



# AUDIT REPORT

DATE OF ISSUANCE: 5/14/82

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DISTRIBUTION:		ALAB-2	MD1-601-2
RCash	HPLeonard		
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JEBrunner	REMcCarley		18.4.7
DECalkins	DBMiller		DATE OF AUDIT:
JWCook	JARutgers		4/19/82 through 4/22/82
LEDavis	MSkates		ORGANIZATION AUDITED:
MADietrich	DATaggart		The Zack Company, Chicago
GSKeeley	RAWells		PLANT & PROJECT:
SIG. OF AUDIT TEAM LEADER/DATE:		APPROVED BY/DATE:	Midland Unit 1 and 2
<i>Susan Brudla 5/14/82</i>		<i>[Signature] 5/14/82</i>	

## I. SCOPE AND OBJECTIVE

The objective of this audit was to verify The Zack Company's compliance with program requirements as defined in the Zack Quality Assurance Manual, Plant Quality Control Procedures and Weld Procedure Specifications.

The audit scope encompassed those activities related to the implementation of the following procedures:

- a) Zack Quality Assurance Manual (all sections as applicable to PQCP's)
- b) PQCP-1, Rev. 2 "Receiving Inspection"
- c) PQCP-3, Rev. 1 "Plant Fabrication"
- d) PQCP-6, Rev. 3 "Weld Filler Metal Control"
- e) PQCP-7, Rev. 5 "Document Control"
- f) PQCP-8, Rev. 1 "NCR"
- g) PQCP-10, Rev. 1 "Calibration"
- h) PQCP-11, Rev. 1 "Training, Certification and Evaluation of QCI"
- i) PQCP-14, Rev. 1 "Hold"
- j) PQCP-15, Rev. 2 "Procurement"
- k) PQCP-16, Rev. 1 "On-going Training"
- l) PQCP-17, Rev. 1 "Training, Certification and Evaluation of QA Auditors"
- m) PQCP-20, Rev. 0 "Trend Analysis"
- n) WPS-1, Rev. 11 "Gas Metal ARC Welding of Zinc Coated Structural and Sheet Steel"
- o) WPS-2, Rev. 7 "Shielded Metal ARC Welding of Zinc Coated Sheet and Structural Steel"
- p) WPS-3, Rev. 0 "Gas Metal ARC Welding of Stainless Sheet and Structural Steels"
- q) WPS-4, Rev. 0 "Shielded Metal ARC Welding of Stainless Sheet and Structural Steels"
- r) WPS-6, Rev. 2 "Braze Welding Zinc Coated, Sheet and Structural Steels Using Carbon ARC"
- s) WPS-7, Rev. 8 "Qualification/Certification of Welders Using GMAW, SMAW, CAW Processes"
- t) WPS-8, Rev. 1 "Preheat/Interpass Temperature Control"

Follow-up verification of completed corrective action on the following Audit Findings was also included in the scope of this audit. All of these items were deemed "ready for closure" by The Zack Company.

- a) AFR MD1-35-1-01
- b) AFR MD1-35-1-02
- c) AFR MD1-35-1-08
- d) AFR MD1-35-1-10

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- e) AFR MO1-35-1-11
- f) AFR MO1-35-1-14
- g) AFR MO1-35-1-15
- h) URI MO1-35-1-01

## II. IDENTIFICATION OF AUDITORS

The audit was performed by the following personnel:

- SBandla - Audit Team Leader (MPQAD-HVAC QA)
- GParker - Auditor-in-Training (MPQAD-HVAC QA)
- JZimmerman - Audit Team Member (MPQAD-HVAC QA)

## III. PERSONS CONTACTED DURING THE AUDIT

<u>Name</u>	<u>Organization</u>	<u>Title</u>	<u>Audit Entrance</u>	<u>Audit</u>	<u>Audit Exit</u>
C Zack DeZutel	Zack	President	X		X
J DeZutel	Zack	Exec. Vice President	X		X
D Calkins	Zack	Project Manager		X	X
D Malzahn	Zack	Vice President			X
M Skates	Zack	QA Manager	X	X	X
R Basiaga	Zack	Lead QA Engineer	X	X	X
D Allbritten	Zack	QA Engineer	X	X	X
A Howard	Zack	Document Control Supv.	X	X	
A Wanniger	Zack	Staff Engineer		X	
G Kollaritsch	Zack	Detailer		X	
S Drozd	Zack	Detailing Supervisor		X	
T Delafosse	Zack	Staff Engineer		X	
B Prim	Zack	General Foreman		X	
N Rosa	Zack	Shop Supervisor		X	
C Richards	Zack	QC Inspector		X	
S Bandla	MPQA	Audit Team Leader	X	X	X
G Parker	MPQA	Auditor-in-Training	X	X	X
J Zimmerman	MPQA	Audit Team Member	X	X	X

## IV. AUD. SUMMARY

- A) A pre-audit entrance meeting was held on 4/19/81 with personnel in attendance as noted in paragraph III. The audit scope, plan, tentative schedule and audit finding procedure were discussed. Contacts for the various phases of the audit were identified.
- B) Checklists for this audit were developed from the Zack procedures noted in paragraph I. Specific sections audited are as noted on the completed checklists. Data was collected by proceeding through the checklists for each procedure audited. All checklists employed during the course of the audit are attached to the file copy of this report.
- C) The audit resulted in nine (9) findings which are attached to this report.



# AUDIT REPORT

D) The following observations were made as a result of this audit:

1. The Evaluation of Performance Form (ZQF-37) is required by PQCP-17, Rev. 1 to be initiated to document the observation of an acting auditor (paragraph 6.3.1.2) or acting lead auditor (paragraph 6.3.2.2) and, also to document the annual evaluation of Auditors and Lead Auditors (paragraph 6.5.1). The initiator of the ZQF-37 form is not required to indicate which type of evaluation is being documented and this is not always evident from the completed form. It is recommended that the initiator of the ZQF-37 form briefly describe the type of evaluation being documented. No response to this observation is required.
2. PQCP-17, paragraph 7.7 requires the use of the QA Audit Checklist (ZQF-86). The audit checklists used in the recent vendor audits are different from the ZQF-86 form listed in Exhibit F as a "sample." It is recommended that, in the next revision of PQCP-17, Exhibit F (ZQF-86) be labeled SAMPLE with the associated statement that the form may vary in format but not in content. No response is required to this observation.
3. PQCP-17, Rev. 1, paragraph 6.3.2.2 requires that a minimum of one audit be performed by the candidate after he meets the requirements of paragraph 6.2.1 and 6.3.2. The audit is conducted with the candidate performing as acting lead auditor under the observation of a lead auditor. An evaluation is documented on a ZQF-37 form.

Two lead auditor files were reviewed. Both had ZQF-37 forms that indicated audits performed to meet the requirements of paragraph 6.3.2.2. A detailed review of the qualification audits (internal audits ZC-LS-001 and ZC-LS-002) for E Bodley showed the following:

ZC-LS-001

- a) No written audit plan (as required by paragraph 7.3)
- b) Checklist different than ZQF-86 form (as required by paragraph 7.7)
- c) No indication of exit meeting (as required by paragraph 7.10)

ZC-LS-002

- a) No written audit plan (as required by paragraph 7.3)
- b) Checklist different than ZQF-86 form (as required by paragraph 7.7)
- c) Drafted audit report not issued in 30 days (as required by paragraph 7.11)

The ZQF-37 form used to evaluate Mr Bodley indicated that he was a certifiable candidate for audit team leader. In view of the discrepancies noted above, the auditing requirements in paragraph 7.0 of PQCP-17 were not met by the candidate in performing his qualification audits. There were no indications in the comment section of the ZQF-37 form discussing the situation or any mitigating circumstance that may have warranted this apparent lack of compliance to the procedure requirements by the candidate. It is understood that the audits used to certify E Bodley were performed at LaSalle County Nuclear Station. However, there is no equivalent LaSalle procedure that addresses audit plans, use of checklist ZQF-86 or exit meetings.



# AUDIT REPORT

CONTINUATION SHEET

AUDIT NO:

PAGE 4 OF 6

It appears the The Zack Company auditors/lead auditors may be evaluated for audits performed at the LaSalle, Clinton or Midland sites to qualify as an auditor/lead auditor. However, as noted above, audits performed at other Zack Company sites do not meet the requirements of PQCP-17, Rev. 1. Once qualified, the auditor/lead auditor may perform audits at all sites. Some method must be provided to assure that audits performed of Midland related activities are done so in accordance with PQCP-17, Rev. 1 to preclude the discrepancies noted in AFR MD1-601-2-04. A response to this observation is requested on or before 6/3/82. (AI: S-1511, Priority 5, DCUM00)

4. ZQAM, Section 6 requires that "procedures shall define the methods and systems used to control the preparation, review, approval, distribution and control of instructions, procedures and drawings." Since the Field Procedures implemented by The Zack Co. site personnel are no longer under the control of the Chicago based QA Section, the methods used to control these procedures need to be incorporated into a Field Procedure. A response to this observation is requested on or before 6/3/82. (AI: S-1512, Priority 6, DCUM00)
5. PQCP-7, Rev. 5, paragraph 6.3.4.4 states that BPCo drawings are received at the Zack Company's Chicago Plant for "Information Only." These drawings are now received marked CONTROLLED. It was observed that, although these drawings are currently being logged, the FCN's/FCR's/DCN's associated with them are not. These changes are not being recorded on the face of the drawings although they are attached to the back of the drawing. The procedure should be upgraded to require the logging and posting of drawing changes (similar to requirements in FP-7). A response to this observation is requested on or before 6/3/82. (AI: S-1513, Priority 6, DCUM00)
6. PQCP-7, Rev. 5, paragraph 7.2 requires that "follow-up action...be initiated... if acknowledgement (of transmittals) is not returned within 15 days." Of the 120 transmittals logged sending current revisions of PQCP's, WPS's and the ZQAM, 21 were not receipt acknowledged. Follow-up is accomplished by phone, so there is no documentation that the procedure requirements are being followed. It is recommended that some documentation of the follow-up be implemented, ie. telecon, notation in transmittal log, etc. No response is required to this observation.
7. a) PQCP-3, Rev. 1, paragraph 5.14 requires the QCI to document inspection results by stamping the appropriate block (accept/reject). Contrary to this, the QCI is initialling the block (accept/reject/NA). This discrepancy was brought to The Zack Company's attention during the November audit performed by BPCo Materials and Quality Services Department.

A draft of PQCP-3, Rev. 2, was prepared to allow the QCI to indicate the inspection results by checking or initialling the accept/reject block as appropriate. This revision was submitted to BPCo for approval on 2/23/82. As of the date of this audit, BPCo had not returned this procedure to The Zack Company.

Although MPQAD agrees that the requirement stated in paragraph 5.14 warrants revision, however, BPCo approval is required prior to implementation of a revised procedure.





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- b) PQCP-3, Rev. 1, paragraph 5.14 and 5.15 refer to a paragraph 5.13. The current revision of procedure PQCP-3 does not have a paragraph 5.12 or 5.13.

NOTE: PQCP-3, Rev. 2 was received approved (level II) from BPCo on 5/6/82. Included in the BPCo comments is a reference to section (b) of this observation.

No response to this observation is required.

8. PQCP-11, Rev. 11, requires that specific items be completed and documented prior to certification of the Quality Control Inspector. However, the criteria to maintain certification or to re-certify an individual at his current level is not addressed. Those specific items listed in PQCP-11 are new requirements not previously listed or required at the time of C Richard's certification (level II). It is recommended that PQCP-11 be revised to incorporate requirements for maintenance of certification or re-certification upon completion of the initial 3 year period. It is further recommended that the specific items listed in PQCP-11 be adhered to upon re-certification or maintenance of certification for C Richards. A response to this item is requested by 6/3/82. (AI: S-1514, Priority 9, DCUMOO)
- E) Follow-up verification on the seven (7) previous audit findings and one (1) unresolved item listed in paragraph I was conducted during this audit. The results were as follows:
1. AFR MO1-35-1-01: A further response is required from The Zack Company describing how they intend to meet the ANSI N45.2.9 requirements for quality records storage.
  2. AFR MO1-35-1-02: This finding remains open pending the approval and issuance of PQCP-8, Rev. 1.
  3. AFR MO1-35-1-08: This finding remains open pending a resolution to the inconsistencies noted in the completion of Hold Reports (blank 12).
  4. AFR MO1-35-1-10: Corrective action was verified and this item was closed on 5/12/82.
  5. AFR MO1-35-1-11: This finding remains open pending the approval and issuance of PQCP-15, Rev. 3.
  6. AFR MO1-35-1-14: Corrective action was verified and this finding was closed on 5/12/82.
  7. AFR MO1-35-1-15: Corrective action was verified and this finding was closed on 5/12/82.
  8. URI MO1-35-1-01: This question has been resolved and was closed on 5/12/82.
- F) The post-audit exit meeting was held on April 22, 1982 with those in attendance as noted in paragraph III. At that time, ten (10) draft audit findings, one (1) unresolved item and (11) observations were presented and discussed. As a result of this discussion, the unresolved item concerning The Zack Company's role in the site Trend Analysis program was resolved. This item does not appear in this report.



# AUDIT REPORT

CONTINUATION SHEET

AUDIT NO:  
PAGE 6 OF 6

Since the exit meeting, the ten (10) draft audit findings and eleven (11) observations were combined where possible and appear in this report as eight (8) findings, and eight (8) observations. One (1) draft observation concerning out of date procedures has been escalated to an audit finding (see MO1-601-2-09). Commitment dates for all items requiring responses were discussed.

G) Responses to the audit findings and observations are to be forwarded to MPQAD.

## V. EVALUATION OF EFFECTIVENESS

This full-scope audit of twenty (20) Zack Procedures relative to the Chicago Plant operation resulted in nine (9) audit findings. When this is compared to the previous audit (MO1-35-1, 8/10/81 through 8/13/81) which resulted in fifteen (15) findings after a review of eleven (11) Zack Procedures, it would appear that some improvement has been made in the past eight months.

However, a review of the nine (9) audit findings attached to this report shows that five (5) of the findings were recurrences of the same types of problems identified during the MO1-35-1 audit. In fact, three of the findings are identical to those from the MO1-35-1 audit (ie, MO1-601-2-04, 07 and 08).

For this reason, it must be stated once again that The Zack Company's implementation of the Quality Assurance Program is judged to be marginal. Discrepancies resulting from lack of attention to details and inadequate understanding of procedures is still very much in evidence.

It was suggested to The Zack Company that, when responding to the findings and observations resulting from this audit, they identify methods of corrective actions which are inventive and provide lasting resolutions to the types of problems noted.



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Company  
QA50-1

# AUDIT FINDING REPORT

JECTS, ENGINEERING AND CONSTRUCTION -  
QUALITY ASSURANCE DEPARTMENT

AS IS" CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

The following discrepancies were noted in the implementation of these procedures:

A) PQCP-14, Rev. 1 - Procedure for Hold

- 1) Paragraph 7.6 - requires that the PS (Plant Superintendent) retain a copy of the ZQF-40A form after signing blank 10.
- 2) Paragraph 7.7 - requires the the QCM maintains a file of open ZQF-40A forms for reference.

Thirteen (13) Hold Reports were reviewed. Contrary to the above copies of open Hold Reports M-182 and Q-184 were not in the QCM files. A copy of open Hold Report M-188 was not in the PS file.

B. PQCP-7, Rev. 1 - Procedure for Document Control

- 1) Paragraph 7.3.1 - requires that documents which are voided, canceled, or superseded shall be destroyed or marked VOID and placed in a void file.

(continued on back)

AFR SER NO:  
M01-601-2-01

PRG/DUPT AUDITED:  
Zack Chicago/Midland 16

DATE OF ISSUANCE:  
5/14/82

FILE NUMBER:  
18.4.7

DISTRIBUTION:  
RCAsk-  
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GSKeeley  
HPLeonard  
BWMarguglio  
RBMCarley  
DBMiller  
JARutgers  
MSkates

RECOMMENDED CORRECTIVE ACTION:

Part Corrective Action:

- 1) Provide copies of Hold Reports M-182 and Q-184 for QCM file.
- 2) Provide a copy of Hold Report M-188 for the PS file.

(continued on back)

CORRECTIVE ACTION COMMITMENT:

- 1) Copies of M-182 and Q-184 will be provided for the QCM file.
- 2) A copy of M-188 will be provided for the PS file.
- 3) Void and superseded revisions of PQCP's and WPS's will be marked "VOID."

(continued on back)

DATE OF C/A COMPLETION: 7/13/82

ORG. RESP FOR C/A:

The Zack Company

PERSON MAKING C/A COMMITMENT:

M Skates

DATE OF C/A EFFECTIVENESS: 7/13/82

METHOD OF VERIFICATION:

- 1) Copies of open Hold Reports were provided for the QCM and PS file. Verified on 4/20/82 by GEParker.
- 2) Void and superseded revisions of PQCP's and WPS's were marked VOID during the audit and verified on 4/22/82 by SEBandla.

(continued on back)

IS AF REPORTABLE PER 50.55(\*):

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", TIME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFR ORIGINATOR'S SIGNATURE/DATE:

*Matthew Parker* 5/14/82 *Susan Bandla*

SUPERVISOR'S SIGNATURE/DATE:

*[Signature]* 5/14/82

C/A VERIFICATION SIGNATURE:

*Susan Bandla*

VERIFICATION DATE:

7/23/82



"AS IS" CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFERENCES (CONTINUED)

Contrary to the above, void or superseded copies of PQCP's and WPS's are retained in a history files but are not marked VOID.

RECOMMENDED CORRECTIVE ACTION (CONTINUED):

- 3) Review "history" file for PQCP's and WPS's. Mark "VOID" all those revisions that are void or superseded per the requirements of PQCP-7, Rev. 5.

For both PQCP-7 and 14, train cognizant personnel and forward documentation of this training to MPQAD.

CORRECTIVE ACTION (CONTINUED):

Training will be conducted and documented.  
A response to this item is requested by 6/3/82.

METHOD OF VERIFICATION (continued)

- 3) Training reports showing that a review of PQCP-14 and PQCP-7 were conducted, have been received (M151-C/B-628, dated 7/13/82) reviewed and are attached to the file copy of M01-601-2-01 and M01-601-2-05.

Items 1), 2) and 3) above complete the part and process corrective action for this report.





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QA50-1

# AUDIT FINDING REPORT

AS IS" CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

PQCP-16, Rev. 1 - On-going Training

- 1) Paragraph 7.1 requires a monthly training session by the QCM for the QC and Fabrication Plant personnel. Training to address The Zack Company quality program in the ZQAM, PQCP's and WPS's.
- 2) Paragraph 7.2 requires a monthly training session by the PM (Production Manager) for the QC and Fabrication Plant personnel. Training to address The Zack Company contract requirements as detailed in the project technical specifications and those project drawings designated as safety related drawings.

Five (5) personnel files were audited. Contrary to the above, there are no on-going training records in any of the five QC, QA and Fabrication Plant personnel files between January 1982 and April 19, 1982. The QCM was questioned regarding any other training records or files. None were available. Any training records are kept in each individual's file.

AFR SER NO:  
MD1-601-2-02

PRG/DEPT AUDITED:  
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MADietrich	
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BWMarguglio	
RBMCarley	
DBMiller	
JARutgers	
MSkates	

RECOMMENDED CORRECTIVE ACTION:

Part Corrective Action: None

Process Corrective Action: Establish a training schedule and submit for information to MPQAD. Implement schedule and train on a monthly basis. Document training and forward to MPQAD. Documented training records should be provided to MPQAD for three successive months.

CORRECTIVE ACTION COMMITMENT:

A response to this item is requested by 6/3/82.

DATE OF C/A COMPLETION:

DATE OF C/A EFFECTIVENESS:

ORG. RESP FOR C/A:

The Zack Company

PERSON MAKING C/A COMMITMENT:

M Skates

METHOD OF VERIFICATION:

IS AF REPORTABLE PER 50.55(\*):

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", TIME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFR ORIGINATOR'S SIGNATURE/DATE:

*Shaffer & Parker* 5/14/82 *Susan Benda*

SUPERVISOR'S SIGNATURE/DATE:

*[Signature]* 5/14/82

C/A VERIFICATION SIGNATURE:

VERIFICATION DATE:



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# AUDIT FINDING REPORT

PROJECTS, ENGINEERING AND CONSTRUCTION  
QUALITY ASSURANCE DEPARTMENT

CONTINUATION SHEET:

"AS IS" CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFERENCES (CONTINUED):

the review signature blank.

NOTE: AFR MD1-35-1-08 previously identified incomplete inspection reports and NCR's. Zack had committed to reviewing their inspection report and NCR files to resolve these problems as corrective action to close the finding.

RECOMMENDED CORRECTIVE ACTION (CONTINUED):

and properly complete blanks that are not up to current status; 2) Review inspection reports and complete as necessary; 3) Provide documented evidence of training in the areas of responsibility for PQCP-8 and PQCP-3 for all cognizant personnel.

CORRECTIVE ACTION (CONTINUED):



Consumers Power Company QA50-1

JECTS. ENGINEERING AND CONSTRUCTION - QUALITY ASSURANCE DEPARTMENT

# AUDIT FINDING REPORT

AS IS CONDITION VERSUS AS REQUIRED / AS NEEDED CONDITION WITH REFERENCES:

Four (4) vendor/supplier files were reviewed; one N stamp (title on file), one survey and two (2) audits. The following discrepancies were noted in the implementation of PQCP-17, Rev. 1:

- 1) Paragraph 7.3 - "Auditors/Lead Auditors prepare a written audit plan identifying activity, organization to be audited, etc." Contrary to the above, there are no audit plans in the audit files for the following Vendor audits:
  - a) Hobart North Welding Supply
  - b) Air Monitor Corporation
- 2) Paragraph 7.6 - "A Pre-audit conference is conducted." Contrary to this there is no documentation in the audit files of a pre-audit conference being conducted for the following Vendor files:
  - a) Hobart North Welding Supply
  - b) Air Monitor Corporation
- 3) Paragraph 7.10 - "A Post-audit conference is held." Contrary to this requirement, there is no documentation in the (continued)

AFR SER NO:  
MO1-601-2-04

PROJ/DEPT AUDITED:  
Zack Chicago/Midland 1

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HPLeonard	
BWMarguglio	
RBMCarley	
DBMiller	
JARutgers	
MSkates	

RECOMMENDED CORRECTIVE ACTION:

- 1) Amend the noted discrepant audit files to indicate the subsequent addition of the required information or the addition of documentation identifying and rationalizing the lack of required information. Provide documentation for MPQAD verification.
- 2) Retrain and provide documented evidence of training for cognizant personnel.

CORRECTIVE ACTION COMMITMENT:

A response to this item is requested by 5/3/82.

DATE OF C/A COMPLETION:

ORG. RESP FOR C/A:

PERSON MAKING C/A COMMITMENT:

DATE OF C/A EFFECTIVENESS:

The Zack Company

M Skates

METHOD OF VERIFICATION:

IS AF REPORTABLE PER 50.55(w):

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", TIME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFR ORIGINATOR'S SIGNATURE/DATE:

*Stephen Parker 5/14/82 Susan Bantle*

SUPERVISOR'S SIGNATURE/DATE:

*M Skates 5/14/82*

C/A VERIFICATION SIGNATURE:

VERIFICATION DATE:



Consumers  
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# AUDIT FINDING REPORT

PROJECTS, ENGINEERING AND CONSTRUCTION  
QUALITY ASSURANCE DEPARTMENT

CONTINUATION SHEET:

"AS IS" CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFERENCES (CONTINUED)

audit files to show that a post-audit conference was held for the following Vendor audit

- a) Hobart North Welding Supply

NOTE: Previous audit finding MO1-35-1-07 identified that Audit Plans were not being maintained in the audit files.

RECOMMENDED CORRECTIVE ACTION (CONTINUED):

CORRECTIVE ACTION (CONTINUED):





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QA50-1

# AUDIT FINDING REPORT

AS IS" CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

In conducting the audit, several instances of incomplete documents were noted. These discrepancies are as follows:

**A. PQCP-8, Rev. 1: Nonconformance Reports**

- 1) Paragraph 7.2.8 requires sign/stamp and date in blank 9. Twelve (12) NCR's were audited. Contrary to the above, NCR's M-108, Q-173 and Q-111 were not dated.
- 2) Paragraph 7.2.5 and 7.2.6 require that in blank 6 (owner furnished material/equipment) and blank 7 (Q listed) the "yes" or "no" boxes be audited. Twelve (12) NCR's were audited. Contrary to the above, NCR Q-111 did not have the boxes checked in either blank 6 or 7; NCR M-188 had blank 7 marked "No" for a Q listed item.

**B. PQCP-3, Rev. 1, paragraph 5.14.1 requires that if the inspections were performed by a Level II/III, the review signature blank of the inspection report is marked N/A.**

Contrary to the above, the QCI Level II is not completing

AFR SER NO:  
MD1-601-2-03

FRM/DEPT AUDITED:  
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HPLeonard	
BWMarguglio	
RBMCarley	
DBMiller	
JARutgers	
MSkates	

**RECOMMENDED CORRECTIVE ACTION:**

Part Corrective Action: 1) Date and sign blank 9 on NCR's M-108, Q-173 and Q-111; 2) Mark "yes" or "no" boxes in blank 6 and 7 on NCR Q-111; 3) change the "no" to "yes" for blank 7 on NCR M-188.

Process Corrective Action: 1) Review all Midland related, Zack Chicago generated NCR's (continued on back)

**CORRECTIVE ACTION COMMITMENT:**

- 1) Date blank 9 of NCR's M-108, Q-173 and Q-111.
- 2) Indicate "yes" or "no" in blanks 6 and 7 on NCR Q-111.
- 3) Indicate correct Q listing for blank 7 on NCR M-188.

A response to this item is requested by 6/3/82.

DATE OF C/A COMPLETION:

ORG. RESP FOR C/A:

PERSON MAKING C/A COMMITMENT:

DATE OF C/A EFFECTIVENESS:

The Zack Company

M Skates

**METHOD OF VERIFICATION:**

Blanks on NCR's M-108, Q-173, Q-111 and M-188 are completed. Verified by GEParker on 4/22/82.

IS AF REPORTABLE PER 90.55(\*):

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", TIME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFR ORIGINATOR'S SIGNATURE/DATE:

*Geoffrey Parker 5/14/82 Susan Banda*

SUPERVISOR'S SIGNATURE/DATE:

*[Signature] 5/14/82*

C/A VERIFICATION SIGNATURE:

VERIFICATION DATE:



Consumers  
Power  
Company  
QASO-1

JECTS, ENGINEERING AND CONSTRUCTION -  
QUALITY ASSURANCE DEPARTMENT

# AUDIT FINDING REPORT

AS IS" CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

PQCP-1, Rev. 2, paragraph 4.2 states "Quality Assurance Engineer (QAE), has the responsibility of verifying that items conform to the requirements of the purchase order." PO #1683-1 specified that actual chemicals and physicals be provided for stainless steel bare weld wire.

Contrary to the above, receipt inspection was performed on 3 each 25 pound spools of stainless steel bare weld wire for PO #1683-1 and accepted as conforming to the requirements of the purchase order, however, the physical certs are not available.

NOTE: This weld wire was immediately tagged and removed from the controlled rod issue cabinet. All material ordered and received has been accounted for as of 4/21/82.

APR SER NO: M01-601-2-05	
PROJ/DEPT AUDITED: Zack Co/ Midland 1 & 2	
DATE OF ISSUANCE: 5/14/82	
FILE NUMBER: 18.4.7	
DISTRIBUTION:	
RCash	
WRBird	DATaggart
JEBrunner	RAWells
DECalkins	ALAB-2
JWCook	DGraf
LEDavis	
MADietrich	
GSKeeley	
HPLeonard	
BWMarguglio	
7BMcCarley	
DBMiller	
JARutgers	
MSkates	

RECOMMENDED CORRECTIVE ACTION:

- a) Provide documented evidence of training in the area of responsibilities for all cognizant personnel.

CORRECTIVE ACTION COMMITMENT:

A response to this item is requested on or before 6/3/82.

DATE OF C/A COMPLETION: 7/13/82	ORG. RESP FOR C/A: The Zack Company	PERSON MAKING C/A COMMITMENT: M Skates
DATE OF C/A EFF. AVGES: 7/13/82		

METHOD OF VERIFICATION:

Training of cognizant personnel was performed on 4/23/82 (M151-C/B+628, 7/13/82). This documentation is attached to the file copy of this report.

IS AF REPORTABLE PER 90.55(a): YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	IF "YES", DATE OF REPORT TO NRC: N/A
IF "YES", TIME OF REPORT TO NRC: N/A	IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED: N/A
IF "YES", WHO MADE REPORT: N/A	
APR REGULATOR'S SIGNATURE/DATE: <i>[Signature]</i> 5/14/82	SUPERVISOR'S SIGNATURE/DATE: <i>[Signature]</i> 5/14/82
C/A VERIFICATION SIGNATURE: <i>[Signature]</i>	VERIFICATION DATE: 7/26/82



Consumers  
Power  
Company

# AUDIT FINDING REPORT

PROJECTS, ENGINEERING AND CONSTRUCTION  
QUALITY ASSURANCE DEPARTMENT

CONTINUATION SHEET:

"AS IS" CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFERENCES (CONTINUED):

RECOMMENDED CORRECTIVE ACTION (CONTINUED):

- c) Develop a system by which dates for re-evaluation and re-certification are brought to the attention of the appropriate party to ensure similar reviews are not overlooked in the future.

CORRECTIVE ACTION (CONTINUED):



Consumers  
Power  
Company  
QA50-1

JECTS, ENGINEERING AND CONSTRUCTION -  
QUALITY ASSURANCE DEPARTMENT

# AUDIT FINDING REPORT

"AS IS" CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

The qualifications file for C Richards indicates that his certification for Quality Control Inspector Level II expired on April 15, 1982. Level II inspection had been performed during the period of April 19 through 21, by C Richards.

NOTE: Audit Finding MO1-35-1-12 (8/12/81) identified that the annual re-evaluation for C Richard had not been performed as required by PQCP-11. It was recommended that The Zack Company develop a system by which dates for re-evaluation and re-certification are brought to the attention of the appropriate party so that a review of the qualifications can be performed and action can be taken to ensure compliance to the procedure. A tickler system was developed for tracking these items and was verified to be in existence on 9/22/81, by MPQAD personnel. On 4/21/82, it was determined that this tickler system was no longer in use.

APR SER NO:  
MO1-601-2-06

PRG/DEPT AUDITED:  
Zack Co./Midland 1 & 2

DATE OF ISSUANCE:  
5/14/82

FILE NUMBER:  
18.4.7

DISTRIBUTION:

RCash	
WRBird	DATaggart
JEBrunner	RAWells
DECalkins	ALAB-2
JWCook	
LEDavis	
MADietrich	
GSKeeley	
HPLeonard	
BWMarguglio	
RBMcCarley	
DBMiller	
JARutgers	
MSkates	

RECOMMENDED CORRECTIVE ACTION:

- 1) Evaluate the qualifications for C Richards and if acceptable, re-certify candidate per requirements of PQCP-11. Evaluate all other personnel performing inspections for the Zack Co. Chicago and ensure certification to PQCP-11.
- 2) Revise PQCP-11 to incorporate requirements for maintenance of certification or re-certification upon completion of the initial 3 year period. (continued on back)

CORRECTIVE ACTION COMMITMENT:

Part Corrective Action: Effective April 22, 1982, C Richards' certification as a Quality Control Inspector Level II was extended for a period of one year.

A response to this finding is requested on or before 6/3/82.

DATE OF C/A COMPLETION:

DATE OF C/A EFFECTIVENESS:

ORG. RESP FOR C/A:

The Zack Company

PERSON MAKING C/A COMMITMENT:

M Skates

METHOD OF VERIFICATION:

IS AF REPORTABLE PER 50.55(\*):

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", TIME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFY ORIGINATOR'S SIGNATURE/DATE:

*[Signature]* 5/14/82

SUPERVISOR'S SIGNATURE/DATE:

*[Signature]* 5/14/82

C/A VERIFICATION SIGNATURE:

VERIFICATION DATE:





Consumers  
Power  
Company  
QA50-1

# AUDIT FINDING REPORT

AS IS" CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

PQCP-10, Rev. 1, paragraph 7.5.3 requires that "upon receipt of measuring and test equipment returned from an outside test facility the QC shall... (attach) a new ZQF-61 to acceptable items."

Contrary to this, the GAGE BLOCKS, which had been calibrated on 3/9/82, did not have a ZQF-61 attached. The sticker from the outside facility was attached to the GAGE BLOCKS.

NOTE: This same problem was documented on M01-35-1-13 during the August 1981 audit of the Zack Co., Chicago.

AFR SER NO:

M01-601-2-07

PRGJ/DEPT AUDITED:

Zack Co/Midland 1 & 2

DATE OF ISSUANCE:

5/14/82

FILE NUMBER:

18.4.7

DISTRIBUTION:

RCash	
WRBird	DATaggart
JEBrunner	RAWells
DECalkins	ALAB-2
JWCook	
LEDavis	BJCole
MADietrich	KFhayes
GSKeeley	ESmith
HPLeonard	RWSoderholm
BWMarguglio	TKSubramani
RBMcCarley	
DBMiller	
JARutgers	
MSkates	

RECOMMENDED CORRECTIVE ACTION:

- 1) Comply with procedure requirement or revise the procedure.
- 2) Provide and document training for all cognizant personnel. Forward this documentation to MPQAD.

CORRECTIVE ACTION COMMITMENT:

A response to this finding is requested on or before 6/3/82.

DATE OF C/A COMPLETION:

ORG. RESP FOR C/A:

The Zack Company

PERSON MAKING C/A COMMITMENT:

M Skates

DATE OF C/A EFFECTIVENESS:

METHOD OF VERIFICATION:

ZQF-61 was attached to the GAGE BLOCKS during the audit.

Training for cognizant personnel was conducted on 4/23/82. Documentation of this training was received from Zack Co. on 7/13/82 and is attached to the file copy of this report.

IS AF REPORTABLE PER 50.55(\*):

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", NAME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFR ORIGINATOR'S SIGNATURE/DATE:

*Susan Bandler* 5/14/82

SUPERVISOR'S SIGNATURE/DATE:

*[Signature]* 5/14/82

C/A VERIFICATION SIGNATURE:

*Susan Bandler*

VERIFICATION DATE:

7/15/82



Consumers Power Company QASO-1

OBJECTS, ENGINEERING AND CONSTRUCTION - QUALITY ASSURANCE DEPARTMENT

# AUDIT FINDING REPORT

AS IS CONDITION VERSUS "AS REQUIRED" / "AS NEEDED" CONDITION WITH REFERENCES:

PQCP-15, Rev. 2, paragraph 7.1.1.2 requires that "Purchase Orders include...identification as Safety Related or Non-Safety Related." Furthermore, paragraph 7.1.3 requires that the "PM signs/dates the Purchase Orders."

Contrary to the above, twenty-four (24) out of twenty-four (24) Purchase Orders reviewed were not signed and dated by the PM (six (6) were initialed by the PM) and only eight (8) of the twenty-four (24) Purchase Orders indicated whether the items were Safety Related or Non-Safety Related.

NOTE: AFR MD1-35-1-11 (8/12/81) documented that the PM did not sign/date the Purchase Orders reviewed during that audit. Zack Co. has deleted this requirement from PQCP-15, Rev. 3. This procedure is currently in the review/approval cycle.

AFR SER NO:

MD1-601-2-08

PROJ/DEPT AUDITED:

Zack Co./Midland 1 & 2

DATE OF ISSUANCE:

5/14/82

FILE NUMBER:

18.4.7

DISTRIBUTION:

RCash	
WRBird	DA Taggart
JEBrunner	RAWells
DECalkins	ALAB-2
JWCook	
LEDavis	
MADietrich	
GSKeeley	
HPLeonard	
BWMarguglio	
RBMCarley	
DBMiller	
JARutgers	
MSkates	

RECOMMENDED CORRECTIVE ACTION:

- 1) Review the requirements of PQCP-15 and comply to requirements or revise the procedure accordingly.
- 2) Train cognizant personnel on the above requirements and provide documentation of this training to MPQAD.

CORRECTIVE ACTION COMMITMENT:

A response to this finding is requested on or before 6/3/82.

DATE OF C/A COMPLETION: -

DATE OF C/A EFFECTIVENESS:

ORG. RESP FOR C/A:

The Zack Company

PERSON MAKING C/A COMMITMENT:

M Skates

METHOD OF VERIFICATION:

IS AF REPORTABLE PER 50.55(a)?

YES  NO

IF "YES", DATE OF REPORT TO NRC:

N/A

IF "YES", TIME OF REPORT TO NRC:

N/A

IF "YES", NAME OF NRC OFFICIAL TO WHOM REPORTED:

IF "YES", WHO MADE REPORT:

N/A

N/A

AFR ORIGINATOR'S SIGNATURE/DATE:

*Susan Bonalla* 5/14/82

SUPERVISOR'S SIGNATURE/DATE:

*M Skates* 5/14/82

C/A VERIFICATION SIGNATURE:

VERIFICATION DATE:



Consumers  
Power  
Company

# AUDIT FINDING REPORT

PROJECTS, ENGINEERING AND CONSTRUCTION  
QUALITY ASSURANCE DEPARTMENT

CONTINUATION SHEET:

"AS IS" CONDITION VERSUS "AS REQUIRED" CONDITION WITH REFERENCES (CONTINUED):

RECOMMENDED CORRECTIVE ACTION (CONTINUED):

CORRECTIVE ACTION (CONTINUED):

METHOD OF VERIFICATION: (continued)

7/13/82 M151-C/B-628).

- 3) Training on PQCP-7, Rev. 5 was conducted on 4/23/82. Documentation of this training was received by MPQAD on 7/13/82 and is attached to the file copy of this report.

37



CUSTOM METAL FABRICATION

April 29, 1982

To: CHRISTINE DeZUTEL

From: TERRY HOWARD

Re: CAR 20 (see attached)

Some comments on Item #7 of subject CAR:

1. Records are insufficient to verify necessary training of all personnel connected with 'Q' (Quality) materials that are used by The Zack Company in Nuclear related contracting.
2. All personnel includes those who have a part in the Quality Assurance functions of the company.
3. Document Control Department extends to those same individuals.
4. Compressed time schedules are certainly germane to the forgoing three.

In keeping with the recommendation and direction of yourself and Mr. Skates, may I submit the following corrective action proposal outline to be the subject of a subsequent Corrective Action Request (CAR):

I. The Zack Company Quality Assurance Training Program....

- A. Formal, Documented and Published.
- B. Identification of personnel directly engaged in Quality Assurance Functions.
- C. Identification of personnel indirectly engaged in Quality Assurance activities.

II. The Zack Company Quality Assurance Training Program - Subject Items:

- A. Priority Studies
  1. Client Contract Specifications
  2. Federal Regulations 10CFR50 (Appx. B), etc.

(cont'd)

Exhibit 4

*Release*

20



To: Christine DeZutel  
From: Terry Howard  
Re: CAR 20

-2-

April 29, 1982

3. Applicable nationally recognized codes:  
(i.e.) ANSI, ASME, AISI, AWS, etc.

4. Zack Company QAM's.

B. Procedural Priority Studies

1. QAI - 3 ;

2. QAI - 4 } (Suggested updating)

3. PQCP-7, Rev. 5 (Document Control) - Midland

4. PQCP-7, Rev. 8 (Plant Document Control) - Clinton

C. Required Reading

1. All published material listed in A & B

2. Any assigned reading by qualified instructors engaged in the performance of carrying out the Zack Company Quality Assurance Training Program.

III. Zack Company Commitment

A. Incorporate in official company policy.

B. Monetary impact.

C. Compensated release-time for participants.

IV. Employee Commitment

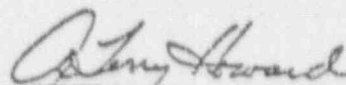
A. Adopt formalized training as a necessary step in continued employment.

B. Follow through with more efficient and effective work habits.

The foregoing is an outline that merely encompasses what, I believe, are necessary actions. Such actions will, without any doubt or question, update the verification issue of all personnel engaged in the Quality Assurance functions of the Zack Company.

It is my intention to discuss this same 'recommended direction' with you.

TH/lf  
CC: M. Skates  
QA File

  
A. Terry Howard





CUSTOM METAL FABRICATION

April 29, 1982

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From: TERRY HOWARD

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1. Records are insufficient to verify necessary training of all personnel connected with 'Q' (Quality) materials that are used by The Zack Company in Nuclear related contracting.
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3. Document Control Department extends to those same individuals.
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- I. The Zack Company Quality Assurance Training Program....
  - A. Formal, Documented and Published.
  - B. Identification of personnel directly engaged in Quality Assurance Functions.
  - C. Identification of personnel indirectly engaged in Quality Assurance activities.
- II. The Zack Company Quality Assurance Training Program - Subject Items:
  - A. Priority Studies
    1. Client Contract Specifications
    2. Federal Regulations 10CFR.50 (Appx. B), etc.

(cont'd)

To: Christine DeZutel  
From: Terry Howard  
Re: CAR 2

-2-

April 29, 1982

3. Applicable nationally recognized codes:  
(i.e.) ANSI, ASME, AISI, AWS, etc.
  4. Zack Company QAM's.
- B. Procedural Priority Studies
1. QAI - 3 )
  2. QAI - 4 } (Suggested updating)
  3. PQCP-7, Rev. 5 (Document Control) - Midland
  4. PQCP-7, Rev. 8 (Plant Document Control) - Clinton
- C. Required Reading
1. All published material listed in A & B
  2. Any assigned reading by qualified instructors engaged in the performance of carrying out the Zack Company Quality Assurance Training Program.

### III. Zack Company Commitment

- A. Incorporate in official company policy.
- B. Monetary impact.
- C. Compensated release-time for participants.

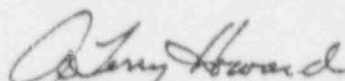
### IV. Employee Commitment

- A. Adopt formalized training as a necessary step in continued employment.
- B. Follow through with more efficient and effective work habits.

The foregoing is an outline that merely encompasses what, I believe, are necessary actions. Such actions will, without any doubt or question, update the verification issue of all personnel engaged in the Quality Assurance functions of the Zack Company.

It is my intention to discuss this same 'recommended direction' with you.

TH/lf  
CC: M. Skates  
QA File

  
A. Terry Howard

QUALITY ASSURANCE TRAINING REPORT

35 35

PROJECT NO. \_\_\_\_\_

1. DATE APRIL 27, 1982

THE BELOW LISTED INDIVIDUAL(S) RECEIVED QUALITY ASSURANCE TRAINING IN ACCORDANCE WITH THE ZACK COMPANY QUALITY ASSURANCE TRAINING PROGRAM

	<u>NAME</u>	<u>INITIAL</u>	<u>POSITION</u>
2.	D. Allbritten	Dma	OAE
3.	M. Cione	MC	Doc. Control <sup>PERSONNEL</sup> Clerk
4.	T. Howard	TH	Doc. Control Super.
5.	C. Grant	CG	Doc. Control <sup>PERSONNEL</sup> Clerk
6.	A. Wanninger	AW	Plant Engineer
7.			
8.			
9.			
10.			
11.			

DESCRIPTION OF TRAINING SESSION CONDUCTED

12. Indoctrination in the proper flow of documentation  
(CMTR, C of C, P.O., RIR, Receiving checklist, Hold, NCR)  
and individual responsibilities.

13. RJ Brucaga LOAE  
 Q.A. TRAINING INSTRUCTOR

CC: Q.A. MANAGER  
 FILE-SITE, QC DEPARTMENT

ZQF-23

Relove

(2)





34

CUSTOM METAL FABRICATION

April 16, 1982

To: All Zack Personnel  
From: Christine Zack DeZutel  
Ref: Document Control Records

EFFECTIVE IMMEDIATELY !

It has been brought to Managements attention that certain allegations have been made to Consumers Power Corp. that questions the integrity of The Zack Quality Assurance Records.

Let me assure you that nothing is farther from the truth! The Zack Company has now and always will stand behind the integrity of its products; both metal and paper.

The Zack Company has notified Consumers Power Corp. that it will cooperate and assist in everyway possible to clear the Zack Company name.

In order to provide the greatest assurance to ourselves and to the Investigating Team that nothing changes its present condition in the Document Control area, the following special provisions now apply:

1. A. Wanninger has been appointed Overseer of the Records Department until the completion of the investigation. In this capacity he will be the watchdog of upper management to verify no unauthorized personnel has access to the records or that the records are changed from the present condition, except as stated below:
  - A. NO packages will be taken from the Document Control center. If copies are needed for reference they will be run by the document control personnel only under the authorization of Mr. Wanninger.  
**THERE ARE NO EXCEPTIONS!**

Continued

• FOUNDED TO SOLVE THE UNIQUE METAL FABRICATION NEEDS OF INDUSTRY •  
• DEDICATED TO CLEANING AND CUSTOMIZING THE AIR OF THE WORLD •

*Release*

the **ZACK** co.



34  
CUSTOM METAL FABRICATION

April 16, 1982

To: All Zack Personnel  
From: Christine Zack DeZutel  
Ref: Document Control Records

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In order to provide the greatest assurance to ourselves and to the Investigating Team that nothing changes its present condition in the Document Control area, the following special provisions now apply:

1. A. Wanninger has been appointed Overseer of the Records Department until the completion of the investigation. In this capacity he will be the watchdog of upper management to verify no unauthorized personnel has access to the records or that the records are changed from the present condition, except as stated below:
  - A. NO packages will be taken from the Document Control center. If copies are needed for reference they will be run by the document control personnel only under the authorization of Mr. Wanninger.  
THERE ARE NO EXCEPTIONS!

Continued

• FOUNDED TO SOLVE THE UNIQUE METAL FABRICATION NEEDS OF INDUSTRY •  
• DEDICATED TO CLEANING AND CUSTOMIZING THE AIR OF THE WORLD •

Release

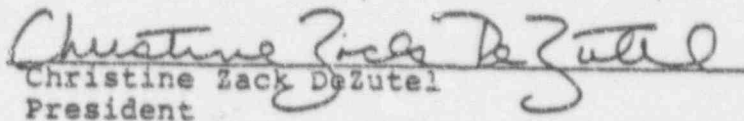
April 16, 1982

Memo to Zack Personnel

Page 2

- B) NOTHING will be removed from the existing document packages. New material received will be reviewed and stamped in accordance with present practice. Old material will be left in the folder and stamped void and initialed and dated.
- C) All changes to packages are to be verified and authorized by Mr. Wanninger.
- D) All keys to the Document Control Room and cabinets will be turned over to Mr. Wanninger immediately. No other persons will have access to those files.
- E) The Document Control Department will function only according to the following schedule:
- 8:00 AM - Mr. Wanninger will unlock room & cabinets. Work may begin.
  - 12:00 Noon - All files will be returned and cabinets locked.
  - 12:30 PM - Mr. Wanninger will unlock files - work may resume.
  - 4:30 PM - All files will be returned and cabinets locked.
2. The above rules will stay in affect until the investigation is complete.

Your cooperation and adherence to these rules is expected and any violations could result in dismissal.

  
Christine Zack DeZutel  
President

CZDZ/nw

the **ZACK** CO.

CUSTOM METAL FABRICATION

March 1, 1982

Commonwealth Edison Company  
R.R. #1 Box 240  
Marseilles, IL 62341

Attn: Mr. J. Dierbeck

Re: NCR's Related to Reportable Defect Evaluation Report

Mr. Dierbeck,

Attached are 99 NCR's that have been generated to close out items that are currently included on the reportable defect evaluation list. Items covered by these NCR's are items purchased solely for the LaSalle Project and items purchased for stock and used at LaSalle.

Of the 99 reports, 30 have been closed internally by The Zack Company. Closure of these reports was accomplished through project management review and the surfacing of documents and information made available by project management. On these grounds we determined that it was within the authority of the The Zack Company to close these reports. Xerox copies of the closed reports are included for information. Any comments or additional information you may have concerning the affected items would, of course, be welcome.

The 69 open NCR's are submitted for an accept as is disposition in all cases. These are items for which, at this point in time, it seems unlikely that necessary documentation to correct deficiencies can be obtained. Also in this group are items that are correctly documented but are not included in the LaSalle Tech. Spec.

Closure of the above referenced NCR's will reduce the number of open items on the list to 35. These items are of a clerical nature and we are reasonably certain that necessary documentation can be obtained to correct the deficiencies. NCR's were not written on these remaining items based on this belief.

Although a time frame for completion of all items on the list cannot be established, closure of the enclosed NCR's and continuing effort on the remaining items will certainly bring this matter to a close in a timely manner.

Very truly yours,  
The Zack Company

*Raymond J. Basings*  
Raymond J. Basings  
Q.A. Engineer

*Christine Zuck*  
Zack Senior Management

• FOUNDED TO SOLVE THE UNIQUE METAL FABRICATION NEEDS OF INDUSTRY •  
• DEDICATED TO CLEANING AND CUSTOMIZING THE AIR OF THE WORLD •

*Release*





43 17

CUSTOM METAL FABRICATION

March 18, 1982

To: Detailing/Drafting Dept.  
Hourly Non-Manual Personnel

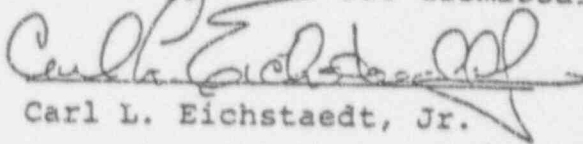
From: C.L.Eichstaedt, Jr.

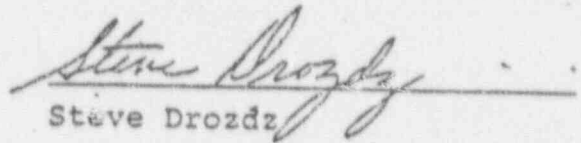
Re: Time Cards/Time Clock

Effective Monday March 22, 1982 a new time clock will be installed in the main first floor office for use of all hourly, non-manual Zack employees. The time cards will be weekly in lieu of daily.


This clock will be used for initial "Check-In", final "Check-Out" as well as Lunch, personal time, school, etc. Company errands will still be on a sign-in/out sheet of Steve Drozdz. This is company policy and there will be no deviations.

Each person will be responsible for punching their own time card. Being caught punching someone else's card, will be grounds for dismissal.

  
Carl L. Eichstaedt, Jr.

  
Steve Drozdz

Concurred:

  
Joseph C. DeZutel

*Release*



Post Office Box 2167  
Midland, Michigan 48640



November 24, 1981

29

The Zack Company  
4600 W. 12th Place  
Chicago (Cicero), IL. 60650

Attention: R. Greune

Job 7220 Midland Project  
Subcontract 7220-M-151  
Meeting Notes  
M-151-B-1391

Dear Mr. Greune:

Attached for your information and files, please find one copy of meeting notes for the jobsite meeting held on November 3, 1981 at Midland. If you do not concur with these notes, please advise us within ten (10) days of receipt.

Very truly yours,

*RW Sobushil - for*  
L. E. Davis  
Site Manager

LED/RCA/EE/ck

Attachment: Meeting Notes

*Ronalds Lewis - called 11:10*

*1-517-431-4286*

*24 410  
411*

*Release*

Meeting Minutes

M-151

DATE: November 3, 1981  
 TIME: 9.00 a.m.  
 PLACE: Jobsite Conference Room  
 PURPOSE: To discuss the Zack report on 10 CFR 50-55 potentially reportable issues on CMTR's; to provide Project Engineering with additional details and to expedite resolution of the disposition.

ATTENDEES:	Dick Soderholm	Bechtel Power Corporation
	Clark Ash	Bechtel Power Corporation
	Ed Entekin	Bechtel Power Corporation
	George Ritter	Bechtel Power Corporation
	Tom Baldwin	Bechtel Power Corporation
	Dennis Appel	Bechtel Power Corporation
	Gary Johnson	Consumers Power Company
	Hank Leonard	Midland Project Quality Assurance Dept.
	Bill Doig	Midland Project Quality Assurance Dept.
	Howard McGrove (McGrawe)	Midland Project Quality Assurance Dept.
	Russ McCarley	The Zack Company
	Dave Calkins	The Zack Company

A meeting was held at the Midland Jobsite Conference Room on November 3, 1981 between Bechtel Field, Bechtel Project Engineering, Consumers Power, Midland Project Quality Assurance Department, and Zack Quality Assurance to discuss the Zack 10 CFR 50-55 report on potentially reportable CMTR issues.

Zack was asked to elaborate on the position taken by the two other utilities similarly involved and particularly if related to the Midland site. It was determined that one other site had determined the issue to be reportable and the other one was indeterminate, since November 2, 1981 was the deadline date. However, it was agreed that the dissimilarity in criteria and circumstances between the three sites precluded drawing any conclusions from the other evaluations.

It was pointed out to Zack that many of the columns in the report stated a need for engineering resolution but that it was not clear what Zack was looking for. Zack elaborated that at the time of issue, many additional items of documentation were still being located; that at a given point all data available was collected and incorporated. It was also stated that Zack was asking for engineering concurrence on proposed resolutions.

It was agreed to discuss the issues by category and the following discussions took place:

Sheet and Coil - It was pointed out that the discrepant condition was listed in most cases as less than 36 KSI. In view of the recent DCN accepting 30 KSI, Zack was asked to determine how much less than 36 KSI. Zack responded that in all cases where CMTR's were available, the yield strength was greater than 31 KSI. Zack also explained that the reason for having the CMTR's that they do have is in conjunction with a requirement on another site whereby they cannot purchase material with physical properties certified. In all cases they have tests performed after delivery and in 100 percent of the cases tested, the material has been greater than the 30 KSI required.

Zack feels that the probability of acceptance of all material now in question is quite high. Total disposition appears to be identification of the affected travelers and establishing a testing program to substantiate the physical properties.

Nuts, Bolts, Washers - In all cases it was determined that a C. of C. was available. However, there is some question as to what constitutes an acceptable C. of C. Engineering agreed to provide criteria. Also, Engineering was asked if the specification required a CMTR. Engineering conceded that the specification was not clear and that they would research and provide an interpretation. Primarily they felt that it should not be required on accessory items but probably should be required on structural members.

A Zack was advised that an SDDR had been returned authorizing use of the non-marked bolts in question and they were advised to submit an SDDR on the nuts and washers.

Action items from the meeting are as follows:

- ✓ 1. Zack to provide an addendum to the report by Friday, November 6, 1981, stating that all items with CMTR listed as "below 36 KSI" are greater than 31 KSI.
- ✓ 2. Zack is to prepare a list of all suspect material purchase orders and update to the Field weekly as dispositions are obtained.
- ✓ 3. Zack to address the "Approved Vendors List" situation by Friday, November 6, 1981.
4. MPQAD to determine and advise the date of the follow-up meeting with CPCo management regarding this and other outstanding quality issues.
- ⑤ Zack is to try to get the material certified to federal specification RIIEW recertified to ASTM or issue an SDDR against this order.
- ✓ 6. Zack to submit an SDDR against MCM-1138 by next Tuesday, November 10, 1981.
7. BPCo Engineering to issue a specification change notice for ventglas material. - N
8. BPCo Engineering is to provide an interpretation of the specification as to when CMTR's are required. - 11 Nov. No
9. BPCo Engineering is to provide clarification as to what constitutes an acceptable C. of C. by November 18, 1981. No

is this  
the reference?





Consumers  
Power  
Company

ORAL COMMUNICATIONS RECORD

OCR-0086

PROJECTS, ENGINEERING  
AND CONSTRUCTION -  
QUALITY ASSURANCE DEPARTMENT

QA5-0

CRON FILE NO 2.15

PAGE 1 OF 2

DATE OF COMMUNICATION 8/25/81 QA-TEAM PERSONNEL PARTICIPATING WRBird, HPLEonard-MPQAD

TIME OF COMMUNICATION 1:15-1:30 PM OTHER PARTY(S) \_\_\_\_\_

PREPARED BY HPLEonard \_\_\_\_\_

PROJECTS AND/OR SUBJECTS DISCUSSED Midland Project - Zack Company - HVAC - Issues

Regarding Certified Material Test Reports (CMTRs)

SUMMARY OF CONVERSATION Mr. Leonard called Mr. Bird to relate the following:

- 1) MPQAD-HVAC QA had been reviewing CMTRs received from Zack-Chicago. The new QA Manager at Zack-Chicago (Dave Calkins) had begun a similar review.
- 2) On 8/25/81 Mr. Calkins visited the Midland site and made Mr. Leonard aware of general concerns resulting from these reviews. Potential problems may be tentatively categorized as follows:
  - a) Incomplete CMTRs
  - b) Material properties which are not in accordance with the governing specification
  - c) Certifications whose validity is in question.
- 3) Mr. Calkins intends to define the issues better, issue a Corrective Action Report to record and track the concerns; and propose an action plan to resolve individual discrepancies. Inherent to the plan is a complete review of all CMTRs.
- 4) Mr. Leonard and Mr. Calkins had discussed the requirements of 10CFR21 and 10CFR50.55(e). Mr. Calkins is aware of Zack's obligations in this area and of the need to solicit Bechtel participation to determine whether any "Deviation" is, in fact, a "Defect" as described in 10CFR21.

*Release*





Consumers  
Power  
Company

# ORAL COMMUNICATIONS RECORD

OCR-0086

PROJECTS, ENGINEERING  
AND CONSTRUCTION -  
QUALITY ASSURANCE DEPARTMENT

CHRON. FILE NO 2.15

PAGE 2 OF 2

QA5-0

DATE OF COMMUNICATION 8/25/81 QA-PLANS PERSONNEL PARTICIPATING WRBird, HPLeonard-MPQAD

TIME OF COMMUNICATION 1:15-1:30 PM OTHER PARTY(S) \_\_\_\_\_

PREPARED BY HPLeonard

PROJECTS AND/OR SUBJECTS DISCUSSED Midland Project - Zack Company - HVAC - Issues Regarding Certified Material Test Reports (CMTRs)

SUMMARY OF CONVERSATION Mr. Bird and Mr. Leonard agreed that no apparent safety concern meeting reportability conditions is evident at this time, recognizing:

- 1) Historically, most CMTR problems are found to be administrative oversight, not technical inadequacies.
- 2) Some deviation from specified material properties can be accomodated by design conservatism.
- 3) Recent documentation from material vendors tends to support the technical adequacy of the material, even though earlier CMTRs may be in question.
- 4) The material properties which could be most problematic if they were out of specification are in fact verified by the success of the welding, forming, and similar operations to which the materials are subject.

ALLEGATION DATA FORM  
Instructions on reverse side

RECEIVING OFFICE

1. Facility(ies) Involved:  
(If more than 3, or if generic, write GENERIC)

(Name)

MIDLAND 1

2

Docket Number (If applicable)

050 00329

050 00330

2. Functional Area(s) Involved:  
(Check appropriate boxes)

operations  
 construction  
 safeguards  
 other (Specify) \_\_\_\_\_

onsite health and safety  
 offsite health and safety  
 emergency preparedness

3. Description:  
(Limit to 100 characters)

DESIGN CHANGE METMOOS; CONTROL ROOM HVAC REDESIGN

4. Source of Allegation:  
(Check appropriate box)

contractor employee  
 licensee employee  
 NRC employee  
 organization (Specify) \_\_\_\_\_  
 other (Specify) \_\_\_\_\_

security guard  
 news media  
 private citizen

Govt. ACCOUNTABILITY PROJECT (GAP)

5. Date Allegation Received:

MM DD YY  
10 05 83

6. Name of Individual Receiving Allegation:

(First two initials and last name)

F. C. HAWKINS

7. Office:

RIII

ACTION OFFICE

8. Action Office Contact:

(First two initials and last name)

J. J. HARRISON

9. FTS Telephone Number:

388-5635

10. Status:  
(Check one)

Open, if followup actions are pending or in progress  
 Closed, if followup actions are completed

11. Date Closed:

MM DD YY

12. Remarks:  
(Limit to 50 characters)

13. Allegation Number:

Office Year Number  
RIII-83-A-0096

160

FAXED 10/13/83

K-1246110

RUN DATE: 04/03/84

A L L E G A T I O N   T R A C K I N G   S Y S T E M

D A T A   B A S E   R E V I E W / U P D A T E   S H E E T

D A T A   A S   O F   T H E   E N D   O F  
M A R C H   1 9 8 4

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ALLEGATION NUMBER: RIII-83-A-0096  
FACILITY/DOCKET: MIDLAND 1 05000329  
MIDLAND 2 05000330  
FUNCTIONAL AREA: CONSTRUCTION  
DESCRIPTION: DESIGN CHANGE METHODS; CONTROL ROOM HVAC  
REDESIGN.  
SOURCE: ORG - GAP  
DATE RECEIVED: 10/05/83  
PERSON RECEIVING: FC HAWKINS  
OFFICE RECEIVING: R3  
ACTION OFFICE CONTACT: JJ HARRISON  
FTS PHONE NUMBER: 388-5639  
STATUS: CLOSED  
DATE CLOSED: 03/07/84  
REMARKS: CLOSED BY REPORT 50-329/83-081 50-330/83-10.

CHANGES TO DATA?     YES     NO

DATE REVIEWED    \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

OFFICE COORDINATOR'S INITIALS    \_\_\_\_\_

B/14

"A" to "F"

June 29, 1982

Mr. Kepples,

Enclosed are six affidavits on the Midland nuclear power plant. All of the affidavits have been notarized and will be made available to you in the original form. Two of these former workers are now in other states. They have agreed to make whatever corrections and changes need to be made, and send them directly to you. They have reviewed the draft and final "print-by-print" and I do not anticipate any changes.

Two of these affidavits are of residents of Midland Ohio, Tom and I believe, as with your investigator's time to talk to in depth. Their oral statements are to give you an introduction to their knowledge.

I look forward to talking to you again about setting up the Midland investigation.

Thank you,

Billie Pinner Gault

DO NOT DISCLOSE OR  
Contains identity of  
confidential source 6/14/91

B/15

ALLEGATION DATA FORM  
Instructions on reverse side

RECEIVING OFFICE

1. Facility(ies) Involved:  
(If more than 3, or if generic, write GENERIC)

(Name) MIDLAND UNIT #1  
MIDLAND UNIT #2

Docket Number (if applicable)

050 00329  
050 00330

2. Functional Area(s) Involved:  
(Check appropriate box(es))

operations  onsite health and safety  
 construction  offsite health and safety  
 safeguards  emergency preparedness  
 other (Specify) \_\_\_\_\_

3. Description:  
(Limit to 100 characters)

CONCERNS REGARDING ZACK  
CONSTRUCTION, WELDING, DOC.  
CONTROL, AND QUALITY  
CONTROL INSPECTORS.

4. Source of Allegation:  
(Check appropriate box)

contractor employee  security guard  
 licensee employee  news media  
 NRC employee  private citizen  
 organization (Specify) GAP AFFIDAVIT DATED 7/15/82.  
 other (Specify) (GAP AFFIDAVIT)

5. Date Allegation Received:

MM DD YY  
07 15 82

6. Name of Individual Receiving Allegation:

(First two initials and last name) J.G. KEPPLER

7. Office:

R I I I

ACTION OFFICE

8. Action Office Contact:

(First two initials and last name) F.C. HAWKINS

9. FTS Telephone Number:

388 - 5585

10. Status:  
(Check one)

Open, if followup actions are pending or in progress  
 Closed, if followup actions are completed

11. Date Closed:

MM DD YY

B/14

12. Remarks:  
(Limit to 50 characters)

ESTIMATED COMPLETION DATE  
6-30-84.

13. Allegation Number:

Office Year Number  
R I I I - 83 - A - 0135

IAC RECEIVED 1/10/84

SENT TO HQ 1/18/84

COORDINATED #/01 WHEN ORIGINALLY RECEIVED.



S. V. 2

AUG 29 1983

Docket No. 50-329; 50-330  
Docket No. 50-461; 50-462

Ms. Billie P. Garde, Director  
Citizens for Accountable Government  
Government Accountability Project  
Institute for Policy Studies  
1901 Que Street  
Washington, DC 20009

Dear Ms. Garde:

I want to again thank you for your assistance in arranging for the depositions of Individuals C and H. Your efforts in that regard are appreciated.

On August 18, 1983, we transmitted the transcripts of both depositions to you for your review. Members of my staff have reviewed both of these transcripts to identify unresolved issues which require further action on our part. To that end, our review of Individual H's deposition has identified two matters involving you. Specifically, you stated on page 55 (lines 9-14) that it would be to our benefit to discuss GAP's knowledge of the Zack issues with you or a member of your staff and you stated on page 64 (lines 7-19) your concerns regarding the inadvertent or careless ordering of materials by Zack and the supply of those materials to utilities. We recognize that your knowledge regarding the Zack issues is of value to our effort and we welcome the opportunity to share your insight into them.

Accordingly, and in keeping with our intent to conduct a complete inspection of this matter we would like to interview you to acquire any information which you believe could adversely affect installed HVAC systems or components at either the Midland or Clinton facilities. You may bring other members of GAP to the interview who you believe can contribute to our special inspection. In order to have a record of your comments, we plan to have the interview transcribed by a court reporter.

Additionally, as agreed between you and members of my staff during the deposition of Individual H, we are in need of legible copies of the 44 attachments to Individual H's original affidavit. These copies are necessary to assure that we are fully cognizant of all items of concern.

8309020377-211

B/17

OFFICE  
NAME  
DATE

AUG 29 1983

Please contact me or Mr. Duane Danielson of my staff as soon as possible to arrange a date for your interview.

Sincerely,

"Original Signed by R. L. Spessard"

R. L. Spessard, Director  
Division of Engineering

- cc: T. Rehn, EDO
- Mr. W. C. Gerstner  
Illinois Power Co.
- Philip L. Willman, Esq.  
Assistant Attorney General  
Environmental Control Div.
- Reed Newman, Esq., Assistant  
Attorney General
- Gary N. Wright, Manager  
Nuclear Facility Safety
- Jean Poy, Prairie Alliance
- Mr. James W. Cook  
Consumers Power Co.
- The Honorable Charles Bechhoefer, ASLB
- The Honorable Jerry Harbour, ASLB
- The Honorable Frederick P. Cowan, ASLB
- The Honorable Ralph S. Dacker, ASLB
- William Paton, ELD
- Michael Miller
- Ronald Callen, Michigan  
Public Service Commission
- Myron B. Cherry
- Barbara Starnis
- Mary Sinclair
- Wendell Marshall
- Colonel Steve J. Gadler (P.E.)
- Howard Levin (TERA)
- Lynne Barnabei, Government  
Accountability Project
- DMB/Document Control Desk (RIDS)  
Resident Inspector, R III  
Clinton/Midland

*Discussed w. Rehn, OK  
to send this into  
our R III signature  
file*

OFFICE	R III 8/24	R III	R III	R III	R III	R III 8/24	R III
NAME	Hawkins/ic	Danielson	Little	Harrison	Spessard	Lewis	Davis/
DATE	8/26/83	8/26/83	8/26/83	8/26/83	8/29/83	8/26/83	8/26/83



RECEIVING OFFICE

1. Facility(ies) Involved:  
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(Name)  
MIDLAND UNIT #1  
MIDLAND UNIT #2

Docket Number (if applicable)  
050 00329  
050 00330

2. Functional Area(s) Involved:  
(Check appropriate box(es))

operations  
 construction  
 safeguards  
 other (Specify) \_\_\_\_\_  
 onsite health and safety  
 offsite health and safety  
 emergency preparedness

3. Description:  
(Limit to 100 characters)

CONCERNS REGARDING A  
PREVIOUS NRC INSPECTION  
REPORT ON 24 CK.

4. Source of Allegation:  
(Check appropriate box)

contractor employee  
 licensee employee  
 NRC employee  
 organization (Specify) GAP (7/15/82 AFFIDAVIT)  
 other (Specify) ~~GAP AFFIDAVIT~~  
 security guard  
 news media  
 private citizen

5. Date Allegation Received:

MM DD YY  
07 15 82

6. Name of Individual Receiving Allegation:

(First two initials and last name) J.G. KEPPLER

7. Office:

RIII

ACTION OFFICE

8. Action Office Contact:

(First two initials and last name) F.C. HAWKINS

9. FTS Telephone Number:

388-5585

10. Status:  
(Check one)

Open, if followup actions are pending or in progress  
 Closed, if followup actions are completed

11. Date Closed:

MM DD YY  
[ ] [ ] [ ] [ ] [ ] [ ]

B/19

12. Remarks:  
(Limit to 50 characters)

ESTIMATED COMPLETION DATE  
6-30-84

13. Allegation Number:

Office Year Number  
RIII-83-A-0138

IAC RECEIVED 1/16/84

sent to HQ 3/18/84

COORDINATED w/ OI WHEN ORDINARILY RECEIVED



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

Attachment A

JUL 26 1983

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

Ms. Millie P. Garde, Director  
Citizens for Accountable Government  
Government Accountability Project  
Institute for Policy Studies  
1901 Que Street  
Washington, DC 20009

Dear Ms. Garde:

In the interest of providing a fresh and independent assessment of the adequacy of the Zack Company's construction activities at Midland, the Region III Administrator directed the Region's Division of Engineering to conduct a thorough inspection of site HVAC construction activities including the concerns brought to our attention by former employees. Accordingly, we have begun the onsite inspection of Zack's activities and the detailed review of the pertinent affidavits which were provided to us by GAF so that an onsite inspection of these concerns can be conducted where appropriate.

One of the affidavits we are reviewing is a response to an investigation conducted by Region III personnel which is documented in Report No. 50-329/80-10; 50-330/80-11. The affidavit was filed with us prior to the issuance of Report No. 50-329/82-15; 50-330/82-15. This report documents the results of the follow-up of open items from Report No. 50-329/80-10; 50-330/80-11. We believe that Report No. 50-329/82-15; 50-330/82-15 addresses the substantive technical issues expressed by the affiant, and are enclosing a copy of this inspection report with the request that you make it available to him for review. If after reviewing this report the affiant still has unresolved issues, then we would like to meet with him to discuss his specific concerns.

8308040300

2pp.

B/20



Please advise Mr. Duane Danielson of this office at (312)932-2610 if you are unable to contact the affiant or if you have any questions regarding this letter. We appreciate your cooperation in this matter.

Sincerely, -

"Original signed by R. L. Spessard"

R. L. Spessard, Director  
Division of Engineering

Enclosure: Report Nos.  
50-329/82-15;  
50-330/82-15

cc w/o encl:

Consumers Power Company  
ATTN: Mr. James W. Cook  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
The Honorable Charles Bechhofer, ASLE  
The Honorable Jerry Harbour, ASLE  
The Honorable Frederick P. Cowan, ASLE  
The Honorable Ralph S. Decker, ASLE  
William Patony ELD  
Michael Miller  
Ronald Callan, Michigan  
Public Service Commission  
Myron M. Cherry  
Barbara Steniris  
Mary Sinclair  
Wendell Marshall  
Colonel Steve J. Gidler (P.E.)  
Howard Levin (TERA)  
Lynne Bernabei, Government  
Accountability Project



RECEIVING OFFICE

1. Facility(ies) Involved:  
(If more than 3, or if generic, write GENERAL)

(Name) MIDLAND UNIT #1  
MIDLAND UNIT #2

Docket Number (if applicable)  

0	5	0	0	0	3	2	9
0	5	0	0	0	3	3	0

2. Functional Area(s) Involved:  
(Check appropriate box(es))

operations  
 construction  
 safety  
 other (Specify) \_\_\_\_\_

onsite health and safety  
 offsite health and safety  
 emergency preparedness

3. Description:  
(Limit to 100 characters)

CONCERNS REGARDING ZACK  
MATERIAL, PURCHASE ORDERS,  
QA PROGRAM, AND QA/QC  
PERSONNEL QUALIFICATIONS.

4. Source of Allegation:  
(Check appropriate box)

contractor employee  
 licensee employee  
 NRC employee  
 organization (Specify) GAP (7/15/82) AFFIDAVIT  
 other (Specify) GAP AFFIDAVIT

security guard  
 news media  
 private citizen

5. Date Allegation Received:

MM DD YY  

0	8	1	5	8	2
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6. Name of Individual Receiving Allegation:

(First two initials and last name) J. G. KEPPLER

7. Office:

R	I	I	I
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ACTION OFFICE

8. Action Office Contact:

(First two initials and last name) F. C. HAWKINS

9. FTS Telephone Number:

3	8	8	-	5	5	8	5
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10. Status:  
(Check one)

Open, if followup actions are pending or in progress  
 Closed, if followup actions are completed

11. Date Closed:

MM DD YY  

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12. Remarks:  
(Limit to 50 characters)

ESTIMATED COMPLETION DATE  
6-30-84.

13. Allegation Number:

Office Year Number  

R	I	I	I	-	8	3	-	A	-	0	1	4	0
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IRC Rec'd 1/16/84 Sent to HQ 1/18/84 COMPLETED W/OE WHEN ORIGINALLY RECEIVED. B/22