

Glen Ellyn, Illinois  
(LOCATION)

April 19, 1982  
(DATE)

I, Ross B. Landsman, hereby make the following statement to Charles H. Weil, who has identified himself to me as an Investigator of the United States Nuclear Regulatory Commission. I make this statement freely with no threats or promises of reward having been made to me.

*RBK* I am presently employed by the Nuclear Regulatory Commission as a Civil Engineer Reactor Inspector. I was recently assigned to inspect remedial foundation work at the Midland Nuclear Power Plant construction site in Midland, Michigan.

On March 10, 1982, I initiated a meeting at the Nuclear Regulatory Commission's headquarters in Bethesda, MD. The purpose of this meeting was to discuss the application of quality assurance criteria and procedures to remedial foundation work underway at the Midland site. During the meeting it was agreed between the Nuclear Regulatory Commission and the Consumers Power Company that work started before March 10, 1982, would not be included in the remedial foundation work quality assurance program. Work commencing after that date would be included in the quality assurance program.

One of the topics of conversation at the March 10th meeting was the status of the installation of instrumentation to measure the settlement of the Midland Auxiliary Building. Mr. Al J. Boos, the Bechtel Power Corporation's Assistant Project Manager at Midland, attended the March 10th meeting. During the course of the meeting, Boos made a statement that lead me to believe the instruments had been installed to measure the settling of the Auxiliary Building, and since the instruments were installed the instruments would not have to be included in the quality assurance program under consideration for the remedial foundation work.

On March 12, 1982, I participated in a telephone conversation initiated by the Consumers Power Company. The purpose of this telephone call was to have Consumers Power Company identify the items, either completed or where installation was underway, not included in the quality assurance program for the Midland remedial foundation work. During the telephone conversation, Al Boos stated, "Gauges, backup gauges, have been procured as non-Q but would be calibrated under a Q program. These are existing dial gauges. Our instrumentation is essentially well under way. Wiring has been pulled - raceway has been installed."

Based on Boos' statements of March 10 and 12, 1982, I understood the instrumentation (i.e. settlement gauges and strain gauges) for the Auxiliary Building settlement monitoring would not be included in the remedial foundation work quality assurance program, as work had begun before March 10, 1982.

*RBK* On March 17, 1982, I was at the Midland site, along with Region III Inspector Ron Gardner, to observe the remedial foundation work. During the course of the inspection, Gardner and I found cables for the Auxiliary Building settlement instruments ~~were~~ *were* being pulled without the benefit of quality assurance or quality control. Later that day, I questioned Mike Schaeffer of the Consumers Power Company Quality Assurance Department about the absence of quality control *RBK*

Page 1 of 2 pages.

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*RBK*  
**EXHIBIT II**

RBL

quality assurance for the instrumentation installation. Schaeffer informed me the cable pulling was not considered to be under the quality assurance program for the remedial foundation work. After discussing the cable pulling with Schaeffer, Schaeffer stated the cable pulling would be stopped since there seemed to be some confusion on the quality assurance status of the cable pulls. Schaeffer also told me that the installation of the settlement instrumentation for the Auxiliary Building had begun on March 11, 1982.

On the morning of March 18, 1982, I observed cable pulling was continuing without quality control/quality assurance, and I informed Mr. Ben W. Marguglio, Consumers Power's Director of the Midland Project Quality Assurance Department, of my observations. Marguglio stated the cable pulling had begun prior to March 10, 1982; therefore, the cable pulling was not a part of the quality assurance program for the remedial foundation work. Also, Marguglio stated it was his understanding that Consumers Power Company Vice President Jim Cook and NRC Region III Director Jim Keppler had previously agreed the Midland project would not be cited by the NRC for things that were obviously non-Q (not included) under the remedial foundation work quality assurance program.

On March 19, 1982, Marguglio informed me that he had stopped the cable pulling because it would now be considered under the remedial foundation work quality assurance program and quality assurance/quality control procedures would be developed to control the work. RBL

RBL

I have read the foregoing statement consisting of two pages. I have made any necessary corrections, and I have initialed those corrections. This statement is the truth to the best of my knowledge and belief. I declare under the penalty of perjury that the foregoing is true and correct. Executed on April 19, 1982 at 3:50 pm.  
(Date) (Time)

Ross B. Landsman  
(Signature)

Ross B. Landsman, Nuclear Regulatory  
Commission Region III, Glen Ellyn, IL.  
(Address)

Subscribed and sworn to before me  
this 19th day of April,  
19 82 at Glen Ellyn, Illinois.

*[Signature]*

Charles H. Weil, Investigator  
Nuclear Regulatory Commission Region III  
Glen Ellyn, Illinois 60137



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

File PRR

APR 2 0 1982

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

82-05

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

Gentlemen:

This refers to the routine safety inspections conducted by Mr. R. B. Landsman of this office on February 3-5, 17-19 and March 17-19, 1982, of activities at the Midland Nuclear Power Plant, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-81 and No. CPPR-82 and to the discussion of our findings with you and Mr. W. R. Bird at the conclusion of the inspections. This report also refers to three meetings; two at NRC Headquarters on February 22-26 and March 9-10, 1982, and one conducted at our office in Glen Ellyn on March 30, 1982.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in noncompliance with NRC requirements, as specified in the enclosed Appendix A. A written response is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days

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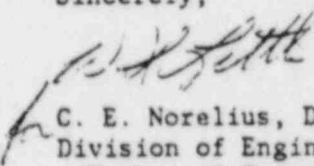
EXHIBIT III

APR 20 1982

are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter and the enclosed inspection report will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,



C. E. Norelius, Director  
Division of Engineering and  
Technical Programs

Enclosures:

1. Appendix A, Notice of Violation
2. Appendix B, Notice of Deviation
3. Inspection Reports  
No. 50-329/82-05(DETP)  
and No. 50-330/82-05(DETF)

cc w/encls:

DME/Document Control Desk (RIDS)  
Resident Inspector, RIII  
The Honorable Charles Bechhoefer, ASLB  
The Honorable Jerry Harbour, ASLB  
The Honorable Frederick P. Cowan, ASLB  
The Honorable Ralph S. Decker, ASLB  
Michael Miller  
Ronald Callen, Michigan  
Public Service Commission  
Myron M. Cherry  
Barbara Stamiris  
Mary Sinclair  
Wendell Marshall  
Colonel Steve J. Gadler (P.E.)



Appendix A

NOTICE OF VIOLATION

Consumers Power Company

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

As a result of the inspection conducted on February 3-5, 17-19 and March 17-19, 1982, and in accordance with the NRC Enforcement Policy, 47 FR 9987 (March 9, 1982), the following violation was identified:

10 CFR 50, Appendix B, Criterion V, states in part that, "Activities affecting quality shall be prescribed by documented instructions...and shall be accomplished in accordance with these instructions...instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

CPCo Quality Assurance Program Policy No. 5, states in part that, "organizations...prepare and maintain procedures as necessary to provide instructions...for a consistent method of performing recurring engineering, construction and Quality Assurance activities...these documents provide qualitative and quantitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

Contrary to the above, the inspector determined the following four examples of noncompliance:

- a. Mergentine's Field Procedure FPC-1.00, Revision 3, dated January 26, 1981, was not reviewed and approved prior to initiation of access shaft work as required by Site Procedure FPG-1.000. This was the result of CPCo allowing Mergentine to proceed without having an approved procedure to prepare procedures.
- b. Site Procedure EDPI 4.49.1 does not have time limits established from engineer approval of the SCN, to distribution of the controlled copies of the specifications on site. This results in untimely delays for important changes.
- c. Specification C-88, for the initial 20 dewatering wells, does not have acceptance criteria for determining if the actual amount of gravel pack/grout used in the dewatering wells was within an acceptable range.

This resulted in inadequate assurance that the wells are acceptable. Furthermore, Specification C-118, for the remaining 40 wells, does not have acceptance criteria for this attribute.

- d. Site Procedure E-1M does not have adequate instructions to prepare or implement overinspection plans. In that, it did not address how SCN's, FCN's, FCR's and DCN's are incorporated into the plans. This resulted in Overinspection Plan C-17B having contradicting and nuclear acceptance criteria. As a result, the inspection reports document erroneous results.

This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

2/23/82  
Dated

*C. E. Norelius*  
C. E. Norelius, Director  
Division of Engineering and  
Technical Programs

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Appendix B

NOTICE OF DEVIATION

Consumers Power Company

Docket No. 50-329

Docket No. 50-330

As a result of the inspection conducted on February 3-5, 17-19 and March 17-19, 1982, the following was cited as a deviation

During IE Inspection No. 81-12, the licensee committed to provide additional qualified QA civil staff prior to the initiation of the remedial soils work.

Contrary to the above, it was determined that certain of the assigned personnel do not satisfy the commitment to provide qualified staff needed to support the remedial soils work.

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/82-05(DETP); 50-330/82-05(DETP)

Docket Nos. 50-329; 50-330

Licenses No. CPPR-81; CPPR-82

Licensee: Consumers Power Company  
1945 West Parnall Road  
Jackson, MI 49201

Facility Name: Midland Nuclear Power Plant, Units 1 and 2

Inspection At: Midland Site, Midland, MI

Inspection Conducted: February 3-5, 17-19, 22-26, March 9-10, 17-19,  
and 30, 1982

Inspector: R. B. Landsman

*R. B. Landsman*  
*C. C. Williams*

4-19-82

Approved By: C. C. Williams, Chief  
Plant Systems Section

4/19/82

Inspection Summary

Inspection on February 3-5, 17-19, 22-26, March 9-10, 17-19, and 30, 1982  
(Reports No. 50-329/82-05(DETP); 50-330/82-05(DETP))

Areas Inspected: Verification of QA Program for Civil QA Staffing, Permanent Plant Dewatering Wells, Drawdown - Recharge Test, BWST Surcharge Test, and Auxiliary Building Access Shafts being done as part of the Remedial Soils measures. The inspector also attended three meetings, two in NRC Headquarters with the licensee and their consultants and one conducted in the Region III office in Glen Ellyn. The inspections involved a total of 86 inspector-hours by one NRC inspector.

Results: Of the areas inspected, one item of noncompliance and one deviation was identified - Severity Level IV, Inadequate Procedures; Deviation from commitment to provide adequate technical QA staff for the Remedial Soils work.

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## DETAILS

### Persons Contacted

#### Consumers Power Company (CPCo)

B. W. Marguglio, MPQAD Director  
W. R. Bird, MPQAD Manager  
M. Curland, MPQAD Site Superintendent  
D. E. Horn, MPQAD Civil Group Supervisor  
R. Akers, MOQAD Civil QAE Supervisor  
R. E. Sevo, MPQAD Civil IE and TV Supervisor

#### Bechtel Power Corporation

A. Boos, Assistant Project Manager  
N. Swanberg, Assistant Project Engineer  
J. Fisher, Remedial Soils Group Manager  
M. A. Dietrich, Project QA Engineer

#### NRC

R. Cook, Resident Inspector

Other licensee and contractor personnel were routinely contacted during the course of these inspections.

### Functional or Program Areas Inspected

#### 1. Quality Assurance Staffing (Civil Area)

During this inspection a review of the quality assurance staff for the civil work activities was made to determine that adequate technical, quality assurance depth and personnel availability exist for the planned remedial measures to be performed as a result of the soil settlement issue.

The onsite QA group is divided into two sections; (1) Quality Assurance Engineering (QAE), and (2) Inspection-Examination and Testing Verification (IE&TV). The QAE section presently consists of a supervisor (an industrial engineer) and three civil engineers. The IE&TV section presently consists of a supervisor (a civil engineer), one civil engineer, a geologist, and two other individuals, one of which has an associate degree in environmental studies. The following determinations were made:

- a. The QAE section supervisor does not have the technical experience to implement the MPQAD program for the required remedial measures.
- b. The IE&TV staff has very limited technical depth for the complex nature of the remedial actions.

Staffing problems were previously discussed with the licensee (as described in IE Reports No. 81-01 and No. 81-12). CPCo committed to provide, prior to the initiation of the complex remedial activities, additional qualified staff to participate in these activities. It is the assessment of the inspector that the staff is not fully adequate and are judged not to be commensurable with the complexity of the task. Therefore, it has been determined that CPCo is in deviation from an NRC commitment as described in Appendix B of the report transmittal letter (50-329/82-05-01; 50-330/82-05-01).

Subsequent to the inspection, CPCo informed the Region III office that the civil QA section will be reorganized into a remedial soils group and a structural group. The remedial soils group, will have a qualified civil engineering staff. Additional qualified staff will also be provided. This action will be verified during a subsequent inspection.

## 2. Permanent Plant Dewatering Wells

The inspection was conducted to verify the implementation of the QA program for the initial 20 wells already installed and for the remaining 40 wells presently being installed.

The inspector reviewed the initial 20 well data sheets which are required by Specification C-88 to document all field data obtained during the well installation. From this review, the inspector determined that one of the important well log parameters, comparing the amount of actual gravel pack/grout used to the calculated amounts, was not reviewed. This was determined because the actual amount of gravel pack used was up to 10 cubic feet less than the calculated amount. The hydrogeologist preparing and approving these well logs failed to identify and correct these adverse conditions. This was because the controlling Specification C-88, did not have appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished. This is in noncompliance with 10 CFR 50, Appendix B, Criterion V as described in Appendix A of the report transmittal letter (329/82-05-02C; 330/82-05-02C). The licensee committed to review the well logs to determine if the dewatering wells are acceptable.

The inspector reviewed the following documents controlling the remaining 40 dewatering wells:

- a. Specification C-118, "Subcontract to Install Observation Wells and Permanent Dewatering Wells System," Revision 3, dated December 16, 1981.
- b. PQCI 7220/C-2.02, "Permanent Gravel-Packed Wells," Revision 0, dated January 18, 1981.
- c. Subcontractor Procedure 7220-C118-1-1, "Procedure for Installation of Dewatering and Observation Wells," Revision 0, dated January 11, 1982.

- d. PIPR 7220-C-20D, "Installation of Gravel-Packed Wells," Revision 0, dated January 13, 1982.
- e. Drawing C-2016, Revision 5, dated January 8, 1982.
- f. Drawing C-2017, Revision 0, dated October 30, 1981.
- g. Drawing C-2018, Revision 0, dated October 30, 1981.
- h. Drawing C-2019, Revision 0, dated October 30, 1981.

From this review the inspector concluded that the documents appear to be satisfactory to control the installation of the remaining 40 wells. The licensee agreed to revise Section 6.5 of Specification C-118 to incorporate appropriate acceptance criteria for the actual amount of gravel pack/grout used. This item remains open and will be addressed in the previous item of noncompliance.

3. Drawdown-Recharge Test

The inspection was conducted to verify the implementation of the QA program for the recharge test. It is being done to establish that even if all the wells are lost that the water table will not rise significantly during a certain time period to make the loose sands underlying the plant site liquifiable.

The inspector reviewed the following documents controlling the recharge test:

- a. PQCI 7220/C-2.03, "Drawdown Recharge Test," Revision 2, dated February 3, 1982.
- b. PIPR 7220/C-20C, "Drawdown/Recharge Test," Revision 1, dated February 3, 1982.
- c. Drawing C-1300, Revision 1, dated February 1, 1982.
- d. Drawing C-1301, Revision 1, dated February 1, 1982.
- e. Drawing C-1302, Revision 2, dated February 1, 1982.

From this review the inspector concluded that the documents appear to be satisfactory to control the recharge test. The licensee took baseline readings on February 3, 1982, and shut the dewatering pumps off on February 4, 1982.

4. BWST Surcharge Test

The inspection was conducted to verify the implementation of the QA program for BWST valve pit surcharge. The inspector reviewed the following documents controlling the surcharge:



- a. Specification C-93, "Surcharging and the Instrumentation and Monitoring during Surcharging, for the Borated Water Storage Tank Area," Revision 1, dated December 3, 1981.
- b. PIPR 7220/D-17B, "Surcharging and Settlement Monitoring of the Borated Water Tank Area," Revision 4, dated November 13, 1981.
- c. Drawing C-1148, Revision 3, dated September 14, 1981.
- d. Drawing C-1152, Revision 4, dated November 18, 1981.

From this review, the following concerns were discussed with the licensee. Overinspection Plan C-17B, Revision 4 has contradictory inspection criteria in Item Nos. 4.3D and 4.4A. Item No. 4.3D states that an acceptable crack width of 20 mils will be allowed. The reference document given was Specification C-93, Revision D, Section 5.5.4. The inspector determined that Section 5.5.4 was deleted by SCN 11003. SCN 11003 also added Section 6.0 to Specification C-93 which stated that an acceptable crack width of 16 mils will be allowed. This is also reflected in the overinspection plan in Item No. 4.4A which contradicts Item No. 4.3D.

Furthermore, while reviewing completed Overinspection Plans C-17B, No. 1 and No. 2, the inspector determined the MPQAD inspectors listed SCN 11003 as one of the documents reviewed while making the inspections. In fact, in the remarks column under Item No. 4.3D of the overinspection plans, Plan No. 1 stated, "less than 20 mils" and Plan No. 2 stated, "no deviations noted." Neither inspection plan identified that Item No. 4.3D was a superceded inspection criteria.

Additionally, the inspector determined that site Procedure E-1M, "Site Inspection Planning and Site Inspection," Revision 1, dated November 13, 1981, the controlling document for preparing and implementing overinspection plans, was inadequate. There are no instructions for the preparer of the plan to list SCN's that were used in the preparation of the plan. There are also no instructions for the inspectors to list SCN's that were issued after the plan was prepared and were subsequently used by the inspector.

In summary, design criteria outlined in the specification, have not been adequately translated into inspection procedures, in that they provide contradicting acceptance criteria. This appears to be the result of an inadequate department procedure. As a result of this, the inspection reports document erroneous results. This is contrary to 10 CFR 50, Appendix B, Criterion V as described in Appendix A of the report transmittal letter (329/82-05-02D; 330/82-05-02D).

The licensee committed to revise Procedure E-1M to clarify the use of SCNs, FCNs, FCRs and DCNs both in preparation and implementation of the overinspection plans. They also agreed to revise overinspection Plan C-17B to delete the contradictions.



Additionally, the inspector determined that site Procedure EDPI 4.49.1, "Specification Change Notice," under Section 3.3, has no time limit set to distribute approved SCNs to the affected specifications on site. This failure to have an adequate procedure is another example of non-compliance with 10 CFR 50, Appendix B, Criterion V as described in Appendix A of the report transmittal letter (329/82-05-02B; 330/82-05-02B).

Another concern raised by the inspector was that QC was using a Field Inspection Report (FIR) in lieu of the usual PQCI's to do their inspections. Site Procedure PSPG-1.1 intent was to use the FIR's merely as daily recording documents, i.e., similar to a daily report, not repetitive inspections. They were not to be used for preplanned comprehensive inspections. This appears to be an isolated case and the licensee has agreed not to use the FIRs in this manner again.

5. Auxiliary Building Access Shafts

The inspection was conducted to verify the implementation of the QA program for the access shaft installations. The inspector determined that the installation of the access shafts was being done without complete QC/QA requirements. For example, the access shaft by Unit 1 required seven soldier piles to be installed. From a review of the notes on Q Drawing C-1420, Revision 2, the inspector determined that the drilling of the holes for the piles was non-Q. The piles themselves were also non-Q. However, the concrete and grout used to backfill the holes was Q. The inspector further determined from a review of Specifications C-196 and C-45, that only one and one-half holes and piles were Q. Five and one-half were considered non-Q because they were in non-Q soil. This fragmented approach is the result of the shafts being considered as a non-quality related activity.

This is a continuation of the same problem that the inspector has had with trying to inspect the soils borings and the initial 20 permanent dewatering wells. Only portions of each activity were considered Q. This fragmented approach to quality activities is detrimental to the overall satisfactory completion of the remedial soils work.

After numerous discussions with site QA personnel, the issue could not be resolved and it was decided to have a meeting between CPCo, Bechtel, NRR and IE to finally address the inspector's concerns in this area. See Section 6.b of this report.

Furthermore, the inspector determined that site controlled Field Procedure FPC-1.00 for installing the soldier piles for the access shaft was not reviewed and approved by the contractor prior to the initiation of work on Q-piles as required by Site Procedure FPG-1.000. The inspector determined that this was the result of CPCo allowing Mergentine Corp. to proceed without having an approved procedure to prepare procedures. This failure to follow procedures, is another example of the licensee's noncompliance with 10 CFR 50, Appendix B,

Criterion V as discussed in Appendix A of the report transmittal letter (50-329/82-05-02A; 50-330/82-05-02A).

6. Meetings with CPCo, Bechtel, and NRR

a. The inspector attended meetings held on February 22-26, 1981, in NRC Headquarters regarding the remedial measures to be taken for the soils deficiencies. In particular, the following items were discussed:

- (1) Recharge Test
- (2) Dewatering Concerns
- (3) BWST Surcharge Program
- (4) SWPS Soils Issues
- (5) SWPS Structural Issues
- (6) SWPS Remedial Construction Issues
- (7) DG Soils Issues
- (8) DG Structural Issues
- (9) DG Cracking Concerns
- (10) Auxiliary Building Remedial Work Monitoring Program
- (11) Auxiliary Building Spring Constants

b. The inspector also attended a meeting held on March 9-10, 1982, in NRC Headquarters regarding the quality assurance program for the remedial soil work activities.

The purpose of the meeting was to discuss concerns raised by IE-R111 over the amount of limited involvement that MPQAD has with the remedial soils work. Following discussions, the meeting ended with the licensee verbally committing to the following:

- (1) All remaining remedial work will be Q-listed except on very specific items which can be shown to justify non-Q treatment. NRR/IE concurrence in this justification must be obtained prior to conducting any work outside of the QA program.
- (2) Continue the access shafts down to EL.609 as non-Q, but from there on, Q.
- (3) Continue the freeze-wall and dewatering wells as non-Q.

c. The inspector also attended a meeting held on March 30, 1982, in Region III offices. The meeting was initiated by Region III to discuss: (1) the issues raised from the inspection of the auxiliary building remedial soils instrumentation; (2) the specifics on how our inspection program for the remedial soils work will be handled; and, (3) the licensee's QA program for the remedial soils work. Those in attendance were:

CPCo

J. Cook, Vice President  
B. W. Marguglio, MPQAD Director  
W. R. Bird, MPQAD Manager  
J. A. Mooney, Projects  
J. Brunner, Lawyer

NRC

C. E. Norelius, Director, Division of Engineering and Technical Programs  
W. S. Little, Chief, Engineering Inspection Branch  
R. C. Knop, Chief, Projects Branch 1  
E. G. Adensam, Chief, NRR Licensing Branch No. 4  
C. C. Williams, Chief, Plant Systems Section  
D. C. Boyd, Chief, Reactor Projects Section 1A  
D. S. Hood, NRR Project Manager Midland  
J. Gilray, NRR QA Branch  
R. Gardner, Inspector  
R. Cook, SRI Midland  
M. Blume, ELD Lawyer

A summary of the items discussed is as follows:

- (1) The auxiliary building remedial instrumentation was specifically identified as Q on the licensee's January 7, 1982, submittal to the NRC. As such, a Confirmation of Action Letter was discussed with the licensee and it was decided, at the licensee's request, that they would submit a confirmatory action letter to the NRC.
- (2) The licensee was informed that one inspector has been dedicated to the Midland Soils Area; and, inspections will be conducted in accordance with our standard inspection program. They were requested to provide the NRC with upcoming weekly construction schedules, including any abnormalities that occurred during the prior week. They were also requested to provide a principal point of contact for the remedial soils work.
- (3) The agreements reached during the March 10, 1982, meeting were reconfirmed. That is, the remaining remedial soils work will all fall under the "Q" classification. Exceptions on very specific items will require NRC concurrence prior to conducting any work outside of the Quality Assurance Program.

Exit Meetings

The inspector met with the licensee and contractor representatives at the conclusion of the inspections on February 5, 9 and March 17, 1982, and summarized the inspection scope and findings. The licensee acknowledged the findings reported herein. However, as a result of the findings identified, the inspector again informed the licensee that more emphasis must

be placed on the attention to detail in the preparation, review and implementation of documents. The enforcement history in this area indicates a continued lack of attention to detail. As a result of these findings, it is clear that upper management is not playing an active role in conveying the principles of Quality Assurance to the working staff to assure QA principles are being properly carried out.