STONE AND WEBSTER MICHIGAN, INC. DM (3

		P.O. BOX 1963, MIDL	AND, MICHIGAN 48640
	PRINCIPAL STAFF	53	DATE 6-1-84 J O NO 14509 P O NO
VIA	A/RA DRMSP		LTR NO. SWM- /3/
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Item 086	ó		

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D. E. Karr

CIO Program Manager

APAmoruso (2) KRArndt/Chrono/Vault w/o attach(2)

Initiator

STONE & WEBSTER	17EM NUMBER HOLD POINT NUMBER 070
CONSTRUCTION IMPLEMENTATION	X TRACKED ACTION ITEM
OVERVIEW	TRACKED INFORMATION ITEM
MIDLAND NUCLEAR PLANT J.O. NO. 14509	TRACKED RECOMMENDATION ITEM
REFERENCE(S) Discussions between T. Spellman (CPCo),	UNTRACKED ITEM
B. McKenzie & W. Pettit (BPCo) and T. Parker (CIO)	HOLD POINT NOTIFICATION
CONDITION DETAILS	
CIO has discussed, with those referenced above, the value Memorandums (IOM's) issued that clarify the status as a result, CIO has the following concern.	
The IOM's which clarify the status assessment process BPCo Project Field Engineer, Project Superintendent, Supervisors, Team Supervisors and/or anyone else seein of a particular status assessment subject area. The IO processed through any one point for any tracking, revisor reference.	Construction Systems ng a need for clarification OM's are not being cleared/
	YES NO SI X NO
(continued on Sheet 2 of 2)	ATTACHMENTS
DATE RESPONSE REC'D. INITIATORIDATE 19/9/9/9/	INITIATION APPROVED/DATE
RESPONSE	0
Reference attachment for complete response to this	item.
하는데 열심히 나는 이번 말이 가지 않는데 얼마를 다 하는데 되었다.	
	YES NO.ST NO
	ATTACHMENTS .
EST. CORRECTIVE ACTION   RESPONDENT	ITLE   DATE
COMPLETION DATE	57.2
NA DIENELL VA	est Cont Sent 5/9/81
	11/1/17
RESPONSE ACCEPTED DATE RESPONSE VERIFIED/CL	Jelan 5-31-9 DATE /31/84

# CONDITION DETAILS (CONT.)

This lack of administrative control can lead to the following problems;

- Inconsistancy in direction provided to personnel implementing CCP activities.
- 2) Redundancy in memos issued on the same topic.
- Clarifications being issued which represent changes to existing procedure requirements.
- 4) Inability to evaluate the IOM's for needed program/procedure changes. Please provide CIO with CPCo's plan for addressing the concerns noted above.

#### Response To CI 0-070

Two programs are now in place that address this concern.

- To disseminate information that should be placed in a procedure and does not involve a major revision to the procedure, FPG-1.000, Rev 7 was issued on May 7, 1984, to include provisions for the use of Change Notice (Attachment 1).
- 2. To disseminate information related to construction that does not require incorporation in field procedures, the Information Bulletin (Attachment 2) was established with the issue of Change Notice No. 1 to FPG-1.000, Rev 7 on May 9, 1984. The information bulletins are issued by the Project Field Engineer, logged and distributed by field document control and maintained by each holder of controlled sets of field procedures.

JTM/EK/ejt 050905f7

# ITEM/HOLD POINT NOTIFICATION FORM

Sheet 1 of

Attachments 2 and B pr	o's response, provided via CP, and found it to be acceptab closed.	Co Transmittal No. CSC le. CIO considers thi	7
CIO has evaluated CPC ments 1, A, 2, and B) as NIRs 022 and 023,	o's response, provided via CP, and found it to be acceptab closed.	Co Transmittal No. CSC le. CIO considers thi	7
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CIO has evaluated CPComents 1, A, 2, and B)	o's response, provided via CP, , and found it to be acceptab	Co Transmittal No. CSC	-7810 (Attach- s Item, as well
CIO has evaluated CPComents 1, A, 2, and B)	o's response, provided via CP, , and found it to be acceptab	Co Transmittal No. CSC	-7810 (Attach- s Item, as well
Attachments 2 and B pr			7040 (444
	rovide a complete response to	NIR-023.	
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Attachments 1 and A pr			
	rovide a complete response to	NIR-022.	
RESPONSE (SEE NOTE)			
5-24-84	Rich Scallan Stzz/84	90	ban 5.12.8x
DATE RESPONSE REQ'D.	INITIATOR/DATE	INITIATION APPRO	. / .
		ATTACHMENTS	
		YES NO'S)	ĭ NO
OAR RA-C	00157 VAK	RA-00155	
CPCo Let	tter #CSM-0768 CPC	Letter #CSM-0769	
Reference: 1. Stone &	Webster NIR No. 022 2. Stor	ne & Webster NIR No. 0	23
Current replies provide	inaccurate and conflicting in	nformation.	
below) concerning NIR 02	responses received from Bechte 22/NIR 023, we request one rep	oly clarifying our ini	tial findings.
CONDITION DETAILS	Dankt	al and that of MPOAD (	See Reference
QAR RA-00155/QAR RA-0015	57	HOLD POINT	NOTIFICATION
REFERENCE(S)	TRANTO.O. NO. 1750)	UNTRACKED IT	
MIDIAND MICIEA	R PLANT J.O. NO. 14509		OMMENDATION ITEM
0	VERVIEW	TRACKED ACT	ORMATION ITEM
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CONSTRUCTIO	ON IMPLEMENTATION	086	

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

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

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

#### 1. Missing Documents (findings 1 and 11)

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

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

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

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

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

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

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

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

# 5. Legibility (findings 19, 20)

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

# 6. Miscellaneous (findings 3, 10, 15)

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

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

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

Attachment A

		DISCR	CDD	Attachment		V 219	
REV	REV	The second second second second				OTHER	IN STA.
			100000000000000000000000000000000000000		BACK	COMMENTS	LOGE
4	4	FCR MIDZES	YES	YES	No		YES
0	0	IDCN 20123	No	YES	YES		YES
1	1	FRL [	No	YES	No		YES
3/51	3/F1	165 #8	No	XES No	FNo		YES
2	2	IDEN 20040	No	No	No		YES
5	5	FCR 229182292	XNo		No		YES
5	5	FCR 2291 12272	No	YES	No		YES
11/1	11/51	TCS 3,8,13,14	YES	Y63	YES		No
0	0	FCR 3942	No	No	No		YES
0	0	IDEN 2013.3	No	YES	Ye3		YES
7	17	FCN HIZ95 OFZIPS	No	Xes As M1295	No	TRANSPOSED NUMBERS GNAUSE ISSUE	YES AS M-219
7	8		_	_			
9	9	M-4139	No	YES	YES	ATTOSHIFENT HOS OLD WORK PRINT STAMP	YES
5	5	E-7551	No	YES	YES	SAME AS ABOVE	XES .
4	4	E-2613	No	YES	No		YES
7	7		-			PAGE LAST PAGE 15 1031	
0	0	10×N 20119	2003	No	No		YES
0	0	IDEN 20125	No.	YES	Y53		Yes
_	-	FCN-8000	No	YES	YES		Yes
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Item 086 Attachment 2 Page 1 of 2

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

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

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

#### 1. Old Workprints versus New Workprints

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

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

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

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

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

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

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

Finding (22) - FCR was removed

- ICS stamp was placed on front of drawing

Finding (23) - Status stamp was placed on front of drawing

Finding (24) - ICS stamp was placed on front of drawing

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

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

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

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

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

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

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

#### 7. Other Concerns noted on the Audit Report

#### a) Training

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

# b) Processes followed in Workprint Stations

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

DOCUMENT	REV DWG	REV REG	DOCUMENTS IN QUESTION	IN REG	LISTED ON FRONT	BRCK	70	OTHER ALLOW HOLLS
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21 2008-15-3	4	4						LEGIBILITY.
3) 2CCB-39-2	5.							LEGIBILITY
) FSK-M-2CCB	1	Batt			NOT LISTED			
-101-1								THOLD 3810 13 ATTACHED BUT NOT
5) 2888-1-1	,	(2)		1-				ON REGISTER
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7) 75k-M-2E88	3	4						1) 2641B/LITY - IDCN 8968
	4	(5)					R	VECR C-4139 ATTACHED BUT NOT
B) 2EBB-3-2	-4	131					37	V 21 TDCN 8478/FCR C-4/39
9) 2EBB-4-1	2	( <del>4</del> )			77			DIDEN BIGI PG #2 LEGIBILITY .
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11) 2EBB-7-4		121						
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16) 2ECB-8-5	4	4			ge ten	-		FRONT OF DIVG.  I) FEN GIBB ATTACHED BUT NOT ON REGISTER
17) 2HBC-160-1	2	2		-	1086			2) FON GIBS NOT WRITTEN ON
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18) 2HCD-82-6	6	6			Φ		-	FRONT OF DIVIG
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