(3) Round

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ORAL COMMUNICATIONS RECORD

PROJECTS, ENGINEERING AND CONSTRUCTION -QUALITY ASSURANCE DEPARTMENT

0000 FILE 90 WRB 51-80

QA5-0	N21 072
DATE OF CONNECTION 5/12/80 & 5/13/80 M-PLAC PERSONE PARTIES	WEBird (DHorn 5/13/80 only)
THE OF COMPLETION ONLY PAIT(S)	Gallagher, MBC
WRBird	1 hs . + 1
PROPERTY AND/OR SUSPECTS DESCRIPTION	
DIESEL GENERATOR SETTLEMENT PROBLEM - 50.	54(f) COMMITMENTS ON
EQUIPMENT QUALIFICATION	1"/
	7
SDEAR OF CONTESSAINS	
5/12/80 - Mr Gallagher asked my assistance in o	btaining compaction equipment qualifications.
NRC had asked for their submittal. The latest	50.54(f) response did not submit the data.
We said he had talked to D Horn several times or	ver the last weeks about the NRC concerns
nat the qualification records were not available	le. The following three coints were made:
1) Qualifications are considered a permanent "	Quality Record." 2) If they don't exist
how can CPCo justify old work or justify continu	ing Work? 2) Tetters stating equipment
is qualified is not good enough - a qualification	on report is needed.
I stated that I would investigate the situation	and take appropriate action. Mr Gallagher
stated that he would ask to see report on his ne	ext visit, and that there are other
vehicles to accomplish their needs.	
5/13/80 - We called Mr Gallagher back to give h	im a status of what my investigation
revealed and what specific actions we had direct	
1) Bechtel will release an official design disc	
C-211) which will list the equipment qualif	ications and the limits of the qualification.
	(OVER)

 Bechtel Engineering had completed their review of the qualification report and Consumers will be finishing up our review today.

Mr Gallagher wondered how we could have been placing soils since last summer if a qualification report had not been reviewed and approved by Quality. He stated it would be a very serious situation if the analysis of the report showed there was equipment deemed to be not qualified which had been used for soil, placement. Don Horn stated that his review to date has resulted in some questions on qualifications for placement of clay but that no Q placements have been made with this equipment. The qualification of the equipment for placement of sands appear to be substantiated. To our knowledge, no Q placements had been made prior to Bechtel Project Engineering's release of the equipment in writing to the field.

We stated that the qualification report was planned to be submitted in a June submittal.

WRB/lr

1 2.10

Editorial Note - Neither our 50.54(f) response nor the Bechtel Program requirements require a Quality Assurance line involvement in the Engineering activities to certify the qualification of the compaction equipment. FIC 1.100 places the qualification and records for qualification of compaction equipment with Geotech.

CC: JWCook, Plb-113A

JLCorley, Midland

LHCurtis, Bechtel AA

LEDavis, Bechtel-Midland

LADreisbach, Bechtel-Midland

DEHorn, Midland

BWMarguglio, JSC-220A

JMilandin, Bechtel AA

DEMiller, Midland

JARutgers, Bechtel AA

-1

midland

1. Guestion: with available information, provide the best estimate of the type and quantity of fill (i.e., lean concrete, sand, or clay) within the limits of E075 to E430 and 55225 to 55036. Also, provide plan and cross section sketch of such information.

Response:

The engineering protrayal provided in the early cross section developed by Engineering provides the information requested above to the same level of accuracy which the field would provide if we were to generate a similar drawing. The only exception to the forgoing is the case of lean concrete where we note (via a review of personal records) that the attached amounts of lean concrete were placed.

LOCATION OF FILL CHEIC YAR 12/20/78 P/48ACKFILL @ DUCTEANK STUB 84Y=4 625' 2 12/15/78 3 12/13/78 D/G BACKFILL @ DUCTBANK STUBS BAYS 1,2, \$3 6281 38 12/12/78 D/G BACKFILL @ DUCTBANK STUB BAY #4 628' 10 8/18/78 DUGBANK MUDMAT S/E D/G 627' 2 e/17/18 DUCTEANK MUDMAT SE 2/G 6271 12 8/7/78 DUCTBANK MNDMAT RINS E-W 5/W D/G 6271 29 8/1/78 " 5. 3/6 " 6271 5 7/31/78 MUDMAT RULS E-W 3/ D/G DUCTBANK 627 11 7/14/78 MUDMAT 5 0/4 " 6 7/7/78 DUCTEANK MUDMAT JE D/G. 627 3 7/5/78 DUCTBANK MUDMAT SE D/G 627 26 4/18/78 DUCTBANK MUDMAT E D/G BLDG 630 / 4/14/78 SEWER ENCASEMENT SW D/G 9 12/20/77 EACKFILL BAY #2 @ JE 5 628 11/25/77 MUDMAT @ D/G 12 11/15/77 MUDMAT @ 2/4 144 10/19/77 MUDMAT SE D/G FIGS 113 9/7/17 DUCTBANK MUDMAT @ 2/4 18 8/18/77 MUDMAT @ D/G 57 6/10/76 BACKFILL @ S. T/8=1 (4.5-5.5LINE) 603 16 5520

Bechtel Power Corporation

001315

777 East Eisenhower Parkway Ann Arbor, Michigan

Mail Address: P.O. Box 1000, Ann Arbor, Michigan 48106

BLC-8313

Mr. G. S. Keeley Project Manager Consumers Power Compan 1945 West Parnall Road Jackson, Michigan 49201 October 18, OCT 2 2 1979

> BECHTEL POWER CORP JOB 7220 PER 2 24000 05/0

Midland Units 1 and 2 Consumers Power Company Bechtel Job 7220 TEMPORARY AIR LINE LEAF IN TANK FARM AREA File 2801/0626

- References: 1) CCBC-2100 (Serial CSC-4334) T. C. Cooke to J. F. Newgen dated 8/21/79.
 - 2) CCBC-1918 (Serial CSC-4066) T. C. Cooke to J. F. Newgen dated 5/17/79.
 - 3) CCBC-1914 (Serial CSC-4094) T. C. Cooke to J. F. Newgen dated 5/31/79.
 - 4) BCCC-4060 J. F. Newgen to T. C. Cooke dated 6-18-79.

Dear Mr. Keeley:

This letter is written to provide a complete and factual response to reference 1), an "Article 9" letter regarding the use of the permanent air piping due to the temporary air line leak in the tank farm area. Confirming previous discussions between Joel Newgen of Bechtel and Tom Cooke of Consumers, we identified this leak in the fall of 1978. We started excavating in early spring 1979 in an attempt to locate and repair the source of the leak in the air line. We stopped this effort shortly after it started because we were in a "stop work" mode on Q-listed soils work. We felt that continuing the excavation (to reach the leak) would only expose a larger area to weathering during the ground thawing and spring rains period with no quick recourse for refilling because

S3178157

BLC-8313 Mr. G. S. Keeley October 18, 1979 Page 2

of the stop work. It is important to note that our decision to stop was also based on the feeling that the disruption to the soil was local and, in that respect, posed no great overall threat to the entire tank form area. We believe that subsequent investigations have adequately substantiated that position. In stopping, we planned to resume our investigation in early summer.

When the NRC inspector, Mr. Gallagher, visited the site the week of May 14, 1979, he showed great concern over the presence of air bubbles in the tank farm area. He, in effect, demanded that the air line be shut down. Bechtel and Consumers Power Company worked very closely on this matter since shutting down this air line would require a cessation of many work activities in the auxiliary building which required construction air service. It was the project's considered decision that work must continue and, also, that the temporary air line be shut down. Tom Cooke's letter (reference 3) formalized this decision.

Reference 3) presented Consumers Power Company's concern over the fact that a portion of the permanent plant air system was used after the decision to shut off the leaking temporary line. Reference 4) was prepared to provide Bechtel's response to Consumers Power Company's concerns expressed in reference 3). In effect, our response in reference 4) acknowledges that we did not properly coordinate the use of part of the permanent plant air system with Consumers Power Company when we learned that it would take additional time beyond that originally estimated to tie in a new construction line. In making the decision to use a portion of the permanent system, Bechtel was acting purely in line with Consumers Power Company's overriding decision, namely, work in the auxiliary building must not be stopped because of a shut down of the temporary leaking line. Moreover, work did continue on a rerouting of the temporary air system with the work being completed in mid-June, 1979.

Based on the facts presented above, it is Bechtel's considered opinion that subsection B.3 of Article 9 does not apply to the contamination of the permanent plant air system, and that the limitation of liability in subsection A.2.c of Article 9 applies to the damage to property by contamination as encoutered in this matter.

Very truly yours

John A. Rurgers po Project Manager

CAR/AJB/kb

cc: D. B. Miller (CPCo-Mid)
P. A. Becnel (B-SF)

(Chil)

Bechtel Power Corporation QCFM-6209/AI-556 Inter-office Memorandum Response Hour Du Day QA Action Hem No L. A. Dreisbach To Date June 27, 1979 Into 1 -41 15 ino POAE W. L. Barclay Midland Project, Units 1&2 From Subject Besp. Cor. QA AI 753, SD 190, QC-AI-556 Review of Soils Tests on Computer Quality Control Elect (1) Printout for Project Engineering Erect (2) Midland, Michigan At Copies to 00/204 × Job No. 07220 J. F. Newgen w/o Programatici R. A. Simanek w/o tost. Frn Ovr References: a) Quality Action Request No. SD-190 Quality Assurance Action Item 753, Trend dated 5/9/79 Sect

This is considered to be Quality Control's complete response to reference a) above.

Problem Statement:

Review the list attached to QAR SD-190 and identify those tests already dispositioned or identified as nonconforming and those that are in non "Q" areas.

Response:

A total of 253 identified by Project Engineering as "Failing Soils Tests" were reviewed per the action request in QAR SD-190.

- A total of 156 Failing Tests were found to have been taken in non "Q" soils areas.
- 2) A total of 5 tests could not be located due to insufficient location data provided on the log sheets. These are listed as follows:

Test No.	Date	Location
a) D0017	8/21/74	330 10' R Wall
b) D1897	8/18/77	200S. of "Q" 100' W of MH12
c) R0608	10/8/76	5'N of MH Centerline
d) R0535	9/2/76	30'S of AA, 30" off wall
e) R0768	3/30/77	42'N of7Line, 30" off wall of S.W.I. Bldg.

. . ./. . .

Mr. L. A. Dreisbac June 27, 1979 Page No. 2

- A total of 36 failing tests have been identified on 5 NCR's, 3) Bechtel NCR's 324, 421, 510, 2294 and CPCo NCR M-01-5-9-012.
- Soil test failures numbered 2844 and 2862 were previously 4) identified as failing on a Discrepancy Report (DR) attached to QCIR C-1,02-102. These tests were added to the below mentioned NCR addressing "Q" listed failing tests not previously addressed on NCR's.
- 5) Some failing tests have been previously addressed by either removing the material or by reworking and retesting. These tests are identified below.

Test No.	Remarks
D0178	Cleared by D0179
D0873	Cleared by D0875
3118	Cleared by 3130
D0373	Material was removed from these areas
D0371	Material was removed from these areas
D0370	Material was removed from these areas
D0374	Material was removed from these areas

The remaining "Q" listed failing soils tests, including the 6) 2 previously addressed on DR's are listed on NCR 2307 for engineering disposition.

See attached sheets 1 through 5 for additional information.

If you have any further questions concerning the above, please contact this office.

PROJECT FIELD QUALITY CONTROL

ENGINEER

Attachments

Response Required: NO

LISTING OF ALL FAILING TESTS FOR WHICH NO CLEARING TEST IS RECORDED, NO NOR INDICATED. AND THE SOIL IS NOT RECORDED TO HAVE BEEN REMOVED, OR THE TEST IS LABELLED AS NON-Q

(DO017- 10.60C. D0163- E347/S4710-E568- 4% RD21 DENSITY 00164A-NO LOC. 001643 D01658 D01664 D0166B 00178 10200 20200 D0309 00370 00371 D0372 00373 00374 00512 D0513 D0515 00516 D0517 D0518 00520 00523 00524 00525 00526 00527 00530 00531 00532 00533

> D0534 D0535 D0536

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D0537
 00539
 D0873
 D0909
 D0938 -
, 01035
 D1050 :
 D1116 :
 01153
 01155
 01191
 01194
 01321
 D1337
 D1393
 01398
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 01546
 D1871
 01875
 01897
 01949
 80050
 02078
 02079
 02176
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 03029
 03160
 R0015
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 R0017
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 R0020
 R0022
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R0024

R.D.

R0059

R0214

R0255

R0308 :

R0319

R0322 .

R0366

R0367 R0368

80369

R0370

R0464

RU466 R0467

RU468

R0469

R0470

R0498

R0532

R0535

R0604

R0607

R0608

R0625

R0663

R0664

R0667

R0680

R0682

R0688

R0734

R0736

R0737

R0738

R0739

R0740

R0741

P0744

20746

R0768 R0785

R0799

ROAZE

R0843

R0845

2847B-

THE PARTY

13 175.

El Juliante

	INTERMEDICA	COSCILLI	6 1 11111	.0 11:10	No.5 T-126	IN-3170	1.22.16
CRH'S TEST	DATE	ENST	SOUTH	ELEV.	MOISTURE.	DAT	CLASSIFIEF
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¥ V10017	06/05/25	400. ?	12100	1310	(CCt	000115	2005
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		- ch E OF 8.7/	CH. O	1.1 81	(.co.	000113	PUZU-74.6%
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0°101645		26'E OF 8.7/ CX	CFA Q	Citi.	0.007	000113	F.024-94.6%
VIC 1653		8.7/25'N. OF	8: 74 3	Cift	:00:	000113	EC24-94.5%
₩ TO 166F				CEFF	2005	000112	P024-93-6%
24 VD0202	07/02/75	306	44.88.46	0.585	0(17	000107-CLEARED	B176-92.0%
324 000201	C7/0E/75			CEFF	CC14	000110	B17016.7% (40
	(7/08/75	250	recoar	(¿ ċ ;	(C 7 F	((0103	9170 92%
×10309	10/02/75	186	16.72 Km		vicee	CCC 103	P03C
*L0372	10/11/75-			8 (101	C(1)	C00114	F.255
₩10373		0 012/ 12/ 12/0	FF WALL Q	(603	0013	CC0124) soils	= 260-13.3%(Ma
120371	10/18/75-	25500411-210	TE CONT. WHE I		L(13	CCO127 FAMOVE	E260-134%(40
VDC370	16/16/75-	223024/22/01	CE day T	C f. C: 4	66.12	(00131(175SE	£ 263-11.3 75 (MG
M00374		327°C#1/26'0		6603	00.12	CCC112) AREAS	9262-70.0%
421 010512	11/13/75	1, 5 (.	4715 9		CC 14	006125	B261-19.2% (M
121 3000513	11/13/75	46t	46 t 7 MISH		0614	000125	E261
KD0516	11/14/75	396	HE SE KING	A C 6-18	0013	000128	E261
-212010	11/14/75-	105 KOFW /CL	0F7.6 Q	0621	7.643	600127	E 26 1-12.5% (100
PD0516	11/10/75	17 6 5	4765 9	6:13	0.013	600121	F261-13.4%(Ma
×10517	11/14/75	472	TEEC NO	20111	(013	CC0128	F261
421 200526	11/17/75	351	46759	0624	0016	000118	F 26 1-910%, 144
421 PDC525	11/17/75	276	41359	0627	00.15	000124	1261-15.255CMD
421 NO 0524	11/17/75	214	11 6 20 Q		(014	000123	P. 2 & 1-14.4% (IAC
421 200527	11/17/75	47(LEED KOL	20615	C(15	000124	5261
VD0523-		34(£ (3(Q	C(14	0607	000119	F040-500%
W1.052(-		341	£ 121 K	CL 14	C015	000123	= 262-14.7.8(HUS
VIC532	11/18/75	-15	41(29	01.28	1.17	(00117	1220-16.6% (Miss
401 20534	11/11/75	351	41120	C124	1.617	CCC11f	F 220-16.7% (Miss
421 MDC 530	11/19/75	LC:	4713 Q	6615	0012	000123	226 HI-7% (MO
421 400537	11/18/75	521	4 t 25 Hours	2 (610	0015	000121	E261 ·
421 VL0536	11/1/75	450	4711 Q	0 € 1 !	(1:	000120	# 26 1-151% Quis
421 MI 0535	11/11/75	451	61750	0120	2015	000124	F 2 6 1-14 67 (Miss
421 000531	11/18/75	226	46 220	0 (3 2	1074	000125	2261-437.00cm
42 000530	11/10/75	14/	45320	01.32	(114	600123	F 26 1-13.97 Face
421 MD0533	11/18/75	351	4/216	((~ 4	1015	000122	= 281-115%(m)
10873	CF/11/71	536	11.02 Q	6636	\$1.70	CCC11 3-CEARED &	1 E 200-15.7% /M
DC909-		£ 15		cros	0.00%	(CC105 00875	FC43-75.0%
\$0.003!	CF/24/76	5.2	ECOCHENIA		(.16	600124	5279
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-D2176	10/05/77-		- V C617	1018	CCC 115	b277
D2249-	10/15/77	324	£ 155Q 0530	1.010	000119	E 255-9.7% (MU)
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₱ RC019	09/24/74	99	4814 Q 0584	1.008	000711	RC11-49.0%
-P0015	09/27/74	128	47709 0186	6011	060113	PG 15-75.4%
F0016	09/27/74	119	4776Q C167	100	000109	RO15-57.7%
_F0017	09/27/74	96.	4637Q 0587	(013	600111	P.O 15-66.7%
-FC020	09/24/74	111	46679 0564	0007	000111	8011-70.2%
-FC022	09/21/74	118	4176Q CLEL	1.012	600708	F. 0 15-54.5%
- F0021	69/27/74	111	4tt7Q Citt	11.	000112	5 C 15-7/.1%
F0056	12/13/74	336	4711Q CEES	1012	650113	FO 16-71.9%
-E0214	04/12/75 34	YOFA /ED?	5011E Q 0'97	: 667	000112	£074-45%
FC255	10/01/15/60	U. CF 5.3/21	COFHU Q CS93	1665	100108	P024-44%
► F030F	11/23/15	174	45 77 Q -10 01 02	6065	000123	R 0 40-77%
₩F0319	10/28/75	154	4676 QAIS GLOE	(00 i	000121	1040-43.0%
FC322	10/29/75	133	4750 0 0103	(008	.000122	FO40-67.0%
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-FC367	(6/16/76	184	4676Q C+11	1005	000116	FC44-32.0%
- F036c	00/10/76	194	4171 a gene	.(01	000132	5044-740%
FC369	06/10/7630	U. OF 4.55/12	3.0FA" Q CLOE	1001	000119	FO44-53.0%
-FC37C	CF/1F/768'N	OF AA / 5'E	.0F455 Q C(10	rocs	000116	F. 044-51.0%
7010404	06/28/76	460	48399 0613	1001	000120	P.C44-65.0%
FO466	07/23/76	103	ECENNONG DICC	0000	000119	RO 52
¥50467	07/23/76	108	ECST NOR COLLO	C 6.67	000121	R052
%FCHES	07/23/76	100	1034 NON Q 0 (C)	COCF	000116	F052
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*~ F0535	(\$/\$2/7636	SOFAA /SM	OFFWALL P	10.0	000121	P054-73.0%
FOLCH	10/04/76	2.71	11139 (111		000119	FC54-59.0%
F0007	10/61/76	161	(110 (11)	51.61	000116	FC42-77.5%
St. FUEDI	10/01/71 5	M. OF ELECT	MH. & ? (131	. 01	000100	F037-60.Z%
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J. 1 00 c 3	11/11/76	4, (6931 1121	1001	644121	A054
7 LEGGES	11/24/76	41	4551 (130	: 00.	000116	R054
2-10661	11/23/76	4.6	4011 (130	116:	000176	F.C.54
Fotte	11/25/76	4.6	EC 46 4 1731	: 6.61	000119	F.054
J-FC731	(3/11/77	CFL	ECOPPUR CICI	1001	000122	5.054
F0737	03/11/77	754	16530 (101	1167	C6(116	F054
¥1.0731	L3/11/77	(11)	1 (SE . MA (: ()	1.01	000121	FC54-41.9%
10731	03/11/77	715	10136 (101	((0)	COC 120	P054 P054-7043
-h0726	63/17/77-32			none (C)	CG0114	
De 1 0740	63/11/77	ti.	SHABINGWI CLC1	(())	0.00126.	F059 . P054
	03/21/77	751	"(:3 Q ((01	1.01	000 122	F.054-77.87.
					000172	054-77.0/.

-1071.11	13/71/11	!!!	11111 1150	7.6	riu111	+ 054-56.2%
EC746	C3/21/77	133	11100 1.080	107	CCC 11P*	F054-54.9%
- + + 10761	03/36/77 42	N. TIME /O	HEUNIZUIBID. ? ()		010126	F 054-609%
-10715	04/07/77-18				000120	1054-693%
≥ R0799	04/12/77	17	F001N3136136	30 (0 :	000122	F059
- PCE21	64/19/77-		- Men ? (1 1 3	(.001.	000120	9051
-FCE43	04/28/77	721	10019 1012	(.00.	(00120	FCE 1-66.8%
-FNEU!	r4/29/77-		- NONQ (112	((()	000170	EC61
- WLEFE.	C:/13/77	428	5001NMQ 1624	. ((0;	000118	P061
F0914	05/24/77-		- NON C (15	0005	C00126	2262
VF (922	05/26/77	358	500 1 min crou	1000	000121	P.G.6.1
· 0920	05/25/77	€34	50019 0000	000.		FC61-79.3%
\F0925	(5/27/77	11	£001600 £0(117	((11	000115	F278
VEC935	06/09/77	145	50011 70615	1001	500115	F051
VE 0.623	06/25/77	426	500160r40124	0003	660118	FC51
F1146	CE/31/77	246	5001/7 30024	2000	000120	1.061
P114c	CF/31/77	248	5001 : 6624	CCCC	000119	5061
F1149	09/01/77	248	5001 6621	0000	000121	FC61
F 1150	09/01/77	248	5001 \$ 0021	0005	000121	P061
NF 1252	10/07/77	41	FUCTION COLL 23	1.604	. 000121	R061
F14772	00/27/78-		4375 HONGCE 29	CC 12	000116	F066
F1477E	05/27/78 -		4375 0625	(!: Oc	000118	F666
P 147FF	69/28/78-		4280 0629	(1:0:	000126	RC67
F 1478 2	09/28/78 -		4280 0129	0017	(.00111	F067
F 1475 E	(-/zt/7t		4290 0631	2010	000109	F065
FIUPCE	(0/21/71-		4300 0637	0001	000121	2069
E 14FCA	(6/28/78-		4300 (137	0.007	000115	F069
R 1481A	(9/29/76-		4275 16132	CCCF	660117	367C
F 14874	(0/24/75	- R50	4280 0130	(00)	000116	E071
F1483F	(0/29/78	- 160	4280 0631	(()	000115	5672
F3057	CF/63/76		1630 Y 6124	((() (000109	F.C 65 -71.0%
>2500	59/27/78	551	4375 NOW Q C (20	COF	(00118	FC66 4
2525	(4/26/78	160	4560 KON & 0620	000;	000120	7667 20N
755E	C 9 / 2 E / 7 E	520	4200 Holl QC 637	(.00;	000121	PC65 4
5-012 7549	C9/29/7E	1000	4700 NONQ C131	(014	000113	U001
2562	09/30/78	C	48 SCHONG CC 37	1611	000126	UOC3 ZONE
012-2565	(9/30/78	4(.	4720 NON Q C # 21	0010	000175	9005
0/22568	C9/3C/7E	40	4720 0633	611	€€012€	50CE
0/25.59E	16/02/71	40	4770 \$ 6133	(0 1;	000118	0007
	10/6./75	460	ELECTION CC 19	1005	000119	FOEG
0/2 26 12	10/02/78	300	0210m/2 (159	100€	000116	BC61
	10/02/78	126	111303 KI136	+ C. G.I.	000115	FCE4-79.5%
1261L	10/02/78	480	5, 10700000121	5005	000118	3305
2294 2522	10/02/78	0.3	trocimiques:	. ((:	000113	3905
12(23)	10/03/78	470	#1100 × 0134	1 1.01	620118	F085-17/.6%
3294 2125	10/03/76		ESCOUNDED TO	(0)	000120	FCSC
7676	10/03/78	120	4/20 Q = (+27	1005	600119	F091-75.27
1.7.7	10/03/16	10	* of Change 1 3 ?	(00)	000118	1092 201
2294 262F	10/03/76	11:0	41 C(m) 41 (17	1.51	0.0113	
VE31	10/04/78	37	HIET MOURGEST	000	000116	F094-72.5
₹2€35	10/04/76	20	4:17/20:30:27	(((:	000119	F095
12647	10/04/78	FC	460011050027	. (((,	000110	5098
294 =7 +48	10/04/78	19(4171 Q VOLVE	100	000119	F 103
	10/64/78	336	Witcharders:		666118	F1C4-72
	10/41/78	L7!	1111 11117(12)		(1111	1106
-1176	10/0-/78	196		1000	CLC119	1115
77660	16/61/78	70	1171 Q P (1)3	1007	000120	-116-17/.2
7.7fE1	10/01/75		#100 Mend 0123	- 005	606121	F116
×21.63	10/01/78	475	# ((C MON C () 2 ?	0006	666121	F119
77.6.	10,0,7,6		est wond (Co	cent	000120	5120 V

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294 - 4	10/06/71.	190	41.21 6 . 61.24	(50)	000115	1121-73.6%
	10/06/78	50	necount 0650	0005.	000119	F 128.
4 4	10/01/76	30	4100 NEWS 0135	100:	000115	E125
294 - 2720 :	10/01/76	230	EF75Q - 0124	CCCL	000119	F131-79.8%
- 2721	10/06/76	475	1:55 MAIS (13C	0.000	060119	F 132
3" -2722 "	10/01/78	220	4110 9 4 0126	0004	000116	P133-760%
- 2723	10/07/78	190	4575 Q-V C171	0005	00011+	1134- 572
-7729!	10/07/78	WII	45.63 NON Q 01 25	6016	000123	UC11 620X
≥2730h	10/07/76	40	LFC3 HOUGE CFZE	0010	000126	U012
+2730E	10/07/78	t; ti	HECS HOUR DE 25	1010	000129	U012
394 2731	10/07/78	240	4560 Q V (1.31	1005	000118	R137- STR4
- 2732k	. 10/07/78	2	45.ETNONQCFZE	0010	600127	E013 -75.6
-2732F	16/07/78	2	4587 0625	05.10	000130	0013
-27457	10/08/76	C	45.63 0025	0005	000117	U016
- 2745	10/68/78	W4	4563 \$ 0625	0005	000115	U016
+ 2746F	10/08/78	ПĊ	4563 KP ROCES	rc10	000111	U017
+27472	10/06/76	40	4579 0125	ccoe	000124	J018
÷ 2747h	10/08/78	r: Ē	4575 \$ 0F25	0.000	000118	0018
- 2748F	10/08/78	Wu	4579 HONQCLZE	5000	000128	U019
-27491	· 10/08/78	W5	4595 / 0625	0010	000127	U020
27451	10/01/78	(,	4595 1 0625	0010	000127	U020
₹2752F	10/08/78	4.5	REGEINAR CESE	0000	000121	U021
₹27541	10/08/76	4;	41 11 0625	0010	060131	U022
4r2754E	10/08/78	42	46 11 \$ 063E	(20 5	000130	U022 -68.2
394 - 2756	10/08/78	220	4560 Q V 0630	1.1.05	000117	F1435- STRUE
07/103h	10/09/71	4.6	ne c3 nois 0676	~ CD+	000131	U028
-27642	16/09/78	0	4 6 03 NON Q (6 2 6	(.002	000128	U025
≥2792£	10/09/78	46	4571 NON Q 0626	0.000	000131	UC31
→ 2620	10/09/75	160	4510 NUIQUE 30	1600	000129	U033
2+27i	11/09/71	47	4(11 0(27	0000	000123	UC 34
₹2627k	16/69/72	4%	46 11 \$ Ct 27	CC05	000121	U034
-28283	10/09/78		1.1.11 NONQ (627	0010	000125	UC35
-2839F	10/10/78	WL	41 ET NONQO 127	0016	000129	U036
- 26417	16/16/78	r.E	45 F 7 MONIQ (1 27	0.000	0.00107	11038
: TO - 7844	10/10/78	190	4571NONQ C627	0000	000128	UC35 _ 72.9.
02-102-20 47+	15/16/78	W 3	5025 Q 14 0130	(('07	000117	F1524 STES
- 2847;	10/16/78	C	HEGE L CESE	(000	000126	UG41
+28487	16/16/71	48	41 GE KENROTZE	0.00%	000124	UGUI
+ 2046:	11/10/71	It L	usos cest	0011	000120	0042
2028521	16/16/78	46	4576 CC24	0009	000128	0042
4 28521	11/11/78	1, 1,	4179 \$ 0128	1000	000128	EC44 71.63
394 -: 653	16/16/78	150	11.75 QV (131	COOL	000120	
20557	10/10/71	WZ	HE 53 HAVQ CEZE	(00:	606122	F153 5724
≥-26 E € £	15/16/78	L:	4553 87170628	011	000125	UC46
426561	10/10/78	41	4553 + 0638	1011	(00129	UC 47
294-2157	16/16/71	111	11640 Ex (177	0001	000117	F 154-69.7%
Minter	10/11/78	: 00	1050 0000 0031	101	500115	
294 (11	17/11/71	230	4130 Qu (127	0001	000117	6 16 2-42 2%
47676	15/11/78	20	462011190126	CG1;	000127	162-48.7% UGEC
294-2083	11/11/70	220	11.26 Q V C174	1005	060126	F164 - 79.33
→ 2 £ 8 ë	10/12/78	(## 00 MH 401 32	1.012	000131	11053
-2501	10/12/71	2.31	41 FC Q (+34	0006	000119	
mf: 40 H	11/12/71	21	4115 KON (C136	((1(610128	F 168 -723;
- 2910	10/10/76	C	# 63 NON Q (131	((13	CCOTE	1955
1 -2513	1/1:/71	731	1116 34 0631	0001	666117	174-67.7%
4- 2915	11/13/76	1 t C	4:7: 6 - (131	00.	000119	176-79.22
1942 7420	11/13/78	231	11:00 0 0130	1001	000116	P177- 78-47
-2015	10/13/78	W ',	H' F! NONQ CI ? 1	(613	666124	0058
:94 - 2931	11/13/76	230	412692 6134	::07	660118	F183 -70-2

7964 7964 73035 73035 73036 73057 73105 73110 73118 73120 73123	10/21/76 10/21/76 10/23/76 10/26/78 10/27/78 10/27/78 10/28/76 10/30/76 10/30/78 10/31/76	925 925 925 940 925 935 263 40	. LLEE KONGCE 32 . BY 15 Q OF 26 BY 75 MONGCE 31 BF 75 MONGCE 22 BF 80 OF 30 BF 80 OF 31 BF 90 OF 31	(. 0 t	000115 000115 000115 000126 000126 000127 000131 000131 000131	U085
				CCOE CCOE CC10 CC10	000131 000131 00012P 000126	



NONCONFORMANCE REPORT

Start Up System: Indeterminate PROJECTS, ENGINEERING AND CONSTRUCTION -

QUALITY ASSURANCE DEPARTMENT

927-0			PAGE 1 OF 6
PROJECT BAYS:	7. MOSCONTORACING PART NO:	6. EDECONFORMENC PART NAME:	1. M-61-9-6-038
W: 13 1 1 : 0	NA.	Compaction Equipment as stated in Block]	2
Midland 1 & 2	NA	11. AREA/LOC. OF MC:	3. DATE OF REV:
	Bechtel		NA
NA NA		Midland Nuclear Plan	16.3.1
12. "AS IS" NOWCONTOLNING CONDITION Y	ERSUE "AS REQUIRED" CONDITION WITH REFS:		5. DISTRIBUTION
San Passa 2 5			ACTION COPE:
See Pages 3-5.			LADreisbach
			WLBarclay JMilandin
			WLBarclay JMilandin WRBird DBMiller
			RBCherba RLRixford
			JWCook JARutgers
			TCCooke(2) DATaggart
13. GA RECOMMENSATION FOR PART CA:		-	JLCorley
			LEDavis
See Pages 5 and 6.			PKHansen
			SHHowell CSF-color
DESIGN/PROJECT ENG. DISPOSITION	REQUIRED X NOT REQUIRED -		GSKeeley
14. HOLD DAGS APPLIED:		/ 11 1 - 65 6	BWMarguglio
TES X NO	& W Outside Wall DG B	olds. 638 elev (2)	Corner Oily Waste Bldg (2)
IS PROCESS CA REQUIRED: YES	Y NO THE METERICAL		
16. DOES NO AFFECT Q-LIST ITEM: I	ES X NO	17. IS MC REPORTABLE PER 50.55(e):	YES NO X
18. IS BE REPORTABLE PER PART 21: Y	Z NO V	19. IF HES, DATE & TIME OF REPORT	
SO. IF YES, WHO MADE REPORT TO MRC:		21. IF YES, MANE OF MRC OFFICIAL T	
N			NA
22. NO ONTO TAKE ET: RG WO	liney 23. WRITTEN REPLY REQUIS	5-30-80 24. SUT	THE STORATURE DATE
for DE North	TO ESTABLISE CA CONFLETIO	W DATE	Demand) 5/15/80
25. PART CA DISPOSITION, JUSTIFICATIO			21/0/0/ 3/13/80
26. DESIGN/PROJECT SIG. AUTH. DISF.:	27. PHO SIG. AUTH. DISP.:	26. PROCURINGN'T SIG. CONC. DISP.:	29. SIG. OF ORG. MESP. FOR C/A:
30. FAB/CORST. BIG. AUTH. DO. DISP.:	31. SIG. OF TEST GROUP ACKNOW.	NA 32. FOR MAJOR MOD - FLT. SUPT.	22 04 4777
	CONDITION:	SIG. AUTH. DISP.:	33. QA AUTH. EIG. TO DOLDENT DISP.:
	NA NA	NA NA	
34. METHOD OF PART CA VERIFICATION:			
35. SIG. OF ORG. NESP. POR PART C/A	36. SIG. VERITYING PART	C/A & MOLD TAG 37. NO	R CLOSED BY/DATE:
SIGNIFIED CONFIETION:	RIDMOVAL/DATE:		URT & PROCESS CA COMPLETE)



NONCONFORMANCE REPORT

PROJECTS, ENGINEERING AND CONSTRUCTION -

MCR SIZELAL KINSED, M-01-9-0-03

	PROCESS CORRECTIVE ACTION		
36. GA ASSESSMENT OF MOOT CAUSE	(5):	FACE 2	or 6
	own, to be determined.		
(4)	, , , , , , , , , , , , , , , , , , , ,		
			* "
			4
	일하다 이번에 있는데 가장하다 하다 보세요?		
e ACTUAL BOOK CAUST (5). IF DE	FIRENT FROM ABOVE (TO BE COMPLETED BY ORG. RESPONSIBLE FOR PROCESS CA		
y. 2.00 mm. 0.00(0), 0 1-	TO A PROCESS CA	V2	
124:0			
O. PROCESS CA REQUIRED FROM:			
mesica X	ABRICATION CONSTRUCTION PROCURSE	DESPECTION	
OTHER			
1. QA RECOMMENDATION FOR PROCE	S CA:		
			4.
(A) - (D) Unkno	own, to be determined.		
A	the second of th		
A COMPANY OF THE PARK TO A SECOND			100
PROCESS CA TO BE TAKEN BY OF	NG(S) CHECKED IN BLOCK 41 & DATE OF COMPLETION:		
			4.5

43. HETHOD OF PROCESS CA VEREFICATION:

NCR SERIAL NO: M-01-9-0-038

DATE: 5-15-80
DATE OF REV: NA
FILE NO: 16.3.1

- 12. "AS IS" NONCONFORMING CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFS:
- (A) Specification C-211 Revision 9, Section 8.5.1 states, "Selection and approval of all of the proposed compaction equipment shall be on the basis of demonstrated ability to accomplish adequate compaction..."

Specification C-211 Revision 9, Section 8.7.1 states in part, "Cohesionless material under structures shall be compacted to not less than 85% relative density. All other areas where cohesionless material is used shall be compacted to 80% relative density".

TWX 5283 (BEBC-3162) from Project Engineering to Construction states in part,

"THIS TWX LISTS WHICH EQUIPMENT IS QUALIFIED FOR Q-LISTED AND NON-Q-LISTED FILL PLACEMENT, AS REQUIRED.

EQUIPMENT TYPE	APPLICABLE MATERIAL	REQUIRED PASSES & THICKNESS
M-B-W VIBROTARY (MODEL GP 7000)	STRUCTURAL AND RANDOM SAND	4" LIFT, 6 PASSES
VIERO PLUS SELF- PROPELLED (MODEL CA-25D)	STRUCTURAL AND RANDOM SAND	6" LIFT, 10 PASSES"

Contrary to these requirements, the Test Fill Program Report dated March 1980 indicates:

- Test Fill No 3A using 4" lift of Structural Backfill material and 6
 passes/lift with the M-B-W Vibrotary (Model GP 7000) 10 out of 14
 tests met or exceeded the 85% requirement.
- Test Fill No 4B using 4" lifts of Random Sand and 6 passes/lift with the M-B-W Vibrotary (Model GP 7000) 5 out of 14 tests met or exceeded the 85% requirement.
- No Test Fill has been prepared for Structural Backfill material using the Vibros Plus Self-Propelled (Model CA-25D).
- (B) Specification C-211 Revision 9, Section 8.5.1 states, "Selection and approval of all of the proposed compaction equipment shall be on the basis of demonstrated ability to accomplish adequate compaction..."

Specification C-211 Revision 9, Section 8.7.2 states in part, "Cohesive material shall be compacted to not less than 95% maximum dry density, except as required by Section 8.7.3," and 8.7.3 states, "Cohesive materials placed in non-Q areas approved in advance by project engineering shall be compacted to not less than 90% maximum density determined in accordance with ASTM D 1557, Method D".

Sour Sour

NCR SERIAL NO: M-01-9-0-038

DATE: 5-15-80 DATE OF REV: NA FILE NO: 16.3.1

12. "AS IS" NONCONFORMING CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFS:

(Contd from Page 3)

(B) (Contd)

IOM dated September 4, 1979 from S S Afifi to L H Curtis states in part,

"The following compaction equipment is qualified for use based on test fill's and field results as monitored by Geotech ...

B. Clays ...

(a) all areas requiring 90% compaction = - Nm Q 3. Vibro plus dynapact (model_CF-43)

(b) 8" lifts and 6 passes per lift..."

Contrary to these requirements, the Test Fill Program Report dated March 1980 indicates Test Fill No 5 using 8" .lifts of clay and '6 passes/lift with the Vibro Plus Dynapact (Model CF-43) 2 out of 10 tests met or exceeded the 90% requirement.

(C) Specification C-211 Revision 9, Section 8.5.1 states, "Selection and approval of all of the proposed compaction equipment shall be on the basis of demonstrated ability to accomplish adequate compaction ... "

Specification C-211 Revision 9, Section 8.7.2 states in part, "Cohesive material shall be compacted to not less than 95% maximum dry density, except as required by Section 8.7.3," and 8.7.3 states, "Cohesive materials placed in non-Q areas approved in advance by project engineering shall be compacted to not less than 90% maximum density determined in accordance with ASTM D 1557, Method D".

TWX 5560 (BEBC-3301) from Project Engineering to Construction states in part,

"THE RAMMER-TYPE COMPACTOR (POGO STICK) RV4B HAS BEEN SATISFACTORILY QUALIFIED FOR USE IN COMPACTING SOILS REQUIRING THE FOLLOWING:

2) 90% AND 95% DENSITY DETERMINED IN ACCORDANCE WITH ASTM D1557 METHOD D FOR CLAYEY SOILS WITH 4 INCH LAYERS AND 8 PASSES ..."

Contrary to these requirements, Test Fill No 11 in the Test Fill Program Report dated March 1980 indicates only one density test was taken on the clayey soils material to justify qualification of the Pogo Stick.

PAGE 5 OF 6

NCR SERIAL NO: M-01-9-0-038

DATE: 5-15-80 DATE OF REV: NA FILE NO: 16.3.1

12. "AS IS" NONCONFORMING CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFS:

(Contd from Page 4)

(D) Specification C-211 Revision 9, Section 8.5.1 states, "Selection and approval of all of the proposed compaction equipment shall be on the basis of demonstrated ability to accomplish adequate compaction..."

Specification C-211 Revision 9, Section 8.7.1 states in part, "Cohesionless material under structures shall be compacted to not less than 85% relative density. All other areas where cohesionless material is used shall be compacted to 80% relative density".

TWX 5560 (BEBC-3301) from Project-Engineering to Construction states in part,

"THE RAMMER-TYPE COMPACTOR (POGO STICK) RV4B HAS BEEN SATISFACTORILY QUALIFIED FOR USE IN COMPACTING SOILS REQUIRING THE FOLLOWING:

1) 80% AND 85% DENSITY FOR STRUCTURAL BACKFILL SAND AND RANDOM SANDS WITH 4 INCH LAYERS AND 8 PASSES..."

Contrary to these requirements, Test Fill No 11 in the Test Fill Program Report dated March 1980 indicates:

- Only two density tests were taken on the Structural Backfill material to justify qualification of the Pogo Stick.
- Only two density tests were taken on the Random Sand material to justify qualification of the Pogo Stick.
- 13. QA RECOMMENDATION FOR PART CA:
- Review all correspondence for 1979 and 1980 concerning equipment qualification for soil work from Geo Tech to Project Engineering and Project Engineering to Construction for similar problems.
- 2. Review all Project Quality Control Instructions C-1.02 "Compacted Backfill" Inspection Records for 1979 and 1980 for reference to correspondence identified in (A) - (D) in Block 12 and correspondence identified in 1. above having similar problems and document all Q-material placed using this correspondence.
- 3. Receive a Project Engineering disposition on any Q-material documented in 2. above.

NCR SERIAL NO: M-01-9-0-038

DATE: 5-15-80 DATE OF REV: NA FILE NO: 16.3.1

13. QA RECOMMENDATION FOR PART CA:

(Contd from Page 5)

- 4. Revise the correspondence identified in Block 12 (A) (D) and 1. above having similar problems, specifically calling out the equipment type, applicable material, maximum loose lift thickness of the material to be compacted, compactive effort and the density the equipment is qualified to (ie, 90% or 95% Compaction, 80% or 85% Relative Density) and supplement Specification C-211 with the revised equipment qualification information.
- 5. Make additional qualification tests for the Pogo Stick for Structural Backfill, Random Sand, and clay materials and documentation of this additional qualification prepared by the onsite geo-technical soils engineer.

Inter-office Memorandum

R. L. Castleberry To

September 1974

Plant Area Fill Midland Units 1 & 2

15. S. - AllII

Job 7220-001

Geotechnical Services 01

Copies to

J. H. Allen

H. H. Burke/W. R. Ferris

J. C. Hink

R. L. Rixford

J. O. Wanzeck 1320,3410

Ann Arbor - E

This memo is intended to assist in preparing your formal response to Item 3 of BCBE-370 regarding compaction requirements for the plant area. Herein, we address recommendations given in the soils reports prepared by Dames & Moore for the Midland project and compare them with our earthwork specifications. The material in this memo confirms our previous discussions with your group.

The evaluation here pertains to plant area fill supporting and surrounding structures, any Category I slopes in the plant area, and

In-Situ Clays

Tables 1 & 2 attached (taken from Dames & Moore's soils report of June 28, 1968, Page 15 and its supplement of March 15, 1969, Page 16) present compaction recommendations for fill and backfill. In the June 28, 1968 report, the minimum clay compaction is recommended to be 95% for support of critical structures, 90% for support of noncritical structures, and 90% adjacent to structures, respectively; all percent compaction values are according to ASTM D 1557 Method D (about 56,000 ft-1b compaction energy). In the March 15, 1969 report, the minimum clay compaction is recommended to be 100% for support. of structures, 95% adjacent to structures, and 90% for area fill (not supporting or adjacent to structures); all percent compaction values are according to Bechtel Modified Compaction (BMC: 20,000 ft-1b compaction energy).

Specification 7220-C-210 (Section 13.7) requires 95% of ASTM D 1557 Method D for in-situ clay in the plant area and berm.

In comparing the reports with the specification for in-situ clay supporting structures, it is seen that the specification and the 1968 Dames & Moore report are identical. Also, the specification and the 1969 report are consistent since 95% of ASIM D 1557 Method D is approximately equivalent to 100% BMC in some soils. However,

R. L. Castleberry 13 September 1974 Page Two

the requirement of 95% of ASTM D 1557 Method D given in the specification is the applicable criteria for compacting clay to support structures. Further assurance by conducting shear strength tests is required (see Section 12.4.8, Specification 7220-C-210). Compressibility tests may also be required.

The berm fill must be compacted to 95% of ASTM D 1557 Method D to insure adequate seepage protection and stability.

Category I fill placed within the failure zone of a slip circle may require a degree of compaction higher than 95% of BMC, because of design for the full SSE. However, it is conceivable that in-place fill compacted to 95% of the BMC will be adequate if strength and permeability properties are shown to be adequate.

Similarly, in-place fill supporting light structures may be adequate at 95% of BMC provided its strength and compressiblity are shown to be adequate.

Fill in the plant area which will not support structures or pipes or be placed within the failure zone of Category I slopes may be compacted to a lesser degree than 95% of ASTM D 1557 Method D (e.g. 95% of BMC). This agrees with Dames & Moore's requires only 90% of ASTM D 1557 Method D.

In-Situ Sands

The Dames & Moore June 1968 report presents recommendations for compacting sand in terms of maximum density while their March 1969 report presents recommendations in terms of relative density. The later report is considered more applicable for sands since relative density is one of the basic parameters required to control liquedaction. Therefore, in-situ sands supporting structures must be graded sands around structures, the 80% relative density specified in 7220-C-211 is adequate.

or be involved in Category I slopes and the berm must be compacted to 95% of ASTM D 1557 Method D.

If the fill is already in place according to BMC, it may be adequate for some structures, pipes, or slopes, provided it is shown by sufficient testing that its strength, compressibility and seepage

R. L. Castleberry 13 September 1974 Page Three characteristics are adequate. This requires sampling and laboratory shear strength and consolidation testing. Section 12.4.8 of the earthwork specification addresses this issue for any in-place fill. Compaction curves using both ASTM D 1557 Method D and Bechtel Modified Method must also be developed and correlated with shear strength and consolidation test results on the compacted soil to evaluate the compressibility and shear strength achieved from both methods of compaction for the in-place fill. This information will allow a complete evaluation of any in-place fill for its proposed function, in addition to providing information which will be needed for the FSAR. It should also clear up any questions as to how fill should be placed in the future. We will be happy to discuss this matter further with you at your Sheif s. gof. SSA: lab Attachments SBS00235

TABLE 1

Minimum Compaction Criteria from Dames & Moore

June 1968 Report**

	Recommended Minimum Percent of Maxim	Compaction Criteria mum Density*
Purpose of Fill	On-Site Cohesive Soils	On-Site Granular Soils
Support of Critical Structures	95	100
Support of Non-Critical Structures	90	95
Adjacent to Structures	90	95

^{*} Maximum density and optimum moisture content should be determined by the ASTM Test Designation D 1557 Method D.

^{**} Report, Foundation Investigation and Preliminary Explorations for Borrow Materials Proposed Nuclear Power Plant, Midland, Michigan, June 28, 1968.

Minimum Compaction Criteria from Dames & Moore March 15, 1969 Report***

Purpose of Fill Perce	Sand Soils	On-Site Clay Soils Percent of Maximum Densi
Support of Structures	85	100
Adjacent to Structures	75	95
Area Fill (not supporting or adjacent to structures)	70	90

^{*} Maximum and minimum density of sand soils should be determined in accordance with ASTM Test Designation D-2049.

^{**} Maximum dry density and optimum moisture content should be determined in accordance with ASTM Test Designation D-698, modified to require 20,000 foot-pounds of compactive energy per cubic foot of soil.

^{***} Supplement to Report, Foundation Investigation and Preliminary Explorations for Borrow Materials, Proposed Nuclear Plant, Midland, Michigan March 15, 1969.

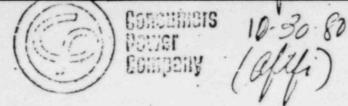
MINIMUM COMPACTION CRITERIA PLANT AREA FILL AND BERM

Function of Fill	Minimum Compa	ction Criteria
	In Situ Sand (1)	In Situ Clay (2)
Support of Structures (3)	35%	95%
Adjacent to structures (Gradation specified in 7220-C-211)	80%	
Category I Slopes		95%
Bern		95%
Area Fill (not supporting or adjacent to structures)	•	95%

⁽¹⁾ All sand compaction is in terms of relative density as determined from ASTM D 2049 test.

⁽²⁾ All clay compaction is in terms of maximum density as determined by ASTM D 1557, Method D except for area fill not supporting or adjacent to structures. In these areas, ASTM D 1557 may be altered such that only 20,000 ft-1b/ft³ of energy would be required.

⁽³⁾ Strength and compressibility testing may be required to confirm adequacy of fill.



General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 . Area Code 517 full

October 22, 1979

Mr J A Rutgers
Project Manager
Bechtel Fower Corporation
PO Box 1000
Ann Arbor; MI 48106

MIDLAND PROJECT REMOVAL OF LOOSE SAND FILE 0130 UFI 08*06 SERIAL 7802

Reference: 1) Consumers Power Company Letter, Serial 3478, Dated October 6, 1

2) Bechtel Letter, BCCC-3587, Dated October 23, 1978

3) Bechtel Letter, BLC-8167, Dated September 17, 1979

We have reviewed Bechtel letter, BLC-8167, (Reference 3) and disagree with the conclusion that Bechtel is not responsible for the additional costs associated with efforts to resolve NRC Question 362.2. We disagree for the following reasons:

- 1. The NRC raised the loose sand question in early 1970. On Page 8.00-1 of the PSAR, Bechtel provided the NRC with a discussion of how the sands would be treated. The Bechtel intentions as stated in the PSAR were as follows:

 "For example, in those areas of the turbine building adjacent to the emergency diesel generator building, existing sand will be removed if further tests show relative density of this sand is less than 75%." It is obvious that in place density testing was intended to be performed in order to ver the natural sand densities.
- Bechtel Engineering communicated this commitment to construction in 1975 by
 placing a note on Drawing C-44 indicating that sands with less than 755
 relative densities must be removed.
- 3. The loose sand commitment was also delineated in FSAR Section 2.5.4.5.1. This was a statement that the design drawing (C-44) was issued to require removal of loose sands with relative densities less than 75%.

4. In mid-1978, Bechtel Engineering asked both the Bechtel Construction and Consumers Power Company Field Engineers if they had any knowledge of Consumers Power Company Field Engineers areas where natural sands density tests taken for the purpose of clearing areas where natural sands had existed. Consumers Power Company civil field personnel spent several days looking at records in Jackson to identify any field tests performed days looking at records in Jackson to identify any field tests performed to document the densities of the sand. All efforts by Bechtel and Consumers fower Company were unable to identify any documented field density tests. Fower Company were unable to identify any documented field density tests which would resolve this question. In mid-1978 when the investigation ocwhich would resolve this question had been covered by approximately 30 curred, all of the areas in question had been covered by approximately 30 of backfill.

It seems obvious to us that although field density tests were to be performed to approve areas where natural sands existed, they were not performed or if performed, they were not documented. Based on the inability to show by documentation that the commitment had been adequately addressed, borings were ordered tion that the commitment had been adequately addressed, borings were ordered by Bechtel Engineering to resolve the NRC question. If density test had been performed and documented initially, the recent borings and engineering analysis would not have been required. Failure to properly meet PSAR and FSAR commitments, and the requirements of Drawing C-44, has resulted in significant costs to Consumers Power Company.

Therefore, we do not accept the argument that because the recent borings showed natural sands which had relative densities greater than 75%, Bechtel has no liability for additional costs. It is our contention that no borings or analysis would have been necessary if Bechtel had properly executed drawing, FSAR and PSAR requirements.

G S Keeley

Project Manager

GSK/cg

BCC DEMiller, Midland (3)

JLBacon, M-1085A

DGPandolph, P-14-422

JEFelber, Midland-Accounting

PROBLEM: "UNCOMPACTED BACKFILL" Plant Area-does not Include Dikes

	IS	IS NOT	DISTINCTION	CHANGES
	D/G Bldg.	Power Block	Recent Plant Area Fill	Use of both C-210, C-211 Prior - used only C-210
	X-Former Pads	Evaporator Bldg	Not part of Dike/ North Plant Area Fill	Sand & clay vx clay alone
W H	Condensate Tanks	Cooling Tower	Fill placed during different time periods	Two contractors - Bechtel & Canonie
A T	Radwaste Bldg*	Steam Tunnel	Last ares to be backfilled	Bechtel used C-211
	Tank Farm*	Service** Water	Settlements seem to occur in spread type footings	Large equipment to large & small equipment
	*Not as signi- ficant or wide spread as other areas Guard House	Water	Excavation/Re- excavations (sig- nificant areas	Use of ramps/temporary fill

Occurred After 1975	Prior to 1975	Slowdown of 75 with personnel changes	Specification interpretations by didfferent individuals
		Late in jobless emphasis on civil work	deletion of 4" lift requirement
		Cooling Pond Filled	Urgent need to see work com-

MHEN

together with clays
Qualification of personnel

Sand/structural fill used

may have changed

Differing weather conditions

Rebar problems occurred

PROBLEM: "UNCOMPACTED BACKFILL" Limited to Plant Area - does not Include Dikes

	IS	IS NOT	DISTINCTION	CHANGES
Ε	Plant Area Fill AFter 1975	Plant Area Fill prior to 1975	Sand incorporated in fill	Sand/clay interfaces - softing of clays due to watering
X T E	elev 612' & above	Below elev 612'	Smaller areas of fill	Larger lift thickness for equipment and harder to control lift thickness
7	Most signifi- cant problem area south & southeast of Turb Bldg		Most extensive examination re-excavations	Introduction of smaller equipment
		Glacial Till Undisturbed	Require handling & Placement by Equipment	
W H E R	Backfill (clay) (sands)	Natural sands	Clays - N/W Plant dike sand/clay rest of area	More mixing & material interfacing
E ?		Backfill Concrete	Area exposed the longest during construction	More winters
		North/West Plant Fill		

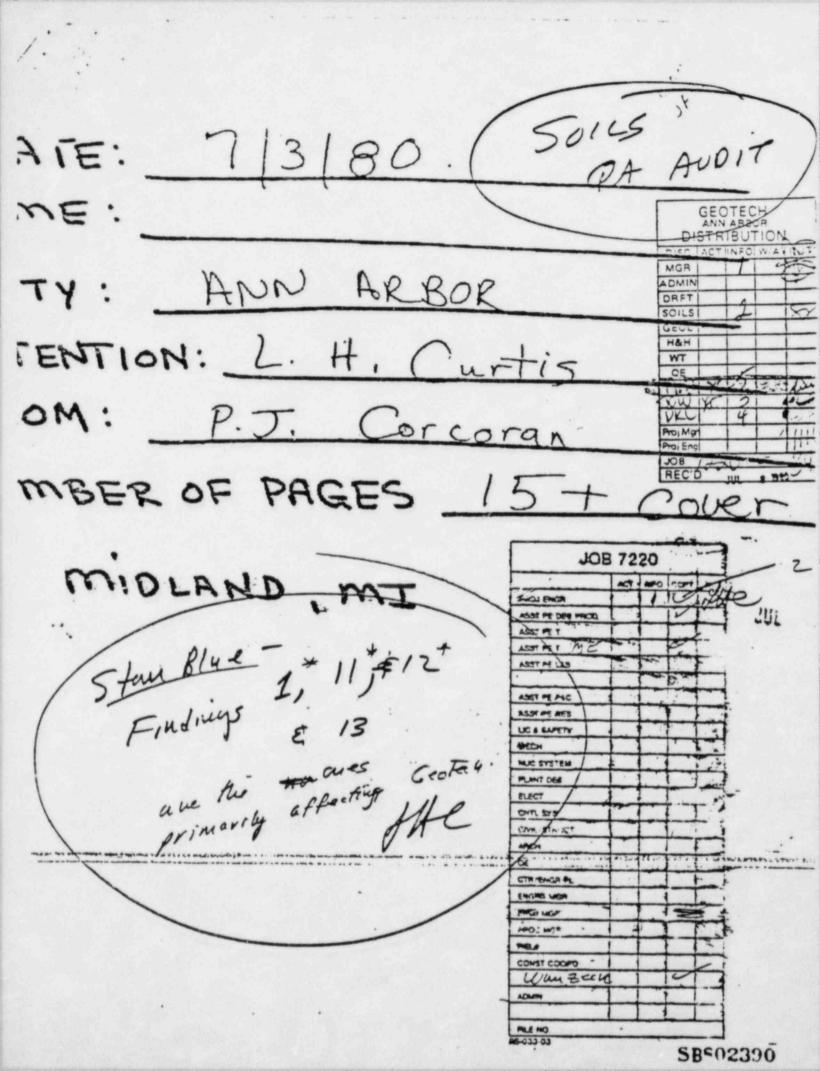
Test	Yes	No	?	Cause
se of different Specification	х			Problem is only associated with areas which used Spec C-211
Recent Work		X		
Not Part of Dike/Plant (N/W) Area			X	
Placement of Fill during different periods	х			Different personnel different equipment
Last Areas to be Backfilled	х			Schedule pressures
Occurs on spread FIGS	Х			Design may be deficient
Excavations Re-Excavation	х			Most significant problem in area when most excavation/re-excavation occurre
ntroduction of C-211	х			Differing requirements/people/ interpretations
Different Materials	х			Differing methods for co _tion - addition of water to sands
Use of small equipment	Х			Not able to compact as effectively (rest pads for small equipment qualifications)
75 Slow Down	х			Changes in personnel and discontinuin of work
Filled Cooling Pond		х		Designed to be in saturated condition
Less emphasis on civil work	х			Less supervision and inspection
Specification intrepretation	х			Relates to personnel
Larger lifts per spec.	х			Coupled with small equipment

Test	Yes	No	?	Cause
chedule pressures	х			Complete work hastily
Personnel qualifications	х			No soils engineer on site
Smaller fill areas	Х			Relates to equipment and lifts
More Freeze-thaw cycles	х			These areas filled during several winters
Weather (dry or wet) also when material was placed			х	
Removal of temporary ramps and fill	х			Uncompacted materials placed and left in large amounts
Rebar Problem occurred	Х			Deals - priorities for inspection extent of inspection

Make I was recommended to the same of the

ACTION PLAN

- Define problem areas better by boring logs and TOPO's (PMO work on this).
- 2. Define problems by elevations (use boring logs) (PMO OA later).
- 3. Define difference between C-211 and C-210 (QA).
- 4. Define what work was done by Bechtel and Canonie (PMO).
- Define where trenches were made (excavations) (photos, TOPO's, etc) (PMO QA).
- List all equipment used by a) Bechtel
 b) Canonie
 (photos, rental sheets).
- 7. Look at changes in personnel/qualifications (QA, PMO).
- 8. Look at assignments of supervision to earthwork by period.
- 9. Look at telecons/FCR's to spec, DR's (QA).
- 10. Look at specs and also photos.
- 11. Look at rate fill in areas where there was problems (PMO).
- 12. Check problem areas with completion of the year's work (freeze thaw) do with 4.
- Look at number of QC people assigned to soils, their time involved with soils (IR's, FE Reports).
- 14. Ramps Check photos, TOPO's, compare with borings (also gravelly areas in borings) (can do in conjunction with 12, 4) (QA, PMO).
- 15. Review weather date for periods of problems (PMO).



PQCI SC-1.05 Rev. 9 - Activity Test 2.229 states: "Field density tests resulting in 105 and over of maximum leboratory density of proctors and/or relative densities, retested." This is a witness point. Contrary to this requirement SC-1.05-180 was signed off for activity 2.229 on 6/9/80 - 6/13/80 as NA scoped for 6/9/80 through 6/13/80 and test 6182 taken 6/3/80 and test 6184 taken 6/5/80 had 108.1 and 106.6 percent relative density respectively. The Compacted Fill Density Test Report containing test 6/82 and 6/84 was signed off by responsible QC engineer 6/11/80.

INVESTIGATION

- A. There is no requirement in the specification for retest et ...
- B. This item was incorporated in the QCI at client QA insistence, based on a 50.54(f) response commitment to this effect.
- C. The QCI requirement was overruled by the GeoTech personnel instructing U. S. Testing personnel that retests will not be required. This review was conducted on all tests subsequent to the Rev. 8 of QCI SC-105 from the period of December 3, 1979, Enrough the current period.
- D. The GeoTech engineer is reputed to have given his direction to U. S. Dtesting under the authority of Paragraph 8.3.5 of Spec. C-211, which says that all soils work shall be performed under the direction of a qualified soils engineer.

RECOMMENDED SOLUTION

The recommended solution for this item is for QC to implement the existing quality program. That is, when a test is recorded with greater than 105% of the theoretical, a retest will be performed. QC will not accept or approve the U. S. Testing Report that identifies a test of 105 or greater.

CAR will be issued for corrective action. NCR 3041 has been issued to document areas where retests were not performed.

ADDITIONAL ACTION

Since this requirement is not a spec. requirement, a retest that results in 105 or greater would allow acceptance of the area without further test.

QCIR No. C-1.02-140 dated 1/2/80 for the first shift, Area "E" indicates test 6083 was taken at elevation 626.5. Contrary to this, Compacted Fill Density Test Report for 6083 indicates elevation 627.5.

INVESTIGATION

It has been determined that there was an error in the elevation recorded by U. S. T. personnel. Daily sheet by Q.C. and F.E.R. by GeoTech indicates El. 626.5 for elevation. Referenced density test #6083 was failing. The area was reworked and retested on 1/4/80, by density #6086, which was also at elevation 626.5. The retest exceeded minimum density requirements, and clears #6083.

Daily Soil Placement Report for C-1.02-140 dated 12/31/79, forst shift, Area "A", indicates coordinates South 5035 to 5056. Contrary to this, it only indicates the width to be 8 feet.

For Area "B", the East coordinates 255 to 295 does not correspond with the length of 36 feet.

Ares. "C" has East coordinate 295 to 335. Contrary to this, a length of 36 feet is given.

For Ares "D" South coordinates are given as 5165 to 5185. Contrary to this, the width indicated is only 12 feet. East coordinates are 345 to 390, but the length indicated is only 32 feet.

For Area "E", South coordinates are 5140 to 5156. Contrary to this, the width is given as 12 feet. East coordinates are 330 to 390. Contrary to this, the length is given as 58 feet.

INVESTIGATION

Sketches and locations of backfill operations, required by Instruction #5 on daily sheets, indicates the approximate work areas. These are showing excavated areas, which are often irregular in shape. The length and width data recorded is used to calculate quantities of fill placed as opposed to extent of excavations.

Daily Soil Placement Report dated 12/31/79 first shift, QCIR No. C-1.D2-14/ for Area "A" indicates two lifts were placed and only one series of 8 passes observed. Area "D" indicates two lifts placed and only one series of 8 passes was observed for two pieces of equipment. Area "E" same as orea "D" above.

Daily Placement Soil Report dated 1/4/80 for the first shift for QCIR No's C-1.02-140, for area "C" indicates four lifts placed and only one observed for B passes. Area "D" same as area "C" above. Cannot tell which lift was observed. Not all lifts were observed for compaction.

INVESTIGATION

Instructions for \$8 on the daily sheet says check the method used to compact soil and the number of passes required. That has been followed on all daily soil reports. The instructions say nothing about recording that information per lift of material placed. This was not the intent of the requirement. All lifts placed have complied with the data indicated in \$8.



The Daily Soil Placement Reports do not indicate what elevation the placement began at and what the final elevation of the placement was at the end of each shift.

INVESTIGATION

Block 9 of the daily Soil Placement Report indicates the lift thickness with start and finish elevation of each lift. The finish elevation on the last lift place is the finish elevation of placement after compaction.

All packages (40) reviewed show no deficiencies in this area.



C-1.02 has not been signed off by Level II in a timely manner.

C-1.02-118 scoped 8/2/79 - 8/4/79 is through.

C-1.02-163 scoped 6/9/80 - 6/14/80 have not been signed off by a Level II.

INVESTIGATION



- A. QC recognizes that a number of QCIR's have not been reviewed by a Level II.
- B. The daily QC soil placement reports are reviewed and signed off by a Level II. The daily soil test reports include the detail calculations and data of the tests and are supplemental to the IR.
- C. Paragraph 8.9 of PSP G-6 indicates that the OC Engineer confirms his acceptance of the activities described in the OCI by initialing and dating the appropriate sign-off blocks in the inspection record. Paragraph 8.10 of the same PSP indicates that completeness and acceptance of the recorded data is accomplished by a Level II in the same discipline.
- D. There is apparently no requirement written for a timely review of the data by a Level II. In addition to the daily soil placement reports being reviewed by the Level II Civil QC Engineer, the U. S. Testing Field Density Report Test results are also reviewed and signed off by the corresponding subcontract QC Engineer, Level II.

SUMMARY

The apparent lack of timeliness of a level II review of this data does not appear to constitute a quality problem in the acceptability of the soils work, but indicates a lack of available manpower in the Quality Control organization for clearing up quality control inspection records.

Daily Soil Placement Report for Area "D" dated 1/16/80 first shift for QCIR No. C-1.02-142 states on Line 6, "Subgrade was removed to suitable material, spiciened and compacted with 8 passes prior to start of backfill." However, this does not state the elevation at which the subgrade was removed.

INVESTIGATION

The first elevation shown in Block #9 is the starting elevation, or subgrade. for that day's work. As indicated on daily soil report, 1/16/80, subgrade was el. 630'-8", it was moistened and compacted, prior to placement of fill. On report for 1/15/80, the same information is given for an area just west of the 1/16/80 area. This work consisted of backfilling diesel fuel oil lines.

FINDING NO. 7A

OC inspection assignment record for C-1.02-153 on line 3 indicates 1/31/88 through 2/28/80. This should be 3/31/80 through 4/4/80.

INVESTIGATION

Scope of work as shown in Block #6 of QCIR C-1.02-153 shows correct date of work operations. IAR is not a permanent record, is only used to inficate review of inspection criteria.

FINDING NO. 8.

PRELIMINA Daily Soil Placement Report for 4/14/80 first shift for Area "A", OCIR No. C-1.02-155 on line 5 indicates test frequency r equired. One per backfill location and indicates the actual as "none taken".

INVESTIGATION

Frequency for referenced area was met on 4/16/80 by test #6142. Frequency per that backfill location or area was I test per 3 cubic yards placed. None taken on 4/14/83 as indicated on daily report.

10 4 15

PRELIMINARY

FINDING NO. 9

Daily Soil Placement Report dated 5/2/80 for Area "A", QCIR No. C-1.02-157 indicates in line 9 that material was placed in two lifts over an area that had test 6160 fail compaction. It should be noted that the test was taken 5/1/80 and results were given to the CC Inspector on 5/2/80 at 9:00.

INVESTIGATION

There is no requirement to stop backfill operation after a density test is taken; however, backfilling operations are stopped when failing results are obtained from U. S. Testing, as they were on 5/2/80 in the A.M. Two feet of material had since been placed and compacted in 4" lifts. A retest was taken at the same elevation, as the failing test and results of 6165 were acceptable. Backfill operations commenced the following Monday in that area.

11 4 15

PRELIMINARY

FINDING NO. 10

Field Engineer Report dated 5/14/80 states, in part, "backfill in progress, pipe excevation south of oily waste building and tank from 5 4665 E 405 to 5 4665 E 500." Contrary to this, the Daily Soil Placement Report for 5/14/80 indicated on line 13 "No 'Q' Backfill Placed Today."

Field Engineer Report dated 5/21/80 indicated soil placement E of Gily Waste @ 5 4673 E 510 to 5 4673 E 550. Contrary to this, the Daily Soil Placement Report for 5/21/80 indicated soil placement South 4665 + to 4680 + East 515 + to 540 + Length 25' + Width 12' +.

Field Engineer Report dated 5/6/80 indicated soil placement south of Turbine Building bounded by S 5035 to S 5042 E 320 to E 379.

Contrary to this, the Daily Scil Placement Report for 5/6/80 indicated on line 13 "No 'Q' Backfill Placed Today."

INVESTIGATION

A review of the Field Engineers Report Form, and the Daily Soil Placement Report for the days in question shows evidence that the reports are correct as written. The apparent discrepancy is caused when soil is placed in an area, but no tests are taken. This is possible because tests are not required for each placement lift, but rather the frequency of tests is determined by the number of cubic yards of materi al placed, and/or at the discretion of the GeoTech on-site engineer additional tests above the required frequency may be taken.

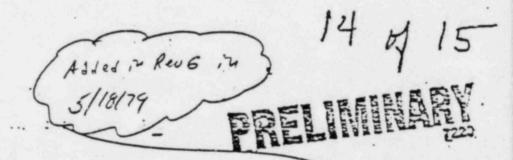
PRELIMINARY FINDING NO. 11 Specification C-211 Rev. 10 section 8.6 states: "B.6 COMPACTION EFFORT The onsite geotechnical soils engineer shall verify that the equipment used for compacting the backfill material is capable of obtaining the desired results and obtaining the same acceptable compaction effort schieved in the test pad area. This verification shall include, but not limited to, the following: _ 8.6.1 Number of passes 8.6.2 Speed 8.6.3 Revolutions per minute (frequency) 8.6.4 Overlap per pess 8.6.5 Lift thickness requirements and uniformity." . Contrary to this requirement, there is no evidence in the Field Engineer Reports that this compaction effort has been verified. (The onsite geotechnical soils engineer does not have a copy of the "Test Fill Program.") INVESTIGATION Item No. 11 related to the fact that per paragraph 8.6 of Specification C-211.

Item No. Il related to the fact that per paragraph 8.6 of Specification C-211, the on-site GeoTech soils engineer shall verify that equipment used for compacting the backfill is capable of obtaining the desired results and obtaining the same acceptance compaction effort achieved in the test pad area. The auditors finding states that contrary to this requirement, there is no evidence in the field engineer records that compaction effort has been verified. The on-site GeoTech soils engineer does not have a copy of the test fill program. Results of Investigation (based on conversations with Jim Wonzak and Rao) follows.

RESULTS OF INVESTIGATION

A. Wonzak and Reo expressed their opinion that the intent of this section of the specification was not to provide document ed evidence that this verification had been accomplished, but rather that the on-site GeoTech engineer was familiar with the soils compaction equipment capabilities and verified that they were properly used. The precise wording in the specification is not being adhered to.

- B. It is apparent that the on-site GeoTech soils engineer doe s not have to have the results, the test program, etc., that would be implied to be available to him to verify that the equipment being used is being properly used.
- C. It should be noted that J. Wonzak makes frequent trips to the jobsite and reviews the use of the equipment. Jim Wonzak was the original conductor of the qualification testing on the soils compaction equipment.
- D. It is also not apparent that the original intent here was to burden a professional Geolech soils engineer with a degree of recordkeeping which is commensurate with quality control record-keeping in an area where he is assigned because of his training and experience to verify that the process is under control. Resolution of this item indeterminate at this time.



Specification C-211 Rev. 10, paragraph 8.11 states, in part, "The ensite geotechnical soils engineer shall review and approve each soils test report." Contrary to the above, there is no objective evidence that the geotechnical soils engineer "reviews and approves" each soils test report.

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O specific regions.

INVESTIGATION

The GeoTech on-site engineer does review and approve each soils test report. There is no procedural requirement for him to sign the report indicating his review and approval. All tests are performed at his, and under his direction, and test results are sent to him for his review. The GeoTech on-site engineer does sign his Field Engineers Report Form in which any tests taken are listed. The report also states that he has observed the soils test to be performed satisfactorily and in accordance with ASTM Specifications.

W

SB802402

PRELIMIN

The process by which

FINDING NO. 13

Spec. C-211 Rev. 10, section 8.12, states:

"FAILING TEST

All material represented by failing tests are to be reworked until the specified density and/or moisture is obtained. No material shall be placed on any known failing material until satisfactory tests are obtained."

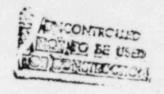
Contrary to this requirement, it appears the top surface of the existing fill is reworked, but not all the material represented by the failing tests.

INVESTIGATION

Item 013 identified in the audit was that records indicate that for failing tests only the top layer of an area is being reworked. Results of Investigation:

- A. This finding is apparently a lack of understanding on the p art of the auditor in that tests are normally conducted one to two feet below the surface of the spil as it is installed. Those additional compaction efforts which are required to rewerk the soil in the area where the test indicates a failure can, in the opinion of the GeoTech experts, best be accomplished by performing additional compaction effort at the top level of the surface, that is, one to two feet above the level of the tests. The concept of considering that a failed antih test at one level that would indicate all of the compacted soil between that point and the previous acceptable test results to be improperly compacted is Incorrect The concept of using controlled equipment and controlled. frequency of tests versus the amount of soil placed and compacted would be destroyed. The failing tests as such represent the material at that elevation and reqork can be accomplished by compaction at the existing top surface and subsequently retested. The concept of all soils underneath that being unacceptable is not in context with the soils program, that is, with the use of qualified equipment and controlled procedures.
- B. Mr. Rao indicated that intent of this section was for the GeoTech engineer to advise the QCE as to the equipment requirements per Section 8.6 depending upon the location and type of material involved.

To the bottom of the tel that failed SBSO



FIC 1.100 Q Rev. 3 8-<u>1</u>5-80

BECHTEL POWER CORPORATION

Field Instruction

FIC - 1.100(Q)

Q-Listed Soils Placement Job Responsibilities Matrix
This supersedes FIC 1.100 Revision 2 Dated 2/25/30

TO: All Civil Field Engineers & Civil Craft Superintendents.

1.0 PURPOSE

ELIVE HOLE

This field instruction is written to provide a definition of job responsibilities for Q-Listed soils placement pursuant to Field Procedure FPG-3.000.

2.0 SCOPE

This field instruction applies to all Q-listed placement on the Midland Nuclear Project.

3.0 REFERENCES

Field Procedure FPG-3.000; Job Responsibilities of Field Engineers,

Superintendents, and Field Subcontract

Engineers.

Specification 7220-C-211; Technical Specification for Backfill.

PQC1 C1.02-SC-1.05 Instructions for QC inspection for compacted backfill and U.S. Testing

activities.

4.0 RESPONSIBILITIES

The duties and responsibilities of the following individuals are defined in this instruction:



- a. On-Site Geo-Tech Soil Engineer
- b. Field Soils Quality Control Engineer
- c. Lab Quality Control Engineer
- d. Project Geo-Tech Soils Engineer
- e. United States Testing Co. Lab Technician

5.0 INSTRUCTION

This instruction provides job responsibilities instructions for Q-listed soils placement. It is provided as an amplification to FPG-3.000 and is complimentary to the directions provided in Specification 7220-C-211 and Quality Control Record Instructions C-1.02 and SC-1.05. Any questions on this instruction should be refered to the Lead Civil Field Engineer.

Prepared By: Paul a. Soquer	1 8/14/80 Date
Project Field Engineer:	- 8/14/80
Reviewed By:	bate
PFQCE: 59 L Summer	8-15-60
201111	Date
LQAE: R.C. Hollan	8-15-80 Date
Approved By:	Date
Consumers Power Company: 18/15/90 3000	8-15-80
Site Manager: Ellini	Date 8/15/80 Date



ATTACHMENTS

Appendix A Summary of on Site Geo-Tech Soils Engineers duties and responsibilities. (Note: See correction TWX dated 8/15/80 attached.)

Attachment 1 MATRIX

Attachment 2 IOM - L. H. Curtis to L. E. Davis, BEBC-3633, dated January 30, 1980.

Attachment 3 IOM - L. E. Davis to L. H. Curtis, BCBE-2772, dated February 13, 1980

APPENDIX A FIC 1.100 C Rev. 3 8-1 -80

Bechtel Associates Professional Corporation

Inter-office Memorandum

13 August 1980 Karl A. Kleinhart ·To Date S. S. Afifi Duties and Responsibilities of Subject From the Onsite-Geotech Soils Engineer Geotechnical Services Of Ann Arbor 10 D 5 S. L. Blue Copies to At S. S. Afifi L. H. Curtis A. Boos J. Rutgers

Attached is a summary of the Onsite Geotech Soils Engineer duties and responsibilities. This attachment superceeds the one transmitted to you on August 8, 1980.

If you have any questions, please call S. S. Afifi or J. O. Wanzack.

Jawangel For/55A

Jow/aka Attachment

S. Rao 1320, 3100

SUMMART OF ONSITE GEOTECHNICAL SOILS ENGINEER DUTIES AND RESPONSIBILITIES

POSITION:

Onsite Geotechnical Civil Soils Engineer

PROJECT:

CPCo Midland Plant Units 1 and 2

REPORTS TO:

Field lead civil engineer for administrative direction and project geotechnical soils engineer for technical direction

GENERAL JOB REQUIREMENTS:

- 1. Notify the project geotechnical soils engineer and quality control engineer of any onsite soil-related activity not in accordance with the specifications, drawings, or engineering practice.
- 2. Frepare a daily report in accordance with the attached outline on the field engineer's report form (attached). These daily reports shall be prepared at the completion of each day's work and shall be submitted to the project geotechnical soils engineer at the end of each work week.
- 3. Notify project superintendent of construction and/or project field engineer or other appropriate construction personnel of any construction activity detrimentally affecting the quality of soil-related work.
- 4. Provide pertinent information to project engineering personnel as required.

DAILY RESPONSIBILITIES:

- 1. Excavation: Observe foundation excavations to ensure that foundations and other facilities are constructed in accordance with applicable specifications and drawings.
- 2. Esckfill: Observe beckfill operations to ensure conformance to specifications.
- Compaction testing: Observe onsite testing operations to ensure the requirements of Specifications 7220-C-211 and C-208 are met. Observe selected laboratory tests daily to ensure compliance with specifications. Review all testing reports and notify project geotechnical soils engineer of any problems.
- 4. Soils work: Ensure that all soils work conforms to requirements of Specification 7220-C-211(Q).

Summary of Onsite Geotechnical Soils Engineer Duties and Responsibilities (Continued)

- is qualified and listed in the specification and canadeliver the required degree of compaction for the proposed backfill area (i.e. under the structures, around the structures, Q-listed areas, and som Q thisted areas) Establish if the proposed backfill area is confised and if the speed of advancement of compaction equipment cannot be accurately measured. Advise quality control engineer of the implace density testing frequency. The speed of advancement in such areas need not be documented.
- 6. Inprocess testing: Observe at least once a day the inprocess testing operations. These testing operations shall include field density tests and moisture tests, laboratory proctor tests, gradation tests, plotting zero airvoids curves, etc. For further details see EEEC-3633 and BCBE-2772 (copies attached).
- 7. Specification clarification: If clarification to the specification is required, request such clarifications in writing by memorandum of TWX. The clarifications will be furnished by project engineering by a specification change notice or by revising the specification.
- 8. Testing frequency: Determine if the backfill location is a confined area and establish the frequency of testing based on Specification 7220-C-211(Q). These requirements are minimum. If additional tests are required, advise appropriate personnel and document such requests. Ensure that all soil placement is uniform, consistent and select the number of tests using professional and technical judgement.
- Reworking areas represented by failing tests: If a failing test is reported, review the calculations for gross errors. If the calculations are correct and the failing test is confirmed, advise appropriate personnel to rework the area represented by the failing test. The rework should include additional compacting, disking, moisture conditioning, or removing materials to the elevation at which the test was taken. The test elevation is usually I foot or 6 inches below the surface for cohesionless and cohesive materials, respectively. Direction for such rework shall be documented. Location for the retest shall be chosen within the same proximity (approximately 3-foot radius) and approximately at the same elevation (+3").
- 10. Test fill program: Ensure that soil placement activities are compatible with those performed in the test fill program. Get familiarized with the reports on the test fill program.

DAILY REPORTS OUTLINED:

1. Backfill

Observations of backfill operations should be recorded each day of Q activity with the following items reported, when observed:

Summary of Onsite Geotechnical Soils Engineer Duties and Responsibilities (Continued)

a. Backfill area

Compection equipment types

- c. Loose lift thickness
- d. Number of passes, speed, frequency and overlap.
- e. Discussions with construction, engineering or contractor personnel of any problems.
- g. Any fill being placed without adequate compaction.

2. Excavations

Record any observations made including:

- a. Area location
- b. Approximate excavation dimensions
- c. Acceptance of the excavation

3. Compaction Testing

Record any deviance from specified testing procedures and attach the affected test results. Deviances which cannot be resolved by the onsite geotechnical soils engineer will be identified as an action item in accordance with Item 4.

4. Action Item Last

A list of action items shall be attached to the field engineer's report (FER) defining action items resulting from the onsite soils engineer's observations and those personnel responsible for these items. Tracking and closure of all identified items is the responsibility of the onsite geotechnical soils engineer. It is not intended that all FERS will result in action items.

DALLY REPORT SUBMITTAL:

- 1. FER
- 2. Action Items

NOTE: The daily RER and attachments shall be routed to quality control and the field lead civil engineer.

DALLY FER:

The following are to be recorded by the casite geotechnical soils engineer as applicable on the daily FER.

- 1. Perform as the "Contractor" when Specification 7220-C-210(Q) is referenced.
- Observe selected tests or portions of tests on a daily basis to include but not be limited to the following: ASTM D 1557-70 Method D; ASTM D 422-63; ASTM D 2049-65; and ASTM D 2216-71.

Summery of Onsite Georechnical Soils Engineer Duties and Responsibilities (Continued)

- 3. Check to see if materials below and beyond the required excavation limits were distributed because of excavation methods used. Advise appropriate personnel to remove such disturbed material and document.
- 4. Approve foundation subgrade by performing visual examination to ensure that the foundation is cut to firm material, and is free of loose and wet materials. Request and review laboratory tests such as moisture, and implace density when deemed necessary.
- 5. Prior to resumption of backfill operations, each spring approve all areas in which backfill material is to be placed. Determine type and number of tests to be taker in the layer upon which the fill is to be placed.
- 6. Determine switability of the structural backfill material in accordance with Section 8.8 of Specification 7220-C-211(Q) for the proposed backfill location.
- 7. Determine that, except for sand from offsite sources, materials used for plant area backfill are in accordance with the material portion of Section 13.3 of Specification 7220-C-210.
- 8. Where applicable, approve the use of Zone 4A material for the top 6 inches of area fill.
- 9. Approve sand from offsite sources.
- . 10. Approve locations of lean concrete in lieu of backfill.
 - 11. Determine exceptions for the requirements of Section 8.3.2. of Specification 7220-C-211 (i.e. free from lenses, pockets, streaks, or other imperfections).
 - 12. Approve exceptions to requirements of Section 8.3.6 of Specification 7220-C-211(Q) (i.e., suspension of soils work when aubient temperature is 32F and falling). Document if heating cover inside building or other means of protection are used.
 - 13. Determine compatibility of rapid moisture determination methods with results obtained using ASTM D 2216, if required.
 - 14. Record that the specified compaction equipment is being used.
 - 15. Provide information to project engineering regarding proposed compaction equipment and locations if other than hand held equipment is to be used within 3 feet of structure walls. Use memorandums, TWX or FAX, but document.
 - 16. Visually inspect and approve material to be used from stockpile.
 Frovide direction and document any exceptions that take place to the specified daily inspection and testing requirements.

Summary of Onsite Geotechnical Soils Engineer Duties and Responsibilities (Continued)

- 17. Determine all density test locations and testing frequency including additional tests.
- 18. Review and approve each test report. Review and initial all acceptable test report sheets from U.S. Testing and document on FERs the test reports reviewed.
- in accordance with Section 8.3.4 of Specification 7220-C-211(Q):
 - 20. Verify equipment acceptability for parameters such as speed, frequency, lift thickness, number of passes and overlap in accordance with attachment?

 1 to Specification 7220-C-211(Q).
 - 21. Record the method of rework used and document retest results.

Attachments: 1. Field Engineer's Report Form

2. | BEBC-3633

3. BEBC-2772



FIELD ENGINEER'S REPORT FORM

MIDLAND UNITS 182

			OF
INSPECTION	DESCRIPTION	ACTION	REQUIRED/TAKEN
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Attachment #2 FIC 1.100 (Q Rev. 3

Bechtel Associates Professional Corporation

Inter-office Memorandum

BEBC-

3633

L.E. Davis To

January 30, 1980 Date

Midland Plant Units 1 & 2 Subject

Job 7220

Response to 10 CFR 50.54

Questions

Copies to File: 0274, C-211PR, C-0465

L.E. Curtis From

Engineering Of

Ann Arbor At

W. Barclay

S. Blue

P. Corcoran

L. Curtis

L. Dreisbach

R. Rixford

J. Wanzeck

Reference: Response to NRC Question 23, Part (3).

Section 5, Action Item 22

The referenced action item requires that project engineering and geotechnical services develop guidelines for surveillance of testing operations by the onsite geotechnical soils engineer.

It is requested that field engineering incorporate the following guidelines into the appropriate field instruction and forward a copy of the revised field instruction to project engineering by February 22, 1980.

Guidelines for Surveillance of Testing Operations:

The onsite geotechnical soils engineer shall observe the testing operations at least once a day while testing is in progress. The testing operations to be observed shall include field density and moisture tests, laboratory proctor tests, gradation tests, plotting of zero airvoid curves, etc. Tests to be observed will be selected by the onsite geotechnical soils engineer. The selection will be random, based on tests being conducted on a particular day and varied to his satisfaction such that all phases of testing are being conducted correctly and are providing the necessary control of the earthwork operations. The onsite geotechnical soils engineer shall inform appropriate authorities if the operations are carried out incorrectly and/or if there are any other methods or tests that could be utilized to improve the control or provide increased assurance that testing operations are carried on correctly and effectively.





Bechtel Associates Professional Corporation

IOM to L.E. Davis BEBC- 3633 Page 2



The onsite geotechnical soils engineer's daily report should show what testing operations were observed and any recommendations for improvements which may have been made.

for L.E. Curtis

SR/ht 12/5/1



Bechtel Power Corporation

February 13, 1980

Interoffice Memorandum

L. E. Davis

Construction

TELECOPY

L. H. Curtis

Operations BCBE-2772

Copies to

Subject

Job 7220 Midland Project Onsite GeoTech Soils Engineer Surveillance of Testing

P 1 C----

P. J. Corcoran J. P. Betts

255-2772

Midland, MI

File No.

From

Reference: BEBC-3633, dated January 30, 1980

The referenced memorandum was received by Field Engineering on February 5, 1980. This memo includes the following directions:

"The onsite GeoTechnical soils engineer shall observe the testing operations at least once a day while testing is in progress. The testing operations to be observed shall include field density and moisture tests, laboratory proctor tests, gradation tests, plotting of zero airvoid curves, etc. Tests to be observed will be selected by the onsite GeoTechnical soils engineer. The selection will be random, based on tests being conducted on a particular day and varied to his satisfaction such that all phases of testing are being conducted correctly..."

Based upon discussion among field personnel and telephone conversations with Project Engineering, the field interprets this to mean that not all backfill related tests conducted each day must be observed but that at least one of the test procedures on any day of testing must be observed.

We also interpret this direction to mean that all test procedures related to backfill operations must be observed often enough so that the onsite GeoTechnical soils engineer can be satisfied as to the correctness and efficiency of testing operations and can document such observation. L. H. Curtis
BCBE-2772
February 13, 1980
Page Two

As directed by the the reference in F
February 22, 1980, unless direction t

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As directed by the reference, the field will incorporate the reference in Field Instruction FIC-1.100 (Q) by February 22, 1980, including the above interpretation, unless direction to the contrary is received from Project Engineering.

L) E. Davis

LED/GK/jrh



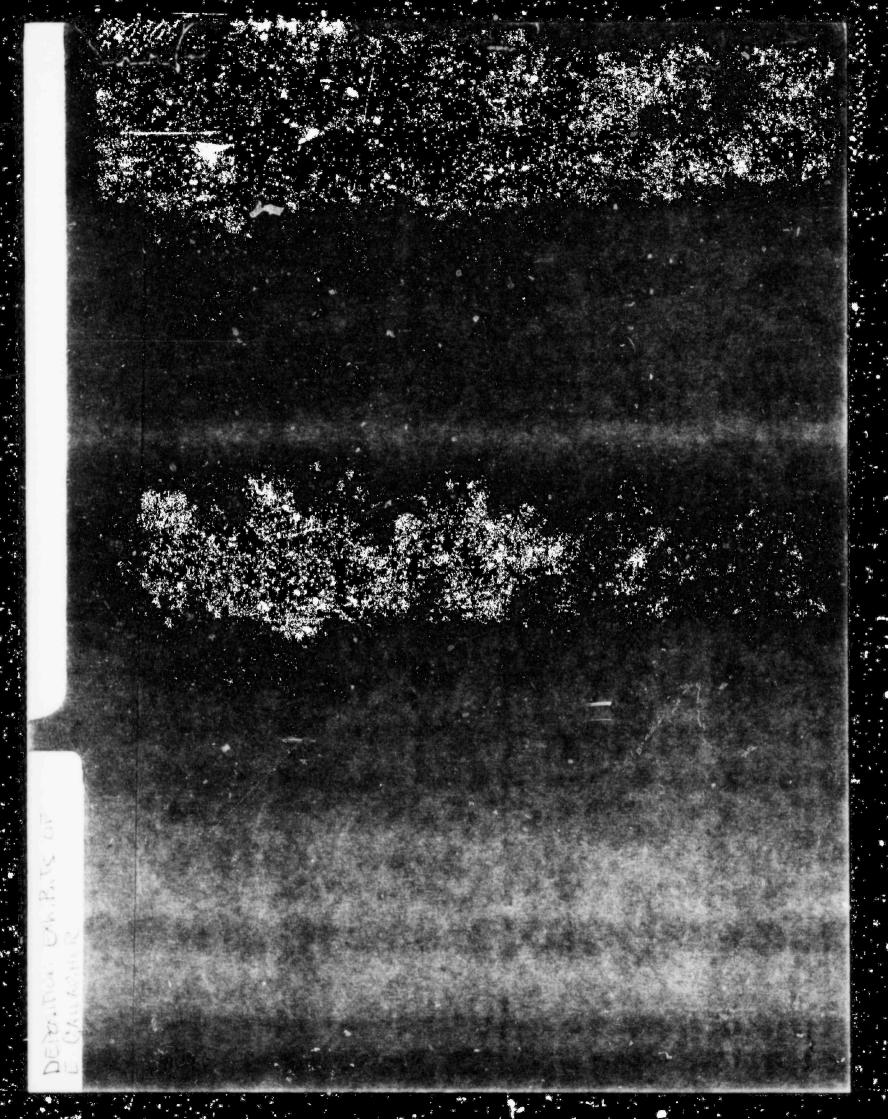


EXHIBIT 11-18-10 mg

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

CONSUMERS POWER COMPANY

In the Matter of

indicated.

(Midland Plant, Units 1 and 2)

Docket Nos. 50-329-0L

50-330-OL

50-329-OM 50-330-OM

-11

NOTICE OF DEPOSITION

PLEASE TAKE NOTICE that Consumers Power Company shall take the deposition on oral examination of the following named persons at the times, dates and locations

1:00 p.m. Nov. 17, 1980 Isham, Lincoln & Gene Gallagher Beale, Suite 4200 NRC Inspection One 1st Natl. Pl. & Enforcement, Chicago, IL 60603 Region III 1:00 p.m. Nov. 19, 1980 Isham, Lincoln & James W. Simpson Corps of Engineers Beale, Suite 4200 ne 1st Natl. Pl. Chicago, IL 60603

Each deponent is requested to make available, prior to his deposition, the documents described in Appendix A of the Notice of Deposition dated September 22, 1980, as modified by agreement of the parties.

The subject matter of the depositions shall be all matters relating to the issues set forth in the Order Modifying MOV 26 000

8911740045 566

Construction Permits, dated December 6, 1979 and the contentions set forth in the Appendix to the Prehearing Conference Order Ruling on Contentions and on Consolidation of Proceedings (October 24, 1980) and the contentions of Intervenors Marshall and Sinclair.

Sincerely,

Alan S. Farnell

Counsel for Consumers Power Company

ISHAM, LINCOLN & BEALE One First National Plaza Suite 4200 Chicago, Illinois 60603 312/558-7500

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of
CONSUMERS POWER COMPANY
(Midland Plant, Units 1 and 2)

Docket Nos. 50-329-OL 50-330-OL 50-329-OM 50-330-OM

CERTIFICATE OF SERVICE

I, Alan S. Farnell, hereby certify that a copy of Consumers Power Company's Notice of Deposition and Notice of Continuation of Depositions was served upon all persons shown in the attached service list by deposit in the United States mail, first class, this 5th day of November, 1980.

Alan S. Farnell

SERVICE LIST

Frank J. Kelley, Esq. Attorney General of the State of Michigan Stewart H. Freeman, Esq. Assistant Attorney General Gregory T. Taylor, Esq. Assistant Attorney General Environmental Protection Div. 720 Law Building Lansing, Michigan 48913

Myron M. Cherry, Esq. One IBM Plaza Suite 4501 Chicago, Illinois 60611

Mr. Wendell H. Marshall RFD 10 Midland, Michigan 48640

Charles Bechhoefer, Esq. Atomic Safety & Licensing Bd. Pnl. Counsel for the NRC Staff U.S. Nuclear Regulatory Com. Washington, D.C. 20555

Dr. Frederick P. Cowan 6152 N. Verde Trail Apt. B-125 Boca Raton, Florida 33433

Mr. Gustave A. Linnenberger Atomic Safety & Licensing Bd. U.S. Nuclear Regulatory Com. Washington, D.C. 20555

Carroll E. Mahaney Babcock & Wilcox P. O. Box 1260 Lynchburg, Virginia 24505

James E. Brunner, Esq. Consumers Power Company 212 West Michigan Avenue Jackson, Michigan 49201

Grant Merritt, Esq. Thompson, Nielsen, Klaverkamp & James 4444 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402

Atomic Safety & Licensing Appeal Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Mr. C. R. Stephens Chief, Docketing & Service Section Office of the Secretary U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Ms. Mary Sinclair 5711 Summerset Street Midland, Michigan 48640

William D. Paton, Esq. U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Atomic Safety & Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Barbara Stamiris 5795 North River Road Route 3 Freeland, Michigan 48623

Sharon K. Warren 636 Hillcrest Midland, Michigan 48640