

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

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Transmittal No: CSC-7825

Date: May 31, 1984

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

PRINCIPAL STAFF			
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- Attached Is: Partial Response To
 Complete Response To
 For Your Information
 Other

Description:

Tracked Action Item 068 - Revised response per attached letter BCCC-9392 dated May 31, 1984.

Signature:

M. I. Beckel

- 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

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Bechtel Power Corporation

Post Office Box 2167
Midland, Michigan 48640



May 31, 1984

Consumers Power Company
P. O. Box 1963
Midland, MI 48640

Attention: D. L. Quamme

Job 7220 Midland Project
Subcontract 7220-M-1A
STONE AND WEBSTER -
ACTION ITEM 068
BCCC-9392

Dear Mr. Quamme:

This letter is in response to your letter CSC-7793, dated May 22, 1984. The following quoted response was received from B&WCC in answer to Stone and Webster's letter SWM-119, concerning CIO Tracked Action Item 068.

"This letter is in regards to the effective Code editions being implemented by B&WCC for the installation of Component Supports. Stone and Webster's letter of May 17, 1984, concludes that ASME Section III, Division 1, 1971 Edition through Summer 1973 Addenda was the Code being implemented by B&WCC for installation of Component Supports. This is not the case. It has always been B&WCC's practice and intention to implement ASME Section III, 1974 Edition, Subsection NF for the installation of Component Supports. B&WCC's contract with Bechtel (Specification 7220-M-1A) has recently been revised to be explicitly clear on the effective Code for Component Support Installation. Our intentions of implementating ASME III, 1974 Edition, Subsection NF have remained consistent throughout the course of Component Support work.

B&WCC's evaluation of the cause of the cited condition is as follows:

The 1974 edition of Subsection NF is not explicitly clear regarding the certification of personnel performing visual weld inspections. This Code refers to SNT-TC-1A for visual certification philosophy but SNT-TC-1A does not specifically address visual inspection as an NDE method. Subsection NF does state....."For Nondestructive Examination methods not covered by SNT-TC-1A documents, personnel shall be qualified by the Manufacturer or Installer to comparable levels of competency by subjection to comparable examinations on the particular method involved"....We felt we met the intent of Subsection NF as well as SNT-TC-1A by qualifying all Quality Control personnel performing visual inspections to Level II certification in accordance with ANSI-N45.2. We considered ourselves on firm ground using an accepted industry standard such as ANSI-N45.2 for certification versus the vague Code requirements of 1974 NF.

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May 31, 1984
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B&WCC's Resolution & Corrective Action to the cited condition is as follows:

In early April, we began hearing that there were concerns in MPQAD regarding their visual certification process. Our QA personnel began evaluating our visual inspection procedures. On May 7, 1984, we were notified in a meeting by MPQAD that B.O.P. personnel had suspended visual weld inspections due to inadequate visual certifications. We issued a partial Stop Work, our QA personnel completed their procedure evaluation and issued a revision to our visual inspection procedure (9-WG-112) as well as issued a new visual certification procedure (9-VIS-100). Both of these procedures were submitted to site manual holders on May 14, 1984. Personnel performing visual inspections were given general, practical, and specific examinations on May 16, 1984. Certification (VT) records were completed May 18, 1984. The partial Stop Work on visual weld inspections was lifted on May 30, 1984.

Though we have only recently developed a Visual Certification Procedure (9-VIS-100), we do not feel that a significant problem exists with previous visual weld inspections. We have initiated a 100% reinspection of all previously completed component supports, including visual weld inspection, and this should negate any concerns in this area. Based on our evaluation of site training in visual inspection criteria and the completely successful examinations administered to visual inspection personnel we do not feel we have any problem with previously inspected welds. The remainder of our visual weld inspection activities will be performed by personnel who have been certified to perform visual weld inspections.

We would like to take exception to Stone and Webster's statement that...."The B&W QA Program does not include a visual inspection NDE procedure for NF Component Support Welds.".... We would point out that Quality Control Procedure 9-WG-112 was written specifically for this purpose and was being implemented well in advance of any site concerns regarding visual weld inspections."

If you have any questions, please contact Kelly Pulito at extension 7257.

Very truly yours,

for 
G. A. Hierzer
Site Manager

GAH/DRS/wlw

cc: N. I. Reichel (CPCo)
D. J. Vokal (CPCo)