

Midland, Michigan

(LOCATION)

April 9, 1982

(DATE)

I, Ronald J. Cook, 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.

RC I am presently employed by the Nuclear Regulatory Commission as the Senior Resident Inspector at the Midland Nuclear Power Plant, Midland, Michigan.

On March 10, 1982, I attended a meeting at the Nuclear Regulatory Commission's headquarters in Bethesda, MD. This meeting concerned the quality assurance program under consideration for remedial soils work at the Midland plant. One discussion topic at this meeting was the instrumentation to be used to monitor the settling of the soils. Al Boos of Bechtel Power Corporation was in attendance at this meeting, and Boos made statement which indicated the settlement instrumentation was installed. Because of Boos' statements that the instrumentation was installed, it was agreed between the Nuclear Regulatory Commission and the Consumers Power Company that quality assurance requirements would not be backfitted and imposed on instrumentation already installed. Rather the quality assurance requirements would be imposed on additional remedial soils work starting with Phase 2. Phase 1 of the remedial soils work was the access shaft above the 609' elevation; Phase 2 being additional excavation, including the access shaft, below the 609' elevation. Also Consumers Power Company and the Nuclear Regulatory Commission agreed that instrumentation installation starting after March 10, 1982, would be included in the quality assurance program, and any installations completed prior to March 10th would not be included, but reliability of the work would have to be demonstrated. At the conclusion of the March 10th meeting, it was understood and stated by the Nuclear Regulatory Commission that all remedial soils work beyond Phase 2 would be under the quality assurance program, unless specific relief from the quality assurance program had been granted. This statement was made in the connotation that the Nuclear Regulatory Commission would not require the removal or rework of any installations which were either completed or well under way to completion at that time - provided Consumers Power Company and Bechtel Power Corporation could demonstrate the completed work was not detrimental to the job.

R. J. Cook
On March 12, 1982, Consumers Power Company requested that I participate in a conference telephone call to the Nuclear Regulatory Commission's Region III Office. This telephone call was placed to Ross Landsman and Dwane Boyd at the Region III Office to discuss some of the items which would be included, or excluded, under the remedial soils quality assurance program. Al Boos of Bechtel participated in this telephone call from the Midland site. During the conversation Boos stated, "Our instrumentation is essentially well under way. Wiring has been pulled, raceway has been installed." To me Boos' statement that "our instrumentation is essentially well under way. Wiring has been pulled, raceway has been installed, " meant that all instruments were installed and all wires had been pulled. I expected all work to be complete, except for a few terminations and the calibration of the instruments, ^{and} "debugging the system."

On March 16, 1982, Mike Schaeffer, Consumers Power Company's Electrical Quality Assurance Section Head, telephoned me. Schaeffer stated he had heard Ron Gardner

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Page 1 *RC* 3 pages.

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EXHIBIT VI

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an electrical inspector assigned to NRC Region III, was coming to the Midland site on the following day, and Schaeffer wanted to know the reason for Gardner's visit. I told Schaeffer that Gardner was coming with NRC Inspector Ross Landsman to look at the foundation under pinning work and that Gardner would be looking at the electrical installation of the instruments for the underpinning. Schaeffer told me that he did not know any electrical work was being done in the underpinning and there were no quality assurance requirements to inspect the electrical installations associated with the underpinning. Schaeffer stated he had better get geared-up and find out what was going on with the soils settlement instrumentation. He (Schaeffer) was surprised to find out that there was NRC attention to the soils settlement instrumentation.

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On March 17, 1982, Landsman and Gardner arrived at the Midland site. They inspected the electrical installation of the instrumentation for the remedial soils work of the Auxiliary Building and they found very little work had been done. They contacted Mike Schaeffer and found that quality assurance criteria and quality control inspection requirements had not been established for the installation of instrumentation for the Auxiliary Building remedial soils work. Schaeffer told Landsman, Gardner and myself that work would be stopped on the instrument installation until quality assurance criteria were established.

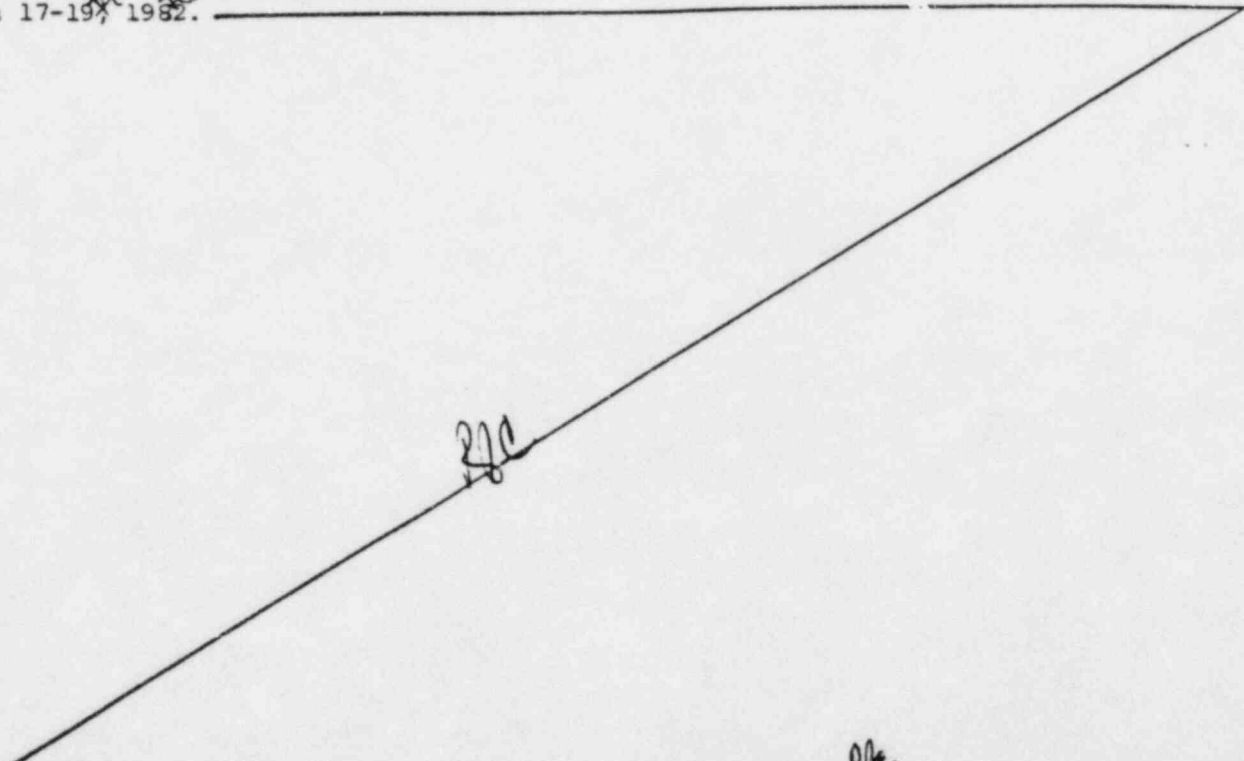
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On March 18, 1982, Landsman and Gardner told me they had been to the Auxiliary Building and had found that instrument wire was being pulled without quality control inspectors being present or quality assurance requirements established. Landsman, Gardner and I, along with Mike Schaeffer and Ed Jones (who works for Schaeffer) went to the Data Room for the remedial soils instrumentation on the roof of the Auxiliary Building. We found, by counting, only about 10% of the wires had been pulled to the Data Room. As I recall, this was eight or ten of the eighty, plus, wires required for the instrumentation. Schaeffer informed Landsman that the pulling of instrumentation wires from the devices at the foundation of the Auxiliary Building to the Data Room on the roof of the Auxiliary Building had begun on March 11, 1982.

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After making the above observations, Landsman, Gardner and I telephoned Dwane Boyd and Cordell Williams at the Region III Office to inform the regional office of our findings. After this telephone call, we went to Ben Marguglio, Consumers Power Company's Director of Quality Assurance. We informed Marguglio of our observations and that Consumers Power Company was in noncompliance with NRC requirements for not having established quality assurance criteria or performing quality control inspections for the installation of instrumentation for the remedial soils work.

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Marguglio stated to us that there was no basis for our citation for noncompliance, as the installation of instrumentation for monitoring the remedial soils work was not within the scope of the quality assurance program as defined in the March 10th meeting in Bethesda, MD. Marguglio continued that Jim Cook, a Consumers Power Company Vice President, and Jim Keppler, the Director of NRC Region III, had made an agreement not to cite for items of noncompliance with NRC requirements for any installation work involving the remedial soils program for work started before March 10, 1982, or work which was obviously considered to be non-safety related.

R. J. Cook

Later on March 18, 1982, Marguglio stopped work on the instrumentation installation for the remedial soils program. I do not know Marguglio's reason for stopping the work. I assume the work was stopped as a result of the observations made by Landsman, Gardner and myself on March 18, 1982, and that our observations and concerns were compatible with those of the instrumentation engineers located at Bechtel Power Corporation's office in Ann Arbor, Michigan. The concerns of the instrumentation engineers (Bechtel Power Corporation and Bechtel's subcontractor, Wiss, Janney, Elstner and Associates, Incorporated) were discussed during a conference telephone call on March 18th. The call was between Bechtel and its subcontractor in Ann Arbor and the NRC (Landsman, Gardner and I) and Consumer Power Company (Marguglio, Schaeffer and Jones) at the Midland site. The instrumentation engineers indicated the instrument installation, including the wires, would be adequate, provided excess wire pull force was not exceeded, excess bending occurred, and pull boxes, no more than 100 feet apart were used. These were the same technical concerns expressed by the Nuclear Regulatory Commission, during the inspection of the instrumentation for the remedial soils work, on March 17-19, 1982.



I have read the foregoing statement consisting of three 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 9, 1982 at 11:01 AM.

(Date)

(Time)

R.J. Cook
(Signature)

Ronald J. Cook, Senior Resident Inspector
Midland Nuclear Power Plant, Midland, MI.
(Address)

Subscribed and sworn to before me this 9th day of April, 1982 at Midland, Michigan.

Charles H. Weil
Charles H. Weil, Investigator
NRC Region III, Glen Ellyn, Illinois