ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

THREE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60602
TELEPHONE 312 558-7500
TELEX: 2-5288

EDWARD S. ISHAM, 1872-1902
ROBERT T. LINCOLN, 1872-1889
WILLIAM G. BEALE, 1885-1923

WASHINGTON OFFICE
1120 CONNECTICUT AVENUE, N.W.
SUITE 840
WASHINGTON, D.C. 20036
202 833-9730

April 12, 1983

BY MESSENGER

James Keppler
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Midland OM/OL

Dear Mr. Keppler:

I enclose Consumers Power's testimony on quality assurance. It has already been served on all parties, except for that of Mr. Rutgers which is being served today.

Sincerely,

Wesley Kinnear
Legal Assistant

WK:sc

Enclosure

add 2 pgs (cert of svc)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|---|---|---|
| In the Matter of: | ) | Docket Nos. 50-329 OM |
| | ) | 50-330 OM |
| CONSUMERS POWER COMPANY | ) | Docket Nos. 50-329 OL |
| (Midland Plant, Units 1 & 2) | ) | 50-330 OL |

AFFIDAVIT

I, John A. Rutgers, being first duly sworn, state that my accompanying testimony on quality assurance is true and correct to the best of my knowledge and belief.

John A. Rutgers

SUBSCRIBED & SWORN To Before Me
This 11th Day Of April, 1983.

Laura Y. Tad
Notary Public

Commission Expires: 9-10-86

4/11/83

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|---|---|---|
| In the Matter of: | ) | Docket Nos. 50-329 OM |
| | ) | 50-330 OM |
| CONSUMERS POWER COMPANY | ) | Docket Nos. 50-329 OL |
| (Midland Plant, Units 1 & 2) | ) | 50-330 OL |

TESTIMONY OF JOHN A. RUTGERS
ON QUALITY ASSURANCE

Q1. Please state your name and position.

A1. My name is John A. Rutgers. I am Bechtel Power Corporation's Project Manager for the Midland Plant. My qualifications are detailed in the resume which follows transcript page 3059 and which was submitted in the proceedings on August 5, 1981.

Q2. Mr. Rutgers, have you read the testimony of James Keppler on quality assurance which was filed October 29, 1982?

A2. Yes, I have and I would like to respond to some specific items addressed in the attachments to Mr. Keppler's October 29, 1982 testimony.

Q3. Mr. Rutgers, referring to the technical issues of Attachment A, page 2, paragraph 2 and to Attachment

B, paragraph 1 to Mr. Keppler's October 29, 1982 testimony, what is your position as to the adequacy of the program for reinspection of electrical cables which was initiated as a result of NRC concerns on the adequacy of the qualifications of selected QA inspectors?

A3. As a result of a May, 1981 NRC inspection at Midland, the qualifications of certain QC inspectors certified to perform electrical cable installation inspections were questioned. The NRC considered the inspections performed by these inspectors to be indeterminate and requested that MPQAD perform overinspections. In response, MPQAD performed overinspections of 100% of the work done by all but one of these inspectors and 50% of the work done by the last one. Fifty-five cables out of 1,084 checked (5%) were found to be misinstalled in part.

The results of the overinspections were analyzed for the purpose of ensuring that each identified problem was fully understood and appropriate corrective action taken. The cable installation problems were categorized to further determine if the concerns were generic. The result was that, for 38 of the 55 cables (3.5% of the total overinspected), it was determined either that the problems were not generic or that if the problems were to occur elsewhere in the plant,

there would be no impact on safety. For the remaining 17 cables (1.6% of the total overinspected), it was determined that there could be a concern if similar problems occurred elsewhere in the plant. The 17 cables fell into two categories. First, some cables were overlapped in adjacent trays at transition points. This could lead to inducing noise in instrumentation cables perhaps leading to distortion of instrument signals. Second, some trays had too many cables in them leading to potential overheating if those trays were to be wrapped with asbestos blankets for fire protection.

To ensure that these items of potential concern if occurring elsewhere would be properly identified and dispositioned, the following actions were planned or taken:

1. Revision of the QC area walkdown inspections (PQCI 7220-E-3.0) to require additional inspections of all cable transitions from raceways to ensure that no voltage violations occur.
2. Thermal analysis of wrapped trays conservatively accounting for cable mispulling. This would identify specific cable trays which would be inspected by QC to verify

correct loading requirements.

3. Additional training for Quality Control inspectors.

Thus, all the types of nonconformances identified by the overinspections were analyzed for their impact on safety. Either there was no impact or additional inspections and actions were planned to preclude impact for those attributes important to safety. The foregoing plan was presented to the NRC in May 1982.

Subsequently, the NRC requested that all Class 1E cables be reinspected in accordance with circuit and raceway requirements to ensure correct routing. Consumers Power Company is currently in the process of performing the reinspection requested by NRC, which will include reinspection of approximately 9,200 Class 1E cables. To date, the reinspection is approximately 91% complete.

Because a 100% reinspection of all Class 1E cables is being carried out, the concern that only a partial overinspection was being conducted, raised in Attachment A, page 2, paragraph 2 and Attachment B, paragraph 1 of Mr. Keppler's October 29, 1983 testimony, has been addressed.

Q4. Mr. Rutgers, what is your response to the statement concerning the use of a statistical analysis for addressing the adequacy of quality control inspections of pipe supports during 1980 as stated in Mr. Keppler's October 29, 1982 testimony, Attachment A, Technical Issue 3?

A4. During May 1981, the NRC conducted an inspection where they noted that some pipe supports installed in 1980 had not been installed in accordance with the design drawing and specification requirements. As a result of this, MPQAD conducted an overinspection of a sample of 123 supports installed prior to January 1, 1981, for the purpose of assessing the acceptability of the original installations and inspections. Fifty-five (45%) of the 123 supports inspected were found to have at least one nonconforming condition. None of the nonconforming conditions existing with these 55 supports presented a safety concern. In a report submitted to the NRC in August 1982, this information was presented in the form of number of characteristics overinspected. While the report did include statistics, its main theme was specification of the problems and planned corrective actions. The report documented our approach which is outlined below.

The report analyzed the nonconforming conditions,

classifying them into 14 groups. This assisted in ensuring that the problem was understood and therefore was useful in determining the significance of the nonconformances and in framing appropriate corrective actions.

For 9 of the groups of nonconforming conditions it was determined that there would be no impact on safety even if the condition should occur elsewhere in the plant. An example would be a member which has a length exceeding the design drawing dimension but which is attached to the structure in the correct place and supports the pipe at the pipe's correct location. For the remaining five conditions (missing components, incorrect component orientation, incorrect clevis rotation, incorrectly located welds, and incorrect clearances between pipe and support) which could be a concern if they occurred elsewhere in the plant, additional inspections were planned to ensure that these were identified and resolved if they existed elsewhere. Planned inspections were:

1. Prior to turnover, field engineers and QC inspectors were to perform additional inspections of each hanger installed prior to January 1, 1981 for, among other things, missing components, incorrect component orientation, incorrectly located welds, and

incorrect clevis rotation.

2. Design engineers were to inspect for correct clearance between pipe and support for all Q supports in addition to previously planned items of inspection during their functional stress walkdown. This inspection was to apply to all Q supports regardless of installation date.

Subsequent to their review of this plan, the NRC requested that Consumers Power Company reinspect all pipe supports installed prior to January 1, 1981, and reinspect a sample of pipe supports installed after January 1, 1981. Later, during development of the Construction Completion Program, we concluded that it would be more practical and timely to reinspect all installed supports regardless of the time of their installation or turnover.

Additionally the following actions are planned coincident with the Construction Completion Program:

1. Improve the quality of pipe support installation by requiring installation checkoff lists for crafts, craft supervision, and field engineers; by consolidation of dimensional tolerances to simplify specification

interpretation; and by reducing field-initiated changes through an improved space control program.

2. Rewrite Project Quality Control Instructions (PQCIs) to incorporate acceptance criteria into the inspection instructions. Project engineering and field engineering are reviewing these to ensure that correct interpretations of requirements are provided in the inspection instructions. Reinspections will be performed with these revised PQCIs.

The reinspections for all attributes and the planned actions described above will ensure the adequacy of pipe support construction.

Q5. Mr. Rutgers, would you please explain the situation involving use of a Coordination/Installation Form as described in Attachment B, paragraph 3 of Mr. Keppler's October 29, 1982 testimony?

A5. At a May 28, 1982 NRC exit meeting, Mr. R. Gardner of NRC stated the need for a coordination form to interface and control the sequencing of work. The approval of this form was necessary to allow underpinning instrumentation installation to continue.

A conversation was held between Mr. M. Schaeffer

of MPQAD and Mr. Gardner of the NRC on June 1, 1982, confirming NRC approval of a coordination form which had been drafted by MPQAD and Bechtel engineers.

During June, 1982, a meeting was arranged with working level representatives from Bechtel and MPQAD to review the instrumentation work and develop additional coordination forms. When the Bechtel site manager and his staff reviewed the outcome, they suggested changes in the format of the coordination forms including the form previously approved by NRC, primarily to distinguish the coordination forms from other quality related documents.

Subsequently, on June 18, 1982, Mr. Schaeffer phoned Mr. Gardner and obtained his approval for use of the revised coordination form and the additional forms. Mr. Schaeffer advised Mr. Gardner that the changes to the previously approved coordination form were administrative and that they did not change the intent or purpose of the form. Following the approval by Mr. Gardner, the forms were posted in the field for use by the field engineers and superintendents.

Q6. Does the foregoing issue suggest that Bechtel determines the regulatory environment for the Midland project?

A6. An engineer-constructor for a nuclear plant does

not dictate the regulatory environment under which it will work. This is the purview of the NRC and the owner. Bechtel does advise and make recommendations to Consumers Power Company. In the case of this particular coordination form, the advice from Bechtel supervision happened to follow contact between Consumers and the NRC, thereby accentuating Bechtel's input. Normally, Bechtel's review and input would occur before NRC approval is sought. We feel that such advice would be expected from an experienced contractor who performs design, procurement, and construction. It is clearly understood that Consumers Power Company and the NRC have review and approval authority. There was no attempt to use a revised form without such approval and there is no question that Consumers does dictate the regulatory environment.

Q7. Mr. Rutgers, would you please respond to the concern raised in Mr. Keppler's October 29, 1982 testimony, Attachment B, paragraph 4, regarding deficiencies in material storage conditions and procedures at the Midland site?

A7. Consumers Power Company and Bechtel are committed to a storage and maintenance program that covers all

materials and equipment which are stored at the Midland site or are in place in the plant. This storage and maintenance program's objective is to preclude significant degradation of any material or equipment. Problems related to storage have occurred, but when they have, steps have been taken to resolve them.

For example, in recognition of the extension of project schedule announced in early 1980, a special task force, the Long-Term Environmental Control Working Group, was formed to identify and resolve long-term storage problems. Initially, the group, consisting of representatives from Consumers Power Company, Bechtel, and Babcock & Wilcox, met bi-monthly. Later, the meetings were monthly. Specific items addressed by the group were:

1. Secondary Side of the Once Through Steam Generator
2. Turbine Lay-Up
3. Pipe Cleanliness
4. Main Feedwater Pump Turbine Lube Oil System
5. Condensate Pumps
6. Evaporator System

Meetings were chaired and documented by Consumers Power Company and provided a means for Consumers Power Company, Bechtel, and Babcock & Wilcox to air and

resolve storage and maintenance concerns on the spot. In some instances, specific detailed instructions were generated as a follow-up to the meeting. A specific example of this was a Contractor Work Request (CWR), generated for the lay-up of the evaporator system. With storage problems resolved for the major pieces of equipment, the group was dissolved.

We have responded to problems noted in routine audits. The routine auditing process by MPQAD in 1981 and early 1982 identified several areas of concern in regard to Bechtel's outside storage and maintenance program. In general, the biggest areas of concern were:

1. Missed storage/maintenance intervals.
2. Material not properly protected from the elements.
3. Material not maintained as required by procedure.
4. Inspection intervals were too far apart.

In response to these concerns the manual method of tracking storage intervals was superseded in January 1982 by a computerized method of control which has proven far more effective in maintaining on-time inspections.

Another step to improve storage was taken when in November 1982, in addition to the vendor recommended

storage/maintenance intervals, field engineering instituted weekly checks of the Poseyville laydown area to review storage conditions. We are monitoring the results of these reviews and taking corrective actions as conditions warrant. Additionally, in response to two findings involving marking of material documented in the NRC's special inspection related to the diesel generator building, Inspection Report 82-22 (February 8, 1983), formal quality control inspections of various jobsite laydown areas were changed from monthly to weekly and procurement personnel responsible for marking steel were retrained.

I believe that our responses to problems noted in the material storage and maintenance program are positive. Bechtel and Consumers are both committed to proper material storage and maintenance. This commitment is illustrated by the changes that have been implemented.

Q8. Mr. Rutgers, would you please respond to the concern about support of cables awaiting routing or termination raised in Mr. Keppler's October 29, 1982 testimony, Attachment B, paragraph 5?

A8. Meeting in-process requirements for installation of cables is a particularly difficult aspect of con-

struction -- one which constantly provides the potential for nonconformances, especially in the area of cable coil support and end-capping. We are alert to this potential and respond to indications of problems. Thus, as nonconformances have been identified, prompt action has been taken to correct the conditions. Additionally, throughout 1981 and 1982, construction management and the electrical superintendent issued memoranda to their supervision and foremen calling for improvement in their performance in supporting coils and end-capping. Such supervisory actions served to reinforce long standing field procedures such as electrical field procedure, FPE-4.000, originally issued in 1977 and revised in August 1981, to provide instruction for supporting cable coils to field installation personnel. Additionally, in response to reported coil support nonconformances, and in order to provide an overcheck and to keep management informed of performance in congested cable termination areas like the control room, in August 1981, we added a check for proper coils support in in-process inspection project quality control instruction (PQCI) E-1.60. This instruction currently requires a weekly inspection of selected plant areas for conformance to seven installation attributes including coils support.

We have included support of cable coils in a continuing orientation program for electrical supervision, foremen and craftsmen in electrical field installation procedures. Moreover, our inspections will continue and prompt action will be taken to correct any problems detected.

These actions illustrate our continuing attention to this concern.

Q9. Would you please respond to the assertion in Mr. Keppler's October 29, 1982 testimony, Attachment B, paragraph 6, that there was an inordiante amount of resistance to marking instrumentation impulse lines?

A9. The NRC, during an inspection at the end of April 1981, raised a concern relating to identification of safety-related instrumentation impulse lines. Initially, there was a period of time during which we did not understand that the NRC's concern with identification of instrumentation impulse lines referred to physically marking the lines rather than identification of the lines on drawings. Ultimately, we understood that the NRC's position was that instrumentation impulse lines are part of the protection system and therefore are required to be physically marked pursuant to IEEE Std. 279-1971. Our position was that marking of instrumentation

impulse lines was not a requirement of IEEE Std. 279-1971. We interpreted the scope of IEEE Std. 279-1971 to be from the transmitter to the actuating device and not to include impulse lines. Our practice is to classify impulse lines as an extension of the process lines and therefore govern them by ASME criteria, rather than IEEE standards. The NRC disagreed with this position and asked for additional response.

Consumers Power Company subsequently responded to the NRC and agreed to identify each safety grade impulse line with a two-letter designator. Thereafter, Consumers directed Bechtel to initiate actions to support the commitment to the NRC. Bechtel followed Consumers Power Company's direction, but also reiterated our differing interpretation of IEEE Std. 279-1971 from that of the NRC.

Q10. Mr. Rutgers, what is your response to paragraph 7 of Attachment B of Mr. Keppler's October 29, 1982 testimony which cites the licensee's attitude toward the NRC's finding of improperly installed drop-in anchors as an indication that slipshod workmanship is tolerated on the Midland project?

A10. Bechtel helped to pioneer nuclear power technology out of a firm conviction that nuclear energy could become a clean, safe, economical way to generate electricity. We have had prime responsibility for en-

gineering or construction of about 40% of the nuclear power units presently in operation in the United States. In the course of our nuclear activities we have achieved a work record of three times fewer lost work days from injuries on nuclear power projects than the heavy construction industry average. Twelve Bechtel nuclear power projects have achieved one or more million hours worked without a lost-time injury. The Midland project has achieved this record three times. I offer this as background because I believe that this track record is not one of a company which tolerates "slipshod" performance in any aspect of its work.

While I am proud of our accomplishments, I must acknowledge that we are not perfect -- nor is any enterprise consisting of human beings. What we are attempting to foster are attitudes of improvement. These include striving for the next million hours without lost-time injury and striving for zero defects relative to design requirements. We view these commitments to excellence as being incumbent on individual performers and we orient all employees to our safety program and to our quality improvement program. Basically, we expect safety and quality to be built in. Although we have high expectations of individual performance, our work processes include checks on this performance. Employment of safety and quality control engineers are examples of these checks.

We have been criticized by NRC for over-reliance on the checks in our process, and I can understand and accept this criticism as being constructive. At the same time, I think it is important to recognize that checking is part of our process and it is important to management to probe findings to see if the total process is working. In the case of drop-in anchors, as I understand the situation, the work coordination forms showed the work to be construction complete when in fact one anchor did not have the proper embedment depth. Because of this improper embedment, the work did not conform to design requirements, and that is not satisfactory performance in our book.

I agree that when conformance is achieved upstream in the process, we are all better off. That is what is behind our quality improvement motto "Do it right the first time." At the same time, in this instance I cannot ignore the fact that the total process was not complete -- the checking by QC had not been performed. Therefore I cannot conclude that a total process failure had occurred. As a manager, I believe I have the right to rely on the total process to produce a product conforming to requirements without being viewed as tolerating "slipshod workmanship."

We have reviewed our installation and checking process effectiveness based on the results of the 1982-1983 diesel generator building inspection which found

some instances of nonconforming work which had escaped the QC inspection process. In response to the inspection findings, Consumers initiated the Construction Completion Program which includes both verification of past work and improved control of future work. This improved control addresses clearer communication of design requirements and work acceptance criteria to the performers, and better coordination of the inspection activities in the total work process. We believe the craftsmen's skills are excellent -- essentially their work reflects the instructions they have been given. What management must do is insist that design, supervision, and field engineering are lockstepped to assure that the instructions given are exactly in accordance with design and procedural requirements and, if for some reason changes are required, that not only are they properly approved before work is performed but also the record proves that they were.

In summary, I do not believe that Bechtel tolerates "slipshod workmanship." We simply have no incentive to do anything other than to strive for excellence. Our record in the nuclear industry is a good one and we want to keep it that way. It is my expectation that the verification conducted under the Construction Completion Program will give us valuable feedback regarding the true condition of the plant. We

will use this feedback constructively and adapt our approaches to see that the plant is constructed in a manner which protects the public health and safety.

Q11. Mr. Rutgers, would you respond to the view expressed in Mr. Keppler's October 29, 1982 testimony, Attachment B, paragraph 10 that there is an unwillingness on the part of Bechtel to share information with the NRC as reflected by the response to an NRC inspector's request to review resumes of persons involved in remedial soils work?

A11. Bechtel is not reluctant to provide information to the NRC. With regard to the example cited, Dr. Ross Landsman indicated on May 18, 1982 during a site entrance meeting that he would like to see the resumes of the geotechnical engineers. The resumes were maintained in the Ann Arbor Personnel Department. Because these resumes contain personal information, such as family data and career aspirations, they are not routinely provided to third parties.

On May 21, 1982, at the exit meeting, we provided Dr. Landsman with resume information prepared to respond to his request, but which excluded personal information which we believed unnecessary to his purpose. Dr. Landsman commented that the information provided was not specific enough. In response, Dr. Landsman was advised that day that more detailed re-

sumes would be prepared consistent with an FSAR level of detail and telecopied to him in Glen Ellyn. These resumes were sent on May 25, 1982.

In order to avoid this problem in the future, the current practice is to provide suitable resumes at the site for resident structural engineers and resident geotechnical engineers.

Q12. Mr. Rutgers, would you please respond to the concern raised at the end of paragraph 11 in Attachment B to Mr. Keppler's October 29, 1982 testimony that there may be "memorandums written to the effect that 'peripheral vision' should be curtailed and communication with the NRC stifled?"

A12. I am aware of no memoranda to this effect, and I say that having learned of this concern on NRC's part some time ago and having made attempts to uncover any memoranda which could have led to this concern. We have identified one memorandum which was issued about two years ago denoting individuals within the Bechtel organization at Midland responsible in various subject areas for responding to questions from Consumers Power Company, NRC, or other Bechtel personnel not assigned to the Midland Project. (Attachment A). It may be that this memorandum either by mischaracterization or misunderstanding has given rise to the concern registered by NRC. This memorandum was issued to minimize the

opportunity for inadequate or incorrect responses to questions beyond the knowledge of individuals who may be questioned in areas outside their responsibility. The memorandum served to provide all personnel with a common list of knowledgeable persons in the various disciplines and technical areas. Referral of questions to these cognizant individuals identified in the memorandum was intended to allow a more rapid and factual response and to facilitate a more productive process for responding to questions.

The memorandum was in no way intended to inhibit communications. In fact, the intent was just the opposite. It was designed to identify individuals who could provide information when questioners sought information in a given subject area and to alert employees to the availability of these resources. It did not address situations where a questioner was interested in the knowledge of a particular person rather than information about a particular subject, regardless of the source. Nor did it address any individual employee's right to initiate discussions with anyone -- NRC or anyone else.

Two memoranda are attached to this testimony. We expect that the concern expressed by NRC may have come from the earlier memorandum promulgated in January 1981. Thus, after learning of the concern, the memo-

randum was reviewed with that sensitivity in mind and rewritten to ensure there was no misunderstanding among Bechtel employees or within NRC. The second memorandum, issued in November 1982, remains in effect for our employees. (Attachment B).

Q13. Mr. Rutgers, would you please explain Bechtel's treatment of cost and scheduling as related to quality on the Midland project, a subject discussed in Mr. Keppler's October 29, 1982 testimony, Attachment D, Enclosure 4, page 2?

A13. We do not agree that quality is taking a back seat with Bechtel management. We do agree that cost and schedule are emphasized, but not to the detriment of quality. All three are essential.

As project manager, I must respond to Consumers in all three areas. Any two alone out of three are just not responsive to the requirements of a major project. Schedule and cost objectives are generally best served by doing work right and doing it only one time.

When I was assigned to Midland in late 1979 I noted that there were no routine project management level meetings of all team members with an agenda solely dedicated to quality issues. Accordingly, I expanded the monthly meeting of the Bechtel team to include a quality agenda. The agenda included progressing closure of open quality actions and reviewing

quality trend reports for management action. I continued to chair this meeting after formation of MPQAD and until September of 1982 when weekly meetings chaired by Mr. Cook were initiated.

I recently have sought counsel from higher Bechtel management and from Consumers as to priorities involving cost, schedule, and quality. Their guidance states that all three are priority, with quality standing first. I do not view this guidance as contrary to the philosophy my team has espoused in the past. We will continue to emphasize quality in the construction of the Midland Plant.

# Bechtel Power Corporation

**Inter-office Memorandum**

| | | | |
|---|---|---|---|
| To | Distribution | Date | January 29, 1981 |
| Subject | Job 7220 Midland Project<br>Quality Assurance Matrix<br>0-3695 | From | L.E. Davis |
| | | Of | Construction |
| | | At | Midland, Mi. |
| Copies to | J. Rutgers (AA) P. Hansen (AA)<br>L. Curtis (AA) | | |

The attached matrix identifies individuals who are to respond to questions posed by the Client, NRC, or other outside agencies during their routine visits, inspections and audits at the job site.

The purpose of this authorization is to minimize the opportunity for inadequate or incorrect responses to specific questions. The identification of individuals will also allow for more rapid, factual responses.

Contacts with AAO engineering staff should be handled through the identified QA engineer and the resident engineer.

Individuals not identified on the attached matrix should contact their supervisor when questioned by the Client or an NRC or other outside or non-project agency.

L.E. Davis

LED/JR/jrm

Attachment - Quality Assurance Matrix

Attachment A
Rutgers' Testimony
4/11/83

RESPONSES

| ACTIVITY | FIELD ENGINEER | QC | TURNOVER | SERVICES | QA | ENGINEERING | ENGINEERING | Labor Relations | Rev. February 7, |
|---|---|---|---|---|---|---|---|---|---|
| All | J. Gilmartin<br>J. Potts<br>Schonbrunn | E. Smith<br>Russell<br>Kirber | Choy-Hee<br>Ryoung | R.W. Soderholm | M. Dietrich<br>A. McClure | Corcoran<br>T. Supplee | Rothwell | | |
| CSull | Gagnon<br>Weber | | R/I | N/A | Seve | J. Hoebwater<br>B. Chakrabarti | Bhar | | |
| Post-Functioning | Potts<br>Gagnon | S. Galnett<br>P. Vandervoor | N/A | N/A | Seve | J. Hoebwater | S. Le | | |
| Mech/Pipe. Pipe | Dunbar<br>Hendricks | Creel<br>Fugate | N/A | N/A | M. Dietrich<br>A. McClure | F. Grawes<br>L. Hutchins | D. Anderson<br>Tulloch | | |
| Sm. Pipe & Hangers | G. Smith<br>B. McKenzie | Creel<br>Fugate | R/I | N/A | M. Dietrich<br>A. McClure | M. Rothwell<br>F. Young | Tulloch | | |
| Electrical | Collin<br>B. Scott | Aloesworth | N/A | N/A | Dietrich | G. Varner<br>C. Dowtt | Kanowitz<br>J. Kovach<br>G. Ellis | | |
| Instrumentation | G. Smith<br>B. McKenzie | Creel<br>Fugate | N/A | N/A | McClure | J. Mayer<br>J. Clinton | J. Anderson | | |
| Welding | M. Keene<br>G. Savale | Daly<br>Harrison | N/A | N/A | M. Dietrich<br>A. McClure | N/A | D. Anderson | | |
| Turnover | TBD | Russell | Choy-Hee<br>Ryoung | N/A | M. Dietrich | N/A | Hughes | | |
| Documentation/<br>Document Control | R/I | Foote<br>Reigelsperger | Choy-Hee | Hollstrom<br>J. Davis | McClure | N/A | M. Bakarich | | |
| Subcontracts | N/A | Siple<br>Russell | Choy-Hee | Littydkite<br>C. Cross | M. Dietrich | N/A | Hughes<br>D. Lewis | | |
| Field Procurement/<br>Receiving Inspection | N/A | Delaney | Choy-Hee | Stebbs<br>Reigelsperger | A. McClure | N/A | Hughes<br>C. Ash | | |
| IEB Audits by SRB<br>Brchtel personnel,<br>State or Federal<br>offices | N/A | N/A | N/A | | | | | Dort | |
| NLRB Investigations | N/A | N/A | N/A | | | | | Dort | |
| Legal matters con-<br>cerning manual<br>personnel | N/A | N/A | N/A | | | | | Dort | |
| Dept. of Labor<br>Inquiries | N/A | N/A | N/A | | | | | Dort | |

*Also responsible for Safety, Finance & Accounting.

DISTRIBUTION

C. Choy-Hee
P. Corcoran
L. Davis
M. Dietrich
J. Gilmartin
O. Holman
M. Petersen
E. Reinsch
E. Smith
D. Soderholm
T. Valenzano
R. Weatherred
B. Akerly
J. Gilmartin
J. Lillywhite
J. Meilstrup
L. Morfin
E. Newman
J. Russell
L. Brown
J. Steele
C. Stubbs
S. Suggs
B. Sutherland
D. Wharff
B. Netzela
H. Adler
M. Baker
J. Betts
R. Bradford

C. Cross
B. Daly
C. Dart
J. Davis
D. Delaney
T. Foote
S. Gelnett
H. Hudson
S. Hulsey
E. Lawrence
W. Lemke
N. Ainsworth
B. Collin
D. Naberhaus
K. O'Neil
B. Reigelsperger
J. Savoie
S. Schumitsch
R. Dunbar
R. Siple
G. Smith
P. Solomon
D. Tewes

# Bechtel Power Corporation

## Inter-office Memorandum

| | | | |
|---|---|---|---|
| To | Distribution | Date | November 10, 1982 |
| Subject | Job 7220 Midland Project<br>RESPONSE MATRIX<br>0-5097 | From | L.E. Davis |
| | | Of | Construction |
| Copies to | J.A. Rutgers (AA) w/a<br>P.K. Hansen (AA) w/a<br>W. Greenwell (AA) w/a | At | Midland, Michigan |

This IOM is to add further clarification to the subject.

Individuals, when approached by any outside agency, should answer questions specifically in his area of responsibility. If the question or situation exceeds the individual's precise and specific area of responsibility, he should inform the outside agency of his lack of knowledge and refer the agency to the identified cognizant supervisor in the subject matrix.

The purpose of this referral is to minimize the opportunity for inadequate or incorrect responses to question beyond the knowledge of the questioned individual. The referral to these identified cognizant individuals is intended to allow for more rapid and factual responses and facilitate a more productive process for the questioning agency.

Contacts with Ann Arbor Engineering staff should be referred to the identified Quality Assurance engineer and/or the resident engineer.

If you or individuals under your responsibility have any questions concerning this subject, please contact me.

L.E. Davis

LED/jrm

Attachment: Response Matrix

Written Response Requested: No

Attachment B
Rutgers' Testimony 4/11/83

November 9, 1982

| ACTIVITY | FIELD ENGINEER | QC | TURNOVER | SERVICES | QA | ENGINEERING | ENGINEERING | LAB. |
|---|---|---|---|---|---|---|---|---|
| Civil | J. Gilmartin<br>P. Goguen | E. Smith<br>R. Siple | G. Collins<br>G. Cully | L. Davis | M. Dietrich<br>A. McClure | P. Corcoran<br>D. Anderson<br>D. Riat | E. Hughes | Howard |
| Coatings | P. Goguen<br>S. Harvey | S. Kirker<br>E. Dutton | N/A<br>- | N/A | M. Dietrich<br>A. McClure | B. Senn<br>J. Rysdon | S. Sobkowski | |
| Field Soils Org. | J. Fisher<br>D. Lavelle | M. Blendy<br>D. VanDoorne | R. Groshong | N/A | M. Dietrich<br>A. McClure | E. Cvikl<br>J. Darby | N. Swanberg | Howard |
| Mech/Lge. Pipe | H. Harl<br>A. Kiliszek<br>L. Harrison | D. Fredianelli<br>C.R. Amos | N/A | N/A | M. Dietrich<br>A. McClure | D. Hannekamp<br>V. Chawla | R. Tulloch<br>T. Ballweg | |
| Mech. Pipe & Hangers | R. Harl<br>J. Franklin | D. Fredianelli<br>C.R. Amos | N/A | N/A | M. Dietrich<br>A. McClure | D. Riat<br>F. Almeida | R. Tulloch | |
| Electrical | D. Scott<br>R. Black | D. Preslar<br>J.W. Miller | N/A | N/A | M. Dietrich<br>A. McClure | G. Warner<br>P. Kelly | J. Kovach<br>A. Julkae | |
| Instrumentation | D. Rennick<br>C. Fugate | D. Fredianelli<br>C.R. Amos | N/A | N/A | M. Dietrich<br>A. McClure | T. Lui<br>J. Clinton | G. Singh<br>D. Simpson | |
| Welding | S. Sprague | D. Fredianelli<br>E. Stankiewicz | N/A | N/A | M. Dietrich<br>A. McClure | N/A | T. Ballweg | |
| Turnover | J. Gilmartin | R. Siple<br>M. Allard | G. Cully<br>B. McKenzie | N/A | M. Dietrich<br>A. McClure | N/A | K. Hodgin | |
| Documentation/ Document Control | N/A | R. Siple<br>M. Allard | G. Cully<br>B. McKenzie | J. Card | M. Dietrich<br>A. McClure | N/A | M. Bakarich | |
| Subcontracts | N/A | E. Smith | G. Cully<br>B. McKenzie | C. Ash(except HVAC)<br>K. Pulito(B&W)<br>B. Thind<br>D. Graf (HVAC) | M. Dietrich<br>A. McClure | N/A | E. Hughes | |
| Field Procurement/ Receiving Inspection | J. Gilmartin | S. Kirker<br>R. MacGlashan | G. Cully<br>B. McKenzie | Stubbs<br>Reigelsperger | M. Dietrich<br>A. McClure | N/A | E. Hughes | |
| QA Audits by SFHO Contract personnel, State or Federal Agencies | N/A | N/A | N/A | | | | | Howard |
| QA Investigations | N/A | N/A | N/A | | | | | Howard |
| Legal matters concerning manual personnel | N/A | N/A | N/A | | | | | Howard |
| Dept. of Labor Inquiries | N/A | N/A | N/A | | | | | Howard |
| QSO | J. Reinsch | J. Russell | J. Reinsch | J. Reinsch | J. Russell | P. Corcoran | N/A | Howard |

C-5097

DISTRIBUTION:

G. Collins
P. Corcoran
M. Dietrich
J. Gilmartin
J. Howanitz
D. Lavelle
J. Meilstrup
D. Naberhaus
K. O'Neill
J. Reinsch
E. Smith
C. Stubbs
T. Valenzano
C. Ash
B. Bane
J. Betts
L. Brown
G. Cully
J. Davis
J. Eddy
J. Fisher
D. Fredianelli
P. Goguen
D. Graf
S. Kirker
B. Matthews
D. McIntosh
C. Norberg
D. O'Dell
D. Preslar
K. Pulito
J. Russell
D. Short
B. Siple
J. Steele
R. Weight
R. Amos
M. Baker
R. Bradford
D. Burnard
J. Card
E. Entrekin
B. Gamble
S. Harvey
T. Klug
G. Lawrence
H. Lohr
R. MacGlashan
R. Marl
M. Martin
B. McKenzie
R. Murphy
C. Newville
B. Reigelsperger
D. Rennick
L. Rice
D. Scott
G. Simoneau
S. Sprague
B. Thind
L. Williams
C. Valot

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|---|---|---|
| In the Matter of: | ) | Docket Nos. 50-329 OM |
| | ) | 50-330 OM |
| CONSUMERS POWER COMPANY | ) | Docket Nos. 50-329 OL |
| (Midland Plant, Units 1 & 2) | ) | 50-330 OL |

CERTIFICATE OF SERVICE

I, Rebecca J. Lauer, one of the attorneys for Consumers Power Company, hereby certify that a copy of Testimony Of John A. Rutgers On Quality Assurance was served upon all persons shown in the attached service list by deposit in the United States mail, first class, this 12th day of April, 1983 except where service was made as otherwise indicated.

Rebecca J. Lauer
Rebecca J. Lauer

ISHAM, LINCOLN & BEALE
Three First National Plaza
Suite 5200
Chicago, Illinois 60602
(312) 558-7500

## SERVICE LIST

Frank J. Kelley, Esq.
Attorney General of the
State of Michigan
Carole Steinberg, Esq.
Assistant Attorney General
Environmental Protection Div.
720 Law Building
Lansing, Michigan 48913

Cherry & Flynn
Suite 3700
3 First National Plaza
Chicago, Illinois 60602

* Mr. Wendell H. Marshall
4625 S. Saginaw Road
Midland, Michigan 48640

* Charles Bechhoefer, Esq.
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

* Dr. Frederick P. Cowan
6152 N. Verde Trail
Apt. B-125
Boca Raton, Florida 33433

* James E. Brunner, Esq.
Consumers Power Company
212 West Michigan Avenue
Jackson, Michigan 49201

Mr. D. F. Judd
Babcock & Wilcox
P. O. Box 1260
Lynchburg, Virginia 24505

* Barbara Stamiris
5795 North River Road
Route 3
Freeland, Michigan 48623

Steve Gadler
2120 Carter Avenue
St. Paul, Minnesota 55108

Atomic Safety & Licensing
Appeal Panel
U. S. Nuclear Regulatory Comm.
Washington, D.C. 20555

*Mr. Scott W. Stucky
Chief, Docketing & Services
U.S. Nuclear Regulatory Comm.
Office of the Secretary
Washington, D.C. 20555

*Ms. Mary Sinclair
5711 Summerset Street
Midland, Michigan 48640

*William D. Paton, Esq.
Counsel for the NRC Staff
U.S. Nuclear Regulatory Comm.
Washington, D. C. 20555

*Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

*Jerry Harbour
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Lee L. Bishop
Harmon & Weiss
1725 "I" Street, N.W. #506
Washington, D.C. 20006

*Ms. Lynne Bernabei
Mr. Thomas Devine
Mr. Louis Clark
Government Accountability
Project of the Institute
for Policy Studies
1901 Q Street, N.W.
Washington, DC 20009

*Federal Express