



STONE & WEBSTER MICHIGAN, INC.

P.O. Box 2325, BOSTON, MASSACHUSETTS 02107

Mr. J. G. Keppler, Administrator, Region III
Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

July 18, 1983
J.O. No. 14509
NRC File #83-07-18

RE: DOCKET NO. 50-329/330
MIDLAND PLANT - UNITS 1 AND 2
OVERVIEW OF THE CONSTRUCTION COMPLETION PROGRAM
REPORT # 5

A copy of the Construction Implementation Overview Report No. 5 for the period July 8, 1983 through July 14, 1983 is enclosed with this letter. In addition, minutes of a meeting held with CPCo management is enclosed. A status of the program development is provided herein.

If you have any questions with respect to this report, please contact me at (517) 631-8650 extension 486.

Very truly yours,

S.W. Baranow
Program Manager

Enclosure

SWB/ka

cc: JHarrison, NRC Glen Ellyn
RCook, NRC Midland (site)
DBMiller, CPCo Midland (site)
RKelly, S&W
APamaruso, S&W
CORichardson, S&W

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Report No. 5

July 8, 1983 through July 14, 1983

Personnel on Site

Stone & Webster Michigan, Inc.

S. Baranow	W. Miller
F. Bearham	A. Smith
W. Sienkiewicz	J. Chawla
R. Scallan	C. Larson (temporary)
J. Langston	

Meetings Attended

<u>Date</u>	<u>Attendees</u>	<u>Purpose</u>
July 13, 1983	CPCo Bechtel Stone & Webster	CIO Reports
July 14, 1983	Stone & Webster US NRC	CCP

Meetings

July 13, 1983 - A meeting was convened by D.B. Miller for discussion of the adequacy of CPCo responses to CIO questions and concerns, which were addressed in CIO letters and memorandums issued from May 19, 1983 through June 28, 1983. Attendees at this meeting were:

D. Miller, CPCo	S. Baranow, S&W
R. Lee, CPCo	F. Bearham, S&W
*G. Hierzer, Bechtel	
*R. Cote, Bechtel	
*Part-time	

July 14, 1983 - a brief meeting was held with Mr. J.J. Harrison, US NRC for discussion of staffing of Stone & Webster personnel to support the CCP effort. CIO advised J.J. Harrison that there were no restrictions on limiting Stone & Webster personnel.

It was pointed out that our organization chart, dated June 1, 1983, provided for 4 additional inspectors and 2 evaluators. It is anticipated that these persons would be on-site during August, 1983.

Other points of discussion were the CCP and concerns of the NRC on previous non-conforming observations. CIO was advised of, and was requested to attend two meetings to be held on July 21, 1983 in Midland.

Activities

Training - CIO attended and evaluated training sessions conducted on July 13 and July 14, 1983. The training was presented in a professional manner, fully understood by the attendees and was in compliance with the requirements of FPG-4.00 "Training Evaluation Team Organization and Responsibilities."

The subject matter of the training sessions were:

1. Piping System Erection Fit-up Control Specification M-214
2. Construction Completion Program

Results of the evaluation have been documented on checklist number MP-MIS-001E and are available for review.

Action Items (closed)

With reference to CIO Report #4 dated July 12, 1983 the followings reviews with resolutions have been completed.

1. June 3, 1983 Report No. 1

Concern - "Program requires revision to address how trainers are trained."

Response - "FPG-2.000, Paragraph 7.3 defines how trainers are trained."

Resolutions: CIO has reviewed FPG-2.000 and verified that the procedure has been revised to reflect this requirement. This item is closed.

2. June 27, 1983 Report No. 3

Concern - "CIO had indicated a concern regarding the methods of evaluating construction training courses."

Response - The CIO evaluated and commented on a training session given to personnel of the Bulk Hanger Organization. A concern was expressed that evaluation sheets, filled out by approximately one-half of the class attendees, were unsigned and hence "does not provide objective evidence of who correctly or incorrectly answered the questions on the evaluation sheets."

The concern expressed by the CIO appears to stem from a misunderstanding of the training evaluation program as outlined in G-4.00 (Training Evaluation Team Organization and Responsibility). The objective evidence that individuals are qualified and have received adequate training is provided by their performance on the job. The individual's supervisor monitors his performance.

The training session evaluation observed by the CIO has a different purpose which is covered in G-4.00. Each lesson plan includes an effectiveness measurement strategy which is designed to demonstrate that the student can master the lesson objectives for the material presented. In many cases the effectiveness measurement used will be a written exam which is administered to a minimum percentage of the class as specified in G-4.00 since the results of the exam are used to define modifications to the lesson plan and/or the instructor presentation, identification of the evaluation form to specific students is not needed.

The initial experience with this approach indicates that it is working to provide effective classroom instruction and student mastery of the lesson objectives.

In summary, the purpose of the training session evaluation is to verify that the classroom instruction has been effective in presenting the stated lesson objectives. If the students sampled can pass the effectiveness measurement instrument, it is taken that the lesson objectives have been met. The ultimate test is the responsibility of the supervisor in monitoring individual on-the-job performance.

Resolution - CIO, having evaluated a construction training session (Piping System Erection Fitup Control, Specification M-214, and reviewing the results of the Bechtel evaluation of the presentation, have determined that the CCo response is satisfactory. CIO agrees that the present method of training evaluation is a valuable tool and that it's use should continue. This item is closed.

3. June 14, 1983 Report No. 2

- a. Concern - "Adequacy of drawings (A8) - large bore pipe hangers"

Response a) Adequacy of drawings (A8) - large bore pipe hangers

The configuration of some hangers is governed by redline drawings. These redlines are issued and controlled by Bechtel document control. Furthermore, Bechtel is currently in the process of incorporating redlines into ungraded revisions of the drawings. Discussions with inspectors involved in hanger reinspections indicate that the redlines are clear, legible, and appropriate for inspections. Based upon the above, we consider that the control and "inspectability" of these drawings is acceptable. This item is therefore considered to be closed.

Conclusions - CIO personnel shall verify that drawings are legible and appropriate for inspections. This item remains open pending our verification.

- b. Concern - "Additional verification of equipment received and installed."

Response - Additional verification of equipment received and installed (E2).

As you know, the QVP commits only to verification of closed receipt inspection IRs. In addition to this QVP related activity, it has been proposed to initiate a separate program with regard to vendor furnished equipment in general. We are currently arranging, for PAE management approval, a presentation in this regard. This effect would be outside the scope of the QVP, and would not be a restraint to the QVP. For these reasons, this item is considered to be closed with regard to implementation of the QVP.

Conclusions - CIO accepts the response which is in keeping with the requirements of paragraph 6.4 of the June 10, 1983 letter. This item is closed. CIO shall request a copy of the "separate program for review purposes.

- c. Concern - "Material traceability of installed hangers."

Response c) Material traceability of installed hangers (E3).

A report concerning material traceability is due by the end of this week. Note that the traceability issue was specifically identified in previous Management Review Meeting minutes as not being a restraint for QVP implementation.

Solutions - CIO shall request a copy of the report concerning material traceability for review. Pending our review of this report, this item remains open.

- d. Concern - "Discussion of nonconforming items with Project Engineering."

Response - Discussion of nonconforming items with Project Engineering.

This item referred specifically to certain engineering reviews which would have been invoked by the sampling plan. Since sampling will no longer be in effect for QVP implementation, this item is not applicable to the QVP. With regard to processing NCRs, the existing mechanism (MPQAD procedure F-2M and PSP G-3.2) will be used. For these reasons, this item is considered to be closed.

Resolutions - CIO has reviewed and accepted the response. This item is closed. However, if at a later date, the US NRC approves a sampling plan, consideration should be given to the formulation of a program, if not in existence, for Project Engineering involvement.

4. June 28, 1983, Report No. 3

Concerns: Item #2 - "Are job descriptions and responsibilities of CPCo personnel engaged to implement the QVP available?"

Response - "Job descriptions of QVP supervisory personnel are provided in attachment #2.

Resolution - CIO has reviewed attachment #2 which contains descriptions and responsibilities of 21 positions and accepts the response. This item is closed. Job descriptions and responsibilities will be added as an attribute to our "MIS" series of checklists for continuing evaluation.

5. Open Action Items

1) June 14, 1983 Report No. 2

Concerns: Item 3(e) need to identify commitments made to US NRC.

2) June 17, 1983 Letter

Concerns: Item 4(6) CIO considers the list of commitments to the US NRC a constraint to the QVP

Resolution: In our meeting with CPCo Site Management and Bechtel Power on July 13, 1983, it was proposed by CPCo that they would submit a base list matrix of all commitments made to US NRC to a given date. As commitments will continuously be made to Criticality, CIO considers this approach to be satisfactory. This resolution covers items 1 & 2 above.

3) June 17, 1983

Concern - "The 14 required to resolve Management Review Team Observations should be approved and issued.

Response - "The Management Review Committee must take action relative to R.A. Wells memo dated June 7, 1983 (Serial 22848). (Attachment to S&W #8).

Resolution - CIO has accepted the 14 observations classified as constraints as resolved through the issuance of revised "N" procedures, dated June 20, 1983.

CPCo Required Action

MRC to convene to confirm or modify recommendations of MPQAD (last paragraph of R.A. Wells memo).

June 28, 1983, Report No. 3

Concern - "Has a program been developed and responsibilities established of personnel assigned to process nonconformances?"

Response - Will be responded to later

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Resolution - Item remains open. CIO is given to understand that the program is under development.

General

- 1) Three CIO personnel, R. Scallan, W. Miller and J. Langston attended a 3 hour course on entry and behavior in confined spaces on July 12, 1983.

STATUS OF CIO PROGRAM DEVELOPMENT

I. PQCI Activity

	This Week	To Date July 7, 1983	Total To July 14, 1983
Applicable PQCI Recd	2	65	67
PQCI -1st Draft	5	52	57
Approval Cycle	17	38	55
Typing	8	27	35
Approved for Issue	7	11	18
Issued	0	0	0
CN's	8	79	87
Rev.	3	19	22

II. MP-MIS Activity

	This Week	To Date July 7, 1983	Total To July 14, 1983
MIS-Draft Cycle	3	11	14
MIS-Approval Cycle	5	6	11
MIS-Typing	1	4	5
MIS-Approved for Issue	1	3*	4
MIS-Issued			

*MP-MIS 002 to be revised per CPCo letter of 6-10-83