the register.

   Document Control reviewed the drawings against the field status, noted discrepancies and took corrective action as follows:

   Finding (22) - FCR was removed
   - ICS stamp was placed on front of drawing
   Finding (23) - Status stamp was placed on front of drawing
   Finding (24) - ICS stamp was placed on front of drawing

4. Legibility (findings 2, 3, 5, 6, 7, 8, 9, 11, 12, 13, 14, 19, 23, 25, 26)

The Document Control Assurance Group reviewed these drawings at station 209 on May 23, 1984. It was found that four (4) of these drawings have been deleted from distribution for station 209. Nine (9) of these drawings have been superseded by later revisions and one (1) of these drawings was voided. In all cases, the review for legibility of the existing drawings found the drawings adequate for use by construction.

5. Change Paper not removed or added to Drawings (findings 4, 12, 17, 19)

Change paper had not been removed from or added to the drawings per pull back instruction. Discrepancies have been corrected.

6. Other Miscellaneous (findings 18, 20)

An FCN was not listed on the front but was attached. This is a clerical error and has been corrected.

Document Control is unable to verify the information in the audit report on finding 20. Additional information will be required.

7. Other Concerns noted on the Audit Report

a) Training

The construction assistant responsible for this workprint location attended training sessions on January 6, 1984 and January 10, 1984. Instructions on posting and other requirements of FPD-1.000 and FPD-3.000 were discussed. Document Control has also reviewed the requirements with the construction assistant since these training sessions.

b) Processes followed in Workprint Stations

These issues will be resolved when the workprint stations are maintained by Document Control as part of the Document Control Corrective Action Plan. Until this conversion is complete, Document Control will review training needs with the construction assistants and arrange for training as appropriate.

1 OF 2 Attachment B DRAFT

Finding No.	DOCUMENT NUMBER	REV DWG	REV REG	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER COMMENTS
1	M2EBD-38-1-H2	1	1					NOT ON FDDL (STN. LOG SHOWS TAKEN OFF 10-7-83.
2	2CCB-15-3	4	4					LEGIBILITY.
3	2CCB-39-2	5				NOT LISTED		LEGIBILITY
4	FSK-M-2CCB-101-1	1						
5	2EBB-1-1	1	(2)					1) HOLD 3810 13 ATTACHED BUT NOT ON REGISTER 2) LEGIBILITY.
6	2EBB-2-2	Aug. 1119 4 3	(4)					1) IDCN 3861 ATTACHED NOT ON REGISTER 2) LEGIBILITY.
7	FSK-M-2EBB 3-1	3	(4)					1) LEGIBILITY - IDCN 8968
8	2EBB-3-2	4	(5)					1) FCR C-4139 ATTACHED BUT NOT NOT ON REGISTER 2) IDCN 8478 / FCR C-4139 LEGIBILITY
9	FSK-M-2EBB-4-1	3	(4)					1) IDCN 8191 PG #2 LEGIBILITY.
10	2EBB-4-3	3	(4)					1) HOLD 3809 ATTACHED BUT NOT ON REGISTER.
11	2EBB-7-4	1	(2)					1) IDCN 8299 ATTACHED BUT NOT ON REGISTER. 2) LEGIBILITY IDCN 8299 PG. #2
12	2EBB-7-5	0	0					1) FCR 6698 ATTACHED BUT NOT LISTED ON FRONT. 2) IDCN 8004 PG #2 LEGIBILITY 3) FCR M-6690 / 6698 / C5485 ATTACHED BUT NOT ON REGISTER.
13	2EBB-8-11	2	(3)					1) IDCN 8297 / HOLD 3757 ATTACHED BUT NOT ON REGISTER 2) IDCN 8297 PG #2 LEGIBILITY
14	2EBB-10-1	3	(4)					IDCN 6092 LEGIBILITY
15	2ECB-7-1	3	3				FCR →	IDCN NOT WRITTEN ON FRONT OF DWG.
16	2ECB-8-5	4	4					FCR M10146 NOT WRITTEN ON FRONT OF DWG.
17	2HBC-160-1	2	2					1) FCN 6183 ATTACHED BUT NOT ON REGISTER 2) FCN 6183 NOT WRITTEN ON FRONT OF DWG.
18	2HCD-82-6	6	6					1) FCN M-13620 NOT LISTED ON FRONT OF DWG. 2) DWG NOT ON DWG.

1 OF 2 ATTACHMENT B

1 OF 2 ATTACHMENT B

2 OF 2 Attachment B DISCREPANCIES STATION Attachment B

DOCUMENT LOG No.	NUMBER	REV DWG	REV REG	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER COMMENTS
(19)	2HCD-555-1	1	1					1) FCN M-3638 ATTACHED NOT ON REGISTER 2) LEGIBILITY ON TOP OF FCN
(20)	M-604 SH1	5	12					1) FCR M 9562 / FCN M 12871 ATTACHED BUT NOT ON FRONT OFF DRAWING.
(21)	M-604 SH1	"/F1						1) FCR M-3701 ATTACHED NOT ON REGISTER
(22)	M604 SH.9	14/F2	14					1) FCR 6834 ATTACHED NOT ON REGISTER 2) ICS STAMP NOT ON FRONT DRAWING
(23)	M604 SH15	14/F1	14					1) NO "STATUS STAMP" ON FRONT OF DRAWING 2) LEGIBILITY
(24)	M639-14	14/F1	14					1) ICS 4 NOT LISTED ON FRONT OF DRAWING
(25)	FSK-DVI-M-604-1	5	5					1) LEGIBILITY 2) IDCN 9382 PAGE 2 STRUCK-OUT
(26)	FSK-DVI-M-604-8	7	7					1) IDCN 9311 PAGE 2 ILLEGIBLE

OTHER CONCERNS:

1)- PERSONNEL AT THE WORK PRINT STATION STATED THEY HAD NOT BEEN TRAINED TO WRITE CHANGE PAPER ON FRONT OF DRAWINGS. NO RECORD OF TRAINING EXISTS ON COMPUTE RECORD/PRINTOUT. IT APPEARED PERSONNEL HAD NOT BEEN ADEQUATELY TRAINED.

2) ACTIONS BY RECIPIENT ORGANIZATIONS SUCH AS FILING, LOGGING AND CONTROL OF DOCUMENTS APPEAR TO VARY FROM STATION TO STATION.