

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329

Docket No. 50-330

As a result of the inspection conducted on January 22 - February 20, 1983, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion II requires holders of construction permits for nuclear power plants to document, by written policies, procedures, or instructions, a quality assurance program which complies with the requirements of Appendix B for all activities affecting the quality of safety-related structures, systems, and components and to implement that program in accordance with those documents.

Contrary to the above, Consumers Power Company and it's contractor did not adequately implement a quality assurance program to comply with the requirements of Appendix B as evidenced by the following examples:

- A. Consumers Power Company Quality Assurance Program Policy No. 6, Revision 13, requires that documents which prescribe activities affecting quality be prepared, issued and controlled according to written procedures and that these documents be reviewed for adequacy and approved for release.

Contrary to the above:

1. Measures were not established to control the issuance of Administrative Guidelines which described activities affecting quality. The Administrative Guidelines were not reviewed for adequacy or approved for release by the licensee. Two examples were:
 - a. Administrative Guideline M4.00, Piping System Walkdowns, Revision 0, October 28, 1982.
 - b. Mechanical Guidelines for System Turnover, Revision 1, no date.
2. The CPCo Soils Section was using an out-of-date drawing C1424, Revision 2, instead of Revision 3 to review and approve underpinning Pier 11 work.

- B. Consumers Power Company Quality Assurance Program Policy No. 18, Revision 13, requires that audit results be documented and the findings resolved....

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Contrary to the above, on September 22, 1982, during audit MQ1-333-2, auditors determined that unofficial Attachment 10 forms were being used by QC inspectors to document nonconformances and deficiencies instead of using In Process Inspection Notices. This audit finding was drafted in pencil, however, the finding was not included in the above audit report and there was no evidence that a management review of this finding was conducted.

- C. Consumers Power Company Quality Assurance Program Policy No. 16, Revision 13, requires that conditions observed or identified which are adverse to quality are considered for corrective action. The policy further requires that the corrective action be documented and the status be reported to management.

Contrary to the above, a determination of significance and corrective action was not taken on approximately 500 Attachment 10 forms which were written by QC personnel and were identified as containing nonconformances and deviations that were adverse to quality.

- D. Consumers Power Company Quality Assurance Program Policy No. 2, Revision 13, Paragraph 3.2 states, in part, "The Quality Assurance Program assures that structures, systems and components important to the safety of the power plant...have been...erected...to standards commensurate with the safety function to be performed."

Contrary to the above, "Q" activities, including the performances of load calculations for "Q" electrical conduit hangers, were being accomplished in accordance with non-"Q" work procedures/instructions.

This is a Severity Level III 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.

April 6, 1983
Dated

James G. Keppler
James G. Keppler
Regional Administrator

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/83-03(OSC); 50-330/83-03(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: January 22 - February 20, 1983

Inspectors: *J.J. Hamison for*
B. L. Burgess

4/5/83

J.J. Hamison for
R. J. Cook

4/5/83

R. N. Gardner
R. N. Gardner

4/5/83

R. B. Landsman
R. B. Landsman

4/5/83

Approved By: *J.J. Hamison for*
W. D. Shafer, Chief
Section 2, Midland

4/5/83

Inspection Summary

Inspection on January 22, - February 20, 1983 (Reports No. 50-329/83-03(OSC); 50-330/83-03(OSC))

Areas Inspected: Licensee actions on previously identified items; allegations; Quality Control inspector training and recertification activities; conduit hanger loading calculations; document control; excavation permit system; third party independent assessment; underpinning pier concrete; remedial soils work activities; quality assurance audit; diesel generators and laydown area. The inspection involved a total of 258 inspector-hours onsite by five NRC inspectors including 27 inspector-hours onsite during offshifts.

Results: Of the 12 areas inspected, no items of noncompliance or deviations were identified in nine areas; one item of noncompliance with four examples was identified in the remaining three areas (failure to provide a quality assurance program over "Q" activities - Paragraph 2.c; failure to control the issuance of documents - Paragraphs 1.a and 3; failure to identify and correct nonconformances - Paragraph 1.c; failure to document and resolve audit findings - Paragraph 1.b).

83-4220552

DETAILS

Persons Contacted

Consumers Power Company

R- A. Wells, Executive Manager
D. Miller, Site Manager
M. L. Curland, Site QA Superintendent
E. Jones, MPQAD
J. K. Meisenheimer, MPQAD
B. H. Peck, Construction Superintendent
M. J. Shaeffer, MPQAD
R. M. Wheeler, Technical Section Head
R. H. Wieland, Construction

Bechtel Power Company

L. E. Davis, Site Manager
M. A. Dietrich, PQAE

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

1. Licensee Actions on Previously Identified Items

(Closed) Unresolved Item (50-329/82-22-27; 50-330/82-22-27):

In a previous inspection a determination was made that QC inspectors were performing quality inspections and documenting observed deficiencies and nonconformances on an unofficial form identified as Attachment 10. A review of several hundred of the Attachment 10 forms revealed numerous examples of construction deficiencies and nonconformances that were not incorporated into the licensee's corrective action system.

- a. The use of the Attachment 10 form was described in a Bechtel Administrative Guideline, M-4.00, Piping System Walkdowns, Revision 0, October 28, 1982. This Administrative Guideline was not considered as part of the Quality Assurance Program and had not been subjected to any review or control process outside the Bechtel Organization.

The inspectors also noted that Attachment 10 forms had been in use since at least March 1981. Further review revealed that another Bechtel Guideline, Mechanical Guidelines for System Turnover, Revision 1, no date, contained guidance on the use of the Attachment 10 forms, however, the form was described as Attachment 8. This guideline had also not been subject to any review or control outside the Bechtel organization.

The use of unofficial non-quality documents to document QC inspection findings was considered an item of noncompliance with 10 CFR 50, Appendix B, Criterion II as described in the Appendix of the report transmittal letter. (50-329/83-03-01A(1); 50-330/83-03-01A(1))

- b. Discussions with MPQAD representatives revealed that Audit Report M01-333-2 described the misuse of the Attachment 10 forms and resulted in MPQAD forcing Bechtel QC to identify all nonconformances on In Process Inspection Notices (IPIN's). A review of the Audit Report did not verify that the Attachment 10 form problem had been identified as an audit finding.

Interviews with the QA Auditor responsible for the audit revealed that an Audit Finding on the Attachment 10 form problem had been drafted, but had not been included in the Audit Report. This was verified by reviewing the draft audit finding.

The failure to document audit results in order for the results to receive proper management review and corrective action was considered an item of noncompliance with 10 CFR 50, Appendix B, Criterion II as described in the Appendix of the report transmittal letter. (50-329/83-03-01B; 50-330/83-03-01B)

- c. A review of the licensee's Quality Trend Graph for the period August 29 - October 2, 1982, revealed that management was notified that QC had not been reporting inspection findings through the normal IPIN program. This was described by notation on the bottom of the Quality Trend Graph. The note stated that an agreement existed between the PFQCE (Bechtel QC) and construction (Bechtel) not to use IPIN's in order to facilitate the testing program.

On December 23, 1982, the same Quality Trend Graph was revised and re-issued. The revised Quality Trend Graph did not contain any reference to an agreement between Bechtel Construction and Bechtel QC.

As a result of these findings, an investigator was requested to assist in the inspection. The details of the investigative effort are described by a separate report (A3/83/002).

The conclusion reached by the investigator and inspector was that there was no intent on the part of the licensee to deceive by changing a quality record. The record contained the original graph, an annotated copy, and the final revised copy. Discussions with a licensee representative revealed he had made the change in order to clarify the issue discussed in the Quality Trend Graph notation.

The corrective action to prevent further use of the Attachment 10 form and to force QC to use the IPIN program appeared acceptable; however, the failure to review and disposition the deficiencies and nonconformances identified on the Attachment 10 forms since 1981 was considered an item of noncompliance with 10 CFR 50, Appendix B, Criterion II as described in the Appendix of the report transmittal letter. (50-329/83-03-01C; 50-330/83-03-01C)

2. Review of Conduit Hanger Loading

The inspectors reviewed the licensee's method for assuring that calculations were being performed to verify the adequacy of the loading of conduit hangers. During this review the inspectors determined the following:

- a. QC inspectors were not required to calculate the loading of conduit hangers. The licensee stated that the QC inspectors received training in the calculation of hanger loading and as a practice perform load calculations during their inspections of conduit installations.
- b. Field engineers were required to calculate the loading of conduit hangers. Individual field engineers interviewed by the inspectors stated that in all cases field engineers were calculating the loading of conduit hangers. The field engineers further stated that as class 1E and/or non-class 1E conduits are attached to a conduit hanger, calculations of the cumulative loading of the conduit hanger were performed. When questioned by the inspectors as to what written procedure/instruction delineated the requirement that conduit hanger loading calculations be performed to assure that the hanger loading was acceptable, the field engineers stated that these requirements were delineated in Bechtel Field Instruction FIE 3.320. Sections 4.5 and 4.8 of FIE 3.320 required the field engineers to perform the load calculations to determine the acceptability of conduit hanger loading.
- c. Bechtel Field Instruction FIE 3.320, Rev. 1, "Numbering Raceway Hangers" was identified as an instruction that did not contain "Q" related material. However, the installation of class 1E hangers and the subsequent verification of the adequacy of the loading of class 1E hangers (see paragraph b. above) was a "Q" activity. Performing load calculations on "Q" hangers utilizing "non-Q" instructions was an example of the licensee performing "Q" activities utilizing "non-Q" field instructions/procedures.

The inspector further identified that Bechtel Field Procedure FPE 3.000, Rev. 1, "Installation and Rework of Electrical Cable Tray and Conduit" has been designated as a procedure that contains both "Q" and "non-Q" related material. Examples of "non-Q" sections of FPE 3.000 were section 6.1 pertaining to the development of field routing drawings and section 6.4 which identified the requirement that QC be notified prior to the installation or rework of class 1E cable tray or conduit. This was a further example of the licensee performing "Q" activities utilizing "non-Q" field instructions/procedures. On March 1, 1983 the inspectors reviewed Consumers Power Company letters to Bechtel Power Corporation, dated March 1 and 5, 1982, in which MPQAD revised the scope of scheduled audits to exclude procedures FPT-1.000 and FIT-1.200 which were classified as "non-Q" even though the procedures pertained to "Q" activities. This failure of the quality assurance program to provide controls

over activities affecting the quality of "Q" items or activities was considered an item of noncompliance with 10 CFR 50, Appendix B, Criterion II as described in the Appendix of the report transmittal letter. (329/83-03-01D; 330/83-03-01D)

3. Document Control

- During the review of the design package with CPCo personnel for Pier 11, the inspector determined that the CPCo Soils Section controlled drawing file contained an out-of-date drawing. Revision 2 of drawing C1424 was on file instead of the required Revision 3. Since this department was responsible for ensuring that the NRC/CPCo work authorization procedure, the Bechtel/CPCo soils work permit procedure, and the Bechtel excavation permit system were followed, they are required to have the latest up-to-date revision of documents. Subsequently, the licensee issued Deviation Report No. D-MLD-83-15. The failure to maintain control over distribution of drawings was considered an item of noncompliance with 10 CFR 50, Appendix B, Criterion II as described in the Appendix of the report transmittal letter. (50-329/83-01A(2); 50-330/83-03-01A(2))

4. Excavation Permit System

At the ASLB hearing during the week of February 14, 1983, the inspector determined that the scope of the excavation permit system did not cover the underpinning work associated with the Auxiliary Building and the SWPS, as well as the rebedding and replacing of the Service Water Piping. It was recommended to the Board and the licensee by the inspector that these exceptions to the procedure be deleted. Subsequent discussions with the licensee indicated that they do not plan to implement this recommendation. The licensee was requested to document the basis for not using the excavation permit system as recommended. This is an open item. (50-329/83-03-02; 50-330/83-03-02)

5. Third Party Independent Assessment

A concern identified with the S&W independent assessment team was that they were not reviewing the design documents for technical adequacy. They were only performing an implementation review to ensure that the design documents were being followed in the field. From discussions with Stone and Webster personnel, it was determined that this parameter was not included in their contract with Consumers Power Company. The licensee agreed to include this in Stone and Webster's contract for the remaining work.

6. Underpinning Pier Concrete

- During a review of Mergentine's pier concreting procedure it was determined that the licensee had planned to use a superplasticizer as an additive to the concrete mix in lieu of good concreting practices, i.e., consolidation by vibration.

The licensee was using ACI 336 as his basis for not vibrating. The inspector informed the licensee that this publication was intended for circular drilled piers, better known as caissons. In fact, the publication stated that this document was not to be used for rectangular piers.

- The licensee continued to insist on not vibrating because they planned to use a superplasticizer. The inspector contacted various consultants including the Corp of Engineers and PCA. The overwhelming consensus was that using a superplasticizer was not a substitute for good concreting practices. The licensee, after considerable discussion finally agreed to vibrate all underpinning concrete in accordance with good engineering practice.

Another concern raised by the inspector was that they were going to allow a free fall of concrete of ten feet. With the high slump caused by the superplasticizer, this would almost surely have resulted in segregation of the concrete. Subsequently, the licensee decided not to use a superplasticizer. The inspector informed the licensee that previously accepted site concrete specifications and procedures only allowed for a free fall of five feet. The licensee agreed to limit the height of fall to an industry standard of five feet.

7. Remedial Soils Work Activities

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

- a. Proofload jacking of the East and West FIVP.
- b. Shallow probing to locate electrical ductbanks at BWST's #1 and #2.
- c. Conversion of seven existing water wells used to repair the 72" lake fill line to support SWPS dewatering.
- d. Release feedwater pipe hanger on East FIVP and install additional dial gauges during proofload jacking.

The licensee completed concreting of piers 12W and 12E during the report period.

8. Allegations

An inspection was conducted to address allegations concerning the Midland Plant contained in an affidavit received by NRC RIII. The inspectors contacted the allegor by telephone on February 17, 1982, and interviewed the allegor at his residence later the same day. The following allegations were addressed:

- a. Allegation No. 1: He has personally seen circumstances that suggest heavy alcohol consumption by workers on the job. Plant workers are purchasing alcoholic beverages at Owens Party Store while on their way to work.

- Review: There were no specific details the allexer could or would provide which related to poor workmanship or which resulted in damage to equipment due to onsite alcohol consumption. The NRC resident inspectors continually tour the site and have not observed any onsite consumption of alcohol. The licensee has the responsibility to prevent the onsite consumption of alcohol.
- Conclusion: Due to the lack of specific information provided by the allexer during the interview and in his affidavit and the absence of objective evidence found during the NRC review, there was insufficient basis for continued NRC investigation into this allegation. (Closed 329/82#01-01; 330/82#01-01)
- b. Allegation No. 2: Plant worker informed me that some truckers, for fifty dollars, will pick up anything in the plant they can carry - piping, tools, weld rod, material, etc. - and deliver to purchasers residence. He says this is common knowledge.
- Review: The allexer would not provide the NRC with the names of any individuals who allegedly had specific information in regards to this matter, nor could the allexer furnish such specific information.
- Conclusion: There was insufficient information for continued NRC investigation. (Closed 329/82#01-02; 330/82#01-02)
- c. Allegation No. 3: Other employees told me that Midland workers manufacture pipes and belt buckles out of nuclear material while they are idle on the job. I have personally seen such around town.
- Review: The allexer could not provide the NRC with information indicating that the installation of nuclear grade material or equipment had been jeopardized by the manufacture of pipes and belt buckles onsite. Misuse of material used in manufacture of buckles and pipe is a licensee concern - not an NRC regulatory concern.
- Conclusion: As stated in the review, misuse of material to manufacture pipes and belt buckles is not a NRC concern. In addition, there was insufficient information to justify continued NRC investigation. (Closed 329/82#01-03; 330/82#01-03)

d. Allegation No. 4: A security guard told me that a panel was missing from the back of the control room. Employees enter freely. This may explain some of the vandalism in the control room, which has been plagued with ripped out wires, cut cables and splattered paint.

Review: The allegor would not provide the NRC with the names of any individuals who supplied or could supply additional information. The instance of vandalism which the allegor had general knowledge of dealt with an incident which occurred approximately two-and one-half years ago. The licensee has recently established a security watch for the control room which precludes the uncontrolled access to the control room.

Conclusion: Lack of specific information regarding instances of onsite vandalism involving safety related systems and components negates further NRC investigation of this matter. (Closed 329/82#01-04; 330/82#01-04)

e. Allegation No. 5: Gambling is widespread, involving general foremen who run pools of up to one hundred dollars per member on games such as sportscore. He has heard that general foremen receive a cut of the operation. He is fearful that good workers will be retaliated against because of a bad debt causing conflicts with plant construction quality.

Review: The allegor would not provide the NRC with the names of any individuals who could provide specific information in regards to this allegation. The allegor's references to gambling related to sporting events such as football pools. The allegor had no personal knowledge of any instances in which construction quality was affected by onsite gambling.

Conclusion: There is insufficient information which would facilitate the continued NRC investigation into this matter. (Closed 329/82#01-05; 330/82#01-05)

f. Allegation No. 6: A Bechtel inspector who was a relative of a neighbor made internal challenges to plant construction and was rebuffed. The individual left Bechtel, and upon his return several years later, stated that construction was still stymied by the same defects that had been present two years earlier.

Review: The allegor would not provide the NRC with the names of any individuals who could provide specific information in regards to this allegation. The allegor did not have personal knowledge of any construction defects alluded to in the allegation.

Conclusion: The NRC has insufficient information which would facilitate the continued investigation into this matter. (Closed 329/82#01-06; 330/82#01-06)

g. Allegation No. 7: Consumers Power Company is rushing completion of the plant and is making repairs prematurely before obtaining NRC approval.

Review: The allegor stated that the issue of premature repairs pertained to the work on items for which design changes were made due to NRC required changes. The allegor stated that the costly repairs were also due to poor initial workmanship which was caused by poor licensee management controls. The allegor could not identify any specific component quality concerns.

Conclusion: The allegation dealt exclusively with monetary concerns and not with component quality concerns. Due to the lack of specific quality concerns there was insufficient information for continued NRC investigation. (Closed 329/82#01-07; 330/82#01-07)

h. Allegation No. 8: An electrician said that he has to do the same work over and over. Wrong sized conduits have been installed that had to be ripped out and replaced with larger conduits.

Review: The allegor would not provide the NRC with the name of the source of this allegation or with the names of any individuals who could provide specific information in regards to this allegation. The allegor stated that there was no known instance in which wrong sized conduits were installed and not subsequently replaced with the proper sized conduit. The allegor stated that the allegation pertained to excessive financial waste and not to quality concerns.

Conclusion: The allegation dealt with monetary concerns and not with component quality concerns. Monetary issues are not within the purview of the NRC. (Closed 329/82#01-08; 330/82#01-08)

- i. Allegation No. 9: Many workers shove their garbage in pipes and then later close the pipes up with the garbage still there.

Review: The allegor would not provide the NRC with the names of any individuals who supplied or who could supply additional information in regards to this issue. The preoperational testing program will flush and conduct performance demonstrations of each safety related system. Flushing procedures of safety related systems require both a visual inspection of strainers to determine the amount and extent of contaminants within the system and a chemical check performed by a qualified chemist to ensure system water chemistry is within specifications. Combined, these tests would detect the presence of contaminants such as garbage, etc.

Conclusion: At this time, the NRC has not been given sufficient information which would facilitate the continued investigation into this matter. (Closed 329/82#01-09; 330/82#01-09)

- j. Allegation No. 10: Another consequence of excessive haste is gross financial waste.

Review: The allegor acknowledged that this allegation dealt with financial waste and not with plant quality concerns.

Conclusion: The allegation dealt with cost concerns and not with component quality concerns. Monetary concerns are not within the NRC purview. (Closed - this issue was not included in the RIII tracking system)

9. Quality Control Inspector Training and Recertification Activities

During this inspection period the following balance of plant Quality Control (QC) training and certification activities were reviewed:

- a. The written exam bank of questions pertaining to Project Quality Control Instructions (PQCI) E-4.0, Cable Installations, and E-5.0, Cable Terminations, were reviewed. The questions were relevant and pertinent to the respective PQCI's.
- b. A performance demonstration was observed during which a prospective QC inspector attempted to demonstrate his knowledge of the electrical cable installation requirements. The prospective QC inspector failed to demonstrate acceptable knowledge of cable installation requirements. MPQAD personnel informed the prospective QC inspector

that he had failed the performance demonstration and that an evaluation would have to be completed to determine whether he would be given the opportunity to take the performance demonstration for the second time.

c. The scheduled review session for prospective QC inspectors (trainees) being trained to PQCI E-6.0, Equipment Installation, was observed. The review session initially involved discussion of previously covered material and later evolved into a question and answer session. As a result of attending the review session, the inspector determined the following:

- (1) The trainees were required to complete a written evaluation pertaining to the adequacy of specific classroom training provided for each PQCI. Trainees indicated that while there was evidence that changes in the training program were being implemented based on their comments recorded on the written evaluations there were several instances in which the training appeared to suffer as a result of schedule pressures.
- (2) The prerequisites for the E-6.0 PQCI training were not clearly delineated. It was not clear that all prospective QC inspectors who were to be certified to PQCI E-6.0 would have been required to have previously completed training in general welding. However, QC inspectors certified to PQCI E-6.0 would, during the inspection of installed equipment, be required to perform visual inspections of completed welds.

During a subsequent inspection on March 1, 1983, the inspector determined that the licensee had taken action to correctly define the prerequisites for the E-6.0 PQCI training.

d. The inspector observed an additional performance demonstration of Project Quality Control Instruction (PQCI) E 4.0 - Cable Pulling, given on February 10, 1983, by a MPQAD Level III to a Bechtel QC inspector. The performance demonstration was a part of the continuing effort by Consumers Power Company to recertify Bechtel QC inspectors. This test of the PQCI was performed in the Auxiliary Building utilizing a previously installed cable. To pass the performance demonstration required that all functional areas were successfully completed. The candidate passed all functional areas and the test was completed adequately.

10. Four Point Jacking Test

The inspectors observed portions of the four point jacking test performed on the Unit 1 Feedwater Isolation Valve Pit (FIVP) on February 12, 1983. The test was performed to insure the attached structural steel and rock bolts would adequately support the FIVP structure. Observations included review of Bechtel drawing C-1494(Q) and FCR 5593 for acceptance criteria, initial test preparations, actual test performance, and review of test data during and after the test.

At test increment #7, it was noted that the combined average pressure of the combined calibration data for jacking point WA had been incorrectly transposed. This error could have caused the actual loading at 100% test load to be approximately 30 kips less than specified. At the next increment, jacking point WA was loaded to compensate for the error. Compensation to correct the error was based on the insignificance of distributing 30 kips over four jacking points loaded to 1890 kips.

An NCR was written to document and allow project and field engineering resolution of the error prior to test acceptance. The NCR was resolved satisfactorily and the test reviewed and accepted.

At test increment #9, the load was reduced to 91% of the test load. This load was to be applied for at least 30 minutes or until the shims became tight. It took approximately one hour and forty-five minutes from the time of reducing the load to 91% of test load for the shims to become tight. This indicated that the FIVP settled at a slower rate than originally anticipated.

The procedure required recording data within one hour of the proof test. However, the Resident Inspector observed this data being taken five to ten minutes after the jacks were released. The Resident Inspector objected to taking the data point so close to the time the jacks were released - particularly when considering the slow FIVP settling time. The licensee agreed to take another data point at nominally one hour after the jacks were released.

As a portion of the load test, the licensee performed crack mapping after release of the jacks. Several new cracks were identified at the bottom side of the top slab. One of the cracks in the Unit 1 FIVP reached the alert level of 0.010 inch. Unit 2 FIVP also experienced cracking in the same locations, but none of these cracks reached the alert level.

The licensee noted during the load testing of Unit 1 FIVP that the spring hanger attached to the slab at the location of the cracking had been locked in the rigid position. Having the hanger locked rigid was considered by the licensee to be a contributing cause to the new cracking. However, the identical spring hanger attached to Unit 2 FIVP was released prior to load testing and this (Unit 2) FIVP exhibited cracking in the same location as in the Unit 1 FIVP.

The licensee was requested to perform an engineering evaluation as to the causes of the new cracking identified in the FIVPs prior to excavation under the FIVPs.

11. Pier 12 East and West

During the reporting period, the Resident Inspectors observed concrete being poured into the base of Pier 12 West. The concrete was pumped to the placement location and free fall was limited to five feet. The concrete was consolidated by the use of vibrators. QC inspectors were present near the pour location at the base of Pier 12 West.

The Resident Inspectors examined Pier 12 East which had been readied to accept concrete.

12. Quality Assurance Audit

On January 11, 1983, a QA audit was performed of the Material Services Section. Quarterly inspections required by ADMIN 1305.7 were not documented on the required forms, but instead were documented on a form issued subsequent to the inspections. A Safety Concern and Reportability Evaluation (SCRE) was written on January 12, 1983. The responsible employee (Material Services Supervisor) was terminated on January 14, 1983.

13. Diesel Generators

Paralleling of two redundant diesel generators of different load groups was identified by the licensee on a Safety Concern and Reportability Evaluation (SCRE) No. 63 on October 29, 1982. The SCRE identified that the diesels could be paralleled in the test mode through manual action.

During the review of the SCRE, the inspector noted that Reg. Guide 1.6 stated that an interlock was required to prevent parallel operation of redundant standby power sources. A review of the logic diagrams and schematics failed to identify the required interlock. A meeting was held with electrical QA and a CPCo electrical testing engineer to review the SCRE and identify the required interlock. Discussions with the electrical testing engineer and re-review of the schematics proved that an interlock existed which prevented paralleling the diesel generators when in standby and when the diesel generators were initiated by an ESFAS signal or an electrical bus fault signal. However, with both diesel generators in test, it was possible to parallel the generators in manual as stated in the SCRE. To preclude this event, administrative controls were to be used.

The inspector requested copies of those procedures that would prevent testing and/or maintenance of redundant diesel generators. At the time of the inspector's request, the procedures had not been finalized and were in the process of revision. When finished, the inspector will review the appropriate procedures for administrative controls to prevent paralleling diesel generators.

14. Laydown Area

During the reporting period, the Resident Inspector examined the laydown area and noted that the stock steel in the non-Q area was painted yellow on the ends and that the paint which resembled faded yellow paint had been removed from the stock steel stored in the Q area. (Reference NRC Inspection Report No. 80-329/82-22; 80-330/82-22)

15. Tours

At periodic intervals during the report period, tours of essentially all site areas were performed. These tours were conducted to assess the cleanliness of site areas, 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. The remedial soils work was examined during some of these tours. It was noted during these tours that mechanical and hydraulic snubbers in both containments had varying degrees of protective covering ranging from no covering to full covering. None of the restraint ends were protected. Areas of heavy prior personnel traffic could not be determined because a large portion of the scaffolding had been removed; however, no apparent damage was noted in any of the snubbers or restraints examined. No loose uncontrolled weld rod was noted. The Region III Regional Administrator and Deputy Regional Administrator accompanied the Resident Inspectors on one of these tours.

16. Public Meeting to Discuss the Licensee's Construction Completion Program

On February 8, 1983, a public meeting was held at the Quality Inn in Midland, Michigan between Messrs. J. G. Keppler, A. B. Davis, members of the Region III Midland Section, Messrs. D. Eisenhut, T. Novak and D. Hood of NRR, Mr. J. Sniezek of IE, and Messrs. J. Selby, J. Cook and others of the licensee's staff. The purpose of the meeting was to discuss the licensee's proposed Construction Completion Program (CCP) and to allow public comment on the program.

The meeting consisted of a presentation by the licensee on the CCP and on third party reviews. During the licensee's presentation members of the NRC questioned the licensee on specific aspects of the CCP. Following the licensee's presentation the public was afforded the opportunity to ask questions or make statements regarding the CCP. An additional meeting was held at 7:00 p.m. on February 8, 1983 to allow further public comment on the CCP.

17. 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 4.

18. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspections on February 18, 1983. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the information.

19. Independent Assessment of Auxiliary Building Underpinning

- The inspectors reviewed the weekly reports (attached) submitted by Stone and Webster Engineering Corporation to document the results of the independent assessment of Auxiliary Building Underpinning activities. No significant concerns were identified in these reports.

Attachments: As stated in Paragraph 19