

50-329
50-330

DMB

STONE AND WEBSTER MICHIGAN, INC.
P.O. BOX 1963, MIDLAND, MICHIGAN 48640

DATE	6/4/84
J. O. NO.	14509
P. O. NO.	
LTR. NO.	SWM-135
REF.	

PRINCIPAL STAFF	
<input checked="" type="checkbox"/> RA	<input checked="" type="checkbox"/> DPRP
<input type="checkbox"/> D/RA	<input type="checkbox"/> DE
<input type="checkbox"/> A/RA	<input type="checkbox"/> DRMSF
<input type="checkbox"/> RC	<input type="checkbox"/> DRMA
<input type="checkbox"/> PAO	<input type="checkbox"/> SCS
<input type="checkbox"/> SGA	<input type="checkbox"/> ML
<input type="checkbox"/> E/F	<input type="checkbox"/> File

VIA
TO DISTRIBUTION

DEAR SIRs:

THE FOLLOWING ARE ATTACHED. SENT SEPARATELY:

<input checked="" type="checkbox"/> COPIES	<input type="checkbox"/> PRINTS	<input type="checkbox"/> REPRODUCIBLES	<input type="checkbox"/> MICROFILM APERTURE CARDS
EACH OF			
<input type="checkbox"/> DRAWINGS	<input type="checkbox"/> SPECIFICATIONS		
<input checked="" type="checkbox"/> DOCUMENTS	<input type="checkbox"/> NOTES OF CONFERENCE		

STATUS		PLEASE NOTE	SENT FOR YOUR	
<input type="checkbox"/> FINAL	<input checked="" type="checkbox"/> APPROVED	<input type="checkbox"/> REVISIONS	<input type="checkbox"/> APPROVAL	<input type="checkbox"/> COMMENT
<input type="checkbox"/> PRELIMINARY	<input type="checkbox"/> APPROVED AS REVISED	<input type="checkbox"/> ADDITIONS	<input type="checkbox"/> USE	<input type="checkbox"/> INFORMATION
<input type="checkbox"/> NO COMMENT	<input type="checkbox"/> UNACCEPTABLE	<input type="checkbox"/> COMMENTS	<input checked="" type="checkbox"/> FILES	<input type="checkbox"/> CONCURRENCE
<input type="checkbox"/> SUGGESTIONS AS NOTED	<input checked="" type="checkbox"/> CLOSED			

YOUR ATTENTION IS DIRECTED TO THE FOLLOWING:

RELEASED FOR: FABRICATION PURCHASE OF NECESSARY MATERIALS

PLEASE REVISE AND SUBMIT _____ PRINTS _____ REPRODUCIBLES _____ MICROFILM APERTURE CARDS.

PLEASE SUBMIT _____ PRINTS _____ REPRODUCIBLES _____ MICROFILM APERTURE CARDS OF DOCUMENTS DRAWINGS SHOP DETAIL

PLEASE RETURN ONE COPY EACH OF THIS MATERIAL BEARING YOUR APPROVAL OR COMMENTS

PLEASE ACKNOWLEDGE RECEIPT OF THIS MATERIAL BY SIGNING AND RETURNING THE ENCLOSED COPY OF THIS FORM

WE TRUST THAT THESE NOTES ARE IN ACCORDANCE WITH YOUR UNDERSTANDING. IF NOT, PLEASE ADVISE US

IMPORTANT SHOULD ANY REVISION TO DOCUMENTS OR DRAWINGS RETURNED HERewith INVOLVE A PRICE INCREASE, THE SUPPLIER MUST NOTIFY STONE & WEBSTER PURCHASING DEPARTMENT WITHIN TEN (10) DAYS EVEN THOUGH A DEFINITE ESTIMATE CANNOT BE GIVEN AT THE TIME. OTHERWISE, THE PURCHASER WILL CONSIDER THE REVISIONS MADE WITHOUT COST.

The following closed CIO NIR(s) is (are) forwarded for your information:

_____ 022 _____

_____ 027 _____

_____ _____

J. E. Karr
J. E. Karr
CIO Program Manager

DISTRIBUTION:

- Job File C.4.2 (orig + 1)
- DLQuamme, CPCo
- NIRichel, CPCo
- RAWells, CPCo
- JGKepler, NRC
- JJHarrison, NRC
- BLBurgess, NRC (site)
- APAmoruso (2)
- KRARndt/Chrono/Vault w/o attach(2)
- Initiator

8406120178 840604
PDR ADOCK 05000329
S PDR

JUN 7 1984

IE01

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

DATE OF NONCONFORMANCE: <u>3-23-84</u>		NIR NUMBER <u>022</u>
IDENTIFICATION/LOCATION OF ITEMS: <u>WORK PRINT STATION 219</u>		
DESCRIPTION OF NONCONFORMANCE: <u>DURING THE ONGOING EVALUATION OF SITE DOCUMENT CONTROL, CIO PERFORMED A SAMPLE INSPECTION OF DOCUMENTS CONTAINED AT WORK PRINT STATION 219. THE POPULATION WAS DETERMINED TO BE 1,116. PER 95/5 CRITERIA, A SAMPLE OF 80 DOCUMENTS WERE RANDOMLY SELECTED. THE SAMPLE WAS DETERMINED TO BE ACCEPTABLE WITH 1 REJECT AND REJECTABLE WITH 2 REJECTS. SEE 20 DOCUMENTS WERE FOUND TO BE DISCREPANT. SEE ATTACHED SHEET FOR SPECIFIC DETAILS.</u>		
INITIATOR <u><i>Edward G. Bartram</i></u>		PROGRAM MGR <u><i>J. E. Kan</i></u>
DATE <u>3/23/84</u>		DATE <u>3-23-84</u>
CORRECTIVE ACTION BY: IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION		
CIO determined CPCo's response, provided via CPCo Letter No. CSM-0768 (Attachment 2), to be unacceptable. CPCo's revised response to Item 086, provided via CPCo Transmittal No. CSC-7810 (Attachment 3), has been evaluated and found acceptable. Based on this, CIO considers NIR closed. THIS NIR 6-1-84		
VERIFICATION <input checked="" type="radio"/> SAT <input type="radio"/> UNSAT <u><i>6/4/84</i></u> NEW NIR#	CONCURRENCE	
INITIATOR <u><i>Edward G. Bartram</i></u>	PROGRAM MGR <u><i>J. E. Kan</i></u>	
DATE <u>6/4/84</u>	DATE <u>6-4-84</u>	
REMARKS		

DISCREPANCIES @ STATION 219

DOCUMENT NUMBER	REV DWG	REV REG	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER COMMENTS	IN STA. LOG
RTBD-572-1	4	4	FCR M10265	YES	YES	No		YES
M652-1-H6	0	0	IDCN 20123	No	YES	YES		YES
M652-1-H130	1	1	FRL 1	No	YES	No		YES
M-652-2	3/FI	3/FI	ICS #8	No	YES No	NO		YES
M-652-2-H22	2	2	IDCN 20040	No	No	No		YES
M18-151	5	5	FCR 2291 & 2292	X No	YES	No		YES
M18-152	5	5	FCR 2291 & 2292	No	YES	No		YES
M-652-1	11/FI	11/FI	ICS 3, 8, 13, 14	YES	YES	YES		No
M-652-1-H16	0	0	FCR 3942	No	No	No		YES
" " " "	0	0	IDCN 20133	No	YES	YES		YES
M18-176	7	17	FCN M1295 OR 2195	No	YES AS ^{FCN} M1295	No	TRANSPOSED NUMBERS CONFUSE ISSUE	YES AS ^{FCN} M-2195
M18-175	7	8	—	—	—	—		—
M18-310-3	9	9	M-4139	No	YES	YES	DRAWING HAS NEW WORKPRINT STAMP ATTACHMENT HAS OLD WORKPRINT STAMP	YES
M18-310-4	5	5	E-7551	No	YES	YES	SAME AS ABOVE	YES
M18-348-2	4	4	E-2613	No	YES	No		YES
M18-370	7	7	—	—	—	—	TITLE PAGE SHOWS 1064 AS LAST PAGE. LAST PAGE IS 1031	—
M652-1-H2	0	0	IDCN 20119	YES No	No	No		YES
M652-1-H8	0	0	IDCN 20125	No	YES	YES		YES
M652-1-H18	—	—	FCN-8000	No	YES	YES		YES
M652-1-H-145	2	2	—	—	—	—	AREA'S NOT LEGIBLE	—
M-652-1-H-147	1	1	—	—	—	—	AREA'S NOT LEGIBLE	—

NFR No. 022 ATTACHMENT 1 OF 1



**Consumers
Power
Company**

Midland Project: PO Box 1963, Midland, MI 48640 • (517) 631-8650

May 4, 1984

Mr J E Karr
Stone and Webster Michigan, Inc
P O Box 1963
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT - GW07020
STONE AND WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW
NONCONFORMANCE IDENTIFICATION REPORT NUMBER 022 DATED 03-23-84
FILE 24.2 SERIAL 27883 CSM-0768 LW-11-84

In pursuance of Nonconformance Identification Report number 022, a response is attached to address your concerns delineated in your Nonconformance Identification Report Form.

Should you or your staff have any questions on the content, contact Lonnie Worley at extension 7707.

D L Quamme
Site Manager

- CC DDJohnson, MEC
- BHPeck, MEC
- NIReichel, MEC
- TASpellman, MEC
- JBKepler, Regional Administrator, Region III
- JJHarrison, Chief, Midland Section, Region III
- BBurgess, NRC Resident Insepctor
- RAWells, MEC

RECEIVED

MAY 14 1984

S & W CAC-173 CIO
J.O. NO. 14509.00

ORIGINAL



MIDLAND PROJECT
QUALITY ASSURANCE DEPARTMENT
QUALITY ACTION REQUEST

6. QAR Number
RA-00157 ^{2 AB} ₆₋₁₋₈₄

7. Date Issued
3/28/84

8. Revision
0

9. Page 1 of 3

10. ASME Related
 Yes No

1. Requirement

FPG 7.300 Rev 4
FPD 3.000 Rev 11
FPD 1.000 Rev 19

2. Deficiency Stone and Webster NIR-022 identifies the following deficiencies during a CIO evaluation of work print station 219:

1. Attachments referenced on work prints not attached.
2. Drawing stamp errors have been identified.
3. Station log errors have been identified.

3. QAR Originated by <i>St. McDonald</i>		4. Discipline/Division/Section PAP - Tech Services		5. Response Due Date 4/05/84		11. Potential 50.55(e) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
12. Date Reported to MPQA Mgr N/A		13. Action Item No. SO 5723		15. Item Priority 5		17. S/U Code PGMOO	
14. Discipline N/A		16. Trend Code 2D-5-0001		18. Resb Code BCPCO - STF-G		19. Action Organization Bechtel Field Document Control	
20. QAR Reviewed by <i>P. Dore</i>		21. Date 3-28-84					

22. Cause
SEE ATTACHED SHEETS

23. Proposed Corrective Action
SEE ATTACHED SHEETS

24. Responsible Organization/Person
DDC

25. Proposed Completion Date
4-3-84

26. Disposition Concurrence

<i>P. Dore</i> QAR Reviewer	4/5/84 Date	NA SW 5/2/84 PQAE (ASME Only)	4/29/84 Date
--------------------------------	----------------	----------------------------------	-----------------

27. Disposition Action Taken
SEE ATTACHED SHEETS
J. A. Brown

28. Method of Disposition Verification
SEE ATTACHED FOR CLOSURE JUSTIFICATION.

29. QAR Closed by

<i>SW Wainley</i> MPQAD	5/2/84 Date
NA SW 5/2/84 PFGCE (ASME Only)	Date

Acceptable Unacceptable Superceding QAR

Serial 27883

Response to Nonconformance Identification Report 022 dated 03-23-84.

Workprint 219 is located with team 19. Distribution is done by Document Control and maintenance of the station is the responsibility of the team receiving the documents. This workprint station will be transferred to a controlled document station under the responsibility of Document Control for maintenance as well as distribution. All workprints audited were new workprints. (either distributed after the stop work order or reviewed in the conversion/verification process). This program is in line with our corrective action plan submitted in response to MCARR-DAT-1. QAR number RA-00157 dated 03-28-84 was written in response to Nonconformance Identification Report number 022 and closed on 05-02-84.

The following items address each of the concerns identified:

1. Finding 1. Documents were found to be missing at the workprint station. Replacement copy has been attached.
2. Findings 2, 9, 16, 17. In all cases, the distribution had been made from Document Control and the distribution date was noted on the register. The changes had not been posted by the personnel at the workprint station. No unreasonable time delays were found. A procedure to clarify posting requirements (FPD-1.000) was issued on March 23, 1984. These findings would all be in compliance with the new procedural requirements of FPD-1.000 which requires posting be completed within three working days of the distribution date. Construction assistants were reminded that changes must be completed in three working days per new procedural requirements (FPD-1.000).
3. Findings 6, 7, 12, 13. The ~~change~~ ^{change} paper had been removed from the document but had not been crossed off the front of the drawing or change paper had not been removed or converted. Discrepancies listed have been corrected.

These workprints were reviewed in the conversion/verification program and workprint station personnel were notified of the need to review workprint for procedural compliance.

4. Findings 4, 8, 18. Workprint station logs did not accurately reflect information on hard copy either through omission, miscopying or adding extraneous information. Workprint maintenance requirements were reviewed with construction personnel responsible for maintaining workprints.
5. Findings 3, 5. Drawing M-652-1-H130-FRL-1 was incorporated and was not listed on the front of the drawing as indicated on the Audit Report.

Drawing M-18-370 - alpha and numeric pages do add up to 1064. This number is a total page count used for microfilming.

6. Finding 11 indicated the drawing revision to be revision 7 however, a review of the drawing indicated a revision 8 (not very legible) in the revision block and a revision 8 in the description block (also not too legible). This drawing was returned to the vendor for correction.

Serial 27883

7. Findings 19, 20. Drawings were replaced. Workprint personnel were reminded of the need to check drawing legibility.

LWW
5/4/84

2

Response to NIR 22, dated March 23, 1984, QAR RA-00157, dated March 28, 1984
Subject: Workprint Station 219

Workprint station 219 is located with team 19.

Workprint station 219 is located with team 19. Distribution is done by document control and maintenance of the station is the responsibility of the team receiving the documents. This workprint station will be transferred to a controlled document station in 4-6 weeks and placed under the responsibility of document control for maintenance as well as distribution. All workprints audited were new workprints. (Either distributed after the stop work order or reviewed in the conversion/verification process). This program is inline with our corrective action plan submitted in response to MCARR-DAT-1.

Note: For ease of reading, the findings have been grouped by subject. The letter identification noted on the NIR has been retained for cross-referencing.

1. In-Process Work Activities (Findings 2, 9, 16, 17)

In all cases, distribution had been made from document control and the distribution date was noted on the register. The changes had not been posted by the personnel at the workprint station. No unreasonable time delays were found. A procedure to clarify posting requirements (FPD-1.000) was issued on March 23, 1984. These findings would all be in compliance with the new procedural requirements of FPD-1.000 which requires posting be completed within three working days of the distribution date. Construction assistants will be reminded that changes must be completed in three working days per new procedural requirements (FPD-1.000).

2. Update of Workstation Logs to Reflect Conversion (Findings 5, 10, 14)

Workprint station logs were not updated to reflect workprints that had been converted/verified. Personnel will be reminded of the need to update logs. Workprint station logs/cards will be standardized when the maintenance of stations is transferred to document control. Until this conversion is complete, workprint maintenance requirements will be reviewed with team personnel for maintaining workprints by April 6, 1984.

3. Conversion/Verification Errors (Findings 6, 7, 12, 13)

The change paper had been removed from the document but had not been crossed off the front of the drawing or change paper had not been removed or converted.

These workprints were reviewed in the conversion/verification program. Workprint station personnel will be notified of the need to review workprints for procedural compliance by April 6, 1984.

4. Clerical Errors in Station Logs (Findings 4, 8, 18)

Workprint station logs did not accurately reflect information on hard copy either through omission, miscopying or adding extraneous information. Workprint maintenance requirements will be reviewed with construction personnel responsible for maintaining workprints by April 6, 1984.

5. Auditor Misinterpretations (Findings 3, 15)

Drawing M652-1-H130-FR1 1 was incorporated and was not listed on the front of the drawing as indicated on the audit report.

Drawing M18-370 -Alpha + numeric pages do add up to 1064. This number is a total page count used for microfilming.

6. Missing Documents (Findings 1, 11)

Documents were found to be missing at the workprint station. Replacement copies have been ordered.

7. Legibility (Findings 19, 20)

Drawings will be replaced. Workprint personnel will be reminded of the need to check drawing legibility by April 6, 1984.

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC-7810

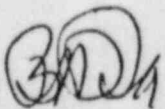
Date: May 29, 1984

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

Attached Is: Partial Response To
 Complete Response To
 For Your Information
 Other

Description:

Tracked Action Item 086.

Signature: 

cc: JGKepler, NRC Region III w/a
JHarrison, NRC Region III w/a
RJCook, NRC Site w/a
RAWells, MPQAD w/a
BHPeck, MEC w/a
NIREichel, MEC w/a
DDJohnson, MEC w/a
LWorley, MPQAD w/a
DEHorn, MEC w/a

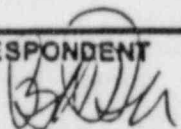
RECEIVED

MAY 29 1984

S & W *CR 193* CIO
J.O. NO. 14509.00

ITEM/HOLD POINT NOTIFICATION FORM

Sheet 1 of 1

STONE & WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW MIDLAND NUCLEAR PLANT J.O. NO. 14509		ITEM NUMBER 086	HOLD POINT NUMBER
		<input checked="" type="checkbox"/> TRACKED ACTION ITEM	
		<input type="checkbox"/> TRACKED INFORMATION ITEM	
		<input type="checkbox"/> TRACKED RECOMMENDATION ITEM	
		<input type="checkbox"/> UNTRACKED ITEM *	
		<input type="checkbox"/> HOLD POINT NOTIFICATION	
REFERENCE(S) QAR RA-00155/QAR RA-00157			
CONDITION DETAILS <p>Due to the conflicting responses received from Bechtel and that of MPQAD (See Reference below) concerning NIR 022/NIR 023, we request <u>one</u> reply clarifying our initial findings. Current replies provide inaccurate and conflicting information.</p> <p>Reference: 1. Stone & Webster NIR No. 022 2. Stone & Webster NIR No. 023 CPCo Letter #CSM-0768 CPCo Letter #CSM-0769 QAR RA-00157 QAR RA-00155</p>			
		<input type="checkbox"/> YES (PAGE NO'S) <input checked="" type="checkbox"/> NO	
ATTACHMENTS			
DATE RESPONSE REQ'D. 5-24-84	INITIATOR/DATE <i>Rich Scallan 5/22/84</i>	INITIATION APPROVED/DATE <i>J. Han 5-22-84</i>	
RESPONSE (SEE NOTE) <p>Attachments 1 and A provide a complete response to NIR-022.</p> <p>Attachments 2 and B provide a complete response to NIR-023.</p>			
		<input checked="" type="checkbox"/> YES (PAGE NO'S) 7 <input type="checkbox"/> NO	
ATTACHMENTS 1, A, 2 & B			
EST. CORRECTIVE ACTION COMPLETION DATE <i>N/A</i>	RESPONDENT 	TITLE <i>Const Supt</i>	DATE <i>5/29/84</i>
RESPONSE ACCEPTED	DATE	RESPONSE VERIFIED/CLOSED	DATE

Attachment 1
Page 1 of 2

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

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

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

1. Missing Documents (findings 1 and 11)

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

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

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

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

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

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

Attachment 1
Page 2 of 2

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

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

5. Legibility (findings 19, 20)

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

6. Miscellaneous (findings 3, 10, 15)

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

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

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

Attachment A

DISCREPANCIES @ STATION 219

FINDING NO.	DOCUMENT NUMBER	REV DWG	REV REG	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER COMMENTS	IN STA. LOG
①	PTBD-572-1	4	4	FCR M10265	YES	YES	No		YES
②	M652-1-H6	0	0	IDCN 20123	No	YES	YES		YES
③	M652-1-H130	1	1	FRL 1	No	YES	No		YES
④	M-652-2	3/FI	3/FI	ICS #8	No	YES ¹³ No	✗ No		YES
⑤	M-652-2-H22	2	2	IDCN 20040	No	No	No		YES
⑥	M18-151	5	5	FCR 2291 & 2292	✗ No	YES	No		YES
⑦	M18-152	5	5	FCR 2291 & 2292	No	YES	No		YES
⑧	M-652-1	11/FI	11/FI	ICE 3, 8, 13, 14	YES	YES	YES		No
⑨	M-652-1-H16	0	0	FCR 3942	No	No	No		YES
⑩	" " " "	0	0	IDCN 20133	No	YES	YES		YES
⑪	M18-176	7	17	FCN M1295 OR 2195	No	Yes As FCN M1295	No	TRANSPOSED NUMBERS CONVERSE ISSUE	YES As FCN M-2195
⑫	M18-175	7	8	—	—	—	—		—
⑬	M18-310-3	9	9	M-4139	No	YES	YES	DRAWING HAS NEW WORKPRINT STAMP ATTACHMENT HAS OLD WORKPRINT STAMP	YES
⑭	M18-310-4	5	5	E-7551	No	YES	YES	SAME AS ABOVE	YES
⑮	M18-348-2	4	4	E-2613	No	YES	No		YES
⑯	M18-370	7	7	—	—	—	—	TITLE PAGE SHOWS 1064 AS LAST PAGE. LAST PAGE IS 1031	—
⑰	M652-1-H2	0	0	IDCN 20119	✗ ^{No} YES	No	No		YES
⑱	M652-1-H8	0	0	IDCN 20125	No	YES	YES		YES
⑲	M652-1-H18	—	—	FCN-8000	No	YES	YES		YES
⑳	M652-1-H-145	2	2	—	—	—	—	AREA'S NOT LEGIBLE	—
㉑	M-652-1-H-147	1	1	—	—	—	—	AREA'S NOT LEGIBLE	—

NIR NO. 022 ATTACHMENT 1 CF 1

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

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

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

1. Old Workprints versus New Workprints

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

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

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

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

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

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

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

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

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

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

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

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

6. Other Miscellaneous (findings 18, 20)

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

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

7. Other Concerns noted on the Audit Report

a) Training

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

b) Processes followed in Workprint Stations

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

DOCUMENT NUMBER	REV DWG	REV REG.	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER ATTACHMENTS COMMENTS
1) M2EAD-38-1-112	1	1					NOT ON FDDL (5TH LOG SHGWS TAKEN OFF 10-7-83.
2) 2CCB-15-3	4	4					LEGIBILITY.
3) 2CCB-39-2	5						LEGIBILITY
4) FSK-M-2CCB-101-1	1				NOT LISTED		
5) 2EBB-1-1	1	(2)					1) HOLD 3870 IS ATTACHED BUT NOT ON REGISTER 2) LEGIBILITY.
6) 2EBB-2-2	4 ^{Aug 119} 3	(4)					1) IDCN 3861 ATTACHED NOT ON REGISTER 2) LEGIBILITY.
7) FSK-M-2EBB-3-1	3	(4)					1) LEGIBILITY - IDCN 8968
8) 2EBB-3-2	4	(5)					1) FCR C-4139 ATTACHED BUT NOT ON REGISTER 2) IDCN 8978/FCR C-4139 LEGIBILITY
9) FSK-M-2EBB-4-1	3	(4)					1) IDCN 8191 PG#2 LEGIBILITY.
10) 2EBB-4-3	3	(4)					1) HOLD 3809 ATTACHED BUT NOT ON REGISTER.
11) 2EBB-7-4	1	(2)					1) IDCN 8299 ATTACHED BUT NOT ON REGISTER. 2) LEGIBILITY IDCN 8299 PG#2
12) 2EBB-7-5	0	0					1) FCR 6698 ATTACHED BUT NOT LISTED ON FRONT. 2) IDCN 8009 PG#2 LEGIBILITY
13) 2EBB-8-11	2	(3)					3) FCR M-6690/6698/C5485 ATTACHED BUT NOT ON REGISTER. 1) IDCN 8297/HOLD 3757 ATTACHED BUT NOT ON REGISTER 2) IDCN 8297 PG#2 LEGIBILITY
14) 2EBB-10-1	3	(4)				FCR →	IDCN 6092 LEGIBILITY.
15) 2ECB-7-1	3	3					IDCN NOT WRITTEN ON FRONT OF DWG.
16) 2ECB-8-5	4	4					FCR M10148 NOT WRITTEN ON FRONT OF DWG.
17) 2HBC-160-1	2	2					1) FCN 6183 ATTACHED BUT NOT ON REGISTER 2) FCN 6183 NOT WRITTEN ON FRONT OF DWG.
18) 2HGD-82-6	6	6					1) FCN M-13620 NOT LISTED ON FRONT OF DWG. 2) DWG NOT ON DWG.

Attachment 3
Page 8 of 9

DOCUMENT NUMBER	REV DWG	REV REG	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	ATTCH. TO BACK	OTHER COMMENTS
19) 2HCD-555-1	1	1					1) FCN M-3638 ATTACHED NOT ON REGISTER
20) M-604 SILL	5	12					2) LEGIBILITY ON TOP OF FCN
21) M-604 SILL	11/F1						FCN M 9562 / FCN M 12 B 71 ATTACHED BUT NOT ON FRONT OFF DRAWING
22) M604 SILL	11/F2	14					1) FCN 4-3701 ATTACHED NOT ON REGISTER
23) M604 SILL	11/F1	14					1) FCN 6834 ATTACHED NOT ON REGISTER
24) M639-14	11/F1	14					2) ICS STAMPS NOT ON FRONT DRAWING
25) FSK-DVI-11-604-1	5	5					1) NO "STATUS STAMPS" ON FRONT OF DRAWING
26) FSK-DVI-11-604-8	7	7					2) LEGIBILITY
							1) ICS & NOT LISTED ON FRONT OF DRAWING
							1) LEGIBILITY
							2) IDCN 9382 PAGE 2 STRUCK-OUT
							1) IDCN 9311 PAGE 2 ILLEGIBLE
OTHER CONCERNS:							
1) PERSONNEL AT THE WORK PRINT STATION STATED THEY HAD NOT BEEN TRAINED TO WRITE RECORD/PRINTOUT. NO RECORD OF TRAINING EXISTS ON COMPANY.							
2) ACTIONS BY RECEIPT ORGANIZATIONS SUCH AS FILING, LOGGING AND CONTROL OF DOCUMENTS APPEAR TO VARY FROM STATION TO STATION.							

STONE & WEBSTER MICHIGAN, INC.
NONCONFORMANCE IDENTIFICATION REPORT

PAGE 1 of 3

DATE OF NONCONFORMANCE:	3/31/84	NIR NUMBER	027
<u>IDENTIFICATION/LOCATION OF ITEMS:</u>			
DOCUMENT CONTROL STATIONS 59 and 501			
<u>DESCRIPTION OF NONCONFORMANCE:</u>			
The following discrepancies exist between controlled drawings used by BPCo field engineers and controlled drawings in BPCo Document Control Center.			
Case 1 Drawing Number M-648 Sheet 7Q			
<u>Field Engineers Copy</u>		<u>Document Control Copy</u>	
a) Rev. 12-F1		Rev. 14	
b) Does not incorporate 1 DCN 24589		Incorporates IDCN 24589	
Note: Actual installation reflects the field engineers copy, i.e the requirements of IDCN 24589 have been excluded from the work.			
<u>David W. Beauchamp</u> INITIATOR		PROGRAM MGR <u>J. E. Kan</u>	
DATE <u>4/4/84</u>		DATE <u>4-4-84</u>	
<u>CORRECTIVE ACTION BY:</u>			
IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION			
CIO has evaluated CPCo's response provided via letter No. CSM-0778 (Attachment No. 1), and found it to be acceptable. CIO considers this NIR to be closed.			
VERIFICATION	(SAT)	UNSAT	
INITIATOR	<u>Rich Scallan</u>		
DATE	<u>6/4/84</u>		
	NEW NIR#		CONCURRENCE
			PROGRAM MGR <u>J. E. Kan</u>
	DATE		DATE <u>6-4-84</u>
<u>REMARKS</u>			

DESCRIPTION OF NONCONFORMANCE (Con't)

- c) Does not incorporate IDCN 24587 Incorporates IDCN 24587

Note: Actual installation configuration not verified.

- d) Detail A shows "1" to trap" Detail "A" shows "½" to trap"

The registers were reviewed and it was established that there were no outstanding changes to the drawings that would reconcile the differences.

Case 2 Drawing Number M-524 Sheet 2Q

Field Engineers Copy

Document Control Copy

- | | |
|--|---|
| a) Revision 22-F1 | Revision 30 |
| b) No access door shown | 8" x 6" access door added adjacent to columns K 6.6 |
| c) IDCN 10802 is shown as outstanding for revision 22-F1 but the information does not show the location of the cooler and duct work. | Unit Cooler 2VM-118A located and duct work added by IDCN 10802. |
| d) No indication of any changes to the flow rates. | Flow rates changed at five outlets. |

For items (b) and (d) the registers were reviewed and it was established that there were no outstanding changes to the drawings that would reconcile these differences.

Case 3 Drawing Number M-506 Sheet 2Q

Field Engineers Copy

Document Control Copy

- | | |
|---|--|
| a) Revision 20 - F1 | Revision 24 |
| b) IDCN 20843 is shown as outstanding for revision 20-F1 but the information does not show the location | Unit Cooler 2VM-121 B located by IDCN 20843 |
| c) IDCN 20487 is shown as outstanding for revision 20-F1 but the information does not show the location | Thermostat and Temp switch located by IDCN 21487 |
| d) IDCN 20836 is shown as outstanding for revision 20-F1 but the information does not show the location | Unit Cooler 1VM-121B located by IDCN.20836 |

e) IDCN 21480 is shown as out-
standing for revision 20-F1 but
the information does not show
the location.

Thermostat and Temp switch
located by IDCN 21480

In addition to the above, it was determined that the registers could not be used to establish which changes should be distributed to holders of the parent documents (in this case the drawings)

For example, the registers indicate that no changes have been distributed to holders of drawing M-524, Sheet 2, Rev. 22-F1, but the drawing stamp indicates that there are outstanding changes to this document.

The changes listed on the drawing were utilized when the comparisons shown in Case 2 above were made.



Consumers
Power
Company

Dean L Quamme
Site Manager
Midland Project

Midland Project: PO Box 1963, Midland, MI 48640 • (517) 631-8650

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May 25, 1984

MAY 29 1984

Mr J E Karr
Stone & Webster Michigan, Inc.
P O Box 1963
Midland, MI 48640

S & WCP-192 CIO
J.O. NO. 14509.00

MIDLAND ENERGY CENTER PROJECT - GWO 7020
STONE AND WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW
NONCONFORMANCE IDENTIFICATION REPORT NUMBER 027 DATED 03-31-84
FILE: 24.2 SERIAL: 27907 CSM-0778 LW 27-84

Stone and Webster Nonconformance Identification Report 027 identified deficiencies of document stations 59 and 501. The following items address each of the concerns identified. This is Document Control Assurance Group's final response.

*Drawing revisions and attachments at work stations could not be reconciled with status as reported with the DDR.

DDR is now being converted to show field drawing distribution and amendment status on the same register. FDCC personnel perform drawing, revision and amendment verification check prior to distribution to the field.

The DDR was checked by DCAG and attachments for Design Drawings/Field Revisions were corrected to reflect all outstanding attachments.

*It was determined that the registers could not be used to establish which changes should be distributed to holders of the parent documents.

An established field distribution list (FDDL) exists for drawings. All incoming amendments are distributed to their parent drawings per the FDDL. In addition, the DDR is now being converted to show field distribution, drawing and amendment status on the same register. FDCC estimates completion by 7-31-84.

* Discrepancies existed between controlled drawings used by BPCo field engineers and controlled drawings in BPCo DCC. The following items address each of the concerns identified.

Case 1, Item A - Rev 12/F1 was incorporated into Rev 15. DDR was checked and project Dwg. (Rev 15) reflects the applicable attachments.

Item B - IDCN 24589 was indicated on Rev 13 on 1-29-84.

Item C - IDCN 24587 was indicated on Rev 14 on 2-10-84.

Item D - Detachment A was changed on Rev 13 on 1-29-84.

Case 2 and 3

Specifics identified in case 2 and 3 are related to HVAC items. HVAC does not receive or use field revisions for their activities. Zack has an ongoing status assessment program and use only the current design document. Zack is not a part of the CCP.


*In the interim period prior to conversion of field revisions into design drawings, Field engineers will use current design drawing along with field revision while performing status assessment.

*Prior to initiation of Phase II work and in accordance with the Construction Completion Plan (CCP), The drawing used to inspect any commodity will be compared with the latest revision of that drawing at the time the commodity is released for construction.

Page 2
Serial: 27907 CSM 0778
May 25, 1984

*This review will insure that any drawing changes affecting the status assessed commodity will be implemented during the construction phase of the CCP through punchlists or corrected through the existing, FCR, FCN, or NCR program, as applicable.

Should you or your staff have any questions on the content, contact Lonnie Worley at extension 7707.



DLQ/LWW/jpf/pal

CC: BBurgess, NRC Resident Inspector
JHarrison, Chief, Midland section, Region III
DEHorn, MEC
DDJohnson, MEC
JBKepler, Regional Administrator, Region III
BHPeck, MEC
NIReichel, MEC
RASpellman, MEC
RAWells, MEC
LWorley, MPQAD