| PRINCIPAL STAFF   |  |  |
|---|--|--|
| tou you   | TONE AND WEBST   | ER MICHIGAN, INC.<br>AND, MICHIGAN 48640 |
| D/RA DE DRMSP   | 50-329   | DATE 6-1-84                              |
| DRMA -  |  | - 0 NO. 14509                            |
| TRO SCS   | 50-330   | P O NO                                   |
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|   | DEAR SIRS:   |  |
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| DISTRIBUTION  | X COPIES PRINTS _  | _ REPRODUCIBLES APERTURE CARD            |
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| STATUS  | PLEASE NOTE  | SENT FOR YOUR                            |
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| PRELIMINARY APPROVED AS REVISED AS DEFINED  | ON ADDITIONS CORRECTION  |  |
| NO COMMENT UNACCEPTABLE   |  | FILES CONCURRENCE                        |
| SUGGESTIONS AS NOTED CLOSED   |  |  |
| YOUR ATTENTION IS DIRECTED TO THE FOLLOV  |  |  |
| RELEASED FOR: FABRICATION PURCHASE OF NECESSARY   |  |  |
| PLEASE REVISE AND SUBMIT PRINTS REPRODUCIBLES   |  |  |
| PLEASE SUBMIT PRINTS REPRODUCIBLES MI   | CROFILM APERTURE CARDS OF DOCU   | IMENTS CRAWINGS SHOP DETAIL              |
| PLEASE RETURN ONE COPY EACH OF THIS MATERIAL BEARING YOUR APP   | PROVAL OR COMMENTS   |  |
| PLEASE ACKNOWLEDGE RECEIPT OF THIS MATERIAL BY SIGNING AND RE   | TURNING THE ENCLOSED COPY OF THIS P  | ORM                                      |
| WE TRUST THAT THESE NOTES ARE IN ACCORDANCE WITH YOUR UNDERS  |  |  |
| WE TRUST THAT THESE NOTES ARE IN ACCORDANCE WITH YOUR UNDERS  | STANDING IF NOT PLEASE ADVISE US   |  |
|   | and the second |  |
| The following closed CIO NIR(s) is (are) for  | rwarded for your informa   | tion:                                    |
| NIR 023   | rwarded for your informa   | ation:                                   |
| NIR 023   | rwarded for your informa   |  |
| RIBUTION:<br>File C.4.2 (orig + 1)<br>amme, CPCo<br>ichel, CPCo<br>lls, CPCo<br>ppler, NRC<br>rrison, NRC<br>rgess, NRC (site)  | J. E. Karr   |  |
| RIBUTION:<br>File C.4.2 (orig + 1)<br>amme, CPCo<br>ichel, CPCo<br>lls, CPCo<br>ppler, NRC<br>rrison, NRC<br>rgess, NRC (site)<br>oruso (2)                                   | J. E. Karr<br>CIO Program Man  | ager                                     |
| RIBUTION:<br>File C.4.2 (orig + 1)<br>amme, CPCo<br>ichel, CPCo<br>lls, CPCo<br>ppler. NRC<br>rrison, NRC<br>rgess, NRC (site)<br>oruso (2)<br>ndt/Chrono/Vault w/o attacn(2) | J. E. Karr   | ager                                     |
| RIBUTION:<br>File C.4.2 (orig + 1)<br>amme, CPCo<br>ichel, CPCo<br>lls, CPCo<br>ppler, NRC<br>rrison, NRC<br>rgess, NRC (site)<br>oruso (2)                                   | J. E. Karr<br>CIO Program Man  | ager                                     |

## STONE AND WEBSTER ENGINEERING CORPORATION NONCONFORMANCE IDENTIFICATION REPORT

| DATE OF NONCONFORMANCE: 3/22/84   |   | NIR NUMBER             |
|---|---|------------------------|
|   |   | WIR NUMBER             |
| IDENTIFICATION/LOCATION OF ITEMS:   |   |                        |
| WORK PRINT STATION NO.  | 209                                     |                        |
| DESCRIPTION OF NONCONFORMANCE:  |   |                        |
| DURING THE ONGOING E  |   |                        |
| CONTROL, CIO PERFORME,  | S A SAMALE                              | INSPECTION OF          |
| BOCUMENTSCONTAINES A  |   |                        |
| THE ADAULATION WAS DET  |   |                        |
| CRITERIA. A SAMPLE OF   |   |                        |
| BE ACCEDITARLE WITH I K   | AMALE WAS                               | DETERMINEDTO           |
| 2 REJECTS. DOCUMENT   | TS INFAF FOR                            | INA TA DE DE DE        |
| PANT SEE ATTACHED SHEET   | 5 FOR SAFCIF                            | C DETAUS               |
|   |   |                        |
| 1 7   |   |                        |
| nullanna  |   | 2013                   |
| INITIATOR   | PROGRAM                                 | MGR f Elan             |
| DATE3/23/84   | DATE                                    | 3.23 84                |
|   | DATE                                    | 3.23.84                |
| CORRECTIVE ACTION BY:   |   |                        |
|   |   |                        |
| IDENTIFY ORGAN  | IZATION TAKING CO                       | RRECTIVE ACTION        |
|   |   | -                      |
| CIO determined CPCo's response, prov<br>(Attachment 2), to be unacceptable  | vided via CPCo Lo                       | tton No. CON 0750      |
| (Attachment 2), to be unacceptable.<br>provided via CPCo Transmittal No. Co | CPCo's revised                          | response to Item 086.  |
| provided via CPCo Transmittal No. CS<br>ated and found acceptable. Based or | 5C-7810 (Attachment<br>this, CIO consid | nt 3), has been evalu- |
|   |   | Gers chis wirk closed. |
|   |   |                        |
| VEDIELCATION CON  |   |                        |
| VERIFICATION SAT UNSAT  | NEW NIR#                                | CONCURRENCE            |
| DATE 1-1-52 251.54  |   | PROGRAM MGR Car        |
|   | DATE                                    | DATE 6-1-84            |
| TEMADUE   |   |                        |

| 32261        | :                  | 09 51100.5 °      | 9                |             |              |                |        | BUTNOT                                |         | Nor ON                          | 168    | BUT NOT     | 4139 .     | 316154         | NED BUT NOT     | Ø                    | 8399 7942           | BUT NOT                                     | 1342 LEGIBIATY | C.S.485<br>DAL REGISTURR. | 17              | 2.EG1314TY   | FTY                  | ON FRONT     | WATTEN ON      | ED BUT NOT         | WAITTEN ON           | LISTED ON                          | DWG.            |  |
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| 1 204        | OTHER<br>COMMENTS  | NOT ON FARL STN 1 | TAKEN OFF 10-7-8 | LEGIBILITY  | 150131174    |                |        | UNGED 3870 IS ATTACHED<br>ON REGISTER | 1171511 | DEDEN 3861 ATTACHED<br>REGISTER |        | 39 Ari      | 8478/FCR 0 | IDCN BIGI 64+2 | 3809            | U IDCN 8299 ATTACHED | Z) LEGIBIUTY IDEN E | 1) FCR 6698 ATTACHED BUT<br>LISTED ON FRONT | N 8009         | 3) FCR M. 6(90/6698/      | DIDEN 8297 HOLD | N 9297 PG #2 | IDEN GOY2 LEGIBTLETY | N NOT WAIT   | SUIC =         | UFCN GIB3 ATTACHED | 2) FEW EI83 NOT WRIT | UFEN M-13620 NOT<br>FRONT OF DIVIG | 2) DWG NUT ON D |  |
| STHTION      | BRCK TD            |                   |                  |             |              |                |        |                                       |         |                                 |        | Y           | 15         |                |                 |                      |                     |   |                |                           |                 |              | Pagere               | FCRA         |                |                    |                      |                                    |                 |  |
| NCIES @ STH1 | LISTED ON<br>FRONT |                   |                  |             |              | NOT LISTED     |        |                                       |         |                                 |        |             |            |                |                 |                      |                     |   |                |                           |                 |              |                      |              |                |                    |                      |                                    |                 |  |
| EPHI         | IN<br>REG          |                   |                  |             |              |                |        |                                       |         |                                 |        |             |            |                |                 |                      |                     |   |                |                           |                 |              |                      |              |                |                    |                      |                                    |                 |  |
| DISCREPHN    | DOCI<br>IN GU      |                   |                  |             |              |                |        |                                       |         |                                 |        |             |            |                |                 |                      |                     |   |                |                           |                 |              |                      |              |                |                    |                      |                                    |                 |  |
|              | REG                | /                 |                  | 4           |              |                |        | (2)                                   |         | (4)                             | Ð      | (3)         |            | <i>(4)</i>     | <i>(4)</i>      | (2)                  |                     | 0   |                |                           | (E)             |              | Ð                    | 2            | +              | 2                  |                      | 0                                  |                 |  |
|              | REV<br>DWG         | 1                 |                  | 4           | 5            | 1              |        | 1                                     | 1. 194  | 5 4 3                           | 3      | 4           |            | 3              | 3               | /                    |                     | 0   |                |                           | 2               |              | 6                    | 6            | +              | <i>c</i> .)        |                      | 0                                  |                 |  |
| 1012         | DOCUMENT           | () NAF 80 -35 442 |                  | 1 2008-15-3 | 31 2008-39-3 | 1 FSK - M-200B | -101-1 | i) 2E8B-1-1                           |         | 5) 2688-2-2.                    | 7) 3-1 | 2) 2EBB-3-2 |            | 1 26 B3 - 4 -1 | 10 2 6 90-4 - 3 | 11 12883-7-4         |                     | 2) 2688-7-5                                 |                |                           | 13 3583-8-11    |              | 14) 26 83-10-1       | 1-1-2503-1-1 | 16) 3868-8-8-5 | 17) 3446-160-1     |                      | 2-28- 50HX (21                     |                 |  |

| 2 042           |        |      | DISCRE          | NHY   | CIES @    | STHTION                       |                                     |
|-----------------|--------|------|-----------------|-------|-----------|-------------------------------|-------------------------------------|
| DCUMENT         | REV    | REV  | REV DOCUMENTS   | N     | LISTED ON | UMENTS IN LISTED ON RTTCH. TD | OTHER                               |
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| 20/ M-604 SHI   | v      | 12   |                 |       |           |                               | M9562 FCN M                         |
| 1/15            | 12/1   | -    |                 |       |           |                               | H-3701 ATTACHED NO                  |
|                 |        |      |                 |       |           |                               | REGISTER                            |
| 22) M604 549    | 14/52  | 14   |                 | -     |           |                               | 1) FCR 6334 ATTACHED NOT ON         |
|                 |        |      |                 |       |           |                               | RELISTER                            |
|                 |        |      |                 |       |           |                               | 2) Il'S STAND NOT ON FRANT DEMUNICS |
| 23) M6 04 54 15 | 14/51  | 14   |                 |       |           |                               | 1) NO "STATUS STAND"ON FRONT OF     |
|                 |        |      |                 |       |           |                               | DRAWLING.                           |
|                 |        |      |                 |       |           |                               | 2)16612174                          |
| 24) W639-14     | A/41   | 14   |                 |       |           |                               | 1) ICS & MOT LISTED ON FRONT OF     |
|                 |        |      |                 |       |           |                               | DANUNG .                            |
| 25) F5K-Dul-H   | S      | S    |                 |       |           |                               | 1) LEGI &ILTY                       |
| 604-1           |        |      |                 |       |           |                               | NIDON 9332 MAGEZ STRUCK-OUT         |
| 26) FSK- DVI-M- |        |      |                 |       |           |                               |                                     |
| 8-4-8           | 4      | 2    |                 | 1     |           |                               | NIXN9311 PAGE 2 TUE61BLE            |
|                 |        |      |                 | 1     |           |                               |                                     |
| OTHER CO        | VEER   | 1:2  |                 |       |           |                               | ×                                   |
| 1- PERSONNEL    | VEL A  | 11/1 | V WACK DENN     | TSA   | AZ WOLLA  | THEY THEY                     | HAD NOT REENTRAINED TO              |
| WRITE           | HANGE  | ARA  | E ON FRONT      | 020   | RAWINGS   | . No Acroed                   | OF TRAIN                            |
| AFCORD.         | PPUNT. | put. | IT POPEALED     | 2     | ASONNEL   | HAD NOT RE                    | REAL DIREGUARDS TRAINED.            |
| 2) ACTIONS      | R4 ,   | RECH | PANT. ORA       | NIZAT | TTONS SA  | A SA HO                       |                                     |
| Tycurre         | H SIM  | PPER | 1010            | FROM  | STPP.     | d TO STATIO                   | N'                                  |
|                 |        |      |                 | 1     |           |                               |                                     |
|                 |        |      |                 | T     |           |                               |                                     |
|                 |        |      |                 | T     |           |                               |                                     |

NIK 023 Attachment 2 Page 1 of 16

# $\varphi$

'dland 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, Michigan 48640

MIDLAND ENERGY CENTER PROJECT - GW07020 STONE AND WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW NONCONFORMANCE IDENTIFICATION REPORT NUMBER 023 DATED 03-23-84 FILE 24.2 SERIAL 27884 CSM-0769 LWW-12-84

In pursuance of Nonconformance Identification Report number 023, 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.

"fran Jogamme

D L Quamme Site Manager

CC DDJohnson, MEC BHPeck, MEC NIReichel, MEC TASpellman, MEC JBKeppler, Regional Administrator, Region III JJHarrison, Chief, Midland Section, Region III BBurgess, NRC Resident Inspector RAWells, MEC

RECEIVED

MAY 1 4 1984

S& W CRC. 174 CIO J.O. NO. 14509.00 Serial 27884

NIR 023 Attachment 2 Page 2 of 16

2

Response to Nonconformance Identification Report number 023.

Workprint Station 209 is located with team 9. 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 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 have not completed the conversion/verification process or been distributed as new workprints since lifting of the stop work orders have not been released by MPQAD for Q-work.

The following items address each of the concerns identified:

 All workprints audited were old workprints that had not gone through the conversion/verification process. None of the drawings audited are being 'sed in work packages. One drawing which was voided, was previously used in a work package.

The new workprint process and copies of the workprint stamp are described in FPD-1.000.

2. 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 re-viewed 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 the current distribution status. No further action is deemed necessary.

3. Findings 21, 22, 23, 24. The auditors reviewed the home office revision information as opposed to the field status which is the revision we construct to. (There are large bore isometrics which are revised in the field to add additional welding information. See procedure FPP-1.00). Therefore, the wrong information was reviewed in the register.

Document Control reviewed all drawings against the field status, noted discrepancies and took corrective action.

These are old workprints and would have been corrected during the conversion/verification process to new workprints.

The legibility of the other drawings/change papers was reviewed again during the conversion/verification process to new workprints.

Serial 27884

3

4. Findings 23, 14, 25, 26. Drawing FSK-DVI-M-604-8, was corrected during the conversion/verification process to new workprints.

The legibility of the other drawings/change paper was reviewed again during the conversion/verification process to new workprints.

- 5. Findings 4, 12, 17, 19. Change paper has been removed or added to the drawings per pullback instructions. This would have been corrected during the conversion/verification process to new workprints.
- 6. Findings 18, 20. An FCN was not listed on the front but was attached. This was a clerical error and was 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 FPP-3.000 were discussed. Document Control has reviewed requirements with the Construction Assistant.
  - 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.
- Quality Action Request number RA-00155 dated 03-29-84 was written in response to Nonconformance Identification Report 023 and closed on 05-03-84.

LWW 5/4/84

|   |  |          |                                       |                           |               |                      | 023<br>achment 2 |
|---|--|----------|---------------------------------------|---------------------------|---------------|----------------------|------------------|
| · · · · · ·                               |  |          | CO Par                                | AT AT                     | 6 OAR Nu      | Paqu                 | e 4 of 16        |
|   |  | N        | HIDLAND PROJECT                       |                           | 0. 444 144    | RA-00155             |                  |
| Consun<br>Power                           | ners   |          | ASSURANCE DEPARTN                     | IENT                      | 7. Date Issu  |                      | 8. Revision      |
| Compa                                     | пу   | OUALI    | TY ACTION REQUE                       | CT.                       | 3/29          | /84                  | 0                |
| ~   |  | GOAL     | ACTION REQUE                          | 51                        | 9.<br>Page    | 1_ of _4_            |                  |
| I. Requirement                            |  |          |                                       |                           | 10. ASME F    |                      |                  |
| EDC 7 2                                   | 00 Rev 4   |          |                                       |                           | Yes           | X No                 |                  |
| FPD 3.0                                   | 00 Rev 11<br>00 Rev 19   |          |                                       |                           |               |                      |                  |
| 2. Deficiency Stone a<br>evaluation of wo | and Webst  | er NIR-0 | 23 identifies the                     | following de              | eficienci     | es during a          | CIO              |
| 1) Attachments 1                          | and the second |          |                                       |                           |               |                      |                  |
| 2) Work prints a                          | and attac  | hments i | llegible                              |                           |               |                      |                  |
| 3) Drawing stam                           |  |          |                                       |                           |               |                      |                  |
| 4) Attachment st<br>(DDR)                 | tatus on   | work pri | nts does not alwa                     | ys reflect Sy             | stem 38       | 11. Potential 50     | 0.55(e)          |
|   |  |          |                                       |                           |               |                      | No               |
| A CAR Originated by                       | rald   |          | e/Division/Section<br>- Tech Services | 5. Response Due<br>4/05/8 |               | 12. Date Repor       | ted to MPQA M    |
| 3. Action Item No.                        | 15. Item Prio  | ority    | 17. S/U Code                          | 19. Action Organi         |               | 20. QAR Review       |                  |
| SO 5721<br>4. Discipline                  | 5<br>16. Trend Co  |          | PGMOO                                 | Bechtel Fi                | eld           | P.D.Q.               |                  |
| N/A                                       | ZD-5-00  |          | 18. Resb Code<br>BCPCo - STF-G        | Document C                | Control       | 21. Date<br>3 - 29 - | 84               |
| 2. Cause                                  | 1 20 5 00  | <u></u>  | 1 DOLOG - DIL-G                       | 23. Proposed Curr         | ective Action | 1 3-61-              | 57               |
|   |  |          |                                       |                           |               |                      |                  |
| 4. Responsible Organizatio                |  |          |                                       | 25. Proposed Corr         |               |                      |                  |
| DD<br>6. Disposition Concurrence          |  |          |                                       |                           | 4-3-8         | 4                    |                  |
|   | Dae  |          | 1/5/64                                | 114 (                     | ZN 1/2        | ola                  |                  |
| QAR Re                                    | The state of the second second second second   |          | Date                                  | POAE (ASME O              | nly)          | 0/37<br>Da           | te               |
| 7. Disposition Action Tak                 |  | Te       |                                       |                           |               |                      |                  |
| SEE ATTAC                                 |  | EEIS     |                                       |                           |               |                      |                  |
|   |  |          |                                       |                           |               |                      |                  |
| 8. Method of Disposition                  |  |          |                                       |                           | 29 QAR CIO    | osed by              |                  |
| SEE AMACH                                 | IED FO   | or clu   | SURE JUSTIF                           | CATION.                   | MPQAD         | brleg                | 5/3/84<br>Date   |
|   | Unaccepto  | bie      | Superceding QAR                       |                           | PFQCE (AS     | ME Only) 5/          | 3/84<br>Date     |

Response to NIR 023, dated March 23, 1984, QAR PA-00155, dated March 28, 1984

NIR 023 Attachment 2 Page 5 of 16

Subject: Workprint Station 209

Workprint station 209 is located with team 9. 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. This program is inline with our corrective action plan submitted in response to MCARR-DAT-1. Workprints that have not completed the conversion/verification process or beem distributed as new work prints since the lifting of the stop work orders have not been released by MPQAD for Q-work.

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. Old Workprints versus New Workprints

All workprints audited were old workprints that had not gone through the conversion/verification process. None of the drawings audited are being used in work packages. One drawing which was voided, was previously used in a work package. These workprints will need to complete the conversion/verification process if they are to be used in the field in work packages. The new workprint process and copies of the workprint stamp are described in FPD-3.000.

#### 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. <u>Misinterpretation of Register Revision Information (Findings 21, 22, 23, 24)</u>

The auditors reviewed the home office revision information as opposed to the field status which is the revision we construct 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 all drawings against the field status, noted discrepancies and took corrective action as follows:

| Finding | (22)- | FCR was removed.                             |
|---------|-------|--|
|         | -     | ICS stamp was placed on front of drawing.    |
| Finding | (23)- | Status stamp was placed on front of drawing. |
| Finding | (24)- | ICS stamp will be noted on front of drawing. |

These are old workprints and would have been corrected during the conversion/verification process to new workprints.

#### 4. Legibility (Findings 23, 14, 25, 26)

Drawing FSK-DVI-M-604-8, was illegible. It will be corrected during the conversion/verification process to new workprints. FSK-DVI-M-6048 will be checked at all other stations for legibility by April 6, 1984.

The legibility of the other drawings/change paper is believed to be acceptable. It will be reviewed again during the conversion/verification process to new workprints.

## 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. This would have been corrected during the conversion/verification process to new workprints.

#### 6. Other Miscellaneous (Findings 18, 20)

An FCN was not listed on the front but was attached. This is a clerical error and will be 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 FPP-3.000 were discussed. (Attendance sheets attached). Document Control will again review requirements with the construction assistant.

## 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.

. U : Dun

STONE AND WEBSTER ENGINEERING CORPORATION NONCONFORMANCE IDENTIFICATION REPORT

| ENTIFICATION/LOCATION OF ITEMS:<br>WORK PEINT STATION NG. 209<br>SCRIPTION OF NONCONFORMANCE:<br>URING THE ONGOING EVALUATION<br>ON TROL, CIO PERFORMED A SAMA<br>OCUMENTS CONTAINED AT WORK F<br>TE POPULATION WAS DETERMINED | E INSPECTION OF         |
|--|-------------------------|
| WORK PRINT STATION NG. 209<br>SCRIPTION OF NONCONFORMANCE:<br>URING THE ONGOING EVALUATION<br>ON TROL, CTO PERFORMES A SAMA<br>OCUMENTS CONTAINES AT WORK F<br>TE POPULATION WAS DETERMINES                                    | E INSPECTION OF         |
| SCRIPTION OF NONCONFORMANCE:<br>URING THE ONGOING EVALUATION<br>ON TROL, CIO PERFORMED A SAMA<br>OCUMENTS CONTAINED AT WORK F<br>TE PODULATION WAS DETERMINED  | E INSPECTION OF         |
| ONTROL, CEO PERFORMES A SAMA<br>OCUMENTSCONTAINES AT WORK F<br>TE POPULATION WAS DETERMINES  | E INSPECTION OF         |
| OCUMENTSCONTAINES AT WORK F<br>TE POPULATION WAS DETERMINED  |                         |
| TE POPULATION WAS DETER HINED  | DAINT STATION NO. 209.  |
|  |                         |
| RITERIA. A SAMPLE OF 80 DOC.   |                         |
|  |                         |
| E ACCEDTABLE WITH , REJECT A   | ND REFECTABLE WITH      |
| REJECTS. DOCUMENTS WERE,   | FOUND TO BE DISCRE-     |
| ANT SEE ATTACHED SHEETS FOR SAEC   | CIFIC DETAILS.          |
| 0  |                         |
| WILL R-R.  | 1 . /.                  |
| INITIATOR PROD   | GRAM MGR JElan          |
| 1 /  | <u> </u>                |
| UAIO   | 3.23.89                 |
| RECTIVE ACTION BY:   |                         |
| IDENTIES ODCANTENTION THE  |                         |
| DENTIFY ORGANIZATION TAKING  | G CORRECTIVE ACTION     |
|  | 10.24 (19.00 - A. 1974) |
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|  |                         |
| FICATION SAT UNSAT NEW NIR#  | CONCURRENCE             |
|  | PROGRAM MGR             |
| DATE   | DATE                    |

NIR 023 Attachment 2 Page 7 of 16

| ICIN,          |         |      |              | 1 1.11 | 1416 d - 100  |           |  |
|----------------|---------|------|--------------|--------|---------------|-----------|--|
| DOCUMENT       | REV     | REV  | DOCUMENTS    | IN     | LISTED ON     | ATTCH. TD | OTHER  |
| NUMBER         | DWG     | REG. | IN QUESTION  | REG    | FRONT         | BACK      | COMMENTS   |
| M2EBD -38-1-H2 | 1       | 1    |              |        |               |           | NOT ON FDDL (STN LOG SHOWS   |
|                |         |      |              |        |               |           | TAKEN OFF 10-7-83.   |
| 36CB-15-3      | 4       | 4    | Man and a la |        |               |           | LEGIBILITY.  |
| 2003-32-2      | 5       |      |              |        |               |           | LEGIBILITY   |
| FSK-M-2CCB     |         |      |              |        | NOT LISTED    |           |  |
| - 101-1        |         |      |              |        |               |           |  |
| 2EBB-1-1       | 1       | 2    |              |        |               |           | DHOLD 3810 15 ATTACHED BUT NOT   |
|                | Qua 119 |      |              |        |               |           | 2) LEGIBILITY.<br>DIDEN 386T ATTACHED NOT ON   |
| ) 2EBB-2-2     | Aug-119 | (4)  |              |        |               |           | REGISTER   |
|                |         |      |              |        |               |           | 2) LEGIBILITY  |
| ) FSK-M-2EBB   | 3       | (4)  |              |        |               |           | 1) LEGIBILITY - IDEN 8968  |
| ) 2EBB-3-2     | 4       | (5)  |              |        |               | 1         | VFCR C-4139 APTACHED BUT NOT<br>NOT ON REGISTER<br>1 2) IDON 8478/FOR C-4139                             |
| Jacob a c      |         | 1=1  |              |        |               | 51        | 1 2) IDON 8478/FOR C-4139<br>LEGIALLITY  |
| ) 2EBB-4-1     | 3       | (4)  |              |        |               |           | UIDEN 8191 PG#2 LEGIBILITY .   |
| 2EBB-4-1       | 3       | æ    |              |        |               |           | D HOLD 3809 ATTACHED BUT NOT   |
| 1) JEBB-7-4    | 1       | 2    |              |        |               |           | DECN B299 ATTACHED BUT NOT   |
| Jacob          |         |      |              |        |               |           | 2) LEGIBILITY IDEN 8299 PG."2  |
| b) #EBB-7-5    | 0       | 0    |              |        |               |           | DECR 6698 ATTACHED BUT NOT<br>LISTED ON FRONT  |
|                |         |      |              |        |               |           | 2) IDON 8004 PG#2 LEGIBILITY   |
|                |         |      |              |        |               |           | 3) FERM-6690/6698/55485<br>ATTACHED BUT NOT ON REGISTER.   |
| 3) 2EBB-8-11   | 2       | 3    |              |        |               |           | JIDCN 8297 HOLD 3757 ATTACHED<br>BUT NOT ON REGISTER   |
| - at 00-0 -11  |         | 1-2  |              |        |               |           | 2) IDON 8297 PG #2 LEGIBILITY  |
| 4) 2EBB-10-1   | 3       | 1    |              |        |               | 23/22     | IDCN 6092 LEGIBILITY.  |
| 5) 2ECB -7-1   | 3       | 3    |              |        |               | FCR->     | FORMINITEN ON FRONT<br>SE DWG.<br>FOR MIDIAG NOT WRITTEN ON  |
| 16) 21ECB-8-5  | 4       | 4    |              |        |               |           | FRONT OF DIVG.   |
| 7) 2HBC-160-1  | 2       | 2    |              |        | CONTRACTOR OF | 1         | DE REGISTER  |
| LA LICE IES    |         |      |              |        |               |           | 7 FENGINS NOT WRITTEN ON CONTO   |
| 18) 2HCD-82-6  | 6       | 6    | •            |        |               |           | W FEN GIBS NOT WRITTEN ON CON<br>FRONT OF DING.<br>DFCN M-13G20 NOT LISTED ON TH<br>FRONT OF DING:<br>6N |
|                |         |      |              |        |               |           | 2) DWG NOT ON DWG.   |
|                |         |      |              |        |               |           |  |

| CP2   |           | DISCREPHNCIES & STRTIDI             | X                                   |
|---|-----------|-------------------------------------|-------------------------------------|
| DCUMENT REV   |           | 00                                  | OTHER                               |
| NUMBER DWG  | 1         | REG IN QUESTION REG FRONT BACK      | COMMENTS                            |
| 2HCD-555-1 1  | -         |                                     | 1) FCN M-3638 ATTACHED NOTON        |
|   |           |                                     | REGISTER                            |
|   |           |                                     | 2) LEGIBILITY ON JOP OF FON         |
| M-604 SHI 5   | 12        |                                     | CR M 9562 FEW M                     |
| 1   |           |                                     | 1) FER M-3701 ATTACHED NOT ON       |
|   |           |                                     | REGISTER                            |
| -) H604 54.9 14/2   | 14        |                                     | 1) FCR 6334 ATTACHED NOT ON         |
|   |           |                                     | REGISTER                            |
|   |           |                                     | 2) Iles STAND NOT ON FRONT DEALURIS |
| H604 SH 15 14F  | 1 14      |                                     | 1) NO "STATUS STAND" ON FRONT OF    |
|   |           |                                     |                                     |
|   |           |                                     | 2)1651312174                        |
| H639-14 AFr   | 14        |                                     | 1) ICS & NOT LISTED ON FRONT OF     |
|   |           |                                     | DEAWING .                           |
| IEX-DUI-H S   | S         |                                     | T                                   |
| 1-100   |           |                                     | 2) IDCN 9332 MAGEZ STRUCK-OUT       |
| FSK-DVI-11-   |           |                                     |                                     |
| 7 8-10  | 1 7       |                                     | NIDON 9311 PAGE 2 TUEGIBLE          |
|   |           |                                     |                                     |
| OTHER CONCERN.  | ens:      |                                     |                                     |
| 1)- PERSONNEL A   | 477       | IN WOOK PENT STATION STATED THEY    | HAD 140T REALTRAINED TO             |
| WRITE CHANGE  |           | PAPER ON FRONT OF DRAWINGS. NO ACOR | DOF TRAINING EXISIS ON COMPUTER     |
|   | PRINTPUT. | TT APPEARED I & SONNEL HAD NOT BY   |                                     |
| . 1   | 1 PEC     | PLENT ORAN                          | 5, Lobertle AND Contral OF 0        |
| DOCULATIVITS  | APERC     | al to vary they statted to statte   | achm                                |
| A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . I A . |           |                                     |                                     |
|   |           |                                     | 2                                   |
|   |           |                                     |                                     |

NIR 023 Attachment 2 Page 10 of 16 1-10-22 10 Diquito, Please Quea 119 いっか きろる There silve a area 110 Mary Cashen Stand 30 Charace Wester area 110 Team 3 Sisandore area 10 49,7 + 720 Val Caringer area 43 Im 9 Juna Stephens Valla +210073 1 learn 5 111293 l'attin Butterel Telir 17 1-10-84 b Jeam 18 X 7049 Jaura Payne acia 32, 52, 48,4-D , 7447 Cino Boose ! × 7217 area 46 ien mulle V 7240 13, 42, 45, 46, 54 Fyles Loute 8 7084 Jean 19 Sprak Senguton Team 19 7218 C. Anham ELCE STATE (AND 83) il should a 6210 7483 SC Mary Oanh HAS 45A-480, 10, 33 Shift Store Sta Ra That Meel 6215

.

NIR 023 Callie Betterel - ana 43 Grant. Attachment 2 Page 11 of 16 7682 Jina Stephend ava 43 Tmg - 7373 Joni Kantz ava #9 MPSAD-OC 6073 Valorie Roberge Area 27B GEPTH 72960 Chin Lose alex 484,0, 32, 52 Betty marchatere area 48 B D'Forch Evans ana =64, 66, 20 7360 7026 Nonna Yielon aver 30, 64,66 7026 Kelley Robistan area 480 7626 Slang lable fr. area 480 7626

-U-F4 Gilanc

NIR 023 Attachment 2 Page 12 of 16

#### DISTRIBUTION FOR QAR # RA-00155

ACTIONEE:

· ; . ;

BTFoote, Bechtel-Midland

INFORMATION:

JABauer, Midland WRBird, P-14-418A JEBrunner, M-1079 RECameron, Midland JWCook, P-26-336B GREagle, AAO-TASK DEHorn, Midland LRJessmore, Midland JPKnight, P-14-416 ODLanham, Midland BWMarguglio/DJones, JSC-220A ERMouser, Midland GEParker, Midland RCSember, Midland CMThompson (ALAB - 2)

NIR 023 Attachment 2 Page 13 of 16

To LWWorley

FROM ROutley

CC

DATE May 2, 1984

SUBJECT MIDLAND ENERGY CENTER PROJECT -QAR RA-00155 FILE 17.0 SERIAL 27881 Consumers Power Company

INTERNAL CORRESPONDENCE

LWW 10-84

During an overview of Document Control Station (209 team 9) items 1 through 7 were found to be corrected.

Action implemented as a result of QAR RA-00155:

- 1) Attachments not referenced or attached
- 2) Work prints and attachments illegible
- 3) Drawing stamp errors have been identified
- Attachment status on work prints does not always reflect system 38.

Action of Document Control Assurance Group:

 Document Control Assurance Group performed 100% overview of Station 209 of discrepancies identified in the (QAR RA-CO155). The discrepancies noted have been corrected. No other discrepancies were found.

Recommend closure of QAR number RA-00155.

STONE AND WEBSTER ENGINEERING CORPORATION NONCONFORMANCE IDENTIFICATION REPORT Attachment 2

Page 14 of 16

DATE OF NONCONFORMANCE: 3/22/84 NIR NUMBER 023 IDENTIFICATION/LOCATION OF ITEMS: PRINT STATION NO. 209 DESCRIPTION OF NONCONFORMANCE: DURING THE ONGOING EVALUATION OF SITE DOCUMENT CONTROL, CTO PERFORMED A SAMALE INSPECTION OF DOCUMENTSCONTAINES AT WORK PRINT STATION No. 209. THE ADAULATION WAS DETERMINED TO BE 1116 PER 95/5 CRITERIA. A SAMPLE OF 80 DOCUMENTS WERE RAND-BE ACCENTABLE WITH , REJECT AND REELETABLE WITH 2 REJECTS. DOCUMENTS WERE FOUND TO BE DISCRE-PANT SEE ATTACHED SHEETS FOR SAECIFIC DETAILS. PROGRAM MGR DATE 3.23.8 DATE CORRECTIVE ACTION BY: IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION VERIFICATION SAT UNSAT NEW NIR# CONCURRENCE 110702708 111 1 111 LIV 4-111 ATE DATE CATE 11112 5

| UMENT        | REV        | REV  | DOCUMENTS                                | IN    | LISTED UN | ATTCH. | TD | COMMENTS  |
|--------------|------------|------|--|-------|-----------|--------|----|---|
| IMBER        | DWG_       | REG  | IN QUESTION                              | neu   | FRUNT     | BRCK   |    |   |
| O. 13 1.H.   | _/         | 1_1_ |  |       |           |        |    | NOT ON FDDL (STN LOG SHOWS  |
|              |            |      | •  |       |           |        |    | TAKEN OFF 10-7-83   |
| 3-15-1       | 4          | 4    |  |       |           |        |    | LEGIBILITY.   |
| ANIA         | 5          |      | 1. |       |           |        |    | LEGIBILITY  |
| -m 200       |            |      |  |       | NOT LISTE |        |    |   |
| -79 - 000    |            |      |  |       |           |        |    |   |
| -1           |            | 0    |  |       |           |        |    | THELD 3810 15 ATTACKED BUT NOT  |
| 13-1-1       |            | (2)  |  |       |           |        |    | 2) LEGISTER   |
|              | fierer11.1 |      |  |       |           |        |    | UTDEN 3861 ATTACHED NOT ON  |
| 382          | 1-2-3      | (4)  | and the second                           |       |           |        |    | REGISTER  |
|              |            |      |  |       |           |        |    | 4) LEGIBILITY   |
| K-11 21.08   | 3          | (4)  |  |       |           |        |    | 1) LEGIBILITY - I DEN 8468  |
|              | 1          | (5)  |  |       |           |        | R  | DECR C-4139 ATTACHED BUT NOT  |
| BP-3-2       | <u> </u>   | LIST |  |       |           |        | 11 | VOF ON REGISTER<br>VI IDON 8918/FOR C-4139  |
| k - 11       |            | 6    |  |       |           |        |    | U IDEN BIGI PA+2 LEANDILITY .   |
| 80           | 3          | (9)  |  |       |           |        |    |   |
| 39-11-7      | 3          | æ    |  |       |           |        |    | 1) HOLD 3807 ATTACHED BUT NOF<br>ON REGISTER:<br>1) IDEN B294 ATTACHED BUT NOT<br>ON REGISTAR:                      |
| 8B-1-4       |            | B    |  |       |           |        | -  | 2) LEGISILITY IDEN 8299 PG. 2   |
|              |            |      |  |       |           |        |    | DECR 6698 ATTACHED BUT NOT  |
| BA 1-5       | 0          | 0    |  |       |           |        |    | LISTRD ON PRONT   |
|              |            |      |  |       |           |        |    | 2) IDON 8009 PG#2 LEGIBILITY  |
|              |            |      |  |       |           |        |    | 3) FCR M-6690/6698/C5485<br>ATTACHED BUT NOT ON REGISTER.<br>I) IDCN 8297/HOLD 3757 ATTACHED<br>BUT NOT ON REGISTER |
|              |            | 10   | and the second                           |       |           |        |    | IJIDEN 8297/HOLD 3757 ATTACHED  |
| Bu - 11 - 11 | -2-        | 3    |  | · · · |           |        |    | 2) IDEN 8297 PG #2 LEGIBILITY   |
|              |            |      |  |       |           |        |    | IDCN GOYZ LEGIBILITY.   |
| 11.3-10-1    | 3          | 0    |  |       |           |        | 1- | The slop  |
| ECH-7-1      | 3          | 3    |  |       |           |        |    | DE DWG.   |
| ee 8 - 9 - 5 | 4-         | 4    |  |       |           |        | -  | FRONT OF DIVG. DW   |
| HBC-160-1    | 2          | 2    |  |       |           |        |    | DECN GIBB ATTACHED BUT NOE  |
|              |            |      |  |       |           |        |    | PRONT OF DING.  |
| HCD .82-6    | 6          | 6    | • •                                      |       |           |        |    | DECN M-13620 NOT LISTED ON NO   |
|              |            |      |  |       |           |        | 1  | 2) DWG NOT ON DWG   |

|           | REV  | DOCUMENTS<br>IN RIFSTON | REG   | LISTED ON<br>FRONT | BRCK TD     | COMMENTS                            |
|-----------|------|-------------------------|-------|--------------------|-------------|-------------------------------------|
| 1         | -    |                         |       |                    |             | ) FCN M-3638 ATTACHED NOTON         |
| -         |      |                         |       |                    |             | REGISTER                            |
| $\vdash$  | Γ    |                         |       |                    |             | ITY ON TOP OF FON                   |
|           | 12   |                         |       |                    |             | PECR M 9562 / FCN M 12 B 7/ AMBCHED |
| 1         |      |                         |       |                    |             | 1) FCR H-3701 ATTACHED NOT ON       |
| -         |      |                         |       |                    |             | REGISTER                            |
| -         | 4    |                         |       |                    |             | 1) FCR6034 ATTACHED NOT ON          |
|           | Γ    |                         |       |                    |             | REISTER                             |
| -         |      |                         |       |                    |             | 2) Iles STAND NOT aN FRANT DEADANG  |
| -         | 14   |                         |       |                    |             | 1) NO STATUS STAND"ON FRONT OF      |
|           |      |                         |       |                    |             | DRAYLNG.                            |
|           |      |                         |       |                    |             | 2)1651312173                        |
|           | 14   |                         |       |                    |             | 1) ICS & NOT LISTED ON FRONT OF     |
| -         |      |                         |       |                    |             | DRAWING .                           |
|           | S    |                         |       |                    |             | Frisi                               |
|           |      |                         |       |                    |             | 2) IDCN 9382 MORE STOUCK-CUT        |
|           |      |                         |       |                    |             |                                     |
| 1         | 2    |                         |       |                    |             | NIDON9311 PAGES TULEOIRUE           |
| $\square$ | T    |                         |       |                    |             |                                     |
| -0.0      |      |                         | 1     |                    |             |                                     |
| X         |      |                         | 1     |                    | 1           | (                                   |
| A         | TH   | E WACK PE               | 11 51 | NOL                | THEN THEY   | 420 NOT REED TRAINED TO             |
| SE H      | Bout | R ON FRON               | TOF   | )RAWING            | . No Accord | D OF TRANING EXISTS ON CONDARD      |
| NTORU     | 12   | IT APPEA                | 400 1 | ASONNEL            | HAD NOT BE  | en alequares reamed.                |
| RE        | CED  | LENT ale                | AVIZA | TTONS SA           | CH AS FUL   | , LOGGING AND CANTROL OF            |
| add       | 1    | R TO VARY               | 1 Fee | 4 STATION          | 1 70 574770 | 6<br>X                              |
| 1         |      |                         |       |                    |             | of .                                |
| 1         | Ī    | •                       |       |                    |             | 6                                   |
| 1         | T    |                         |       |                    |             |                                     |

NIR 023 Attachment 3 Page 1 of 9

#### 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    |
|--------------|------------------------|
|              | X Complete Response To |
|              | For Your Information   |
|              | Other                  |

Description:

Tracked Action Item 086.

Signature:

cc: JGKeppler, NRC Region III w/a
JJHarrison, 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 2 9 1964 S & W CAC 193 C10 J.O. NO. 14509.00

|  |   |   | NIR 023<br>Attachment<br>Page 2 of 9 |
|--|---|---|--------------------------------------|
| ITI  | EM/HOLD POINT N   | OTIFICATION FO  | RM<br>Sheet 1 of 1                   |
| STO  | NE & WEBSTER  | ITEM NU   | MBER HOLD POINT NUMBE                |
| CONSTRUCTI                                 | ON IMPLEMENTAT  |   | KED ACTION ITEM                      |
| C  | VERVIEW   | provide the second s | KED INFORMATION ITEM                 |
| MIDLAND NUCLE                              | AR PLANT J.O. NO. 14  | 509 TRAC  | KED RECOMMENDATION IT                |
| REFERENCE(S)                               |   | UNTR  | ACKED ITEM                           |
| QAR RA-00155/QAR RA-00                     | 157   | - HOLD  | POINT NOTIFICATION                   |
| Reference: 1. Stone                        | e inaccurate and confli<br>& Webster NIR No. 022<br>etter #CSM-0768<br>-00157 | 2. Stone & Webster NJ<br>CPCo Letter #CSM-0<br>QAR RA-00155   | AGE NO NO                            |
| DATE RESPONSE REQ'D.                       | INITIATOR/DATE  |   | IN APPROVED/DATE                     |
| 5-24-84<br>RESPONSE (SEE NOTE)             | Rich Scallan s  | 122/24  | Iban 5.22-8x                         |
| Attachments 1 and A<br>Attachments 2 and B | provide a complete resp   | onse to NIR-023.  | HMENTS 1, A, 2 & B                   |
| EST. CORRECTIVE ACTION                     | RESPONDENT  | TITLE   | DATE                                 |
| COMPLETION DATE                            | Salt  | Canst Supt  | 5/29/84                              |
| RESPONSE ACCEPTED                          | DATE  | RESPONSE VERIFIED/C   | LOSED JATE                           |

NOTE - FOR TRACKED ACTION ITEMS ONLY. EXPLAIN CLEARLY OR REFERENCE ATTACHMENTS FOR

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 t' 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.

|                |      |       | DICCR            | -00  | Attachment   |           | V 210  |                              |
|----------------|------|-------|------------------|------|--------------|-----------|--|------------------------------|
| DOCUMENT       | REV  | REV   | DOCUMENTS        |      | LISTED ON    | ATTCH. TD | OTHER  | IN STA.                      |
| ON NUMBER      | DWG  | REG   | IN QUESTION      | REG  | FRONT        | BACK      | COMMENTS   | LOG                          |
| ETBD-572-1     | 4    | 4     | FCR MID265       | YES  | Yes          | No        |  | YES                          |
| ) M652-1-H6    | 0    | 0     | 1DEN 20123       | No   | YES          | YES       |  | YES                          |
| M652-1-H130    | 1    | 1     | FRL 1            | No   | YES          | No<br>¥Na |  | YES                          |
| M-652-2        | 3/51 | 3/F1  | 165 *8           | No   | XES No       | \$ Na     |  | YES                          |
| M-652-2-H22    | 2    | 2     | 10CN 20040       | No   | No           | No        |  | YES                          |
| ) M18-151      | 5    | 5     | FCR 2291 \$2292  | × No | YES          | No        |  | Yes                          |
| M18-152        | 5    | 5     | FCR 2291 12292   | No   | YES          | No        |  | YES                          |
| M-652-1        | IlFI | II/FI | ICS 3, 8, 13, 14 | YES  | Y03          | YES       |  | No                           |
| ) M-652-1-H16  | 0'.  | 0     | FCR 3942         | No   | No           | No        |  | YES                          |
| ) " " " "      | 0    | 0     | IDEN 20133       | No   | YES          | YES       |  | YES                          |
| M18-176        | 7    | 1%    | FCN MIZ95 OFZI95 | No   | Ves AS MI295 | No        | TRANSPOSED NUMBERS CONFUSE Prive   | YES AS ME - 2195             |
| ) M18-175      | 7    | 8     |                  | -    | -            |           | the day bardanit Course  |                              |
| M18-310-3      | 9    | 9     | M-4139           | No   | YES          | YES       | ATTASHMENT HAS NEW WORKPRINT SATAP<br>ATTASHMENT HAS OLD WORK PRINT SAME | YES                          |
| M18-310-4      | 5    | 5     | E-7551           | No   | YES          | YES       | SAME AS ABOVE  | Xes '                        |
| M18-348-2      | .4   | 4     | E-2613           | No   | YES          | No        |  | YES                          |
| DM18-370       | 7    | 7     |                  | -    | -            |           | FITLE PAGE SHOWS 1064 AS LAST<br>PAGE LAST PAGE 15 1031                  |                              |
| M652-1-H2      | 0    | 0     | IDEN 20119       | 2003 | No           | No        |  | YE5                          |
| DM652-1-118    | 0    | 0     | IDEN ZO125       | No.  | YES          | YES       |  | YES                          |
| M652-1-H18     | -    | -     | FCN- 8000        | No   | 1/55         | YES       |  | Yes                          |
| DM652-1-11-145 | 2    | 2     | -                | -    |              |           | AREA'S Nor LEGIBLE   | -                            |
| DN-652-1-H-147 | 1    | 1     |                  | -    | -            | -         | AREN'S Nor LEGIBLE   | -                            |
| 1. 1. 1. 1. 1. |      |       |                  |      |              |           |  |                              |
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|                |      |       |                  |      |              |           |  | TPZ                          |
|                |      |       |                  |      |              |           |  | NIR 023<br>Attachm<br>Page 5 |
|                |      |       |                  |      |              |           |  | 5 nme                        |
|                |      |       |                  |      |              |           |  | ent<br>of 9                  |
|                |      |       |                  |      |              |           |  | 93                           |
|                |      |       |                  |      |              |           |  |                              |

Attachment 2 Page 1 of 2

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 Docu-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.

#### 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) - FCR 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

Attachment 2 Page 2 of 2

#### 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          | REV     | REV        | DOCUMENTS<br>IN QUESTION | IN    | LISTED ON  | RTTCH. TO<br>BRCK | OTHER Attachment Hand Hand   |
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| 13 2EBB-8-11      | 2       | 3          | 14.2                     | -     |            |                   | JIDCN 8297 HOLD 3757 ATTACHED<br>BUT NOT ON REGISTER   |
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