



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

October 12, 1983
J.O. No. 14509
NRC File #83-10-12

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

The purpose of this letter is to indicate the status of CIO approval of QVP, BHO and Status Assessment.

QVP was conditionally approved by CIO letter, NRC File #83-06-17 dated June 17, 1983. The conditions were satisfied as reported in weekly reports No's 5 and 6. Status Assessment was conditionally approved by CIO letter, NRC File #83-06-30 dated June 30, 1983 and the conditions were satisfied as reported in weekly report No. 12.

BHO and CIO reported 5 observations resulting from the Management Review Committee meeting on May 18, 1983. These observations were satisfactorily responded to in CPCo letter, Serial CSM-0656 dated July 1, 1983. CIO weekly report No. 4 dated July 12, 1983 closes this item.

CIO considers QVP, BHO and Status Assessment ready for implementation.

CIO requires NIRs #002, 003, 004 and 005 to be dispositioned prior to assignment of the referenced 45 MPQAD personnel to QVP. A "Hold Point," has been established against the use of the 45 personnel to perform QVP.

CIO report No. 16 identifies the review of "Vendor Equipment Program" as a Hold Point to Phase II of CCP.

Very truly yours,

S. W. Baranow
Program Manager

SWB/ka

cc: JHarrison, US NRC, Glen Ellyn, IL
RCook, US NRC Midland (site)
DBMiller Jr., CPCo Midland (site)
RBKelly, S&W
APAmoruso, S&W
CORichardson, S&W

8406120308 840517
PDR FOIA PDR
RICE84-96

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SP

STONE & WEBSTER MICHIGAN,, INC.
MIDLAND NONCONFORMANCE IDENTIFICATION REPORT

TO: Mr. J. Meisenheimer MPQAD

Page 3 of 3

FROM: MR. B. Holsinger S & W

SUBJECT: NIR # 15

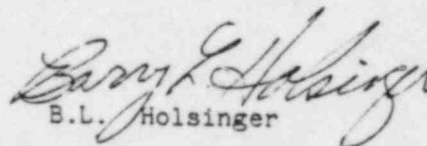
October 4, 1983

Mr. Meisenheimer,

Stone and Webster request the following additional information;

1. The official organization chart.
2. The job description that correspond to this organization chart above the inspector level.

This additional information will help in our evaluation of the responses.


B.L. Holsinger

STONE & WEBSTER MICHIGAN, INC.
MIDLAND NONCONFORMANCE IDENTIFICATION REPORT

NIR. 15

Page 2 of 3

Stone and Webster is not satisfied with the response to NIR No. 15, dated 9-22-83.

This NIR was written based upon the requirements stipulated in CPCo Procedure B-3M-1, not an interpretation of this procedure. Stone and Webster believes that a level of supervisory certification should be the practice as delineated in this procedure.

INITIATOR:

Larry T. Hoberger
9-27-83

PROJECT
MANAGER:

Alfred
9-27-83

STONE AND WEBSTER ENGINEERING CORPORATION
MINOR AND NONCONFORMANCE IDENTIFICATION REPORT

DATE OF NONCONFORMANCE: September 16, 1983 NIR Number 15

IDENTIFICATION/LOCATION OF ITEMS: Consumers Power Company Procedure B-3M-1, Section 5.1.1.

DESCRIPTION OF NONCONFORMANCE: Contrary to above Project Procedure, the QC Night Lead, who is in a supervisory position, is not certified.

REMARKS:

INITIATOR:

Barry L. Lohring

DATE:

9-19-83.

PROJECT

MANAGER:

B. Lohring
for AS LUCKS

CORRECTIVE ACTION BY:

MPQAD - Soils

(IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION)

The policy in practice and the policy and requirements which CP Co feels is provided by B 3M-1 is summarized as follows: MPQAD Procedure B 3M-1 is for qualification and certification of inspection and test personnel. Section 5.1.1 of B 3M-1 states the minimum level capability required for certification. Level II and III certified personnel must be capable of supervising inspection personnel and performing inspection activities as outlined in the described project functions. This is not to be interpreted that supervisors in an inspection organization are required to be certified. Supervisors are authorized to perform activities as prescribed by MPQAD procedures, except where those activities require a specific level of certification.

Donald E. Horn for JK Moisenheimer
9/22/83

INITIATOR:

PROJECT MANAGER:

DATE:



CONSUMERS
Power
Company

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

October 10, 1983

LAB 91-83

50-329

50-330

Mr Stan Baranow
Stone & Webster Engineering
Midland Nuclear Plant Project
Trailer 186
3500 E Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF (3) COMPUTER PRINTS

This will confirm the transmittal of three computer printouts containing information on MPQAD (BCP) Inspector records. These prints cover all training, exams, performance demos, certifications, etc.

GFEwert/LABotimer

A handwritten signature in cursive script, appearing to read "L. Botimer".

cc: JHarrison, NRC
DEMiller, Site Mgr
RAWells

~~831024003~~

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STONE & WEBSTER MICHIGAN, INC.

P.O. Box 2325. BOSTON. MASSACHUSETTS 02107

PRINCIPAL STAFF
<i>Rec'd 13</i>
<i>[Signature]</i>
<i>[Signature]</i>

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

October 5, 1983
J.O. No. 14509
NRC File #83-10-05

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

An evaluation of MPQAD training was performed by CIO utilizing Attribute Checklist N° MP-MIS-018E-0005 and MPQAD Procedure N° B-3M-1.

Records of personnel trained to PQCI N° E-6.0, Rev. 16 were selected for evaluation with records of 6 persons being randomly selected from a population of 45 persons listed on computer printout dated September 19, 1983. (The listing of the 45 persons is attached). All six reviewed records contained one or more discrepancies thus rendering the lot of 45 unacceptable. (See NIRs #002 thru #005 attached)

CIO is transmitting the NIRs to MPQAD along with a request that they review the records of all personnel listed on printout dated September 19, 1983. The NIRs will be statused on the weekly reports to you.

Very truly yours,

[Signature]

S.W. Baranow
Program Manager

cc: JHarrison, US NRC, Glen Ellyn, IL
RCook, US NRC Midland (site)
DBMiller Jr., CPCo Midland (site)
RAWells, MPQAD
RBKelly, S&W
APAmoruso, S&W
CORichardson, S&W

~~831110069~~

OCT 11 1983

STONE AND WEBSTER ENGINEERING CORPORATION
 NONCONFORMANCE IDENTIFICATION REPORT

QCI 15.01
 Attachment 4.1
 Revision 2

PAGE 1 OF 3

DATE OF NONCONFORMANCE: SEPTEMBER 27, 1983

NIR NUMBER 002

IDENTIFICATION/LOCATION OF ITEMS:

MPQAD - RECORDS FILE SECTION

DESCRIPTION OF NONCONFORMANCE:

During a sample inspection of 6 of 45 MPQAD Personnel Training Records, discrepancies were observed in the use of forms to document training activities. It was observed that forms from both B-3M and B3M-1 Procedures were utilized. Forms as found in B-3M-1 are the appropriate ones. See attached list of discrepant items:

Walter H. Siemkiewicz
 INITIATOR

PROGRAM MGR [Signature]

DATE September 27, 1983

DATE October 3, 1983

CORRECTIVE ACTION BY:

MPQAD

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT
 INITIATOR
 DATE

NEW NIR#

DATE

CONCURRENCE

PROGRAM MGR

DATE

REMARKS

PERSONNEL

- 1) B. E. FREIMARK - 365-64-4818
 - 1) Vision Examination Record - Form QA-14-2 used in lieu of QA-115-0
 - 2) Performance Demonstration Record Form QA-10-2 used in lieu of QA-114-0
2. T. G. NELSON - 276-56-6857
 - 1) Vision Examination Record - Form QA-14-2 used in lieu of QA-115-0
 - 2) Personnel Certification - Form QA-37-0 used in lieu of QA-37-1
 - 3) Performance Demonstration Record Form QA-10-2 used in lieu of QA-114-0
3. S. REVICH - 379-84-0876
 - 1) Inspection Test Personnel Qualification Questionnaire Form QA-12-2 used in lieu of QA-117-0 and QA-118-0
 - 2) Vision Examination Record - Form QA-14-2 used in lieu of QA-115-0
 - 3) Personnel Certification - Form QA-37-0 used in lieu of QA-37-1,
Also a revision was not listed on the form.
 - 4) Performance Demonstration Record Form QA-10-2 used in lieu of QA-114-0
- 4) D. W. GASKILL - 278-54-0575
 - 1) Vision Examination Record Form QA-14-2 used in lieu of QA-115-0
 - 2) Performance Demonstration Record Form QA-10-2 used in lieu of QA-114-0
- 5) B. D. HINES - 365-52-6895
 - 1) Inspection Test Personnel Qualification Questionnaire Form QA-12-2 used in lieu of QA-117-0 and QA-118-0
 - 2) Vision Examination Record Form QA-14-2 used in lieu of QA-115-0
 - 3) Personnel Certification Form QA-37-0 used in lieu of QA-37-1
 - 4) Performance Demonstration Record Form QA-10-2 used in lieu of QA-114-0

- 6) J. R. ADOMOWSKI - 368-46-9164
 - 1) Vision Examination Record Form QA-14-3 used in lieu of QA-115-0
 - 2) Performance Demonstration Record Form QA-10-2 used in lieu of QA-114-0

STONE AND WEBSTER ENGINEERING CORPORATION
 NONCONFORMANCE IDENTIFICATION REPORT

QCI 15.01
 Attachment 4.1
 Revision 2

PAGE 1 OF 1

DATE OF NONCONFORMANCE: SEPTEMBER 27, 1983 NIR NUMBER 003

IDENTIFICATION/LOCATION OF ITEMS:

MPQAD - RECORDS FILE SECTION

DESCRIPTION OF NONCONFORMANCE:

A check of MPQAD Personnel Training Records indicated that the yearly Vision Examination of B. D. Hines was exceeded. The due date for the Examination was March 9, 1983. The date of the Examination was March 18, 1983.

Walter H. Sienkiewicz
 INITIATOR

DATE September 27, 1983

PROGRAM MGR [Signature]

DATE October 3, 1983

CORRECTIVE ACTION BY:

MPQAD

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT
 INITIATOR _____
 DATE _____

NEW NIR#
 DATE _____

CONCURRENCE
 PROGRAM MGR _____
 DATE _____

REMARKS

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

QCI 15.01
Attachment 4.1
Revision 2

PAGE 1 OF 2

DATE OF NONCONFORMANCE: SEPTEMBER 27, 1983

NIR NUMBER 004

IDENTIFICATION/LOCATION OF ITEMS:

MPQAD - RECORDS FILE SECTION

DESCRIPTION OF NONCONFORMANCE:

During a sample inspection of 6 of 45 MPQAD Personnel Training Records, the following discrepancies were observed in the use of the on-the-job training records as required in Deviation #99 to Procedure B-3M-1.

Walter H. Sankiewicz
INITIATOR

DATE September 27, 1983

PROGRAM MGR [Signature]

DATE October 3, 1983

CORRECTIVE ACTION BY:

MPQAD

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT _____ UNSAT _____
INITIATOR _____
DATE _____

NEW NIR# _____
DATE _____

CONCURRENCE
PROGRAM MGR _____
DATE _____

REMARKS

PERSONNEL

- 1) B. E. FREIMARK - 365-64-4818
 - 1) There was no revision number listed on the OJT training record
- 2) T. G. NELSON - 276-56-6857
 - 1) The on-the-job training record was not available in the records file, but the above individual was certified to PQCI-E-6.0 Rev. 15
- 3) S. REVICH - 379-84-0876
 - 1) The on-the-job training record was not available in the records file, but the above individual was certified to PQCI-E-6.0 with no revision listed
- 4) D. W. GASKILL - 278-54-0575
 - 1) No revision number was listed on the on-the-job training record
- 5) B. D. HINES - 365-52-6895
 - 1) The title of the PQCI was not listed on the on-the-job training record

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

QCI 15.01
Attachment 4.1
Revision 2

PAGE 1 OF 1

DATE OF NONCONFORMANCE: SEPTEMBER 27, 1983

NIR NUMBER 005

IDENTIFICATION/LOCATION OF ITEMS:

MPQAD - RECORDS FILE SECTION

DESCRIPTION OF NONCONFORMANCE:

A sample inspection of 6 of 45 MPQAD Personnel Training Records revealed that the Personnel Certification Form QA-116-1, Attachment D is not available in the record file as required by Procedure B-3M-1.

PERSONNEL

- | | |
|---------------------------------|----------------------------------|
| 1) B. E. FREIMARK - 365-64-4818 | 4) D. W. GASKILL - 278-54-0575 |
| 2) T. G. NELSON - 276-56-6857 | 5) B. D. HINES - 365-52-6895 |
| 3) S. REVICH - 379-84-0876 | 6) J. R. ADOMOWSKI - 368-46-9164 |

Walter H. Sienkiewicz
INITIATOR

PROGRAM MGR [Signature]

DATE September 27, 1983

DATE October 3, 1983

CORRECTIVE ACTION BY:

MPQAD

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT
INITIATOR _____
DATE _____

NEW NIR#

DATE

CONCURRENCE

PROGRAM MGR _____

DATE _____

REMARKS

Computer Report 4-14-83

PAGE 2 OF 3

PQCI NO. REVISION

E-6.0 16

NAME SS NUMBER

6. FREIMARK BE 365-64-4818

7. GABEL DL 337-44-5286

8. GASKILL DW 278-54-0575

9. GORBAN KP 165-54-3497

10. GOSSETT W.W. 258-46-7828

1. HAHN TM 398-34-9344

2. HINES R.D. 365-52-6895

3. HOLLEY G.H. 251-11-5218

4. HYDE JA 189-44-7200

5. LAWTHER KR 383-30-6234

6. MILLER JW 372-46-6124

7. MONCRIEFF GD 244-88-1717

8. NANCE R.E. 368-48-9474

9. NELSON T.G. 276-56-6851

10. PARKER DC. 374-52-4749

TRAINING DATE	TRAINING METHOD	EXAM. DATE	88 SUPERVISOR EVALUATION	91 OT DATE IF REG. TRNG "	92 PERF DEMO. DATE	CERT DATE	CERT CODE	CERT LEVEL	93 VISUAL EXAM RECORD DATE	94 INSR/TEST PERSONNEL QUAL. QUESTIONNAIRE	95 MINIMUM EDUCAT. 4 EXP. REQ'D FOR C/P
5-18-83/15 REGISTRY	CLASS	PA 5-17-83	6-20-83	5/4-30-83	7-20-83	N		I	4-1-83	C/II	
6-17-83/15 8-4-83/16	CLASS BY MEMO	PA 6-17-83 NA	6-18-83 NA	5/6-25-83 NA	7-20-83	N		II	5-23-83	C/II	
6-17-83/15 8-23-83/16	CLASS BY MEMO	PA 6-17-83 NA	7-13-83 NA	5/4-13-83 NA	7-15-83	NEW		I	3-18-83	C/II	
8-4-83/16 BY MEMO	BY MEMO	NA	NA	NA	6-28-83	N		II	4-15-83	C/II	



Consumers
Power
Company

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

October 4, 1983

50-329

50-330

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL of PQCI's
FILE 24.2 SERIAL 25258

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

P-2.30	Rev 3	CN AA00095
P-2.30	Rev 4	New Revision
R-1.00	Rev 14	CN AA00096
E-6.3	Rev 2	CN AA5109
Control Log - Week ending September 30, 1983		
E-6.1	Rev 7	- Replacement IR
Control Log - For week ending September 23, 1983		
P-2.20	Rev 8	CN AA00093 (Also PQCI revised Eff Date 10/17/83)
R-1.60	Rev 6	CN AA00094

JAPucci

GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, SMO
RAWells, MPQAD

OC0983-0001A-QL05

~~8310240136~~

1031



Consumers
Power
Company

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

October 7, 1983

50-329

50-330

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25262

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

P-2.20	Rev 7	CN #AA00098
P-2.10	Rev 13	CN #AA00097
P-1.00	Rev 7	New Revision
E-6.6	Rev 9	CN AA5112, #AA5113, #AA5114, #AA5116, #AA5117
E-5.0	Rev 13	CN #AA5111
E-6.0	Rev 16	CN #AA5110
PIW-1.00	Rev 6	CN #AA00099
E-6.6	Rev 9	CN #AA5118

JAPucci/sky

GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, SMO
RAWells, MPQAD

~~8310240084~~



Consumers
Power
Company

Midland Project: PO Box 1963, Midland, MI 48640 • (517) 831-2650

October 3, 1983

LAB 86-83

50-329

50-330

Mr Stan Baranow
Stone & Webster Engineering
Midland Nuclear Plant Project
Trailer 186
3500 E Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF (1) COMPUTER PRINT

This will confirm the transmittal of a computer printout containing information on MPQAD (BOP) Inspector records. The print covers all training, exams, performance demos, certifications, etc.

GFEwert/LaBotimer

cc: JHarrison, NRC
DEMiller, Site Mgr
RAWells

~~8810240067~~

IEU



*Wanted
File*

James W Cook
Vice President - Projects, Engineering
and Construction

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0453

September 30, 1983

PRINCIPAL STAFF	
RA	✓ [initials]
D/RA	[initials]
R/PA	[initials]
OF	[initials]
OR	[initials]
DRMSE	[initials]
DE	[initials]
ML	[initials]
OL	FILE ✓

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

MIDLAND ENERGY CENTER PROJECT
MIDLAND DOCKET NO 50-329, 50-330
PROTOCOL GOVERNING COMMUNICATIONS FOR
STONE AND WEBSTER INDEPENDENT THIRD PARTY
OVERVIEWS
FILE 0655 SERIAL 26158

Reference:

1. Letter to Mr J W Cook dated September 15, 1983 for Mr J G Keppler regarding Protocol Governing Communications for Stone and Webster Independent Third Party Overviews on Midland Plant, Units 1 and 2

This letter confirms that Consumers Power Company accepts and will adopt the protocol provided in the reference for communications between Consumers Power Company and Stone and Webster in its capacity as Construction Implementation Overviewer and the Third Party Overviewer on the Remedial Soils Program.

Stone and Webster has reviewed and concurs with the protocol. Confirming prior verbal direction, they are instructed by copy of this letter to adopt the protocol in their third party work on the Midland Project.

James W. Cook

8311010143

CC DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
The Honorable Charles Bechhoefer, ASLB
The Honorable Jerry Harbour, ASLB
The Honorable Frederick P Cowan, ASLB
The Honorable Ralph S Decker, ASLB
William Paton, ELD
Michael Miller, IL&B, Chicago
Ronald Callen, Michigan
Public Service Commission
Myron M Cherry
Barbara Stamiris
Mary Sinclair
Wendell Marshall
Colonel Steve J Gadler (PE)
Howard Levin (TERA)
Billie P Garde, Government
Accountability Project
Lynne Bernabei, Government
Accountability Project
APamaroso, Stone & Webster
NRC Correspondence File, P-24-517
UFI, P-24-517
BJWalraven, P-24-517
Hearings File, P-24-517
JWCook, P-26-336B
DBMiller, Midland
TABuczynski, Midland-207
JNLeech, P-24-507
DASommers, P-14-106 (For SER Related Issues)
DFLewis, Bechtel
DJVandeWalle, P-24-614B
FCWilliams, IL&B, Washington, DC
GALow, P-12-237A
SHHowell, P-14-113B
RAWells, Midland
PHolt, Midland



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

OSC File

SEP 29 1983

Docket No. 50-329
Docket No. 50-330

Consumers Power Company
ATTN: Mr. James W. Cook
Vice President
Midland Project
1945 West Parnall Road
Jackson, MI 49201

Gentlemen:

We have reviewed your proposal to have the Stone and Webster Corporation (S&W) perform the third party independent overview of the Construction Completion Program (CCP). Our evaluation is enclosed.

The staff has considered the qualifications of both the S&W organization and the individuals proposed as team members to conduct the Construction Implementation Overview (CIO) of Consumers Power Company's (CPCo) Construction Completion Program. Inputs to this review included the information supplied by S&W, as set forth in the April 6, 1983, April 11, 1983, and May 19, 1983 submittals, the staff's existing knowledge of S&W performance at other nuclear power plants, and information as to S&W personnel competence.

The CIO program described by S&W in the August 30, 1983, and September 9, 1983, submittals and at the August 25, 1983, meeting has been reviewed by the NRC staff and found to constitute an acceptable third party overview program. The NRC staff has reviewed the CIO activities performed to date and has found this overview to have been adequate.

Based on NRC review of the documentation submitted by CPCo and S&W, followup checks, and consideration of comments by members of the public, we conclude that S&W meets the independence and competence criteria for third party reviewers and that S&W's proposed CIO program is adequate to provide for an assessment of the Construction Completion Program (CCP).

This letter constitutes NRC approval of S&W to perform the CIO.

8310050341

SEP 29 1983

Should you have any questions regarding this letter please contact Mr. R. F. Warnick of my staff.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Enclosure: As stated

cc w/encl:

- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- The Honorable Charles Bechhoefer, ASLB
- The Honorable Jerry Harbour, ASLB
- The Honorable Frederick P. Cowan, ASLB
- The Honorable Ralph S. Decker, ASLB
- William Paton, ELD
- Michael Miller
- Ronald Callen, Michigan
Public Service Commission
- Myron M. Cherry
- Barbara Stamiris
- Mary Sinclair
- Wendell Marshall
- Colonel Steve J. Gadler (P.E.)
- Howard Levin (TERA)
- Billie P. Garde, Government
Accountability Project
- Lynne Bernabei, Government
Accountability Project

RIII
JJA
Gardner/lr
09/27/83

RIII
JJA
Harrison
9/28/83

RIII
RFW
Warnick
9/27/83

RIII
VHZ
Lewis
9/28

RIII
D
Davis
9/29

RIII
JJK
Keppler
9/29/83

TE
9-28-83 11/28/83

BLD
9/28/83

STAFF EVALUATION OF CONSUMERS POWER COMPANY
PROPOSAL TO USE STONE AND WEBSTER MICHIGAN, INC.
TO CONDUCT THE THIRD PARTY
CONSTRUCTION IMPLEMENTATION OVERVIEW OF THE
MIDLAND NUCLEAR PLANT

Purpose and Background

The purpose of this document is to provide an evaluation of the Consumers Power Company's (CPCo) proposal to use Stone and Webster (S&W), Michigan, Inc. to conduct the third party overview of the Construction Completion Program at Midland. Consumers' proposal is documented in their letter of April 6, 1983, in response to the NRC's March 28, 1983, request for additional information. The CPCo commitment to provide for an independent third party Construction Implementation Overview (CIO) has been reviewed and found acceptable. This evaluation provides the basis of the NRC's acceptance of Consumers proposal.

The purpose of the CIO is to provide an independent overview of the Construction Completion Program (CCP) to assure the program is adequate and will be properly implemented. This is to ensure that the construction of the facility can be completed in conformance with the Commission's regulations and the construction permits.

The S&W overview of the CCP will be independent from and supplemental to the normal NRC inspection program. As part of their inspection program, the NRC inspectors will monitor and review the S&W CIO.

The use of S&W as the third party overviewer will provide additional assurance of proper implementation of the quality program. In addition, it will function as a mechanism to allow members of the public and the NRC to regain confidence in the program.

The results of the overview program will be submitted to the Regional Administrator in a weekly report of CCP activities overviewed and any problems identified.

The NRC has required communications between CPCo and S&W to follow a protocol to assure S&W's independence is being maintained and to assure public and NRC knowledge of S&W activities and correspondence. It should be noted that the protocol provides for a monthly meeting, open to the public for observation, to review S&W activities for the month and to discuss problems identified by the overview.

CPCo's Proposed Third Party Reviewer

CPCo has proposed that Stone and Webster perform an independent overview of the Midland project CCP. The NRC staff has considered CPCo's submittal of April 6, 1983, and responses to Region III questions, public comments, and the clarification of submitted comments and additional comments received at

public meetings held in Midland, Michigan on February 8, 1983, and August 11, 1983. In addition, the staff conducted numerous meetings and telephone conversations with representatives of the Government Accountability Project (GAP) and the intervenors. In considering CPCo's proposal, the staff has used as guidance the letter of February 1, 1982, from Chairman Palladino to Congressmen Ottinger and Dingell, (attached) which sets forth the "competence and independence" standards that have been applied by the Commission in determining the acceptability of proposed third-party reviewers.

S&W Competence

The staff has considered the qualifications of both the S&W organization and the individuals proposed as team members to conduct the independent overview of the Midland project. Input to the staff's review included the information supplied in CPCo's submittal, the responses to the staff's inquiries, the S&W submittals, and the staff's existing knowledge of S&W performance at other nuclear power plants.

The staff has reviewed S&W's experience in assessing nuclear construction projects, particularly its performance in independent reviews of design, construction, and quality assurance undertaken for utilities as input to the NRC's operating license reviews.¹

The staff has also reviewed the qualifications of the key persons proposed for the project, as set forth in the April 6, 1983, April 11, 1983, and May 19, 1983, submittals, and has concluded that the team has significant stated experience in QA/QC matters, nuclear plant construction, and management systems. These are the skills which we find necessary to carry out the third party overview. Through reference checks and/or discussions with NRC staff members familiar with the key personnel, we have verified their experience and competence in these areas.

Based upon its review, the staff concludes that the S&W organization and the individual overview team members are competent to conduct the Construction Implementation Overview and meet the technical competence standards set forth in the Ottinger/Dingell letter.

S&W Independence

The staff believes that for an organization to be acceptable to conduct this program the organization must be independent of the utility which owns Midland and independent of contractors whose work will be subject to the third party overview. Independence has been defined by the Commission as being the ability "... to provide an objective, dispassionate technical judgement, provided solely on the basis of technical merit..." (Page 1 of Response to Questions, attached to Ottinger/Dingell letter.) The Commission further defined the term by stating that the company approved to conduct an independent review must be one "...not previously involved with the activities...that they will now be reviewing..." Id.

¹Reference Secy 82-414, "Diablo Canyon Design Verification Program Phase II Recommendations"

The staff has reviewed the information provided by CPCo and S&W regarding previous work performed by S&W for the Midland site and the principal contractors for the Midland project. Previous work at Midland consisted of limited activities (one person) in the planning phase of providing interface controls going from construction/preoperation testing into operations and is not considered to violate the independence criteria.

To the best of our knowledge, all the professional personnel assigned to work on the Midland Construction Implementation Overview have provided the NRC with sworn statements regarding their independence. S&W has stated that none of the staff expected to be assigned to the Midland review has any prior work experience with CPCo or on Midland.

Based on this information and the assessment of S&W to perform work as defined in Secy 82-414, the staff has no basis to believe that S&W is not sufficiently independent of CPCo.

The staff concludes that S&W and the key personnel who have been identified for the conduct of the review meet the standards of independence outlined in the Ottinger/Dingell letter.

S&W's Overview Program

The purpose of the independent third party overview is to provide additional assurance that the CCP is adequate and will be properly implemented. This overview requirement was necessitated by the loss of NRC staff confidence in CPCo to implement successfully the Quality Assurance Program. The CIO will remain in place at the Midland site until the necessary confidence level has been restored to the satisfaction of the NRC staff. CPCo also has the option to continue the CIO as an additional system of checks and balances, beyond any period of time required by the staff.

The written CIO program is controlled by site originated program documents and by S&W corporate program documents as follows:

- A. The documents written expressly for the CIO include:
- . CIO Program Document dated April 1, 1983
 - . CIO Quality Assurance Plan
 - . Third Party CIO Plan
 - . CIO Assessment Procedure, 10.01
 - . Nonconformance Identification and Reporting Procedure, 15.01
 - . A detailed attribute checklist for each CPCo Project Quality Control Instruction (PQCI)

- . A detailed checklist to review generic types of requirements (for non-PQCI activities); e.g., QA Audits and Surveillances
 - . Additional Quality Control Instructions as needed to provide adequate overview control
- B. The following S&W corporate master program documents will also be utilized for the CIO, as required:
- . QA Topical Report SWSQAP 1-74A, S&W Standard Nuclear Quality Assurance Program
 - . S&W Quality Standards; e.g., for quality sampling
 - . S&W Quality Assurance Directives

The NRC met with S&W on August 25, 1983, to gain additional insight into the total S&W program. This meeting was held in Midland, Michigan and was open to the public. Questioning by the public on the CIO was permitted at the end of the meeting. Subsequent to this meeting, S&W submitted on August 30, 1983, to the NRC copies of the material presented at the August 25, 1983, public meeting and on September 9, 1983, submitted a summary of the program presented at that same meeting.

The program described by S&W in the above documents and at the August 25, 1983, meeting has been reviewed by the NRC staff and found to constitute an acceptable third party overview program. The CIO program will be audited independently by the S&W corporate QA staff from Boston and on a routine inspection effort by the NRC.

S&W personnel onsite for the CIO will vary with the demand of the work activities to be overviewed. S&W's CIO staffing plan currently has nine people assigned at the Midland site and there are currently planned increases to 32 people as work activities dictate. These numbers, however, are only estimates and S&W will commit whatever personnel is necessary to conduct the CIO. The number of personnel used is not subject to limitation by CPCO.

The S&W overview activities of the CCP to date have been somewhat limited, since the CCP has not yet been approved and work in progress is therefore limited. Activities being overviewed were pre-Phase I. The activities being overviewed have included the following CCP and non-CCP activities:

- . Program and procedure review
- . Review of MPQAD QA/QC personnel training and certification
- . Review of general training of CPCo and Bechtel personnel, including construction craftspersons
- . Review of CCP Management Reviews

- . Review of System Interaction Walkdowns
- . Review of Design Documents

The above reviews have identified various concerns and one nonconformance that required CPCo actions to resolve. The NRC staff has reviewed the CIO activities performed to date and has found this overview, including actions taken by CPCo, to have been adequate.

Summary and Conclusion

Based on NRC review of the documentation submitted by CPCo and S&W, followup checks, and consideration of comments by members of the public, we conclude that S&W meets the independence and competence criteria for third party reviewers and that S&W's proposed CIO program is adequate to provide for an assessment of the Construction Completion Program (CCP).

sent to DMBS 11/23/83



Consumers
Power
Company

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

September 28, 1983

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25245

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

CW-1.00	Rev 5	CN AA00092	
PF-1.10	Rev 5	New Revision	Effective 10/10/83
C-9.30	Rev 0	First Revision	Effective 10/24/83
E-1.60	Rev 7	New Revision	Effective 11/18/83
E-1.60	Rev 6	CN AA5108	
Overdue Transmittal Sheet			

J. Pucci
GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, SMC
RAWells, MPQAD

SC0983-0001A-QL03

8311290310

sent to DMB 9/23/83



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September 26, 1983

Mr Stan Baranow
Stone and Webster
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3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25241

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

E-1.60 Rev 6 Reactivated 9/22/83
C-1.50 Rev 13 Revised Effectivity Date
C-1.60 Rev 7 Revised Effectivity Date
E-6.10 Rev 7 CN #AA5107

JAPucci
GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, SMO
RAWells, MPQAD

OC0983-0001A-QL05

~~8311270163~~



Consumers
Power
Company

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

September 22, 1983

50-324

50-330

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25234

This will confirm the transmittal of controlled copies of PQCI and/or changes
to Stone and Webster, as listed below:

C-1.40	Rev 11	
C-1.40	Rev 11	CN#AA00090
E-4.0	Rev 13	CN#AA5104
E-3.1	Rev 7	CN#AA5106
E-2.1	Rev 9	CN#AA5105
C-1.10	Rev 16	CN#AA00091 & CN#AA00087

JAPucci

GFewert/JAPucci

cc: JHarrison, NRC
DBMiller, SMO
RAWells, MPQAD

~~8510240063~~

I 201



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

September 20, 1983

50-329

50-330

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25232

This will confirm the transmittal of controlled copies of PQCI and/or changes
to Stone and Webster, as listed below:

Control Log Week Ending September 16, 1983
PF-1.10 Rev. 4 CN#AA00043 Revised Eff. Date (9-20-83)
E-1.60 Rev. 6 Follow-up to Inactive Letter

GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, Site Mgr
RAWells, MPQAD

OC0983-0001A-QL05

~~8310240050~~

I 801



Consumers
Power
Company

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

LAB 80-83

September 20, 1983

50-329

- 50-320

Mr Stan Baranow
Stone & Webster Engineering
Midland Nuclear Plant Project
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3500 E Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF (1) COMPUTER PRINT

This will confirm the transmittal of a computer printout containing information on MPQAD (BOP) Inspector records. The print covers all training, exams, performance demos, certifications, etc.

GFEwert/LaBotimer

cc: JHarrison, NRC
DEMiller, Site Mgr
RAWells

~~8310240033~~

IED1



Consumers
Power
Company

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

September 19, 1983

50-329

50-330

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25229

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

E-1.60	Rev 6	Inactive 9/16/83
P-1.40	Rev 0	CN #AA00083
P-1.40	Rev 0	CN #AA00034 Revised Effectivity Date
MP-1.00	Rev 2	CN #AA00088
C-2.10	Rev 12	CN #AA00086
PIW-1.00	Rev 6	CN #AA00085
E-6.3	Rev 2	CN #AA5103

JFW
GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, Site Mgr
RAWells, MPQAD

OC0983-0001A-QL05

~~8/21/6290131~~

IED1

DSA
SW file

SEP 15 1983

Docket No. 50-329
Docket No. 50-330

Mr. J. W. Cook
Vice President
Consumers Power Company
1945 West Parnall Road
Jackson, MI 49201

Subject: Protocol Governing Communications for Stone and Webster
Independent Third Party Overviews on Midland Plant, Units 1 and 2

As you are aware, we are in the process (nearing completion) of reviewing your proposed Construction Completion Program, (CCP) including its provision for Stone and Webster to serve as a third party overviewer. As a condition for accepting the CCP, and to provide the necessary confidence that the third party is of sufficient independence, we propose that you adopt the attached Protocol to govern communications with the third party.

A key aspect of the enclosed Protocol is a monthly meeting between Consumers Power Company, the independent third party overviewer and the NRC to discuss the previous month's third party overview activities and any problems encountered during the overview. The initial monthly meeting is scheduled for October 13, 1983.

Please confirm in writing that Consumers Power Company and Stone and Webster adopt the Protocol. This confirmation is a prerequisite to the NRC staff's approval of the CCP.

Should you have any questions regarding this letter, please contact Mr. R. F. Warnick of my staff.

Sincerely,

James G. Keppler
Regional Administrator

Enclosure: As stated

cc w/encl: See attached distribution list

RIII	RIII	RIII	RIII	IE	NRR	RIII	RIII	ELD
Gardner/l	Harrison	Warnick	Lewis	Stone	Hood	Davis	Keppler	Cuoco

09/15/83

8456020260

Docket No. 50-329
Docket No. 50-330

Mr. J. W. Cook
Vice President
Consumers Power Company
1945 West Parnall Road
Jackson, MI 49201

Subject: Protocol Governing Communications for Stone and Webster
Independent Third Party Overviews on Midland Plant, Units 1 and 2

As you are aware, we are in the process (nearing completion) of reviewing your proposed construction completion program, including its provision for Stone and Webster to serve as a third party ^(CP) overviewer. As a condition for accepting the CCP, and to provide the necessary confidence that the third party is of sufficient independence, we propose that you adopt the attached Protocol to govern communications with the third party.

A key aspect of the enclosed Protocol is a monthly meeting between Consumers Power Company, the independent third party overviewer and the NRC to discuss the previous month's third party overview activities and any problems encountered during the overview. The initial monthly meeting is scheduled for October 13, 1983.

Should you have any questions regarding this letter, please contact Mr. R. F. Warnick of my staff.

Please confirm in writing that Consumers Power Co. and Stone and Webster adopt the Protocol. This confirmation is a prerequisite to the NRC's staff's approval of the CCP.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Enclosure: As stated

RIII
KM
Gardner/lr
9/14/83

RIII
Harrison
9/14/83

RIII
RFU
Warnick
9/14/83

RIII
Lewis
9/14/83

IE/MER
Davis
9/14/83

RIII
Davis
9/14/83

RIII
Der SHL
Keppler
9/15/83

with corrections noted
ELD
for L. Cuevo
9/14/83

SEP 5 1992

Consumers Power Company

2

cc w/encl:

- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- The Honorable Charles Bechhoefer, ASLB
- The Honorable Jerry Harbour, ASLB
- The Honorable Frederick P. Cowan, ASLB
- The Honorable Ralph S. Decker, ASLB
- William Paton, ELD
- Michael Miller
- Ronald Callen, Michigan
Public Service Commission
- Myron M. Cherry
- Barbara Stamiris
- Mary Sinclair
- Wendell Marshall
- Colonel Steve J. Gadler (P.E.)
- Howard Levin (TERA)
- Billie P. Garde, Government
Accountability Project
- Lynne Bernabei, Government
Accountability Project

Docket No. 50-329
Docket No. 50-330

PROTOCOL GOVERNING COMMUNICATIONS BETWEEN CONSUMERS POWER COMPANY
AND STONE AND WEBSTER (S&W) IN THE REMEDIAL SOILS AND
CONSTRUCTION COMPLETION PROGRAMS

1. This protocol governs communications between Consumers Power Company (CPCo) and Stone and Webster (S&W) in its capacities as the Construction Implementation Overviewer in the Midland Construction Completion Program (CCP) and the third party overviewer of the underpinning activities and the Remedial Soils Program.
2. All exchanges of correspondence, including drafts, between S&W and CPCo will be submitted to the Administrator of NRC Region III at the same time as they are submitted to CPCo.
3. S&W has a clear need for prompt access to information and activities required to fulfill its role. To this end, S&W may request documents, meet with and interview individuals, conduct telephone conversations, conduct audits and inspections, establish and witness program hold points, review work and inspection activities, and undertake similar activities without prior notification to the NRC staff.
4. As a normal program function, S&W may meet with CPCo daily, or as necessary, to discuss program activities such as licensee work schedule, licensee activities overviewed, action items identified, action taken on identified items, resolution and close-out of these actions, audits conducted, and hold points witnessed. A weekly report shall be issued to document these meetings. These meetings shall be open to NRC staff attendance.
5. CPCo and S&W shall meet with the NRC staff monthly to discuss the previous month's activities. Topics to be addressed will include the status of action items and any problems encountered. The meetings shall be open to public observation and shall normally take place on the second Thursday of each month at 9:00 a.m. and shall normally be held at Consumers Power Company Service Center located at 1100 S. Washington St., Midland, Michigan. Minutes of the monthly meetings shall be prepared by the third party and transmitted to the NRC and CPCo.

6. All documents submitted to, or transmitted by the NRC subject to this Protocol, will be placed in the NRC Public Document Rooms in Midland, Michigan and Washington, D.C., and will be available there for public examination and copying.



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

September 15, 1983

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25223

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

PQCI	Control - For week ending September 17, 1983
PQCI	SW-1.01 R.4 CN# AA00084
PQCI	T-1.00 R.10 CN# AA00082
PQCI	T-1.00 R.10 CN# AA00082

JAPucci

GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, Site Mgr
RAWells, MPQAD

OC0983-0001A-QL05

NOV 8 1983

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September 15, 1983

50-329
50-330

Mr Stan Baranow
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MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25225

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

SM-1.70 Rev 1 CN #AA00079
C-2.10 Rev 12
MW-1.00 Rev 2 Has been inactivated

A handwritten signature in cursive script that reads "JAPucci".

GFEwert/JAPucci

cc: JHarrison, NRC
DBMiller, Site Mgr
RAWells, MPQAD

OC0983-0001A-QL05

8310240029

1021



**Consumers
Power
Company**

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

September 13, 1983

Mr Stan Baranow
Stone and Webster
Midland Nuclear Plant Project
Trailer 186
3500 E. Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF PQCI's
FILE 24.2 SERIAL 25222

This will confirm the transmittal of controlled copies of PQCI and/or changes to Stone and Webster, as listed below:

PQCI	Control - For week ending September 10, 1983
PQCI	PI-1.40 Rev 9
PQCI	E-6.3 CN# AA5098 and CN# AA5101
PQCI	C-1.50 CN# AA00081
PQCI	P-2.20 CN# AA00080
PQCI	C-5.10 CN# AA00075
PQCI	W-1.60 CN# AA00073

GFewert/JAPucci

cc: JHarrison, NRC
DBMiller, Site Mgr
RAWells, MPQAD

OC0983-0001A-QL05



Consumers
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Company

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

September 12, 1983

LAB 73-83

Mr Stan Baranow
Stone & Webster Engineering
Midland Nuclear Plant Project
Trailer 186
3500 E Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF (1) COMPUTER PRINT

This will confirm the transmittal of a computer printout containing information on MPQAD (BOP) Inspector records. The print covers all training, exams, performance demos, certifications, etc.

GFEwert/LaBotimer

cc: JHarrison, NRC
DEMiller, Site Mgr
RAWells

SUMMARY OF PRESENTATION TO NRC ON AUGUST 25, 1983
CONSTRUCTION IMPLEMENTATION OVERVIEW (CIO) PROGRAM

Background to CIO

The Construction Completion Program (CCP) has been developed by Consumers Power Company to control the construction and quality activities needed to complete the Midland Nuclear Power Station. One feature of the CCP is the use of an independent third party to assess the CCP's effectiveness in evaluating existing systems, structures, and components and efforts to complete unfinished work.

Consumers Power Company has proposed Stone & Webster as the third party. This selection was based on Stone & Webster's independence with respect to the work to be performed, and on Stone & Webster's experience and technical capabilities to do the job.

Scope of CIO Program

The scope of the CIO Program is to independently assess CCP adequacy. CCP activities presently assigned to the CIO team for assessment are:

- Phase I Planning
- Management Reviews
- Installation and Inspection Status
- Quality Verification Program (QVP)
- Phase II

Activities outside of the CCP, but included in the CIO Program for assessment, are:

- HVAC/ZACK
- NSSS/B&W
- Spatial System Interaction Program (SSIP)

CIO Organization

The CIO Team is made up of two functional groups - the Program Evaluation Group and the Physical Verification Group. The Program Evaluation Group is responsible for assessing compliance with programmatic provisions of the CCP, plans, procedures, commitments, personnel qualifications, training programs, organizational practices, and nonconformances. The Physical Verification Group is responsible for assessing compliance of CCP team, MPQAD, construction, and craft personnel with pertinent procedures and instructions.

The Program Manager is responsible for directing the day-to-day activities of these two groups. The Program Manager receives technical direction from the Stone & Webster Manager of Quality Assurance and resource support from the Project Manager.

A Senior Overview Committee is responsible for monitoring the performance of the CIO Program and providing direction when appropriate. Monitoring will be done by reviewing reports, correspondence, and nonconformances and observing site activities during periodic visits.

Experience Level of CIO Team

Key members of the CIO Team have significant experience with the construction of nuclear power stations. The Program Manager has 15 years of nuclear experience with 10 of those years spent at 5 new construction sites. The Supervisor of Program Evaluation has 25 years of nuclear experience with 13 of those years spent at 8 new construction sites. The Superintendent of Physical Verification has 14 years of nuclear experience with 12 of those years spent at 4 new construction sites.

Supporting Documents for CIO Program

The Stone & Webster Corporate Quality Assurance Program is described in the NRC approved topical report, SWSQAP 1-74A, "Stone & Webster Standard Nuclear Quality Assurance Program". This base document is supplemented by volumes of Quality Standards and Quality Assurance Directives. Provisions of these documents that are applicable to a project and special instructions that are needed to accomplish unique work items, are covered by project procedures and instructions. Corporate generic procedures and instructions are available for use or as models for project document development.

For the CIO effort, four project procedures have been approved by the Corporate Manager of Quality Assurance to supplement Corporate documents in carrying out the assessment of the CCP. These procedures are the Third Party Construction Implementation Overview Program, which establishes the CIO Program; the Project Quality Assurance Plan, which describes quality assurance provisions for the project; QCI 10.01, which describes the procedure for conducting the assessment; and QCI 15.01, which describes the procedure for processing Nonconformance Identification Reports. Additional project procedures will be issued as needed to cover unique items that arise during the CIO effort.

CIO Methodology

The methodology to be used in assessing the installation and inspection status and Quality Verification Program (QVP) of the CCP consists of (1) surveying the activities of each CCP team and all inspections within the purview of each team to evaluate the process being used to carry out the CCP and then, (2) taking a statistical sample of MPQAD inspections and evaluating the results by conducting independent inspections with CIO team members to assess the final product. A full time monitor from the CIO team will be assigned to each CCP team until team performance and inspection results are deemed satisfactory. Full time monitoring might then be adjusted downward, but independent sampling of QVP inspections would continue to ensure that the overall CCP process is being effectively implemented. If independent inspections indicate that problems are developing, full time monitoring will be restored.

Sampling of QVP inspections will be conducted using MIL-STD-105D as the basic statistical method. MIL-STD-105D was selected because it is nationally recognized. Sample lots will be based on the number of inspection attributes completed during a period of time within a CCP team's area/module. Attributes selected for inspection will be assembled to cover the various commodities and inspectors involved and previously identified weaknesses; such as, QA records, control of purchase material, design change control, production welding, document change control, cable pulling, training, etc. Sample size will be based on a 95-5 confidence level. Inspection results, including non-conformances, will be collected, analyzed, and trended to determine the appropriateness of inspection levels and will be used to evaluate changes in those levels.

One of the objectives of the CIO Program is to assess the ability of MPQAD to identify deficiencies in the plant. Sampling the product from MPQAD inspections will provide a reliable assessment of that effectiveness.

Programmatic and training aspects of the CCP will be assessed by reviewing implementing documents and commitments and then developing checklists for use by CIO team members in verifying compliance by surveillance and document reviews.

Deficiencies identified by CIO team members, and not previously reported by MPQAD, will be documented on Nonconformance Identification Reports. These reports will be sent to Consumers Power Company and the NRC, tracked to ensure that satisfactory corrective action is taken, and summarized on weekly reports and during monthly public meetings.

The methodology to be used by Stone & Webster in carrying out the CIO Program will ensure:

- An objective assessment of the CCP
- Corrective action for problem areas
- Awareness of Consumers Power Company, NRC, and Public about the effectiveness of the CCP through reports and meetings

Stone & Webster Corporate Audits

The CIO Program will be audited by the Stone & Webster Quality Assurance Cost & Auditing Division on a regular basis to ensure the adequacy of the CIO Program's procedures, personnel, and implementation.

Manning Plan for CIO Team

- Nine members of the CIO team are currently on site. These people have been reviewing documents; preparing checklists; and evaluating training, organizational practices, and procedures.

Plans are to have one team member assigned to each CCP team, five auditors to conduct the program evaluation function, one to three support engineers depending on the workload, two group supervisors, and the program manager. Anticipating that some 12 CCP teams will be in operation initially, a team of some 21 people will be required. When the anticipated 23 teams become operational, some 32 people will be required. These are minimum numbers and are based on a single shift work schedule. The situation is a dynamic one. As conditions change and more people are needed to carry out the provisions of the CIO Program, more people will be brought in.

Summary

Stone & Webster has designed and constructed a number of nuclear power stations and knows the right way to do the work. The CIO Program will be carried out to ensure that the Midland plant is built in accordance with applicable codes, standards, and regulations.

sent to DMB 9/19/83



Consumers
Power
Company

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

September 9, 1983

PRINCIPAL STAFF		
RA	ENF	
D/RA	SCS	2
A/RA	PAO	5
DRP	SLO	
DRNA	IRC	
DRMSF		
DE		
ML		
OL	FILE	

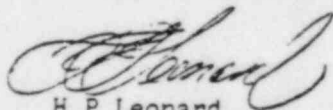
Mr Stan Baranow
Program Manager CIO
Stone and Webster
Midland Energy Center
PO Box 1963
Midland, MI 48640

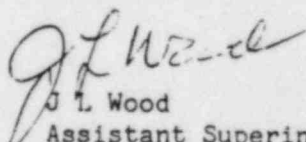
SUBJECT: MIDLAND ENERGY CENTER - REQUESTED DOCUMENTS
FILE: 24.2 SERIAL: 19837

This is to confirm discussions between D S Haas, J Dittenbir, and M L Bupp of MPQAD-HVACA and Rick Scallon and John Barr of Stone and Webster on requesting the following documents:

Test Result Worksheets	FP-10, Rev 8
Purchase Order	FP-11, Rev 0
Test Shop Schedules	FP-12, Rev 4
FP-4, Rev 2	FP-15, Rev 1
FP-9, Rev 4	FP-16, Rev 1
FP-9A, Rev 1	FP-19, Rev 1
FP-9B, Rev 4	

A copy of each of the above is attached for your use.


H P Leonard
General Superintendent
MPQAD-PAD


J L Wood
Assistant Superintendent
MPQAD-HVACA

HPL/JLW/SKC/cn

cc: JHarrison, NRC (w/o att)
RAWells, MPQAD (w/o att)

83092/0271

SEP 19 1983



Consumers
Power
Company

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

September 6, 1983

LAB 71-83

Mr Stan Baranow
Stone & Webster Engineering
Midland Nuclear Plant Project
Trailer 186
3500 E Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF (1) COMPUTER PRINT

This will confirm the transmittal of a computer printout containing information on MPQAD (BOP) Inspector records. The print covers all training, exams, performance demos, certifications, etc.

GFEwert/LaBotimer

cc: J Harrison, NRC
D Miller, Site Mgr
R Wells
G Ewert

TEAM EXPERIENCE

S. BARANOW

PROGRAM MANAGER

15 YEARS NUCLEAR EXPERIENCE

10 YEARS NUCLEAR SITE EXPERIENCE

5 DIFFERENT SITES

F. BEARHAM

SUPERVISOR OF PROGRAM EVALUATION

25 YEARS OF NUCLEAR EXPERIENCE

13 YEARS NUCLEAR SITE EXPERIENCE

8 DIFFERENT SITES

J. THOMPSON

SUPERINTENDENT OF PHYSICAL VERIFICATION

14 YEARS NUCLEAR EXPERIENCE

12 YEARS NUCLEAR SITE EXPERIENCE

4 DIFFERENT SITES

**CONSTRUCTION
IMPLEMENTATION
OVERVIEW**

PROGRAM - CIO

BACKGROUND

**CONSTRUCTION COMPLETION
PROGRAM-CCP**

**STONE & WEBSTER PROPOSED AS
INDEPENDENT THIRD PARTY**

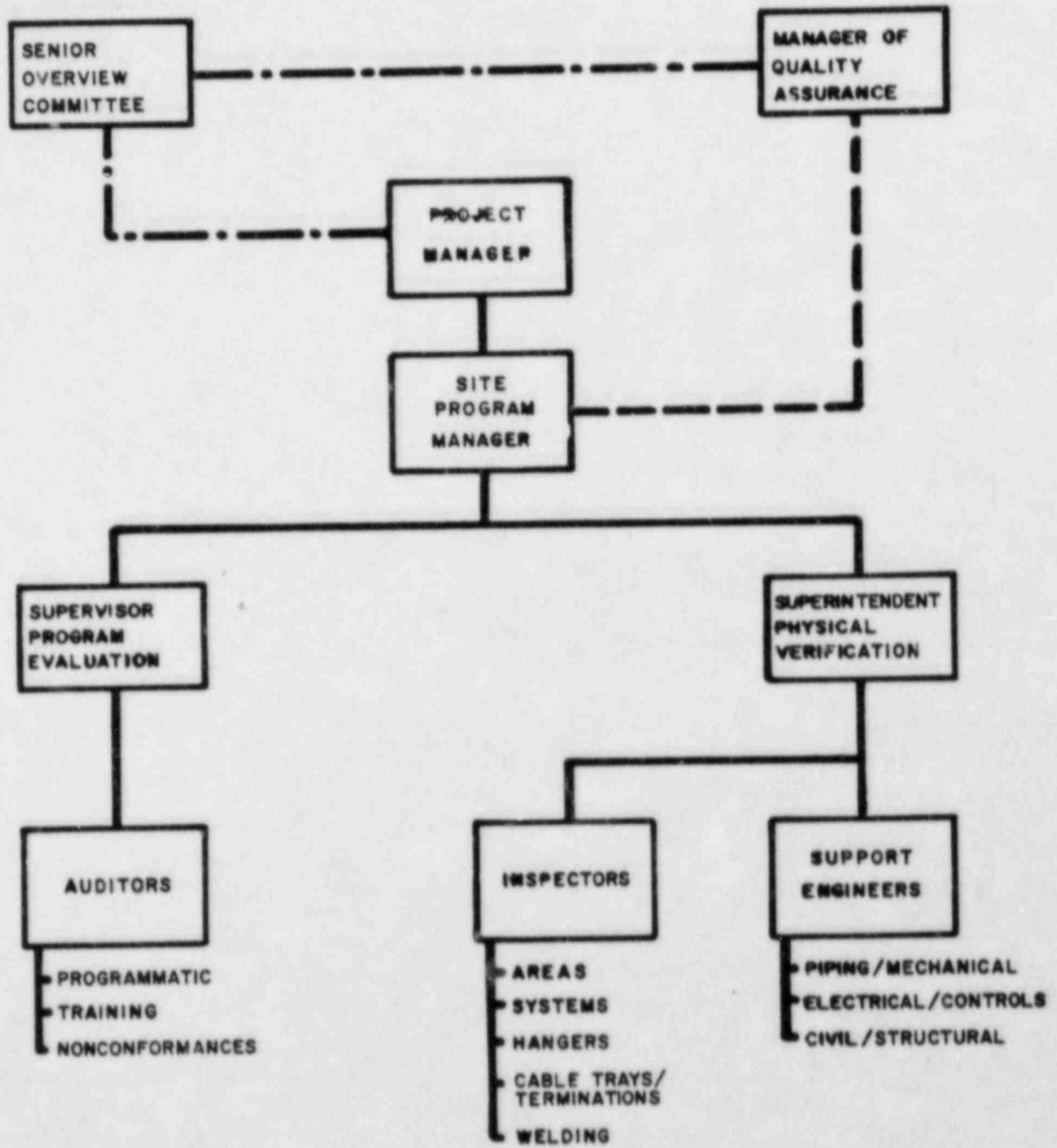
SCOPE

INDEPENDENTLY ASSESS IMPLEMENTATION OF CCP

ACTIVITIES:

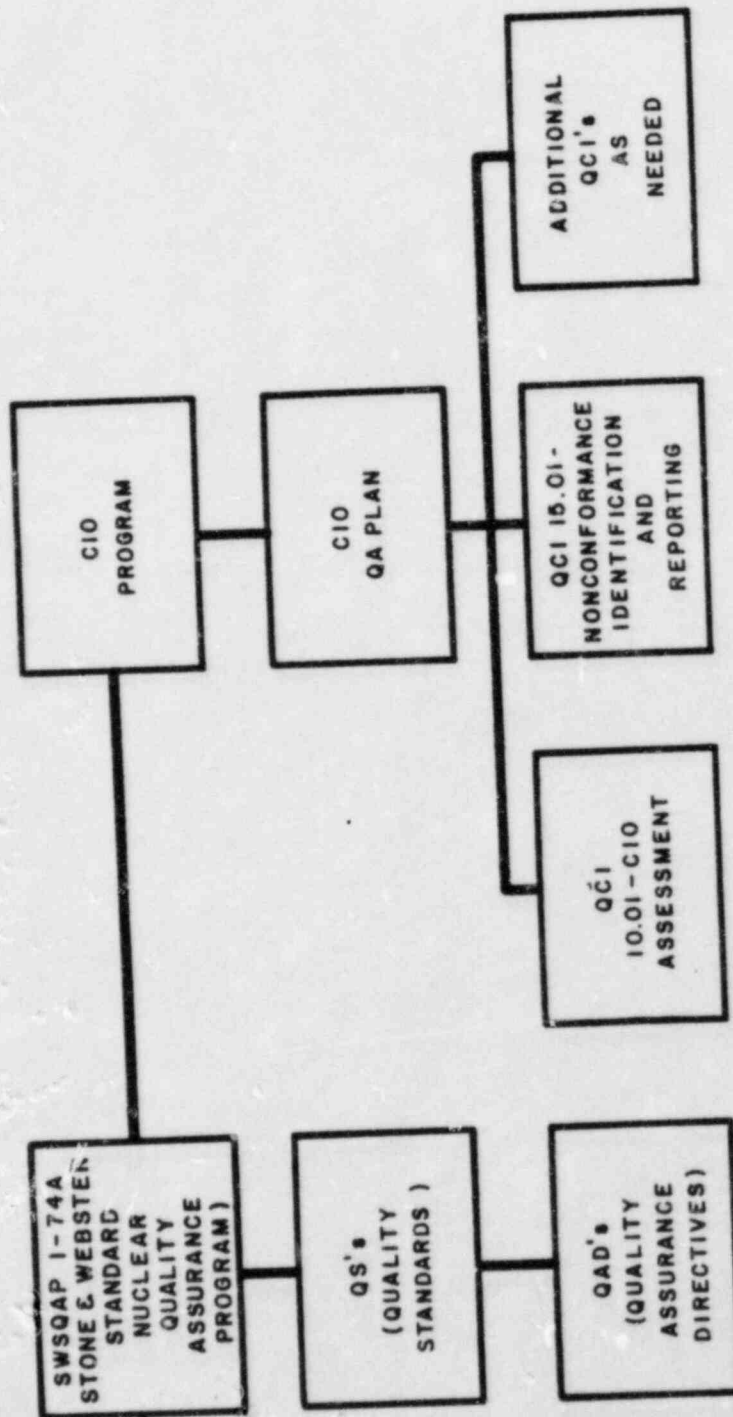
- ✓ PHASE I PLANNING
- ✓ MANAGEMENT REVIEWS
- ✓ INSTALLATION AND INSPECTION STATUS
- ✓ VERIFICATION OF COMPLETED
INSPECTIONS (QVP)
- ✓ HVAC/ZACK
- ✓ NSSS
- ✓ SPATIAL SYSTEM INTERACTION
PROGRAM (SSIP)
- ✓ PHASE II

CIO ORGANIZATION



- - - - - TECHNICAL DIRECTION
 - - - - - OVERVIEW

DOCUMENT TREE



SWEC CIO PROGRAM

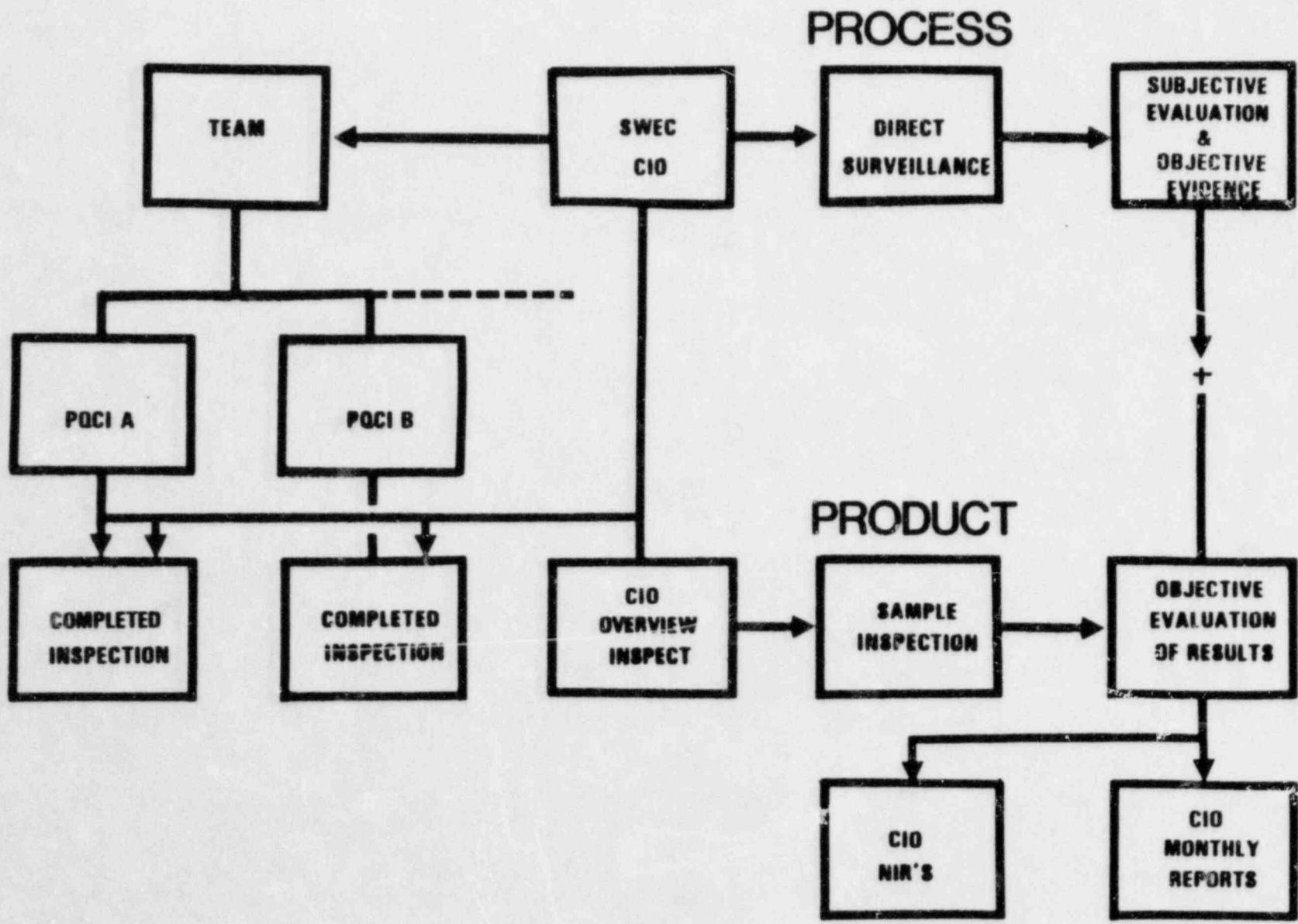
- **OBJECTIVE IS TO ASSESS QVP AND CCP RESULTS TO ESTABLISH THE PROGRAM'S EFFECTIVENESS.**
- **KNOWN STATISTICAL METHODS WILL BE USED TO ESTABLISH THE NUMBER OF INSPECTIONS/ASSESSMENTS.**
- **TECHNICAL EVALUATIONS WILL BE MADE TO ESTABLISH THE SIGNIFICANCE OF NONCOMPLYING CONDITIONS.**
- **CORRECTIVE MEASURES WILL BE REQUIRED IF CPCo PROGRAMS PERSONNEL OR IMPLEMENTATION ARE TURNING OVER LOTS WHICH CONTAIN SIGNIFICANT DEFICIENCIES.**

ASSESSMENT MATRIX FOR PHYSICAL VERIFICATION GROUP

<i>ASSESSMENT ELEMENTS</i>	REVIEW OF PQCI's	REVIEW OF SUPPORTING DOCUMENTS	CHECKLIST DEVELOPMENT	EVALUATION	VERIFICATION
1. STATUS					
INSTALLATION		★	★	★	★
INSPECTION	★	★	★	★	★
2. QUALITY VERIFICATION PROGRAM					
ACCESSIBLE	★	★	★		★
INACCESSIBLE	★	★	★	★	
3. PHASE II	★	★	★	★	★

ASSESSMENT MATRIX FOR PROGRAM EVALUATION GROUP

ASSESSMENT ELEMENTS	REVIEW OF IMPLEMENTING DOCUMENTS PROCEDURES	CHECKLIST DEVELOPMENT	EVALUATION	VERIFICATION
1. PROGRAMMATIC				
MANAGEMENT REVIEW MEETINGS	★	★	★	
CCP ORGANIZATION	★	★	★	
MPQAD ORGANIZATION	★	★	★	
INSPECTION PLANS	★	★	★	
NRC AND CIO HOLD POINTS		★		★
COMMITMENTS TO NRC		★		★
2. PROCEDURES				
CONSTRUCTION PROCEDURES	★	★	★	★
MPQAD PROCEDURES	★	★	★	★
3. TRAINING				
CCP TEAMS	★	★	★	
MPQAD INSPECTORS	★	★	★	
CONSTRUCTION CRAFT	★	★	★	
4. RESOLUTION OF NONCONFORMANCES				
	★		★	★



TEAM MONITORING

INITIAL

- ▶ FULL TIME CIO MONITOR ASSIGNED TO OVERVIEW EACH TEAM'S ACTIVITIES AND ALL INSPECTIONS WITHIN THE PERVIEW OF THE TEAM.
- ▶ A STATISTICAL SAMPLE OF MPQAD INSPECTIONS WILL BE TAKEN AND EVALUATED BY INDEPENDENT CIO INSPECTION.

SUBSEQUENT

- ▶ IF TEAM PERFORMANCE AND INSPECTION RESULTS ARE DEEMED SATISFACTORY - FULL TIME CIO MONITORING WILL BE ADJUSTED DOWNWARD. INDEPENDENT SAMPLING INSPECTIONS WILL BE MAINTAINED.
- ▶ IF TEAM PERFORMANCE OR INDEPENDENT INSPECTION RESULTS REVEAL UNSATISFACTORY, CPCO CCP/QVP FULL TIME CIO MONITORING WILL BE MAINTAINED.

AREAS TO BE CLOSELY MONITORED

TRAINING

WELDER QUALIFICATION

PRODUCTION WELDING

DOCUMENT CHANGE CONTROL

CABLE PULLING

CONTROL OF PURCHASE MATERIAL

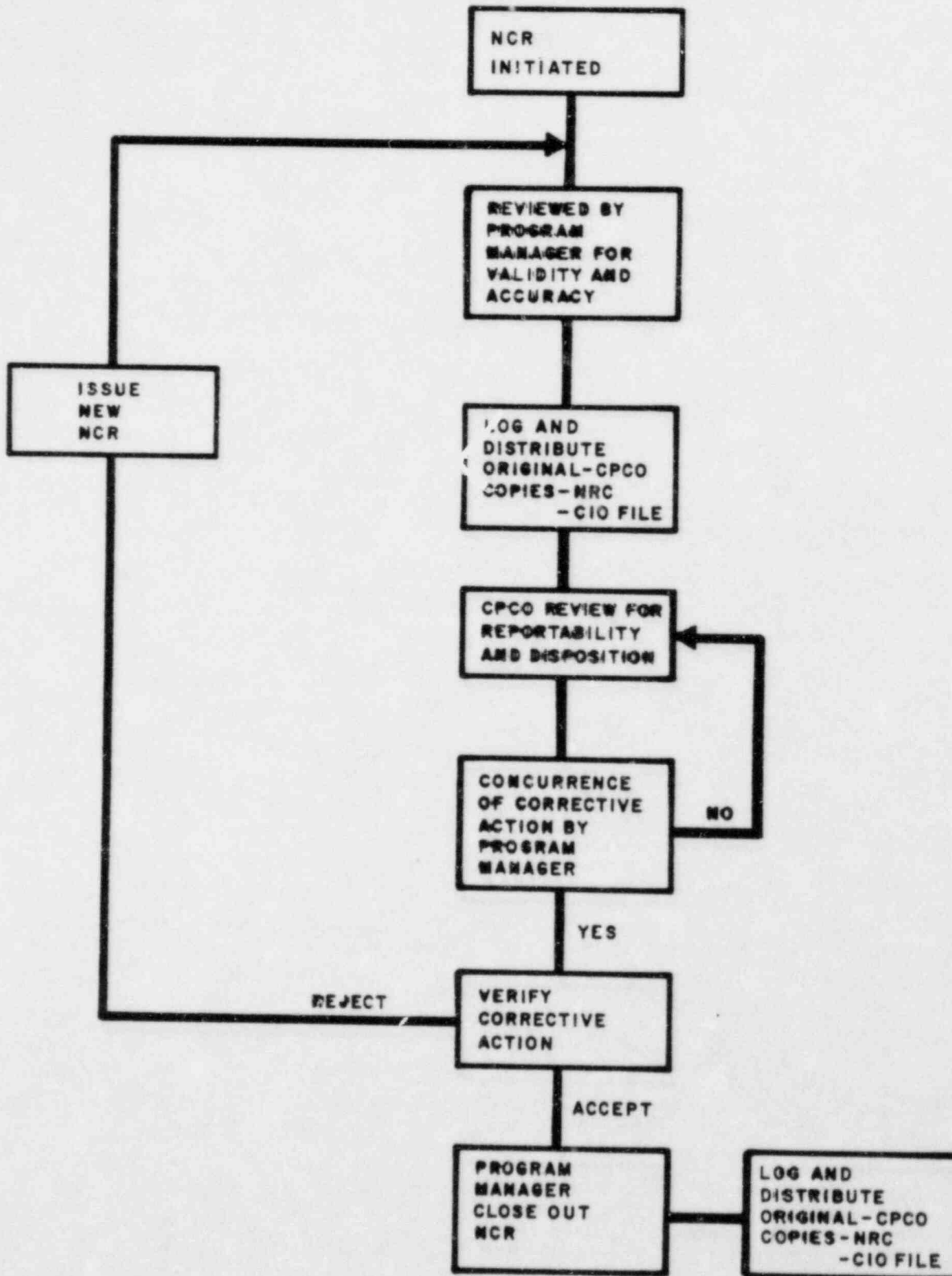
QA RECORDS

STORAGE / PREVENTIVE MAINTENANCE

CORRECTIVE ACTION FOR NONCONFORMANCE

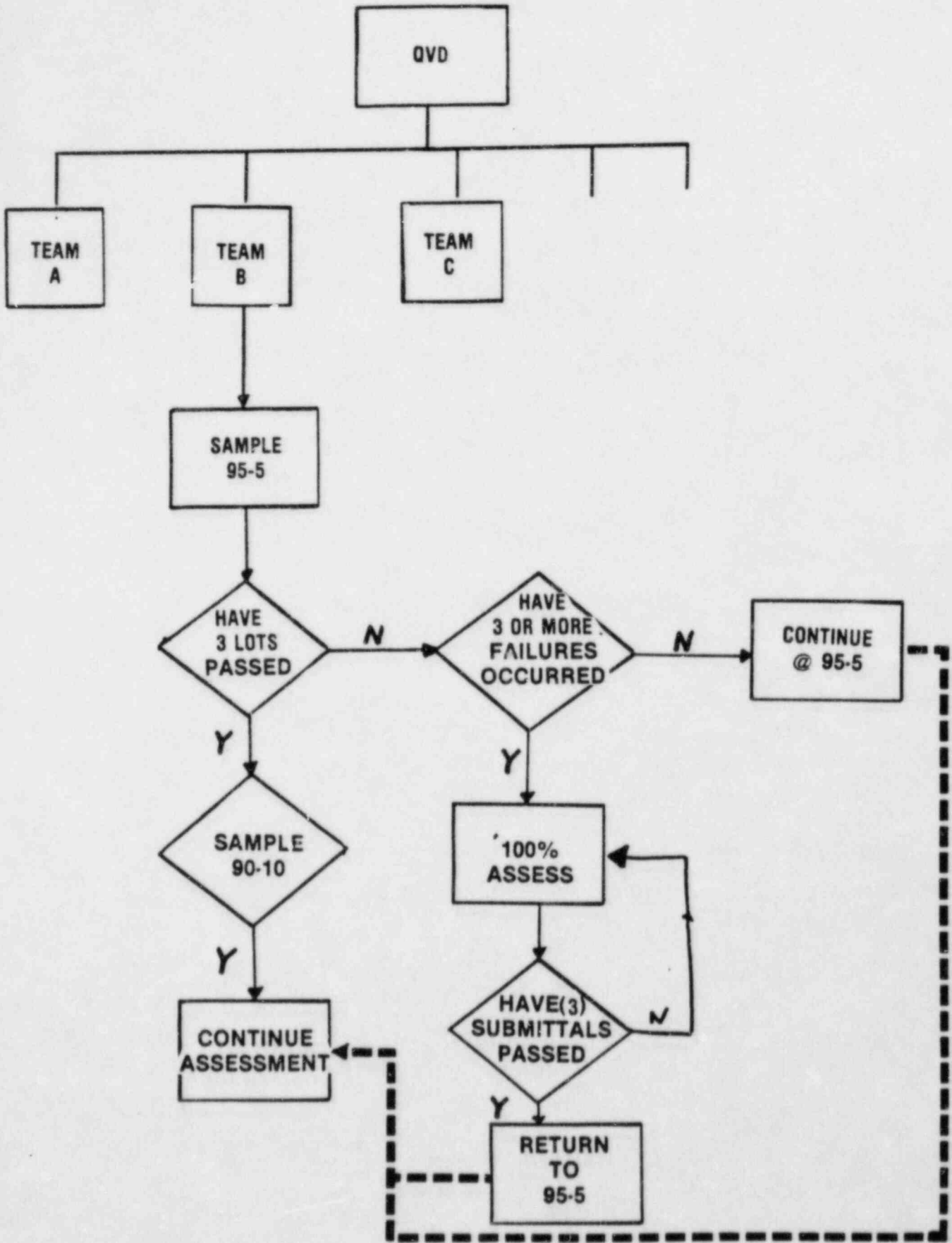
TRENDING & ROOT CAUSES

FLOW CHART FOR NONCONFORMANCE REPORTS



SAMPLING OVERVIEW

- **SWEC WILL USE MIL-STD-105D AS THE BASIC STATISTICAL METHOD.**
- **COMPLIANCE BASELINE WILL BE ESTABLISHED AS FOLLOWS:**
 - **EACH QVP TEAM'S WORK WILL BE SAMPLED USING 95-5 CONFIDENCE FOR 1ST (3) SUBMITTALS**
 - **IF ALL PASS THEN SAMPLING WILL BE REDUCED TO 90-10 CONFIDENCE**
 - **IF A TEAM HAS SINGLE FAILURE BASED ON SIGNIFICANT ATTRIBUTE THEN RETURN TO 95-5. THIS WILL CONTINUE UNTIL (3) CONSECUTIVE PASSES ARE ACHIEVED.**
 - **ANY TEAM SUBMITTING (3) CONSECUTIVE FAILED LOTS WILL BE SUBJECT TO RETRAINING AND 100% INSPECTION UNTIL IT IS JUDGED SAFE TO RETURN TO SAMPLING - NORMALLY THIS WILL BE (3) CONSECUTIVE PASSED LOTS WITH NO SIGNIFICANT CONDITIONS OBSERVED.**

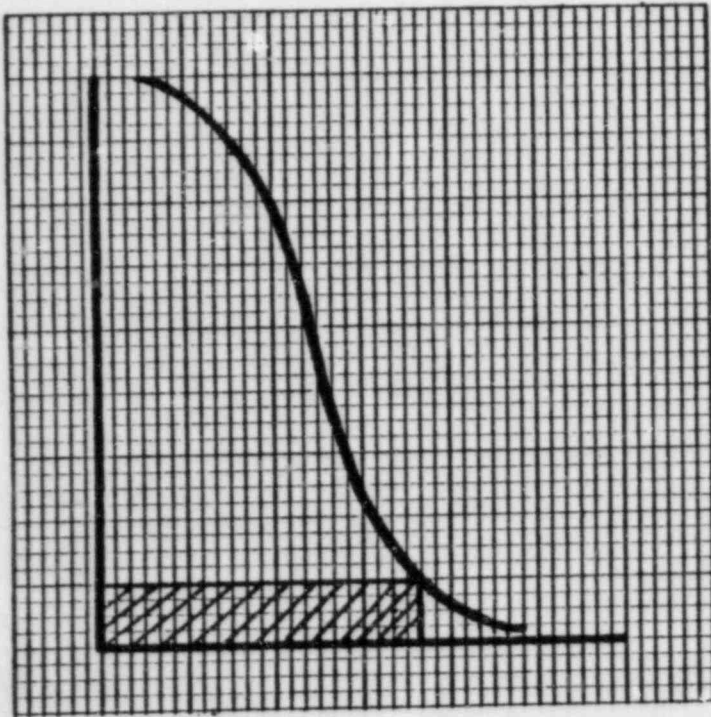


A COMPARISON BETWEEN SAMPLE SIZES

MS-105D LOT SIZE (N)	SAMPLE SIZE (n)		
	@ 95-5	@ 90-10	@ 20%*
2 to 8	ALL	ALL	1 / 2
9 to 15	ALL	ALL	2 / 3
16 to 25	ALL	All to 20	4 / 5
26 to 50	ALL	20	6 / 10
51 to 90	50	20	11 / 18
91 to 150	50	20	19 / 30
151 to 280	50	32	21 / 56
281 to 500	50	50	57 / 100
501 to 1200	80	80	101 / 240
1201 to 3200	125	125	241 / 640
3201 to 10,000	200	200	641 / 2000

*Values rounded up to the nearest
integer for greater confidence

LIMITING QUALITY



- Designed for "isolated" lot vs. continuous sampling
- Provides protection by "fixing" risk of accepting "bad" products
- Provides greater discrimination by designating AQL to avoid greater than allowable proportion defective

SAMPLING OVERVIEW

- **SWEC APPROACH WILL ENSURE**
 - **OBJECTIVE ASSESSMENT**
 - **REPORTS TO NRC, CPCo, PUBLIC**
 - **CORRECTIVE ACTION**
- **PERFORMANCE WILL BE REWARDED AND ENCOURAGED BY SAMPLE REDUCTIONS, WHEN JUSTIFIED.**

SAMPLING OVERVIEW

- ▶ **UPON COMPLETION OF CIO, SWEC WILL STATE:**
 - ▶ **THAT CPCO's, QVP AND CCP HAVE BEEN ASSESSED AND FOUND ACCEPTABLE.**
 - ▶ **THAT ALL SIGNIFICANT CONDITIONS ADVERSE TO QUALITY HAVE BEEN IDENTIFIED AND RESOLVED.**

A CONCLUSION THAT MIDLAND STATION MEETS OR EXCEEDS ALL APPLICABLE REGULATIONS, CODES AND STANDARDS.



Consumers
Power
Company

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

LAB 60-83

August 29, 1983

Mr Stan Baranow
Stone & Webster Engineering
Midland Nuclear Plant Project
Trailer 186
3500 E Miller Road
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT -
TRANSMITTAL OF (1) COMPUTER PRINT

This will confirm the transmittal of a computer printout containing information on MPQAD (BOP) Inspector records. The print covers all training, exams, performance demos, certifications, etc.

GFEwert/LaBotimer

cc: JHarrison, NRC
DEMiller, Site Mgr
RAWells
GFEwert

Original sent to DMB 8/29/83



Consumers Power Company

PRINCIPAL STAFF	
RA	ENF
D/RA	SCS
A/RA	PAD
DRP	ED
DRMA	
CPMSP	
DE	
ML	
OL	IFTE

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

August 23, 1983

Mr Stan Baranow
Program Manager CIO
Stone and Webster
Midland Energy Center
PO Box 1963
Midland, MI 48640

SUBJECT: MIDLAND ENERGY CENTER - REQUESTED DOCUMENTS
FILE: 24.2 SERIAL: 19832

This is to confirm discussions between D S Haas of MPQAD-HVACA and John Barr of Stone and Webster on requesting the following documents:

Test Shop Schedule, dated 8-16-83

Test Shop Schedule, dated 8-17-83

A copy of each of the above is attached for your use.

H P Leonard
General Superintendent
MPQAD-PAD

J L Wood
Assistant Superintendent
MPQAD-HVACA

HPL/JLW/cn

cc: JHarrison, NRC (w/o att)
DEMiller, Midland (w/o att)
RAWells, Midland (w/o att)

8309020574



**Consumers
Power
Company**

*Harrison
Palmer
Lardner*

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

August 18, 1983

PRINCIPAL STAFF	
RA	ENF
D/RA	SCS <i>out</i> + 3
A/RA	PAO
DPRP	SLO
DRMA	RC
DRMSP	
DE	
ML	
OL	FILE

Mr Stanley Baranow
Stone & Webster Construction Co
Midland Nuclear Cogeneration Plant
PO Box 1963
Midland, MI 48640

MIDLAND ENERGY CENTER - SERIAL: 23517 FILE: 24.2

- References:
1. MLCurland letter to RAWells, dated August 8, 1983, Serial 25172
 2. RAWells letter to JWCook, dated August 8, 1983, Serial 23677
 3. RAWells letter to DBMiller, dated August 9, 1983, Subject: Midland Energy Center Project - Material Traceability Review CCP Zone 6

Please find attached copies of the three memos referenced above which deal with material traceability.

Should you have any questions, please feel free to contact me or Brien Palmer.

HPL

HPLeonard, General QA Superintendent
Plant Assurance Division
Midland Project Quality Assurance Department

HPL/BMP/ckt

cc: JHarrison, USNRC
DBMiller, Midland
BMPalmer, Midland
DATaggart, Midland
RAWells, Midland

8308 306642

AUG 25 1983

TO RAWells

FROM MLCurland *MX Curland*

DATE August 8, 1983

SUBJECT MIDLAND ENERGY CENTER PROJECT -
PROGRAMMATIC REVIEW OF MATERIAL
TRACEABILITY BY MPQAD
FILE 24.0 SERIAL 25172

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

CC

MPQAD has completed a review of the procedures and systems in use at the Midland Plant for identification and control of material and components in response to a Zone 6 action item of the Construction Completion Program. An evaluation was made of the adequacy of these procedures and systems to fulfill and adhere to regulatory, code and standard requirements regarding material identification and control. The review consisted of: a search of requirement documents, procedures, specifications and instructions; personnel contact; and observations of stockrooms, storage areas and field installations. Investigations concentrated on pipe hangers and supports, structural materials, piping, and weld filler material.

Based on this review, my staff and I have concluded that the systems in use for material identification and control do provide for compliance with ASME Code requirements of identification through fabrication, and for 10CFR50 Appendix B requirements of preventing the use of incorrect material. Although the requirements are met, the degree of compliance is considered minimal. The report prepared by my staff does recommend some actions which it is believed will provide a more positive control for future activities and will lessen project vulnerability to subsequent difficulty in responding to questions of material acceptability. However, it is my judgement that the present program and the verification of material identification imposed by appropriate PQCI's complies with the commitments for this project. It is my conclusion that although certain improvements will be recommended, as noted above, there should be no constraint or holds placed on the inspection process at this time.

MLC/pab

To JWCook, P-26-336B

FROM RAWells, Midland *Ray Wells*

DATE August 8, 1983

SUBJECT MIDLAND ENERGY CENTER PROJECT -
CCP PROGRAMMATIC REVIEWS
MATERIAL TRACEABILITY
FILE 24.0 SERIAL 23677

CC WRBird, P-14-418A DBMiller, Midland
MLCurland, Midland BMPalmer, Midland
EPLeonard, Midland

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

As part of our Construction Completion Program, MPQAD was assigned the responsibility to conduct certain programmatic reviews as a prerequisite to initiation of Phase 2 of the CCP. The purpose of this memo is to address the review conducted on material identification and control. This study has been completed under the direction of M L Curland, Principal Quality Advisor for MPQAD. The fundamental conclusion of the study is that the systems in use for material identification and control do provide for compliance with ASME Code requirements of identification through fabrication, and for 10CFR50 Appendix B requirements of preventing the use of incorrect material.

The detailed findings, conclusions and recommendations contained in the MPQAD report will be presented to the CCP Management Review group and selected staff in the very near future. It is the position of MPQAD that our material identification and control systems are acceptable, although certain recommendations may be made for future improvements. Additionally, since material identification and control verification is required where necessary through appropriate PQCI's, it is concluded that the program for material identification and control requirements and verification is acceptable for inspection purposes. Although some improvements will be recommended to the overall program, these are not considered a constraint to our inspection process. The ongoing larger reinspection effort and reinspections under the QVP will meet programmatic material identification and control requirements.

This position is based upon a collective review of the final draft report by my staff and upon the recommendation of M L Curland, attached.

RAW/pab

To DBMiller

FROM RAWells

DATE August 9, 1983

SUBJECT MIDLAND ENERGY CENTER PROJECT -
MATERIAL TRACEABILITY REVIEW
CCP ZONE 6

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

CC JWCook
~~HPLeonard~~

The attached memos indicate that MPQAD has completed its review of material traceability as required by Zone 6 of the CCP. As indicated in the attached, the programs presently in place are acceptable, although some recommendations for improvements for future use will be made. The details of the study and conclusions will be presented to the CCP management group for information in the near future.

I consider this CCP assignment closed.

jln

CONSUMERS POWER COMPANY
RECEIVED
AUG 10 1983
HP LEONARD



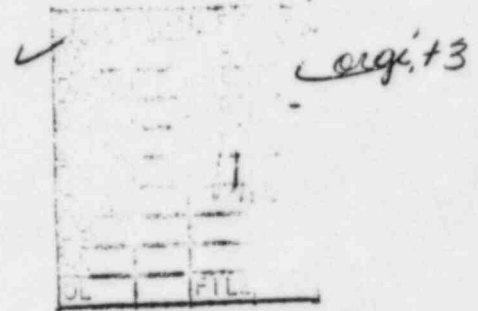
**Consumers
Power
Company**

Donald B Miller, Jr
Site Manager
Midland Project

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

August 9, 1983

Mr. Stanley W. Baranow
Stone & Webster
Midland Nuclear Plant
P.O. Box 1963
Midland, MI 48640



MIDLAND ENERGY CENTER GWO 7020
STONE & WEBSTER CORRESPONDENCE

File: 0655, Bl.1.4 UFI: 99*08, 08*06*04*04 Serial: CSM-0666

Please find attached our response to questions raised in your memorandums to J G Keppler. This response covers open items from my July 1, 1983 letter and also includes responses through Report #7 dated August 1, 1983 (S&W #16) After an evaluation of the attachment CPCo believes that none of the open items are restraints to implementation of the CCP activities.

DBM/RRL/lrb

- cc: JGKeppler
- JWCook
- RJCook
- RAWells
- RBKelly
- APArmaruso

W. S. ... for DBM

AUG 17 1983

OC0783-0001A-CN03

~~830622036~~

SUMMARY OF RESPONSE TO S&W CIO REPORTS

I. S&W OPEN ITEMS PRIOR TO JUNE 30, 1983 (S&W #11)

The following items remain open from previous letters:

1. Need to supply S&W with a copy of the NRC Commitment List

Response: An initial revision of the base NRC commitment list based on the June 10 CCP letter to NRC has been provided to the CIO. S&W letter dated July 25, 1983 (S&W #15) indicates this item as closed. Updates to the commitment will be provided to the CIO as they are made.

2. Need to take action on Roy A. Wells memo (Serial 22848) dated June 7 summarizing status of open items from the QVP management review.

Response: J. W. Cook letter to J. A. Rutgers, CPCo Serial 23624 dated July 13, 1983 acts on the recommendations made by R. A. Wells and concludes for the MRC (Management Review Committee) that all constraints to the QVP, other than NRC approval, have been closed.

3. Need to describe and present procedures on the NCR disposition process.

Response: The NCR disposition process to be used for the QVP is the normal process as described in PSP 3.2. A revised procedure (F2-M) for preparing and processing NCR's will become effective August 30, 1983.

NCR's generated from the hanger reinspection only will have an additional step to develop a recommended disposition prior to final disposition in accordance with the above procedures. These additional procedures will be made available to the CIO. The Nutech portion of the NCR process remains open until we provide the CIO with the process. The Nutech Process was developed for the hanger reinspection program and should not be a restraint to CCP (which includes the QVP). Project Engineering will discuss process with CIO.

II. JUNE 30, 1983 LETTER (S&W #11) - MANAGEMENT COMMITTEE REVIEW

1. CPCo should clearly establish their position on requirements for examination after team training.

Response: The project position is that supervisor evaluation of individual on-the-job performance will determine the qualifications of each individual. Examinations following training sessions will not be used. A separate program for evaluation of training content and instructor performance has been set up. The CIO has reviewed this program and reported it as closed in Report #5 dated July 18, 1983.

2. The review team should assemble their comments in one document and present their findings prior to the Management Review Committee Meeting.

Response: A similar request was made of the review team by the Chairman of the Management Review Committee. An effort will be made to schedule review team activity to allow time for preparation of a single summary document for future management reviews.

3. Restraints presented to the Management Review Committee should be resolved prior to the MRC meeting or the meeting delayed.

Response: The review team has been identifying their open items directly to the responsible organization element prior to the Management Review Committee meeting which allows for corrections or response on each item at the MRC meeting. This approach meets the needs of the MRC and will continue to be used for future management reviews in order to maintain needed management flexibility and prior notice in scheduling meetings.

III. JULY 12, 1983 LETTER (S&W #12) REPORT #4

1. Page 2 of Report Item 3) - "Need to identify commitments made to NRC"

Response: This is a previous open item - It is closed as described in I.1 above.

2. Page 2 of Report - Item 4) - "CIO considers the list of commitments to the NRC a constraint to the QVP"

Response: This is a previous open item - It is described in I.1 above.

3. Page 2 of Report - Item 5) - "CIO concerns in the conduct of training of supervisory personnel"

Response: This item is closed in S&W Report #5 dated July 18, 1983 (Item 2, page 2).

4. Action Items from Page 2 of S&W #12

- 1) Resolve items on B M Palmer's memo - Serial 22897A dated 6-14-83

Response: This was a CIO Action Item and Report #5 (S&W #14) addresses the memo.

- 2) Need job descriptions and responsibilities of CPCo personnel engaged in QVP.

Response: The job descriptions have been reviewed and the item closed (S&W Report #5 dated July 18, 1983).

3) Has a program been developed to process non-conformances?

Response: The program to process non-conformances has been covered in I.3 above.

IV. JULY 14, 1983 LETTER (S&W #13) - OVERVIEW OF CCP

No response required

V. JULY 18, 1983 LETTER (S&W #14) - REPORT #5

1. Item 3)a page 2 "Adequacy of Drawing (A8) - large bore pipe hangers"

Response: Closed by S&W #15

2. Item 3)b page 4 "Additional verification of equipment received and installed (E2)"

Response: Even though S&W has closed this item relative to QVP, a separate program requirement is still open that would establish how to verify vendor equipment.

3. Item 3)c page 4 "Material traceability of installed hangers (E3)

Response: The material traceability issue for hangers is open pending S&W review.

4. Page 5 of Report #5 - Item 4

Response: This item closed. Item 4.2) from Item III above (S&W #12 - Report #4)

Open Action Items - Listed on Page 5 of Report #5

1) Commitment List

Response: Closed as described in I.1 above

2) Commitment List

Response: Closed as described in I.1 above

3) Management Review Committee action in R. A. Wells memo

Response: Closed as described in I.2 above

CPCo Required Action

1) MRC to convene to confirm or modify recommendation of MPQAD

Response: Closed as described in I.2 above

2) NCR Process

Response: Current status described in I.3 above

VI. JULY 25, 1983 (S&W #15) Report #6

Action Items

- 1) Concern - "Adequacy of drawings - Large Bore Pipe Hangers" - closed by this letter. New item opened. Advise CIO of redline NCR and its impact of QVP.

Response: The majority of the Field Redlines (FRL) in question affected pipe supports within the scope of the Hanger Reinspection Program. Approximately 5% of the FRLs affected small bore pipe drawings.

Immediately upon identification of the FRL problem, the necessary procedural controls were implemented by the affected organizations.

These controls include:

- 1) Project Engineering identifying which drawings are affected and placing them on hold in accordance with EDP 4.46.
- 2) Upon notification from Project Engineering, Field Document Control issues a drawing hold cover sheet to all affected organizations on drawing distribution. This action is in accordance with FPD-1.000 Rev 16.
- 3) Quality Control has issued an "activity hold" in accordance with AAPD/PSP G-3.2, preventing any inspections to a drawing with an outstanding FRL.

These programatic controls are sufficient to preclude inspection acceptance of affected items. In addition, all of the individual holds are forecasted to be released and revised drawings redistributed by 9-8-83. For this reason, the redline issue has no quality impact on the QVP.

- 2) Concern - "Material Traceability of Installed Hangers".

Response: Material traceability in general is the subject of a draft report completed by the MPQAD Principle Quality Advisor. Although this draft report recommends some changes for future work, it concludes that the Project does meet the applicable requirements. A memo from the Executive Manager - MPQAD to the Management Review Committee presents this conclusion.

Since the conclusion is that material traceability requirements are currently being met, there will be no impact on reinspections during QVP or the Hanger Reinspection Program.

3) Concern - Has a program been developed ... to process NCR's?

Response: Remains open as indicated in I(3) above.

Open Action Items

1) CPCo believes this is closed based on I.2 above

VII AUGUST 1, 1983 LETTER (S&W #16) Report #7

All identified action items have been addressed in Section VI above.

VIII SUMMARY OF OPEN ITEMS TO DATE

- 1) Develop vendor equipment verification program - (MPQAD/SMO).
This is not a restraint to Phase I CCP activities but has been committed to resolve prior to Phase II.
- 2) Project Engineering to provide the CIO with procedures on the Nutech Process.



STONE & WEBSTER MICHIGAN, INC.

P.O. Box 2325, BOSTON, MASSACHUSETTS 02107

~~Case~~
sent to DMIB
7/21/83

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

July 14, 1983
J.O. 14509
NRC File #83-07-14

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

A copy of the Stone & Webster Third Party Implementation Overview Procedure, Rev. 1 dated July 5, 1983 is enclosed for your review. The Procedure was revised for clarity. As periodic reports have and will be transmitted to your office, requirement for monthly reports has been deleted from the procedure.

Very truly yours,

S. W. Baranow
Program Manager

Enclosure

SWB/ka

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

~~8307250253~~

THIRD PARTY CONSTRUCTION IMPLEMENTATION OVERVIEW

Approval:

Richard Kelly Date 7-1-83
Manager Quality Assurance

Jim Beaman Date 7-5-83
Program Manager

1.0 PURPOSE AND SCOPE

To establish a program whereby Stone & Webster performs independent evaluations and verifications of the Consumers Power Company (CPCo) Construction Completion Program, (CCP) reports progress, observations, and nonconformances to the program; specifically, to verify that:

- 1.1 Management performance is adequate in the following areas:
 - A. Establishment of the Management Review Committee
 - B. Duties and responsibilities of the Review Committee are clearly defined
 - C. Procedures governing the actions of the Review Committee are in place
 - D. Management reviews are complete, effective, and conducted in accordance with the requirements of the CCP Program
- 1.2 CCP procedures, instructions, inspection plans, records, and prerequisites for inspections/reinspections have been satisfactorily approved prior to implementation.
- 1.3 Specific CPCo commitments to the NRC are identified to facilitate tracking; dates for compliance (as appropriate) are adequately identified; appropriate action parties are clearly identified; committed actions have been satisfactorily resolved.
- 1.4 Procedures, prerequisites, and reinspection attributes in References 2.1, 2.2 and 2.3 have been approved by the Management Review Committee.

830725626

J.O. No. 14509
Midland Plant Unit, 1 & 2
Consumers Power Company

- 1.5 Personnel assigned to implement the CCP Program have been properly trained, qualified and certified in accordance with the requirements of ANSI-N45.2.6; SNT-TC-1A and MPQAD Procedure B-3M-1, Qualification and Certification of Inspection and Test Personnel. Construction and craft personnel shall be trained to meet the requirements of the Construction Training Procedure FPG-2.000.
- 1.6 The effectiveness of the Quality Verification Program based on witnessing inspections/reinspections of selected component installation, fabrication and review of applicable test/inspection reports and records.
- 1.7 Measures have been developed to ensure that NRC hold points are clearly identified and controls are in evidence to prevent continuance of work pending clearance of the hold points.

2.0 REFERENCES

- 2.1 Quality Verification Program Document, April 16, 1983
- 2.2 Construction Completion Program
 - a. Letters J.W. Cook to the NRC: January 10, 1983
April 6, 1983
April 22, 1983
- 2.3 Nonconformance Identification and Reporting Procedure

3.0 ATTACHMENTS

- 3.1 Evaluation Attribute Checklist (Later)
- 3.2 Verification Attribute Checklist (Later)
- 3.3 Nonconformance Inspection Report (Later)

4.0 DEFINITIONS

4.1 Construction Completion Program (CCP)

A program to provide guidance in planning and management of design and quality activities necessary for completion of construction of the plant and verification of completed work.

4.2 Quality Verification Program (QVP)

An element of the CCP used to confirm the quality status of safety related procurement and construction activities completed and inspected by the Engineer-Constructor personnel prior to December 2, 1982.

4.3 Evaluation

Assessment of quality related activities based upon review of procedures, plans, instructions, inspection reports, test results and additional commitments.

NOTE

Documentation resulting from resolution of CPCo commitments to the NRC and NRC Hold Points shall be 100% reviewed to verify that proper corrective action has been accomplished.

4.4 Verification

Confirming, substantiating or assuring that CCP and QVP requirements have been implemented and are active, verification actions may include documentation, hardware and management systems.

NOTE

Activities performed by CPCo under the CCP and QVP Programs will be monitored using random sampling techniques. The sampling will be based on a review of day to day activities in sufficient detail to ensure adequate implementation of the programs.

5.0 GENERAL REQUIREMENTS

- 5.1 All personnel assigned quality assurance program evaluation responsibilities shall be certified auditors in accordance with ANSI-N45.2.23 and applicable Stone & Webster procedures.
- 5.2 All personnel assigned construction verification responsibilities shall be certified inspectors in accordance with ANSI-N45.2.6 and applicable Stone & Webster procedures and possess the appropriate combination of education, experience and training.
- 5.3 The Third Party Construction Implementation Overview (CIO) program will be structured to determine, by evaluation of predetermined procedures and instructions, the quality practices utilized in the construction of the Midland Plant Units 1, 2, and the effectiveness of those practices.
- 5.4 A site team will be established to monitor the effectiveness of the Construction Completion Program. The team will consist of a Program Manager and two functional groups. One group will assess the completeness of compliance with procedures and inspection plans being used to complete the work. The other group will review certain aspects of construction activities which relate to the performance of the Quality Control Inspection Program. These two groups will use special procedures, checklists, and random sampling techniques to evaluate the following:
 - A. Adequacy and implementation of CPCo procedures regarding construction activities, personnel qualification, training programs, and organizational practices.
 - B. Compliance of Construction Completion Program teams to prescribed procedures.

- C. Compliance of Midland Project Quality Assurance (MPQAD) personnel to applicable procedures.
 - D. Compliance of construction activities to applicable procedures.
- 5.5 The Program Manager shall maintain communications with the NRC and CPCo Site Manager. Weekly progress meetings shall be held with the NRC and CPCo to discuss progress and report on nonconformance and observations.
- 5.6 Programmatic nonconformances of a serious nature shall be immediately reported to the NRC and CPCo.
- 6.0 PROCEDURES
- 6.1 The following procedures shall be prepared to control the activities of the Construction Implementation Overview (CIO) teams.
- A. Quality Control Instruction 10.01 Construction Implementation Overview Assessment
- 6.2 The site teams shall develop attribute checklists for each evaluation and verification activity. Attributes shall be selected from the CCP, PQCI's, CPCo commitments to the NRC and other applicable requirements.
- 6.3 Auditors assigned to conduct evaluations shall, utilizing checklists, itemize those quality practices evident in the performance of each activity.
- The results of each evaluation shall be documented on the checklist to ensure repeatability. Summaries of the results shall be tabulated weekly for presentation to the NRC and CPCo.
- 6.4 Inspectors assigned to conduct verification, shall utilizing the checklist, monitor the activities of CPCo personnel involved in CCP and QVP activities.
- 6.5 All systems verified shall be identified and documented to assure repeatability.
- 6.6 Nonconformances identified in conjunction with this procedure shall be documented on a Nonconformance Inspection Report (NIR) and processed in accordance with Reference 3.3 of this procedure.

7.0 REPORTS

- 7.1 The following reports will be submitted to NRC and CPCo and S&W by the Program Manager.
- A. Weekly Progress Reports

C. Final Reports on Construction Completion

- 7.2 Weekly Progress Report - Weekly Progress Reports will be submitted during the weekly meeting with CCo, and the NRC.
- 7.3 Final Report - A final report will be submitted 30 days after completion of the program. The report will summarize the SWEC assessment. The final report will be submitted by the Program Manager to the NRC, CCo and S&W.

out to Imb 7/5/83 file



STONE & WEBSTER MICHIGAN, INC.

P.O. Box 2325, BOSTON, MASSACHUSETTS 02107

PRINCIPAL STAFF			
RA	✓	ENF	
D/RA		SCS	✓
A/RA		PAO	
DPRP		SLO	
DRMA		RC	
DRMSP			
DE			
ML			
OL		FILE	✓

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

June 30, 1983
 J.O. No. 14509
 NRC File #83-06-30

SUBJECT: MANAGEMENT COMMITTEE REVIEW (June 23, 1983)

A copy of observations noted by CIO of the Management Review Committee of the discussions relating to the Bulk Hanger Organization (BHO) is attached for your review and consideration. CIO has commented upon three subjects and have indicated conditional approval of BHO.

If you have any questions with respect to this report, please contact me at (517) 631-4286, extension 486.

Very truly yours,

S. W. Baranow
 Program Manager

Enclosure

SWB/ka

- cc: JHarrison, NRC Glen Ellyn, IL
- RCook, NRC Midland (site)
- DBMiller, CPCo Midland (site)
- RBKelly, S&W
- APamaruso, S&W

~~8207110305~~

JUL 5 1983

CIO OBSERVATIONS OF MANAGEMENT REVIEW COMMITTEE (MRC)

MEETING SUBJECT: BULK HANGER ORGANIZATION

A meeting was convened by MRC on June 23, 1983 for discussion of the Release of Area and System Teams to start statusing. An agenda was distributed prior to the meeting.

All the members of the MRC were in attendance and actively participated in the proceedings. Key team members of CPCo, MPQAD and Bechtel were present. The handouts and the presentation covered the subject of discussion in definitive and understandable detail.

CIO reports the following observations:

1). Audit responses, once addressed should not be readdressed unless responses are inadequate. In particular the question of all training requiring an examination or qualifying test was raised at an earlier MRC meeting and again, at this session.

There appears to be two schools of thought on requirements for examinations. The audit group (CPCo) is taking the position that examinations are all encompassing while SMO favors examinations only for those personnel having accept/reject responsibilities. The position of across the board examinations or for the accept/reject responsibility only should be clearly established.

2). Observations by the Review team should be presented to MRC, in one document, several days prior to meeting date. This would enable MRC to respond in full at the meeting and avoid "conditional" approval of the review subject.

3). Restraints require expeditious resolution. The restraints presented to MRC at this session were of a minor nature and should have been cleared prior to the meeting or the meeting postponed until restraints are removed. As in (2) this would allow approval to be considered at the meeting. At present "conditional" approval by MRC is discussed.

CIO considers that preparation for Status Assessment is essentially ready for implementation. Training all personnel to all procedures and waiting for all procedures to be issued is an unnecessary restraint. If sufficient material is available, then a team should start implementation so that the results of that effort may be evaluated and fine tuned as necessary.

Sent to DMB 7/5/83 file



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

June 28, 1983
J.O. No. 14509
NRC File #83-06-28

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

A copy of a Stone & Webster Quality Control Instruction QCI 10.01, Construction Implementation Overview Assessment Revision I is enclosed for information. The revision to the QCI added verification responsibilities of the Superintendent of verification.

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

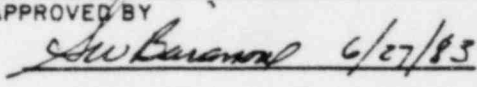
SWB/ka

cc: JHarrison, NRC Glen Ellyn, IL
RCook, US NRC Midland (site)
DBMiller, CCo Midland (site)
RBKelly, S&W
APamaruso, S&W

~~8307080453~~

JUL 5 1983

T-391

STONE & WEBSTER QUALITY CONTROL INSTRUCTION	QCI NO.	REV.	DATE	PREPARED BY
	10.01	1		J.C. Thompson
	DIVISION	LOCATION		
	FQC	MNPP		
	APPLICABILITY	APPROVED BY		
N/A	 6/27/83			
RE: PROCEDURE				
N/A				
SUBJECT	CONSTRUCTION IMPLEMENTATION OVERVIEW ASSESSMENT			

1.0 PURPOSE AND SCOPE

1.1 To establish a program for management planning, conducting and documenting the Construction Implementation Overview (CIO) assessment of the Construction Completion Program (CCP). This QCI shall be applicable to all phases of the CCP and may cover additional activities as directed by the SWEC Program Manager.

2.0 REFERENCES

- 2.1 SWEC Third Party Construction Implementation Overview Procedure 5/19/83
- 2.2 SWEC Project Quality Assurance Plan
- 2.3 Construction Completion Program

3.0 ATTACHMENTS

- 3.1 Evaluation Checklist (Sample)
- 3.2 Verification Checklist (Sample)

INFORMATION COPY

4.0 GENERAL

- 4.1 This CIO program shall assure proper implementation of the CCP through a systematic assessment of procedures, instructions, directives, correspondence, specifications, drawings and commitments as applicable. Assessment shall confirm conformance in the development, approvals and implementation of the CCP and shall encompass program evaluation and physical verification.
- 4.2 CIO shall provide for the evaluation of the CCP in a planned and systematic manner, i.e., prepare schedules for preparation of checklists, develop checklists applicable to specific Project Quality Control Instructions (PQCI) and perform evaluations of documented inspections/activities.
- 4.3 CIO shall use the checklists to perform evaluations and/or verification of the documented inspection or activity.
- 4.4 Results of assessments shall be documented in accordance with Section 6 of this QCI .

3307110040

5.0 RESPONSIBILITIES

5.1 The Program Manager is responsible for:

- Implementation and control of the overview of the CCP activities
- Evaluating compliance and effectiveness of the program.
- Approval of checklists
- Participating in Management Reviews
- Preparation of reports of progress and nonconformances for presentation to the US NRC and CPCo
- Documenting those meetings and telephone conversations that pertain to the CCP

5.2 The Evaluation Supervisor shall be responsible for:

- Developing checklists comprised of attributes based upon activities described in PQCI's, commitments and other project directives.
- Maintaining and up-dating checklist matrices
- Directing the implementation of the Evaluation Program

5.3 The Verification Supervisor shall be responsible for:

- Developing checklists comprised of attributes based upon activities described in PQCI's, commitments and other project directives
- Maintaining and up-dating checklist matrices
- Directing the implementation of the Physical Verification Program

6.0 PROCEDURE

6.1 Evaluation/Verification shall be performed in accordance with the following instructions:

- 6.1.1 Attribute checklists shall be prepared utilizing the PQCI and appropriate additional data. Attribute checklists may include direction for information and guidance to the evaluator. Attributes shall be numbered sequentially, shall be clear, concise, without ambiguity and shall indicate the precise source of the attribute by page and paragraph. In addition the source data shall address any of the 18 criteria of 10CFR50 Appendix B as applicable. The CPCo team number shall be indicated in the "Responsible Organization" Column.

- 6.1.2 Review referenced documents, including correspondence, procedures, and inspection records pertinent to the CCP.
- 6.1.3 Complete the checklist attribute sheets during the assessment by entering the total number of observations made of each attribute and the number of observations found unsatisfactory, noting any remarks under "Comments". Remarks shall contain sufficient information to ensure repeatability of the observation. This information shall include identification of specifications, drawing procedures, reports, test results and nonconforming conditions and shall include copies of supporting documentation as necessary. Attributes determined to be not applicable shall be marked "N/A" and explained.
- 6.1.4 Each attribute noted as unsatisfactory shall be evaluated by the Program Manager to determine if the unsatisfactory observation warrants the issuance of a Nonconformance Identification Report (NIR).
- 6.1.5 Checklists with attributes noted as unsatisfactory that do not result in the issuance of an NIR shall be kept in an active file until reinspection determined that the attribute is considered satisfactory.
- 6.1.6 The checklist attribute sheets shall be considered as a guide for performing assessments. Attributes maybe modified or added or deleted (with explanation) as necessary to satisfy the objectives of References 2.1 and 2.2.

7.0 Records

- 7.1 Upon completion of all activities associated with a specific POCI, the completed package (with copies of NIRs) shall be transmitted to CPCo Permanent Plant Files.
- 7.2 CIO shall maintain a working file of all documentation transmitted to CPCo Permanent Plant Files. This file maybe used for reference or review by the US NRC.

STONE AND WEBSTER MICHIGAN INC

MIDLAND ENERGY CENTER PROJECT

EVALUATION ATTRIBUTE CHECKLIST

ATTRIBUTE CHECKLIST N°	TITLE	REV	DATE
PQCI N°/REFERENCE	TITLE	REV	DATE
<p>This Attribute Checklist shall be completed in accordance with the following procedures.</p> <p>Stone & Webster Quality Assurance Plan Third Party CIO procedure.</p> <p>QCI 10.01 Construction Implementation Overview Assessment QCI 15.01 Nonconformance Identification Report</p> <p style="text-align: right;">S.W. Baranow Program Manager</p>			

Attribute Checklist prepared by

SIGN

DATE

Checklist Approved by

SIGN

DATE

Checklist Completed by

SIGN

DATE

Completed Checklist Approved

SIGN

DATE

STONE AND WEBSTER MICHIGAN INC

MIDLAND ENERGY CENTER PROJECT

VERIFICATION ATTRIBUTE CHECKLIST

ATTRIBUTE CHECKLIST N°	TITLE	REV	DATE
PQCI N°/REFERENCE	TITLE	REV	DATE
<p>This Attribute Checklist shall be completed in accordance with the following procedures.</p> <p>Stone & Webster Quality Assurance Plan Third Party CIO procedure.</p> <p>QCI 10.01 Construction Implementation Overview Assessment QCI 15.01 Nonconformance Identification Report</p> <p style="text-align: right;">S.W. Baranow Program Manager</p>			

Attribute Checklist prepared by _____ SIGN _____ DATE _____

Checklist Approved by _____ SIGN _____ DATE _____

Checklist Completed by _____ SIGN _____ DATE _____

Completed Checklist Approved _____ SIGN _____ DATE _____

ATTRIBUTE CHECKLIST

ITEM NO.	ATTRIBUTES	RESP. ORG.	OBSERVATIONS		COMMENTS
			NO. CKD.	NO. UNSAT.	

MANAGEMENT REVIEW COMMITTEE CONSTRUCTION IMPLEMENTATION OVERVIEW OBSERVATIONS

REFERENCES - MEMO - R. Wells to J. Cook June 7, 1983
Meeting Agenda June 1, 1983

The agenda (copy attached) consisted of 7 items the first 4 of which were satisfactorily dispositioned at the April 29 meeting.

Item 5 - (Management Review Audit Team) identified 23 observations and the validity of these observations was accepted. Responsibility and target dates were assigned to each observations.

Item 6 - (Constraints) addressed the 23 observations and their impact on the Quality Verification Program (QVP) (see memo attached). Subsequent correspondence indicates that MPQAD categorizes these observations as "constraints" to QPV or "Desirable as soon as possible," 14 observations falling into the first category and 8 into the latter. The remaining observations, which concerns the development of a matrix of commitments made by CPCo to NRC is considered as a constraint by the Management Review Audit Team and "Desirable ASAP" by MPQAD.

CIO agrees with these determinations and considers that the development of a matrix indicating commitments to the NRC, responsibility and target date is a constraint to QPV.

Item 7 - (Recommendations) addresses 23 observations in subsequent correspondence. MPQAD recommends that the QVP is accepted. The recommendation is based upon the fact that the 14 "constraint" observations relate to procedures that are in draft or review and that issue of the procedures will remove constraints. The committee is expected to take appropriate action on the "constraint" issue. All items on the agenda were satisfactorily dispositioned.

During subsequent discussion CPCo indicated that trend analysis of NCRs would be performed by a consultant and in response to a question by CIO stated that procedures and job descriptions for that consultant would be available. CIO also questioned if job descriptions were available for MPQAD personnel implementing the QVP and was advised that the descriptions are available. CIO considers the QVP acceptable with the following conditions.

- (a) Copies of Job descriptions of MPQAD personnel assigned QVP duties is requested
- (b) The matrix of CPCo commitment to NRC should be complete
- (c) The 14 required to resolve Management Review Team Observations should be approved and issued

To JWCook
DBMiller

FROM RAWells

DATE June 7, 1983

SUBJECT MIDLAND ENERGY CENTER PROJECT
QVP MANAGEMENT REVIEW OPEN ITEMS
FILE 23.0 SERIAL 22848

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

CC BPalmer
SBaranow (S&W) w/Reference

Reference: CCo Serial 22834 dated 6/3/83 - Midland Energy Center Project
Quality Verification Program Management Review

On June 3, 1983, you were copied on a letter to J A Rutgers from Brien Palmer for me which provided minutes of the June 1, 1983, QVP Management Review and a final punchlist of open items pertaining to implementation of the QVP. The punchlist of open items was included as Attachment C to the minutes and to the best of my knowledge, captures all of the open issues covered by Reference A through F as noted on the cover sheet to Attachment C. It should, therefore, be a complete list. The task of our management team is to identify which of the open issues are truly constraints to implementing the QVP. In order to help us reach a conclusion, I am recommending below which of the items on Attachment C that I see as a constraint and which are desirable but not a constraint:

<u>Item</u>	<u>Forecast Completion Date</u>
1. Constraints	
4, 7, 8, 9, 11, 12, 16, 17, 18, 19, 20, 21, 22 and 23 - All of these relate to resolution of comments on and approval/ issue of procedures	6/13/83 - Issue Date
2. Desirable As Soon As Possible	
1 - PQCI Improvements	6/9/83
2, 3 - IR Data Base Improvements	7/31/83
5 - Material Traceability (Advise Mgmt)	6/10/83
6 - Inspection Process Control System	8/5/83
10 - Topical Report Organization Changes	6/22/83
13* - Commitment Matrix	6/10/83
14 - Issue QVP	Closed
15 - Inspection Safety on T/O Systems	No Date Yet

(*The Management Review Team recommends this as a constraint)

My analysis of the above indicates that when the procedures now in draft stage are issued, that there will be no constraints to QVP implementation and I recommend this position to the Management Review Group.

I am requesting that J W Cook take action as he feels appropriate as chairman of the Management Review Group to confirm or modify my recommendation to establish the Management Review Group's position.

jln

AGENDA FOR MANAGEMENT REVIEW OF QUALITY VERIFICATION PROGRAM (6-1-83)

- ✓ I. Activity Scope and Purpose Palmer
- ✓ II. Organization Palmer
- ✓ III. Procedures Palmer
- ✓ IV. Training and Schedule Palmer
- V. Management Review Audit Slade
- VI. Constraints Palmer
- VII. Recommendations Wells

sent to B 6/13/83 ✓
file
13

SEARCHED	INDEXED
SERIALIZED	FILED
JUN 16 1983	
NRC	



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

June 16, 1983
N.O. No. 14509
NRC File #83-00-16

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

Copies of Stone & Webster documents developed to implement the Construction Implementation Overview of the (CPCo) Construction Completion Program are attached for your review and comments.

1. Project Quality Assurance Plan June 18, 1983
2. Quality Control Instruction, QCI 15.01 Nonconformance Identification and Reporting Rev. 0, June 14, 1983

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

Very truly yours,

pp S.W. Baranow

S.W. Baranow
Program Manager

Enclosure

SWB/ka

cc: JHarrison, NRC Glen Ellyn, IL w/att
RCook, NRC Midland (Site Manager)w/att
DEMiller, US NRC (Site Representative)w/att
RBKelly, S&W 245/5 w/att
APamaruso, S&W 245/13 w/att

JUN 22 1983

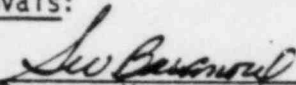
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J.O. No. 14509
Midland Plant Units 1 & 2
Consumer Power Company
Third Party Construction
Implementation Overview

PROJECT QUALITY ASSURANCE PLAN

Approvals:

Dates:



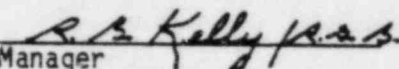
Program Manager

6-13-83



Chief Engineer
Engineering Assurance

6-8-83



Manager
Quality Assurance

6-7-83

SCOPE

This procedure describes the quality assurance plan for activities performed by Stone & Webster Engineering Corporation (SWEC) for the Consumers Power Company's (CPCo) Midland Plant- Units One and Two. The work involved in this third party overview is described in applicable CPCo specifications and procedures and shall be accomplished in the following manner:

- a. Development of an overview program and preparation of a Project Quality Plan.
- b. Review of the design and construction documents to gain familiarity with the work.
- c. Evaluation of the adequacy of technical and related administrative construction and quality procedures.
- d. Evaluation of the degree of compliance with technical and administrative construction and quality procedures.
- e. Daily reviews as necessary with the Owner to obtain any clarifying information and project documents that are needed to carry out this program. The Owner and SWEC will establish a specific communication plan at the start of the work.
- f. Submittal of brief weekly progress reports and a final report to the NRC with a copy to CPCo.
- g. Submittal of monthly reports of findings and observations to the NRC with a copy to CPCo.

- h. Monthly reports and the final report shall be reviewed by a senior level overview committee in accordance with the Project Program Plan.
- i. SWEC will not be responsible for implementing corrective action, however, their professional opinion may be requested.

PROGRAM REQUIREMENTS AND ACTIVITIES

I. ORGANIZATION

The overall SWEC organization is depicted in SWSQAP 1-74A (Section I). A Program Manager will function as the site leader for the third party overview. Project organization is described in the Project Program Plan.

II. QUALITY ASSURANCE PROGRAM

The overall SWEC quality assurance program is designed to provide assurance that all SWEC activities are accomplished in a controlled manner. The SWEC corporate QA program complies with 10CFR50, Appendix B, and NRC Regulatory Guides, and is described in an NRC approved topical report, SWSQAP 1-74A, "Standard Nuclear Quality Assurance Program."

This quality assurance plan shall be maintained up-to-date to reflect any changes in the scope of SWEC work.

This quality assurance plan identifies the procedures which implement the overall QA program as it applies to the SWEC scope. Insofar as possible, applicable standard SWEC procedures will be used to govern the work. When standard procedures do not fit project circumstances, project procedures will be issued to govern the work. Variances from standard SWEC procedures will be approved according to Quality Standard (QS) 5.1 and Engineering Assurance Procedure (EAP) 5.7.

Personnel performing activities in accordance with this plan requiring qualification and certification will be qualified and certified in accordance with Quality Standard 2.12 and Quality Assurance Directive 2.5.

III. DESIGN CONTROL

(Not within the SWEC scope)

IV. PROCUREMENT DOCUMENT CONTROL

Consulting Services, as required, are procured in accordance with Engineering Assurance Procedures 4.1 and 4.15, which are supplemented by Project Procedure (PP) (LATER).

V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS

SWEC procedures, including variances, are prepared and controlled in accordance with Section II of this QA plan.

(Instructions, drawings and specifications are not within the SWEC scope).

- VI. DOCUMENT CONTROL
(Not within the SWEC scope)
- VII. CONTROL OF PURCHASED MATERIAL, PARTS, EQUIPMENT, AND SERVICES
(Control of Purchased Material, Parts and Equipment - not within the SWEC scope).
Control of Services is in accordance with Engineering Assurance Procedure 7.1.
- VIII. IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS
(Not within the SWEC scope)
- IX. CONTROL OF SPECIAL PROCESS
(Not within the SWEC scope)
- X. INSPECTION
Quality Assurance monitoring of the construction and quality activities is performed by surveillance of on-going work.
- XI. TEST CONTROL
(Not within the SWEC scope)
- XII. CONTROL OF MEASURING AND TEST EQUIPMENT
(Not within the SWEC scope)
- XIII. HANDLING, STORAGE, AND SHIPPING
(Not within the SWEC scope)
- XIV. INSPECTION, TEST, AND OPERATING STATUS
(Not within the SWEC scope)
- XV. NONCONFORMING MATERIAL, PARTS, OR COMPONENTS
Nonconformances discovered by SWEC during the monitoring process are reported in writing to the NRC with copy to CPCo.
- XVI. CORRECTIVE ACTION
Reporting under 10CFR50.55(e) is accomplished in accordance with QS-16.2 and EAP-16.2.
Reporting under 10CFR21 is accomplished in accordance with QS-16.3 and EAP-16.3.

T-391

STONE & WEBSTER QUALITY CONTROL INSTRUCTION	QCI NO. 15.01	REV. 0	DATE 6/14/83	PREPARED BY F. Bearham
	DIVISION FOC		LOCATION MNPP	
	APPLICABILITY N/A		APPROVED BY <i>F. Bearham</i> 6/14/83	
	RE. PROCEDURE N/A			
	SUBJECT NONCONFORMANCE IDENTIFICATION AND REPORTING			

1.0 PURPOSE

1.1 To describe the system for initiating, processing, distributing and controlling Nonconformance Identification Reports (NIR), documenting field nonconformances.

2.0 SCOPE

This instruction applies to nonconformances identified by Construction Implementation Overview (CIO) personnel during evaluation and verification of activities associated with the implementation of Phase I and Phase II of the Construction Completion Program (CCP).

3.0 REFERENCES

- 3.1 SWEC Third Party Construction Implementation Overview May 19, 1983
- 3.2 SWEC Project Quality Assurance Plan
- 3.3 Processing of CIO Deficiencies, N-6 Rev. C, May 16, 1983

4.0 ATTACHMENTS

- 4.1 Nonconformance Identification Report (NIR)
- 4.2 Instructions for completion of the NIR report
- 4.3 NIR Log Summary

5.0 DEFINITIONS

5.1 Nonconformance - A deficiency in characteristic, documentation or procedure which renders the quality of an item unacceptable or indeterminate. Examples of nonconformance include: Physical defects, test failures, incorrect or inadequate documentation, or deviation from prescribed processings, inspection or test procedure.

6.0 PROCEDURE

6.1 Nonconformances that are observed by (CIO) personnel and determined to have been previously identified by Consumers Power Company (CPCo.) or their Constructors shall not be reported.

Note - Previously reported nonconformances will normally be identified by number on the Quality Control Inspection Records (QCIR) which are attachments to Project Quality Control Instructions (PQCI).

6.2 Nonconformances which have not been previously identified by CPCo or their Constructors shall be reported on a Nonconformance Identification Report (NIR).

- 6.3 NIRs shall be evaluated for potential reportability under 10CFR 50.55e and/or 10CFR Part 21 by the Program Manager. The Program Manager shall transmit to CPCo a copy of the NIR and a brief explanation outlining the reason(s) why it should be evaluated by CPCo.
- 6.4 Upon concurrence by the Program Manager, the original shall be transmitted to CPCo for processing in accordance with MPQAD procedure N-6, "Processing of Construction Implementation Overview Deficiencies." A copy of the NIR shall be transmitted to NRC site representative for information. Copies of NIRs shall remain in the CIO files for tracking purposes.
- 6.5 The Program Manager shall maintain communication with CPCo to determine when resolutions of nonconformances are accomplished.
- 6.6 Upon notification from CPCo that the nonconformance has been resolved, (CIO) personnel shall verify that corrective actions have been accomplished. After verification, the NIR shall be closed with a brief description of the corrective action accomplished and shall signify concurrence by signing and dating the NIR.
- 6.7 If the corrective action is considered to be unsatisfactory, the initiator shall issue a new NIR which shall be processed in accordance with paragraph 6.4.
- 6.8 A weekly report showing the status of NIRs shall be sent to the US NRC with a copy to CPCo.

7.0 RECORDS

- 7.1 Closed NIRs shall be distributed as follows:
 - ° Original of NIR and MPQAD MCR to CPCo permanent plant files
 - ° One copy to US NRC
 - ° One copy to CIO files
- 7.2 Other records shall be distributed as follows:
 - ° Originals of completed summary logs to CPCo permanent plant files

Instructions for Completion of a Nonconformance Identification Report

Number - Enter next sequential number obtained from file.

Date - Enter date observation was made.

Identification/Location of Item - Use name and serial, mark or heat number, etc., or other description of items affected by the nonconformances.

Description of Nonconformance - Reference documents and requirements and explain manner in which they are violated. Include any pertinent physical condition (dimensions, test reports, damages, etc).

Initiator - Signature of Construction Implementation Overview Team member making observation.

Date - Enter date of report.

Program Management Concurrence - Signature of the Program Manager or his designee signifying concurrence with issue of the NIR.

Corrective Action - Describe action taken by CCo. or their Contractors to correct nonconformance. Include any appropriate report numbers, specification changes and/or methods of repair, etc.

Initiator Concurrence - Signature of Construction Implementation Overview Team member reporting and concurring with corrective action.

Program Management Concurrence - Signature of the Program Manager or his designee signifying concurrence with closure of the NIR.

Date - Enter date NIR is closed.

XVII. QUALITY ASSURANCE RECORDS

SWEC General Policy and Procedure for records collection, retention, and turnover to Consumers Power Company are described in QS-17.1 and EAP-17.2 and as detailed in the scope under items f. and g. EAP 17.2 is supplemented by PP (LATER).

XVIII. AUDITS

(Not within SWEC scope)

STONE & WEBSTER MICHIGAN, INC.
 NIR LOG SUMMARY

NIR NO.	MPQAD NCR NO.	SUBJECT	DATE OF ISSUE	DATE DISP.	DATE CLOSED	COMMENTS/STATUS REP. NO.

Send to DMIB 6/20/83



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

June 15, 1983
J.O. No. 14509
NRC File #83-06-14

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

Attached for your information and files are four (4) copies of the Stone & Webster Engineering Corporation Construction Implementation Overview Organization, Rev. 0 dated June 1, 1983. Revised copies, as updated, shall be transmitted to your office.

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

Very truly yours,

S.W. Baranow
S.W. Baranow
Program Manager

Enclosure

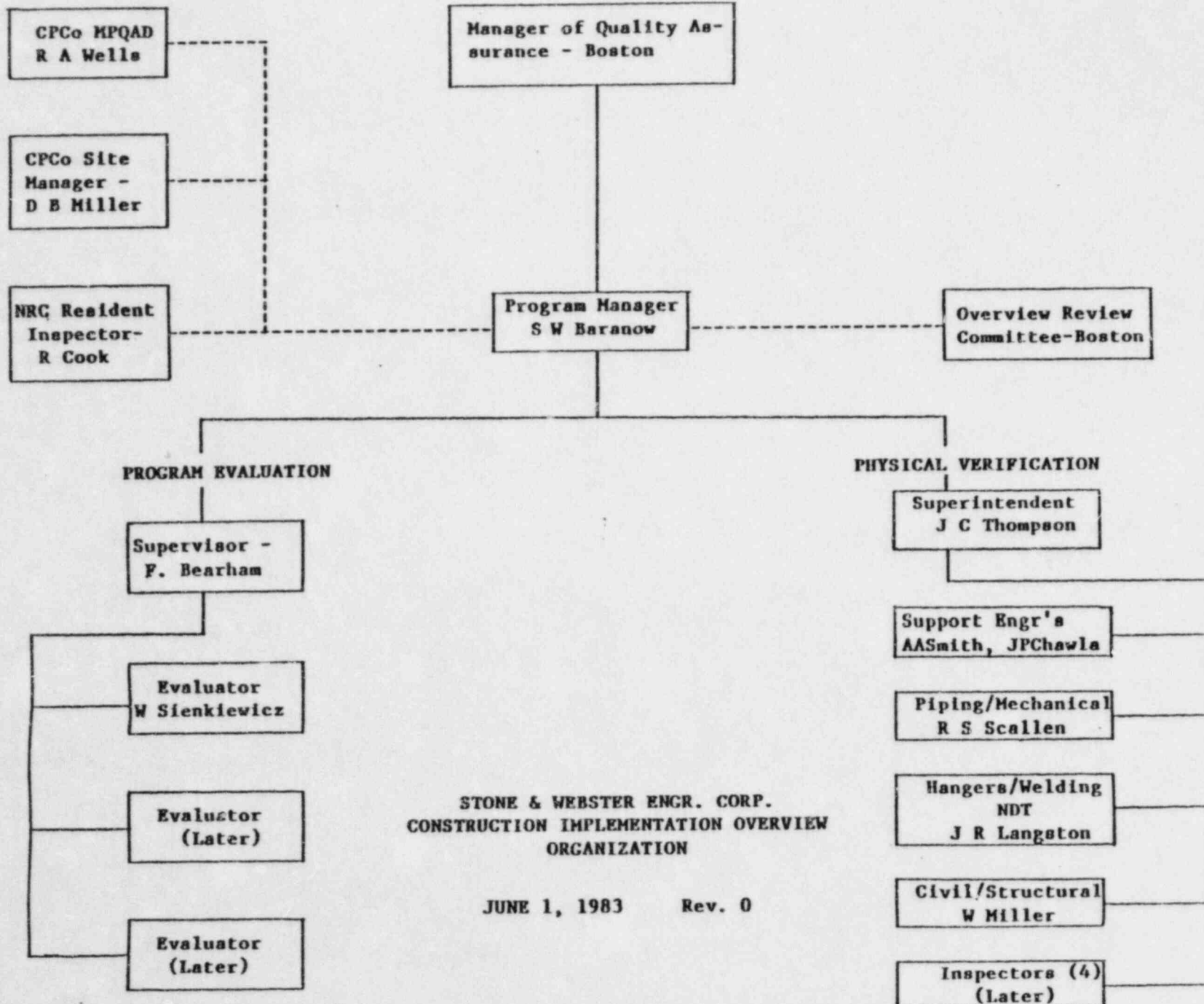
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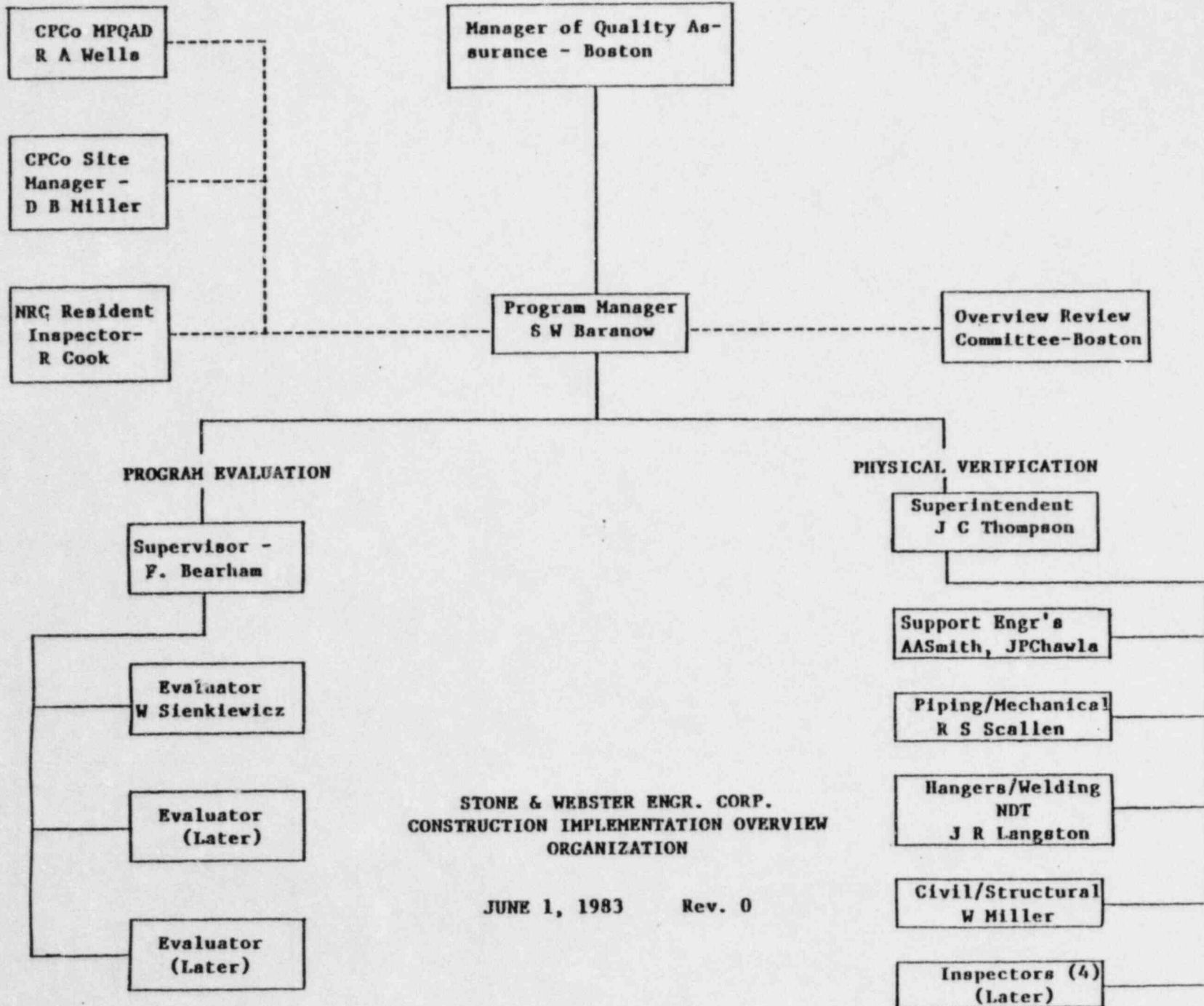
cc: JHarrison, NRC Glen Ellyn, IL
RCook, NRC Midland (site)
DBMiller, CCo Midland (site)
RBKelly, S&W
APamaruso, S&W

ENTIREL STAFF	
<i>Jan</i>	<i>2-3</i>
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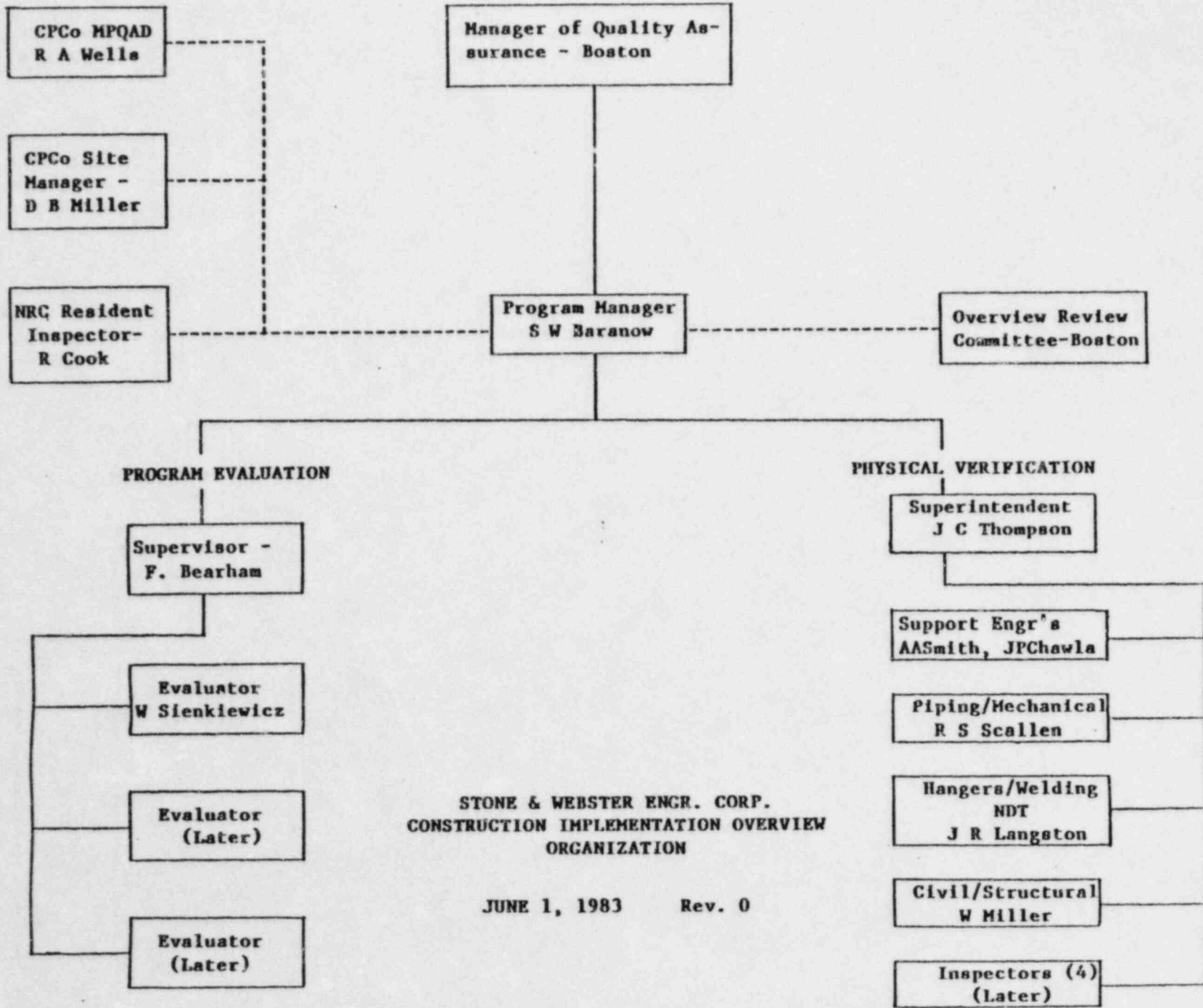
JUN 20 1983





STONE & WEBSTER ENGR. CORP.
 CONSTRUCTION IMPLEMENTATION OVERVIEW
 ORGANIZATION

JUNE 1, 1983 Rev. 0



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