

DMB



Consumers Power Company

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MIDLAND ENERGY CENTER  
MIDLAND DOCKET NOS 50-329, 50-330  
PROGRAM FOR RESUMPTION OF EMERGENCY DIESEL  
GENERATOR SITE ELECTRICAL WORK  
FILE 0975, 0655 SERIAL CSC-7867  
M-18

The purpose of this letter is to request NRC concurrence with a program to resume work necessary to be performed on Transamerica Delaval, Inc. (TDI) designed and supplied electrical control panels and their associated wiring.

Consumers Power Company (CPCo) is proposing a program independent of the Construction Completion Plan (CCP) for the resumption of work required to be performed to vendor (TDI) supplied control panels and associated wiring as a result of deficiencies determined to exist and documented by the Midland Project Quality Assurance Department (MPQAD) and deficiencies reported by the vendor under 10CFR21 provisions.

It is our opinion that this program is more stringent than the CCP and can therefore be independent from it.

The electrical equipment supplied by TDI, similar to the mechanical equipment and diesel engines, is considered to be a part of one component in an overall system. Corrective action to these vendor supplied items was the responsibility of TDI, with Bechtel craft performing the work. It has been determined by CPCo and MPQAD that the TDI electrical quality assurance program is not applicable to the site and TDI had never intended for their site quality control representative to perform quality control activities. Accordingly, no work to TDI supplied electrical equipment has been performed under the TDI quality control program. All previous modifications were done under Bechtel supervision, with technical direction by the TDI field representative, with quality control inspection performed by MPQAD. Formal transfer of responsibility from TDI to Bechtel for performing electrical remedial work has been accomplished by a revision to the contract with TDI, P.O. 7220-M-18AC.

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All work to be performed is remedial in nature and the result of modifications necessary as a result of 10CFR21 reports, deficiencies identified in MCAR-66 and other nonconformance reports generated by MPQAD. There is no "to go" installation work necessary.

Specific elements of the program to complete remedial work to the TDI supplied electrical equipment include:

1. All remedial work to be performed by Bechtel personnel under direction of the TDI technical representative and in accordance with TDI procedures.
2. Quality control inspections for work necessary as a result of MCAR-66 to be performed by MPQAD Procurement Quality Assurance Group to their established project inspection plan, 01-E-7B.
3. Quality control inspections for work necessary as a result of 10CFR21 reports and MPQAD generated nonconformance reports to be performed by MPQAD electrical quality control section in accordance with the established PQCI, E-6.1.
4. MPQAD will specifically designate a quality assurance engineer and quality control inspector to work in Diesel Generator electrical equipment.

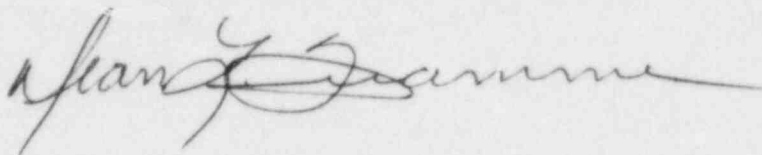
In addition to the above, all previously issued nonconformance reports which have not yet been dispositioned have been evaluated for potential impact on the proposed program. This review resulted in no concerns being generated. The equipment reinspections relating to MCAR-66 have been completed with no additional concerns being identified. A review of the Project Quality Control Instruction (PQCI) which will be used by MPQAD - Quality Control against the MCAR-66 remedial work, resulted in changes to the PQCI, making it a more stringent document.

The TERA Corporation Independent Design and Construction Verification Plan (IDCVP) Open, Confirmed and Resolved (OCR) items through their eleventh (11th) monthly status report of April 17, 1984 were reviewed, resulting in the determination that no outstanding OCR item would have current impact on the intended scope of electrical work.

This program will be implemented by Bechtel System Completion Team 19, which works exclusively in the Diesel Generator Building. The physical work will be performed by Bechtel craft utilizing the Construction Work Package (CWP) program that was developed as part of the CCP and would be overviewed by Stone and Webster-CIO.

Concerns and necessary modifications arising from the TDI Diesel Generator Owners Group, of which CPCo is a member, will be handled independently of this program as it remains our desire to have as much of the construction complete as possible prior to addressing these items.

Your concurrence and timely response would be greatly appreciated.

A handwritten signature in cursive script, appearing to read "Sean J. Sumner". The signature is written in dark ink and is positioned to the right of the typed text.

DLQ/MLE/klw

CC Regional Administrator, Region III  
DSHood, NRR Project Manager, Washington  
Midland Project Manager, Region III  
Midland Resident Inspector, Midland