



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

October 22, 1982

resident
[Signature]
Attachment 2

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

Mr. D. B. Miller
Site Manager
P.O. Box 1963
Midland, MI 48640

Dear Mr. Miller:

We have reviewed Quality Assurance Plans MPQP-1, Revision 4 and MPQP-2, Revision 1, dated October 12, 1982 respectively. We have no concerns with the organizational and typographical corrections made to these documents. These documents are authorized for implementation.

In the future, please be advised that organizational and typographical changes need not receive prior Region III authorization for implementation. We would request that these affected revisions be distributed to our staff in the usual manner.

Changes in the intent of the plans, however, will continue to require staff authorization.

Should you have any questions regarding this letter, please feel free to contact me.

W. D. Shafer
W. D. Shafer
Chief Midland Section

cc: See Attached List

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UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 ATOMIC SAFETY AND LICENSING BOARD PANEL
 WASHINGTON, D.C. 20555

Attachment 3

DATE

November 9, 1982

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Docket Nos. 50-329 and 50-330 OL
 50-329 and 50-330 OM

PRINCIPAL STAFF	
W/A	SEARCH
D/RA	EIF
A/RA	VIP TO
DP&RP	IPAO
DEP&OSI	SLO
DE&TP	
ML	
OL	FILE

MEMORANDUM FOR: William D. Paton, Staff Counsel

FROM: Charles Bechhoefer, Board Chairman

SUBJECT: CLARIFICATION OF LETTER, W.D. SHAFER, CHIEF MIDLAND SECTION, NRC REGION III TO D. B. MILLER, SITE MANAGER, MIDLAND PROJECT, DATED OCTOBER 22, 1982

The Board has recently received the referenced letter. We believe that it would be useful for the phrase "organizational * * * changes" in the second paragraph to be clarified.

The Board assumed on first reading that the term was used in the same context as in the first paragraph in the letter--i.e., that the organizational and typographical changes that need not receive prior approval of Region III staff refer to organizational changes in the Quality Assurance Plans. On the other hand, as used in the second paragraph, "organizational * * * changes" could be construed as referring to structural changes in the Quality Assurance Organization. We request that the Staff clarify this possible ambiguity in the instructions being given to the Applicant.

The Staff may wish to address this ambiguity as a preliminary matter during the hearing session scheduled to begin November 15, 1982.

FOR THE ATOMIC SAFETY AND
 LICENSING BOARD

Charles Bechhoefer
 Charles Bechhoefer, Chairman
 ADMINISTRATIVE JUDGE

cc: Service List

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

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Attachment
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November 23, 1982

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

Mr. D. B. Miller
Site Manager
P.O. Box 1963
Midland, MI 48640

Reference: Letter dated October 22, 1982, to D. B. Miller from W. D. Shafer,
Chief, Midland Section

Dear Mr. Miller,

The above referenced letter discusses when revisions to Quality Assurance Plans MPQP-1 and MPQP-2 will require prior Region III authorization.

The Board has requested that we clarify our statement that organizational changes could be implemented without prior regional approval.

The types of organization changes that will not require prior regional authorization are typographical corrections or title changes that do not include a reassignment of responsibility.

Changes to the organizational structure, reassignment of responsibility and changes to the intent of the plan (which includes the organization charts) will require prior Region III authorization.

Should you have any questions regarding this letter, please feel free to contact me.

W.D. Shafer
W. D. Shafer
Chief Midland Section

cc: See Attached List

~~8211300283~~

D. B. Miller

cc:
D&B/Document Control Desk (RIDS)
Resident Inspector, RIII
The Honorable Charles Bechhofer, ASLB
The Honorable Jerry Harbour, ASLB
The Honorable Frederick P. Cowan, ASLB
The Honorable Ralph S. Decker, ASLB
Michael Miller
Ronald Callen, Michigan
Public Service Commission
Myron M. Cherry
Barbara Staniris
Mary Sinclair
Wendell Marshall
Colonel Steve J. Gadler (P.E.)

OFFICE	RIII						
APPROVED	Shaje/cc						
DATE	11/23/82						

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Harrison
Shaner
Landsman
3/25/83

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

PRINCIPAL STAFF	
RA	ENF
D/RA	✓ FCS 2
A/RA	✓ AO
DPRP	ISLO
DRMA	✓ C
DRMSP	
DE	
ML	
OL	FILE ✓ AR

In the Matter of
CONSUMERS POWER COMPANY
(Midland Plant, Units 1 and 2)

Docket Nos. 50-329 OM & OL
50-330 OM & OL

SUPPLEMENTAL TESTIMONY OF R.J. COOK, R.N. GARDNER,
R.B. LANDSMAN AND W.D. SHAFER WITH RESPECT TO QUALITY ASSURANCE

Q1. Please state your names and positions with the NRC.

A1. My name is Ronald J. Cook. I am the Senior Inspector for the NRC
at the Midland plant.

My name is Ronald N. Gardner. I am an Inspector for the NRC,
Region III.

My name is Ross B. Landsman. I am an Inspector for the NRC, Region
III.

My name is Wayne D. Shafer. I am the Chief, Midland Section,
Office of Special Cases for the NRC, Region III.

Q2. Have your professional qualifications previously been submitted in
this proceeding?

A2. Yes.

Q3. What is the purpose of this testimony?

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A3. This testimony supplements the "NRC Staff Testimony of R.J. Cook, R.N. Gardner, R.B. Landsman, and W.D. Shafer With Respect to Quality Assurance," dated October 29, 1982. (October 1982 testimony.)

Q4. Dr. Landsman and Mr. Gardner, in your response to question 2 of your October 1982 testimony, you state that CPC committed to developing a program for the retraining and requalifying of QC personnel, but had not yet submitted the program. Has that program been submitted?

A4. Yes. However, there has been no formal submittal of the QC retraining and recertification program. Rather, we received copies of the procedures by which QC inspectors would be trained and certified. These procedures do require a combination of written and oral examination for the requalification of QC inspectors, as CPC had committed to do. Also, these procedures conform to the requirements of ANSI (American National Standards Institute, Inc.) N45.2.6 (1978)

Q5. Dr. Landsman and Mr. Gardner, do you monitor the training, qualifying, and certifying of QC inspectors?

A5. Yes. We have monitored the training, qualifying and certifying of QC inspectors and will continue to do so. Recently, we were concerned with the manner in which training for non-soils inspectors was being conducted. We felt that the pace of it was too rushed. As a result, instructors were not always prepared,

questions raised by trainees could not always be answered, and instructional materials were not always available at the classes. To CPC's credit, they acknowledged this problem, suspended the training program, and are taking steps to improve it. When training of non-soils inspectors is resumed, we will monitor the program to assess whether its deficiencies have been corrected. As for other areas of the requalification and recertification program, we have found no significant problems.

Q6. Dr. Landsman, in your response to question 4 of your October 1982 testimony, you discuss the QA program for underpinning activities. Is there supplementation to that testimony.?

A6. Yes. That supplementation is contained in the "Supplemental Testimony of John W. Gilray, Ross Landsman and Wayne Shafer with Respect to the Quality Assurance Program for the Underpinning Activities of the Service Water Pump Structure and Auxiliary Building."

Q7. Dr. Landsman, in your response to question 6 of your October 1982 testimony, you state that with respect to quality assurance overview of remedial soils work, it was your assessment that CPC's QA staff was not "commensurate with the complexity of the task." Are you still of that opinion?

A7. Yes. I still am concerned about the lack of previous QA experience of certain MPQAD supervisory personnel responsible for overseeing remedial soils work.

Since July, 1982, there was established in MPQAD a separate group responsible for overseeing remedial soils work. As indicated by the following excerpts from inspection reports, I have documented a large number of NRC identified concerns with respect to the implementation of remedial soils work.

- A. Inspection Report 82-18 (Attachment 5, October 1982 testimony)
- Section 1. "Licensee Action on Previously Identified Items"
last paragraph (procedural requirements for dewatering well fines monitoring)
- Section 2. "Functional or Program Areas Inspected"
- subpart (b) Slope Layback at Auxiliary Building Access Shafts
- subpart (c) BWST Foundation Grouting
- B. Inspection Report 82-20 (Attachment 1a)
- Section 1. Review of Training Program for Remedial Soils Activities
- C. Inspection Report 82-21 (Attachment 1b)
- Section 1. Review of Remedial Soils QC Recertification Program.
- D. Inspection Report 82-22 (Attachment 4 to Supplemental Testimony of James Keppler With Respect to Quality Assurance)
- Section 25. Perimeter Dike Armor Stone
- E. Inspection Report 82-26 (Attachment 1c)
- "Licensee Actions on Previously Identified Items,"
- subpart (a) Documentation of Training
- "Functional or Program Areas Inspected"
- Section 1. Remedial Soils Work Activities
- Section 2. FIVP Proof Load Jacking

Had the QA supervisors in question had greater QA experience, I feel that there would not have been this many NRC identified concerns. It should be noted, however, that no problem with CPC's performance of actual underpinning activities has been so significant to warrant a recommendation that this work be halted. I also note that in the response to this question, I am expressing my personal opinion and not the Staff's opinion.

- Q8. Mr. Shafer, what is the Staff position as to the lack of quality assurance experience of certain management personnel within MPQAD, as discussed by Dr. Landsman in the response to the previous question?
- A8. With respect to the positions in question, there are no regulatory requirements which dictate the level of QA experience for the persons who fill those positions. Accordingly, the Staff will monitor the activities of the CPC employees in question until the Staff is satisfied with their managerial performance.
- Q9. Dr. Landsman, in your response to Question 9 of your October, 1982 testimony, you discuss the Staff evaluation of drawing 7220-C-45. You state that CPC needed to take the following two steps for the submittal to be acceptable; (1) revise the drawing to provide Q controls for the permitter and baffle dikes adjacent to the ECWR and

(2) reconfirm that no seismic category I underground utilities extend beyond the Q areas of the drawing. Has CPC done so?

- A9. In a letter from James W. Cook to Harold R. Denton, dated December 10, 1982, CPC confirmed that they have taken the above-mentioned two steps. (Attachment 2). The Staff now finds drawing 7220-C-45 to be acceptable.



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

Attachment 1: B

OCT 6 1982

Docket No. 50-329/82-20
Docket No. 50-330, 82-30

Consumers Power Company
ATTN: Mr. James W. Cook
Vice President
Midland Project
1945 West Parnall Road
Jackson, MI 49201

Gentlemen:

This refers to the routine safety inspection conducted by Messrs. B. Burgess, R. Cook, R. Gardner, and R. Landsman of this office on August 20 through September 20, 1982, of activities at Midland Nuclear Power Plant, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-81 and No. CPPR-82 and to the discussion of our findings with Mr. J. A. Mooney at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been

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delayed such that less than seven (7) days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter and the enclosed inspection report will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

10/1 for R F Warnick

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

Enclosure: Inspection Reports
No. 50-329/82-20(OSC)
and No. 50-330/82-20(OSC)

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.)

RIII
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Burgess
9/30/82

RIII
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Cook

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RSG
Gardner

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Landsman
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Shaffer

RIII
RFW
Warnick
10/4/82

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/82-20(OSC); 50-330/82-20(OSC)

Docket Nos. 50-329; 50-330

Licenses No. CPPR-81; CPPR-82

Licensee: Consumers Power Company
1945 West Parnall Road
Jackson, MI 49201

Facility Name: Midland Nuclear Power Plant, Units 1 and 2

Inspection At: Midland Site, Midland, MI

Inspection Conducted: August 20 through September 20, 1982

Inspectors: B. L. Burgess *W.D. Shafer for* 10-6-82
R. J. Cook *W.D. Shafer for* 10-6-82
R.N. Gardner
R. N. Gardner 10-4-82
R.B. Landsman R.N. Gardner 10-4-82
Approved By: W. D. Shafer, Chief 10-6-82
Midland Section
W.D. Shafer

Inspection Summary

Inspection on August 20 through September 20, 1982 (Reports No. 50-329/82-20(OSC); 50-330/82-20(OSC))

Areas Inspected: Review of Remedial Soils work activities, review of training program for Remedial Soils activities, inspection of materials used by Zack Company, and review of protective tagging procedure. The inspection involved 113 inspector-hours onsite by four NRC inspectors and 14 inspector-hours of inoffice direct inspection effort.

Results: No items of noncompliance or deviations were identified during this inspection.

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DETAILS

Persons Contacted

Consumers Power Company

J. A. Mooney, Executive Manager
B. W. Marguglio, QA Director
D. Miller, Site Manager
W. R. Bird, MPQAD
M. L. Curland, Site QA Superintendent
J. P. Foley, MPQAD
L. P. Kettren, MPQAD
J. K. Meisenheimer, MPQAD
B. H. Peck, Construction Superintendent
R. M. Wheeler, Technical Section Head

Bechtel Power Corporation

L. E. Davis, Site Manager
J. W. Darby, Resident Engineer
M. A. Dietrich, PQAE/MPQAD

Other licensee and contractor personnel were routinely contacted during the course of these inspections.

Functional or Program Areas Inspected

1. Review of Training Program for Remedial Soils Activities

The inspectors reviewed the training program initiated by the licensee for personnel involved in the future Remedial Soils activities. Remedial Soils training is primarily obtained through attendance of a special Quality Assurance (QA) Indoctrination Session and during construction of a mock-up test pit. In addition, both Mergentine and Spencer, White and Prantis (SW&P) personnel require specific procedure training prior to initiating any quality related construction activities. The licensee has indicated that a new Quality Improvement Plan. (QIP) will be initiated within 4-6 weeks.

The inspectors reviewed the records and logs to determine which personnel had attended the special QA Indoctrination Session. The licensee's records and logs documenting the attendance at these sessions were inadequate resulting in the licensee having difficulty in determining which personnel had attended and which personnel needed to attend these sessions. Further, the inspector determined that the Mergentine and SW&P training in specific procedures was documented only for superintendents, field engineers, etc. Except for two procedures, there was no documented training provided for craft foremen or craft workmen.

The Resident Inspector and another Midland Team Inspector examined a prototype pit resembling the pit and logging considerations needed for the construction of Pier 12 for the actual underpinning work. The prototype pier is being constructed in the parking area by the main gate and was examined as a portion of the NRC review of training for individuals involved in the underpinning work. Construction of the prototype pier has revealed the need for some modifications in soil supporting techniques used at the base of the excavation.

In addition, the inspector determined that the licensee has not, as yet, provided training for the remedial soils emergency procedures such as C-200 and OP-41. During the exit meeting on September 15, 1982, the inspector informed the licensee that the training program, to date, was not well documented and in some instances, such as training in emergency procedures and training for craft foremen and craft workmen in work procedures, was not complete. The inspector informed the licensee that, prior to initiating future remedial soil work activities, these training program deficiencies would have to be corrected. In addition, the licensee would have to ensure that all deficiencies identified during mockup test pit activities were adequately addressed in their program. This matter is considered an open item (50-329/82-20-01; 50-330/82-20-01).

2. Remedial Soils Work Activities

The inspectors reviewed and authorized the following work activities during the report period:

- a. Calibration of jacks and gauges for the FIVP modification work.
- b. Rebar mapping of the existing BWST foundation.
- c. Stripping of waterproof membrane from BWST valve pit walls.
- d. Installation of the permanent security fence.
- e. Placing armor stone on the N.E. cooling pond dike.
- f. Installation of dewatering wells and piezometers for SWPS dewatering.
- g. Installation of utilities in non-Q soil for the technical support center.
- h. Backfill of two abandoned temporary dewatering ejector holes.
- i. Probing for shallow utilities around SWPS.
- j. Core drilling SWPS for temporary dewatering wells.
- k. Reinstalling piping, pipe hangers and electrical facilities for the BWSTs.
- l. Hydro testing of new service water pipe after replacement.
- m. Relocating fire line by SWPS.

No items of noncompliance or deviations were identified.

3. Midland Section

The Office of Special Cases was formed in July 1982 to address the significant inspection activities at the Midland and Zimmer construction sites. Mr. R. F. Warnick is Acting Director of this office. The Midland Section consists of W. D. Shafer, Section Chief, R. N. Gardner and Dr. R. B. Landsman from the Regional Office, and R. J. Cook, who remains the Senior Resident Inspector. Mr. B. L. Burgess has been assigned as the Resident Inspector effective August 29, 1982.

4. Zack Material Inspection

During the month of August, the Zack Company issued a potential 10 CFR Part 21 to the Region III office (Letter to Region III from the Zack Company, dated August 2, 1982). The Part 21 addressed a possible discrepancy between the welder of record and the welder who may have performed the actual welds. In response to the Part 21, Region III requested an inspection to determine if material manufactured by the Zack Company in Cicero, Illinois was received onsite during the inspection period.

The Resident Inspectors conducted a random sampling of Zack HVAC material from various storage locations onsite. The inspectors traced traveler reference numbers painted on the individual pieces to traveler documentation. Of the 20 pieces identified, 5 were determined to be manufactured by the Zack facility in Cicero, Illinois. The inspector reviewed shipment documentation and receipt inspection reports to confirm material traceability.

5. Workman's Protective Tags

The inspector reviewed Midland Plant Procedure 1042.1, Revision 3, titled "Workman's Protective Tagging." The review was conducted by the resident inspector to ascertain the effectiveness of the plant tagging procedure. In addition, the inspector reviewed the Switching and Tagging Log and the Workman's Protective Tag Log. No major discrepancies were identified. One item was identified during the review pertaining to the licensee's corrective action system. The inspector was unable to determine if items identified as nonconforming during preoperational testing by the operations department were transferred to the corrective action tracking system of the production and testing groups. This item will be reviewed during a future inspection and is considered an open item. (50-329/82-20-02; 50-330/82-20-02)

No items of noncompliance were identified.

6. Extension of SALP III Reporting Period

Consumers Power Company corporate management was informed that the SALP III period would be extended from the original period termination date of June 30, 1982 to December 31, 1982. The decision to extend the period was based on allowing the licensee time to implement those comments from the SALP II period which might help improve the licensee performance in those areas classified as Category III for the period ending June 30, 1981.

7. Radiation Monitoring System Equipment - Inferior Workmanship - 50.55(e) Item

During the reporting period, the licensee performed an inspection in conjunction with the Bechtel Power Corporation of Victoreen Inc., the manufacturers for the radiation monitoring equipment. This joint inspection found that at least 80% of the 820 electronic modules examined would require rework to make them usable. This inspection also revealed

that 12 of the 19 QA program criteria had not been adhered to and that use of the workmanship standard had been deleted without approval of the licensee.

The modules examined had not been completely inspected and/or functionally tested. However, the poor workmanship being used in the manufacture of the modules puts the reliability of the modules in jeopardy.

The licensee has invoked hold shipment restrictions on items slated for the Midland Site and stopped further processes for inspection and testing activities. Manufacture of the modules had not been stopped at the end of this reporting period.

8. Modified Auxiliary Feedwater Header

During the reporting period, the licensee has continued to modify the steam generators to accommodate an external feedwater header. The holes for the Unit 2 steam generators have been sized with the exception of two holes in one steam generator and one hole in the other steam generator. Work has recently commenced for sizing the holes for the Unit 1 steam generators. All 1/2 inch diameter pilot holes have been located and drilled.

Progress on the modifications for the steam generators has been monitored by a Regional Based inspector and the Resident Inspector, including observation of work performed on the mock-up located onsite.

9. Open Items

Open items are matters, not otherwise categorized in the report, that require followup during a future inspection. Open items identified during this inspection are discussed in Section 1 and 5.

10. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspections on September 15, 17 and 21, 1982. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the information.

Attachment 1.6



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

NOV 08 1982

Docket No. 50-329/82-21
Docket No. 50-330/82-21

Consumers Power Company
ATTN: Mr. James W. Cook
Vice President
Midland Project
1945 West Parnall Road
Jackson, MI 49201

Gentlemen:

This refers to the routine safety inspection conducted by Messrs. W. Shafer, R. Cook, R. Gardner, R. Landsman, and B. Burgess of this office on September 20 to October 12, 1982, of activities at Midland Nuclear Power Plant, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-81 and No. CPPR-82 and to the discussion of our findings with Mr. J. A. Mooney at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as specified in the enclosed Appendix. A written response is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by

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an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

10/1/82 R.F. Warnick

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

Enclosures:

- 1. Appendix, Notice of Violation
- 2. Inspection Reports
No. 50-329/82-21
No. 50-330/82-21

cc w/encs:

- 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
- Michael Miller
- Ronald Callen, Michigan
Public Service Commission
- Myron M. Cherry
- Barbara Stamiris
- Mary Sinclair
- Wendell Marshall
- Colonel Steve J. Gadler (P. E.)

FILED	R.I.I.I. <i>[Signature]</i>	R.I.I.I. <i>[Signature]</i>	R.I.I.I. <i>[Signature]</i>	R.I.I.I. <i>[Signature]</i>	R.I.I.I. <i>[Signature]</i>	R.I.I.I. <i>[Signature]</i>
SURNAME	R. Warnick	W. Shafer	R. Cook	R. Gardner	R. Landmar	F.B. Burgess
DATE			11/4/82	11/4/82	11/2/82	R.B.K.

Appendix

NOTICE OF VIOLATION

Consumers Power Company

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

As a result of the inspections conducted on September 20 to October 12, 1982, and in accordance with the NRC Enforcement Policy, 47FR9987 (March 9, 1982), the following violations were identified:

10 CFR 50, Appendix B, Criterion VI, states in part that, "Measures shall be established to control the issuance of documents . . ."

Consumers Power Company Quality Assurance Program Policy No. 6, Revision 12, dated April 2, 1982, states in part, that, "Documents which prescribe activities affecting quality . . . are . . . controlled . . . and distributed according to a controlled distribution . . . The assigned holders of the document are responsible for maintaining the latest revisions of the documents."

Contrary to the above, the inspectors determined the following two examples of noncompliance:

1. The QA department was using a controlled copy of PQCI UP-C-1.013 to make up QC recertification exam questions. This copy of the PQCI was different from a controlled copy obtained from the QC records vault. Both documents were marked revision 0 and dated 8/20/82. There were two pages that were different dealing with the same interface document UP-C-1.008. Furthermore, during the inspection, the licensee could not produce the controlled distribution list for the referenced PQCI.
2. Two controlled copies, Manual numbers 1456 and 1369A, of the Bechtel "Quality Control Notices Manual", Procedure G-6.1, which controls PQCIs, were not of the latest revision.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

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Dated _____

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

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/82-21(OSC); 50-330/82-21(OSC)

Docket Nos. 50-329; 50-330

Licenses No. CPPR-81; CPPR-82

Licensee: Consumers Power Company
1945 West Parnall Road
Jackson, MI 49201

Facility Name: Midland Nuclear Power Plant, Units 1 and 2

Inspection At: Midland Site, Midland, MI

Inspection Conducted: September 20 through October 12, 1982

Inspectors:	^{F.C.} B. L. Burgess	<i>R. B. Landsman</i>	<u>11/8/82</u>
	R. J. Cook	<i>R. J. Cook</i>	<u>11/4/82</u>
	R. N. Gardner	<i>R. N. Gardner</i>	<u>11/4/82</u>
	R. B. Landsman	<i>R. B. Landsman</i>	<u>11/4/82</u>
Approved By:	W. D. Shafer, Chief Midland Section	<i>R. F. Litzvick for</i>	<u>11/3/82</u>

Inspection Summary

Inspection on September 20 through October 12, 1982 (Reports No. 50-329/82-21(OSC); 50-330/82-21(OSC))

Areas Inspected: Review of Remedial Soils QC recertification program; examination of site conditions; conditions for limited site fire main capability and repairs; management meetings and examination of the Zimmer site. The inspection involved 180 inspector-hours on site by four NRC inspectors.

Results: Of the areas inspected, one item of noncompliance was identified with two examples: Severity Level IV failure to maintain the latest revision of documents.

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DETAILS

Persons Contacted

Consumers Power Company

J. A. Mooney, Executive Manager
D. B. Miller, Site Manager
M. L. Curland, Site Project QA Superintendent
D. E. Horn, MPQAD, Civil
J. K. Meisenheimer, MPQAD, Soils
B. H. Peck, Construction Superintendent
J. Schaub, Midland Project Office
R. M. Wheeler, Technical Section Supervisor

Bechtel Power Corporation

M. A. Dietrich, Project QA Engineer
J. Fisher, Manager, Remedial Soils
M. M. Blendy, QC, Civil
J. W. Darbey, Resident Engineer
S. D. Kirker, QC, Civil

Other licensee and contractor personnel were routinely contacted during the course of these inspections.

Functional or Program Areas Inspected

1. Review of Remedial Soils QC Recertification Program

Consumer Power Company letter to the NRC, dated September 17, 1982, "Quality Assurance Program Implementation for Soils Remedial Work", identified the licensee's actions in regards to integrating the Soils QA and QC functions under the direction of MPQAD. In response to this letter, the licensee was required to initiate a recertification program for all Bechtel QC inspectors integrated into the Soils QA/QC organization. The licensee subsequently informed the NRC that the recertification of Bechtel QC inspectors would be accomplished through oral examinations. A schedule of these examinations was submitted by the licensee at the request of the NRC.

On September 23-24, 1982, the Region III inspectors conducted an inspection of the Bechtel QC recertification activities being accomplished by MPQAD. During this inspection, the inspectors determined the following:

- a. The inspectors observed that in administering the oral examinations, MPQAD would excessively repeat the questions, allowing the examinee several attempts to correct previously incorrect examination responses.

- b. The inspectors observed that in administering the oral examination, MPQAD would mark questions, which the examinee failed to correctly answer, as NA, when the question was relevant to the pertinent PQCI.
- c. The inspectors observed that the technical portion of the oral examination lacked the technical content necessary to establish the examinee's level of comprehension of the activity addressed by the subject PQCI.
- d. The inspectors observed that the QA examiner used a controlled copy of PQCI UP-C-1.013 to make up the exam questions. This copy was different from another controlled copy obtained from the QC records vault. Both documents were marked revision 0 and dated 8/20/82. There were two pages that were different dealing with the same interface document, UP-C-1.008. This failure to control documents is in noncompliance with 10 CFR Part 50, Appendix B, Criterion VI, as described in the Appendix of the report transmittal letter (50-329/82-21-1A; 50-330/82-21-1A). Furthermore, during the inspection, the licensee could not produce the controlled distribution list for the referenced PQCI.

The inspectors, while attempting to ascertain why the PQCIs were different, reviewed ten copies of the Bechtel "Quality Control Notices Manual", Procedure G-6.1, which controls PQCIs. During the review, one controlled copy of G-6.1 had pages missing from the procedure. Two other copies, Manual numbers 1456 and 1369A, of G-6.1 were not of the latest revision. This is another example of noncompliance to 10 CFR 50, Appendix B, Criterion VI, as described in the Appendix of the report transmittal letter (50-329/82-21-01B; 50-330/82-21-01B).

During the exit meeting, the licensee committed to review the complete PQCI control process.

Subsequently, Region III issued a Confirmatory Action Letter (CAL) on September 24, 1982, regarding the licensee's commitments in regard to the problems identified in the remedial soils QC requalification program. The licensee commitments identified by the CAL included: (1) the issuance of a Stop Work for all work on remedial soils with the exception of those continuous activities such as maintaining the freeze wall; (2) the suspension of all examinations relating to remedial soils QC requalifications; (3) the decertification of all remedial soils QC personnel previously certified; (4) the establishment of a retraining program for all QC personnel who fail the recertification examinations; and (5) the development of a written examination for all remedial soils QC recertifications.

2. Site Tours

At periodic intervals during the report period, tours of selected site areas were performed. These tours were intended to assess the cleanliness of the site; storage conditions of equipment and piping being used in site construction; the potential for fire or other hazards which might have a deleterious effect on personnel and equipment; and to witness construction activities in progress. A system walk down was performed of portions of the decay heat removal and component cooling water systems prior to the witnessing of initial performance testing.

3. Limited Site Fire Main Capability

As a result of inspection effort into the qualification of QC Inspectors for the remedial soils work, a Stop Work was invoked on September 24, 1982. However, at the time of the Stop Work, the licensee was in the process of making a tie-in between the temporary construction fire main and the permanent site fire main. This tie-in was being made to facilitate remedial soils work at the Service Water Building. Although no excavation was involved, the work was being controlled by use of an excavation permit (WP-106). The Stop Work negated the excavation permit and subsequently any work being performed under the excavation permit.

The licensee became fully aware of the limited fire main capacity on September 25, 1982, and completed working on the fire main tie-in to restore fire main capacity. The licensee notified the NRC that technically the work may have violated the Stop Work, but when considering the limited fire main capacity, it was more prudent to take emergency measures to restore the system to normal capacity. The Resident Inspector was informed of these actions and examined the system tie-in. No excavation work was in process as the excavation for access to the fire main had been performed at an earlier time. The NRC concurred with the licensee emergency action to restore the fire main capacity. (Reference ltr. Warnick to Cook dtd. October 5, 1982).

4. Management Meetings

On September 29, 1982, a meeting was conducted at the Ramada Inn Central in Midland, Michigan. The purpose of the meeting was to discuss the integration of Quality Control (QC) activities into the Midland Project Quality Assurance Department (MPQAD).

On September 28, 1982, the Midland Inspection Site Team met with members of Stone & Webster and Consumers Power Company. The meeting was conducted to introduce the Third Party Independent Assessment Team members for remedial soils work and to explain their function onsite.

On September 22, 1982, the Midland Inspection Site Team met in the regional office to discuss with Consumers Power Company the management of Quality Control personnel onsite. One of the issues discussed was how Consumers Power Company could manage and supervise Bechtel QC inspectors without jeopardizing the Bechtel owned "N" stamp.

5. Resident Inspector Visit to Zimmer Nuclear Power Station

On October 7 and 8, 1982, the Senior Resident Inspector (SRI) toured the Zimmer Nuclear Power Station. This tour was performed to compare the uniqueness of regulatory difficulties between the Zimmer and Midland Sites - both plants have been assigned special attention through Inspection Teams assigned to the Office of Special Cases, RIII.

It appeared to the SRI that inadequate structural steel, welding material traceability and the extensiveness of rework (excluding soils work) were more profound at the Zimmer Station than at Midland. It was apparent that there was little similarity between the exact nature of nonconforming conditions at the Zimmer and Midland Plants.

6. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspection on September 24, 1982. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the information.



**Consumers
Power
Company**

Attachment 2

James W Cook
Vice President - Projects, Engineering
and Construction

General Office: 1848 West Parnell Road, Jackson, MI 48201 • (313) 788-0483
December 10, 1982

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

MIDLAND NUCLEAR COGENERATION PLANT
MIDLAND DOCKET NOS 50-329, 50-330
REVIEW OF SEISMIC CATEGORY I UTILITIES
WITHIN DRAWING C-45 BOUNDARIES
FILE: 0485.16 SERIAL: 19732

PRINCIPAL STAFF		
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D/RA		FILE
A/RA		SP 10/13
DPERP		11/30
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REFERENCE: D EISENHUT (NRC) LETTER TO J W COOK
DATED MAY 25, 1982

Items 1 through 3, inclusive, identified in Enclosure 7 to the above referenced NRC correspondence of May 25, 1982 requested that Consumers Power Company revise Drawing 7220-C-45 to extend Q-listed controls of soils activities to several areas in the vicinity of safety-related structures. Item 4 of Enclosure 7 requested that Consumers Power Company reconfirm that no Seismic Category I underground utilities extend beyond the Q-listed area boundaries identified on drawing C-45.

Revision 9 of Drawing 7220-C-45 is the current drawing revision which resolves the four NRC items of concern identified in Enclosure 7. Revision 9 of Drawing 7220-C-45 along with several other revised documents incorporates those NRC requests identified as Items 1 through 3 of Enclosure 7. We have also completed a careful review of the underground utility locations on as-installed field sketches and wish to confirm that no Seismic Category I utilities are located outside those Q-listed areas shown on Revision 9 of Drawing 7220-C-45.

James W. Cook

JWC/NR/RLT/bjb

DEC 15 1982

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CC Atomic Safety and Licensing Appeal Board
CBechhoefer, ASLB
MMCherry, Esq
FPCowan, ASLB
RJCook, Midland Resident Inspector
RSDecker, ASLB
SGadler, Esq
JHarbour, ASLB
GHarstead, Harstead Engineering
DSHood, NRC (2)
DFJudd, B&W
FJKelley, Esq
RBLandman, NRC Region III
WHMarshall
JPMatra, Naval Surface Weapons Center
Wotto, Army Corps of Engineers
WDPatton, Esq
SJPoulos, Geotechnical Engineers
HSingh, Army Corps of Engineers
BStamiris

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

Letter Serial 19732 Dated December 10, 1982

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 correspondence which resolves several concerns and closes four action items identified in the NRC's correspondence of May 25, 1982. These concerns relate to an extension of Q-listed controls to soils activities in the vicinity of CONSUMERS POWER COMPANY safety-related structures and to a reconfirmation of the location of Seismic Category 1 underground utilities.

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

Sworn and subscribed before me this 13 day of December, 1982

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

My Commission Expires September 8, 1984