

*Specialty II?
"Nuff'ing Dismissed"?*

*1/21 DRAFT
TO: STEVE BURNS, ELD
FROM: G. KLINGLER,
IE*

Docket No. 50-329
Docket No. 50-330
EA 83-3

*FOR COMMENT -
Draft Civil Penalty*

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

Gentlemen:

This refers to the special inspection conducted by the Office of Special Cases, Midland Section, of this office on October 12 through November 25, 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. The results of the inspection were discussed with you on November 10 and 23, 1982, at the conclusion of the inspection and on January 18, 1983, during an enforcement conference in the Region III office between you and others of your staff and me and others of the NRC staff.

The results of the inspection indicate a significant breakdown in the implementation of your quality assurance program as evidenced by numerous examples of noncompliance with nine of the eighteen different criteria as set forth in 10 CFR 50, Appendix B. The breakdown was caused by personnel who failed to follow procedures, drawings, and specification; by first line supervision and field engineers who failed to identify and correct unacceptable work; by construction management who failed to call for quality control inspections in a timely manner, allowing a backlog of almost 16,000 inspections to develop; and by quality assurance personnel who failed to identify the problems and ensure that corrective actions were taken. As a result, you failed to fulfill your primary responsibility as described in Criterion II of Appendix B to 10 CFR 50 *o* "to assure the execution of a quality assurance program." *unde*

We understand that as a result of our findings you have inspected other areas of the plant and found similar deficiencies. As a result of our findings and your own findings, Consumers Power Company halted certain safety-related work at the Midland site, reduced the work force by approximately 1100 people, committed to building cleanup and system layup, committed to organizing teams of construction and engineering personnel responsible for the completion of one or more plant systems, and committed to re-inspect all safety-related systems.

8408150639 840718
PDR FOIA
RICE84-96 PDR

In order to emphasize the need for CPCo management to ensure implementation of an effective quality assurance program that identifies and corrects construction deficiencies, we propose to impose civil penalties for the items set forth in the Notice of Violation that is enclosed with this letter. The violation in the Notice has been categorized at the severity level described in the General Statement of Policy and Procedure for Enforcement Actions, Appendix C of 10 CFR 50. The base value for the Severity Level II violation is \$64,000. After consultation with the Director of the Office of Inspection and Enforcement, I have been authorized to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalties in the cumulative amount of Sixty Four Thousand Dollars. <?

You are required to respond to this letter and should follow the instructions in the Notice when preparing your response. Your reply to this letter and the results of future inspections will be considered in determining whether further enforcement action is appropriate.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,

James G. Keppler
Regional Administrator

Enclosure:
Notice of Violation and
Proposed Imposition of Civil Penalties

Consumers Power Company

- 3 -

cc w/encl:
 DMB/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
 William Paton, ELD
 Michael Miller
 Ronald Callen, Michigan
 Public Service Commission
 Myron M. Cherry
 Barbara Stamiris
 Mary Sinclair
 Wendell Marshall
 Colonel Steve J. Gadler (P.E.)

wrap 4?
 Why are you sewing? Why not Paton

*Ensure
 It is on
 distribution*

RIII
 Landsman/jp
 1/5/83

RIII
 Gardner

RIII
 Shafer

RIII
 Warnick

RIII
 Lewis

RIII
 Davis

RIII
 Keppler

IE:HQ
 Axelrad

ELD?

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTIES

Consumers Power Company
Midland Nuclear Power Plant
Units 1 and 2

Docket Nos. 50-329
50-330
Permit Nos. CPPR-81
CPPR-82
EA 83-3

As a result of the inspection conducted at the Midland Nuclear Plant on October 12 - November 25, 1982, the violation listed below with ~~multiple examples~~ was identified. The numerous examples of the violation demonstrate ~~your~~ failure to exercise adequate oversight and control of ~~your~~ principal contractor, to whom ~~you~~ had delegated the work of executing the quality assurance program. ~~Your~~ failure manifested itself in a widespread breakdown in the implementation of ~~your~~ quality assurance program and at least in part caused Consumers Power Company to halt some safety related work and take other significant actions to provide assurance that safety-related structures and systems are constructed as designed.

In order to emphasize the need for improvements in ~~your~~ ^{the licensee's} management controls, as related to an adequate quality assurance program, ~~we~~ ^{the NRC} propose to impose civil penalties in the cumulative amount of Sixty-Four Thousand Dollars. In accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C) 47 FR 9987 (March 9, 1982), and pursuant to Section 234 of the Atomic Energy Act of 1954, as amended ("Act"), 42 U.S.C. 2282, PL 96-295, and 10 CFR 2.205, the particular ~~violations~~ and the associated civil penalties are set forth below:

CIVIL PENALTY VIOLATIONS

- A. 10 CFR 50, Appendix B, Criterion II requires holders of construction permits for nuclear power plants to document, by written policies, procedures, or instructions, a quality assurance program which complies with the requirements of Appendix B for all activities affecting the quality of safety-related structures, systems, and components and to implement that program in accordance with those documents.

Contrary to the above, Consumers Power Company and its contractor did not adequately implement a quality assurance program to comply with the requirements of Appendix B as evidenced by the following examples:

1. 10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Consumers Power Quality Assurance Program Policy No. 5, Revision 12, Paragraph 1.0 states, in part, "Instructions for controlling and performing activities affecting quality of equipment or activities such

as...construction, installation...are documented in instructions, procedures...and other forms of documents."

Contrary to the above, the following instances of failure to accomplish activities affecting quality in accordance with instructions, procedures, specifications, or drawing requirements were identified:

- a. Installation of diesel generator engine control panels 1C111, 1C112, 2C111, and 2C112 was not in accordance with the requirements delineated on foundation Drawing 7220-M18-250 in that the foundation bolt washers required by the subject drawing were not installed.
- b. Unscheduled pull box associated with conduits 2BN006, 2BN007, and 2BDA002 was not sized in accordance with the requirements delineated on Sheet 42 of Drawing E-42 in that the 12" x 12" x 6" as-built dimensions of the subject pull box did not conform to the 13½" x 12" x 6" dimension requirements delineated on Sheet 42 of Drawing E-42.
- c. The 1' 10" wall to support dimension required by raceway support Drawing E-796(Q), Sheet 2 of 2, Revision 5, for hanger No. 86 was not correctly translated into the as-built installation of the subject hanger in that the as-built wall to support dimension was 2'-1½" in lieu of the required 1'-10".
- d. The 6'-6" wall to support dimension required by raceway support Drawing E-796(Q) Sheet 1 of 2, Revision 11 for hanger No. 14 was not correctly translated into the as-built installation of the subject hanger in that the as-built wall to support dimension was 5'-5" in lieu of the required 6'-6".
- e. The inspectors identified high strength steel plate placed in the laydown area which was not marked with the material type and grade as required by Field Instruction FIG-9.600, Revision 1.
- f. The inspectors identified various stock steel shapes in the "Q" area with yellow colored paint on the ends (indicating the material was non "Q") and various steel stock shapes in the non "Q" area without painted ends, (indicating "Q" material), contrary to the requirements of Field Instruction FIG-9.600, Revision 1.
- g. The slots in the muffler support plates were not machined but were determined to be irregular and flame cut, leaving rough slot edges not in conformance with design Drawing M18-425(5)-1.

- h. Jacking plates were not installed beneath the center support plates of Bay 1 diesel generator muffler as required by Drawing M18-250-6.
- i. Procedure FID-2.100, "Outstanding FCR/FCN Retirement," Revision 2 was inadequate in that the design drawings were not changed when an FCR/FCN had been retired and no further reference to the FCR existed on the revised drawing. This resulted in retired FCR C-2103 being lost and not traceable to the design drawing to ensure a complete quality record.
- j. Field Sketch CY-1035 was not annotated as "Q", nor was there a reference to the affected drawing on the sketch as required by Procedure FPD-5.000, "Preparation of Field Sketches."
- k. Procedure FPD-5.000, "Preparation of Field Sketches," Revision 1 did not require the design drawing to be annotated with a reference to field sketches to ensure a complete quality record.
- l. The eight bracing top gusset plates identified on Drawing C-1004, Revision 10, as 5/16" thick were measured by the inspectors to be 1/2" thick in all four diesel generator bays. This change was not reviewed and properly authorized.
- m. The as-built gusset plate connections in Bay 1 were not built as identified on Detail 3 of Drawing C-1004. The angle braces were welded together as opposed to separate welds for each brace. This change was not reviewed and properly authorized.
- n. None of the sixteen 1/2" bracing angles identified on Drawing C-1004 were constructed utilizing 1/2" material. This change was not reviewed and properly authorized.
- o. Drawing C-1004, Detail 2, required the W10 beam to beam connection to be welded. In Bay No. 3, a bolted connection was constructed in lieu of the required welded connection without review and proper authorization.
- p. The column cover plate identified on FCR-C4401 was not constructed in Bay No. 3 as required. The plate was slotted instead of solid as required. This change was not reviewed and properly authorized.
- q. A section (approximately 18 x 10 x 4 inches deep) of the primary containment wall in Containment Purge Room 702 was removed (by chipping) without obtaining approval as required by FIG-1-111, Revision 4, Concrete Drilling Permit.

Measures shall be established to assure that

also

- 2. 10 CFR 50, Appendix B, Criterion III states, in part, "...applicable regulatory requirements and the design basis...are correctly translated into specifications, drawings, procedures, and instructions. Measures shall be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems, and components. Design changes, including field changes, shall be subject to design control measures commensurate with those applied to the original design and be approved by the organization that performed the original design unless the applicant designates another responsible organization."

Consumers Power Company Quality Assurance Program Policy No. 3, Revision 12, Paragraphs 3.3 and 3.5 states, in part, "Each group or organization performing detailed design translates the applicable regulatory requirements, design bases, codes, standards, and design criteria into design documents, such as...drawings...Changes to the design require the same review and approval as the original design by the group or organization delegated lead design responsibility."

Contrary to the above:

IR 19

- a. Measures were not established for the selection and review for suitability of application of "Q" materials associated with the Diesel Generator Exhaust Muffler in that design drawings and specifications did not indicate the material identity of the installed muffler saddle supports and plates.
- b. Design drawing C-147 required bolted bracing connections for the Diesel Generator Building HVAC bracing gusset plates. Field Sketch CY-1035 was used to change the design to welded connections in lieu of the specified bolted connections. This design change was not properly reviewed and approved.
- c. Design Drawings C-1004 and C-147 did not specify the sizes of the Diesel Generator Building HVAC fan gusset plates. A "combo" shop work order request was used to design the gusset plates without appropriate review and approval.
- d. The licensee failed to analyze the four Diesel Generator Building monorails as seismic Category 1 as described in their commitment to Regulatory Guide 1.29, in Appendix 3A of the FSAR.
- e. The licensee designed and constructed thirty-two Diesel Generator Building exhaust system hangers without ensuring that the applicable requirements for "Q" components were included in the design documents.

*IR 25
MFS?*

IR 23

f. The licensee purchased armor stone for a "Q" portion of the perimeter dike without translating the applicable regulatory requirements into appropriate specifications and design documents.

3. 10 CFR 50, Appendix B, Criterion VII states, in part, "Measures shall be established to assure that purchased...equipment...conform to the procurement documents. These measures shall include provisions, as appropriate, for . . . inspection at the contractor or subcontractor source, and examination of products upon delivery." [s]

Consumers Power Quality Assurance Program Policy No. 7, Revision 12, Paragraphs 1.0 and 3.4, states, in part, "The Midland Project Office and the Midland Project Quality Assurance Department verify that procurement requirements are met. This is accomplished through... source evaluation and inspection...receipt inspections are made to verify that the items...conform to procurement requirements not verified by source surveillance or inspection...."

Am Contrary to the above, source inspections at the panel supplier facility and receipt inspections at the Midland site failed to ensure conformance of the internal wiring within diesel generator engine control panels 1C111, 1C112, 2C111, and 2C112 to Procurement Specification 7220-G-5, Revision 1. Paragraph 5.0 of Specification 7220-G-5 states, "All electrical wiring...within the board enclosure shall conform to the highest industrial standards of design and workmanship." NRC inspection on October 15, 1982 identified the following examples of defective terminations of internal wiring within the subject panels.

- a. The output lead on the Relay Tach device had numerous broken strands at the termination lug.
 - b. The K1 lead on the Relay Tach device had two broken strands resulting in a potential short circuit between the K1 lead and an adjacent conductor.
 - c. The 1- lead on the CB-1 device did not have all strands inserted into the compression lug.
4. 10 CFR 50, Appendix B, Criterion X states, in part, "A program for inspection of activities affecting quality shall be established and executed...to verify conformance with the documented...drawings for accomplishing the activity."

Consumers Power Company Quality Assurance Program Policy No. 10, Revision 12, Section 1.0 states, in part, "Inspection and surveillance

are performed to assure that activities affecting quality comply with documented...design documents...inspection and surveillance are performed according to written instructions."

Contrary to the above:

- a. An inspection program was not established to ensure segregation of cables installed in horizontal trays which used metal dividers to segregate control and instrumentation cables per design requirements.
- b. Quality Control (QC) inspections failed to ensure that activities affecting quality conformed to design documents in that QC inspections performed on July 1, 1981 and documented on QCIR C210-172 failed to detect and identify nonconformances 1.(1) through (o) of this appendix. These nonconformances were associated with installation of the Diesel Generator Building HVAC fan support steel.

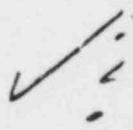
12
48

i. = face of
violation

- 5. 10 CFR 50, Appendix B, Criterion XIII states, in part, "Measures shall be established to control the...cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. When necessary for particular products, special protective environments...shall be specified."

Consumers Power Company Quality Assurance Program Policy No. 13, Revision 12, Paragraph 3.3, states, in part, "Suppliers provide plans...maintain and control items upon arrival at the site."

Contrary to the above, the licensee did ^{not} implement a maintenance program to prevent five of sixteen installed diesel generator slide bearing muffler plates ~~to~~ ^{from} accumulate dirt and dust as required by the vendor's manual. _{ing}



- 6. 10 CFR 50, Appendix B, Criterion IX states, in part, "Measures shall be established to assure that special processes, including welding, heat-treating, and nondestructive testing, are controlled...."

Consumers Power Company Quality Assurance Program Policy No. 9, Revision 12, Paragraph 1.0 states, in part, "Where the required level of quality cannot be measured by inspection only of the item...accomplish these processes under controlled conditions in accordance with applicable codes, standards and specifications using qualified procedures, equipment and personnel." Paragraph 3.3 states, in part, "...Personnel performing special processes maintain records to verify that the required activities were accomplished in accordance with qualified procedures by qualified personnel."

*where
referred*

Contrary to the above, during welding of the Diesel Generator Building exhaust piping hanger support steel, the licensee did not verify pre-heat of existing safety-related structural steel to a temperature of 70°F as required by site specifications and the AWS 1974 Code.

7. 10 CFR 50, Appendix B, Criterion VI states, in part, that "Measures shall be established to control the issuance of documents, including changes ^{such as instructions, procedures and drawings} *there to, which prescribe all activities affecting quality.*"

The Consumers Power Company Quality Assurance Program Policy No. 6, Revision 12, Paragraph 1.0 states, in part, "Measures are included to assure that documents, including changes, ... are distributed according to a controlled distribution to the user functions."

Contrary to the above, measures were not established to control the distribution of changes (red lines) to hanger isometric drawings in that changes to Drawing 1-652-2-25(Q) were not controlled utilizing the Site Document Control Center.

8. 10 CFR 50, Appendix B, Criterion XV states, in part, "Measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation."

Consumers Power Quality Assurance Program Policy No. 15, Revision 12, Paragraph 1.0, states, in part, "Items, services or activities which are deficient in characteristic, documentation or procedure which renders the quality unacceptable or indeterminate and which is considered significant to safety are identified as nonconformances. Nonconforming items... are identified by marking, tagging, segregating or by documentation. Nonconforming items are controlled to prevent their inadvertent installation or use. Nonconforming items and activities are recorded and are considered for corrective action to prevent recurrence...."

Contrary to the above:

- a. Measures were not established or implemented to determine if materials ultimately restricted (per Nonconformance Report No. 3266) from installation or use in ASME Class I systems were actually installed or used in Class I systems.
- b. As of November 10, 1982, two nonconforming conditions identified by the NRC on October 12, 1982, and confirmed by the licensee on October 19 and 25, respectively, had not been documented on a nonconformance report, a quality assurance report, or other appropriate report. The two nonconforming conditions were:

Notice of Violation

1 - 8 -

- (i) The diesel generator exhaust hangers were not classified, designed, or built as "Q" as committed to in the FSAR.
- (ii) The design of the diesel generator monorail was not analyzed to Seismic Category I design requirements as committed to in the FSAR.

Justified

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

Pursuant to the provisions of 10 CFR 2.201, Consumers Power Company is hereby required to submit to the Director, Office of Inspection and Enforcement, U. S. Nuclear Regulatory Commission, Washington, DC 20555 and a copy to the Regional Administrator, U. S. Nuclear Regulatory Commission, Region III, 799 Roosevelt Road, Glen Ellyn, Illinois 60137, within 30 days of the date of this Notice a written statement or explanation, including for each alleged violation: (1) admission or denial of the alleged violation; (2) the reasons for the violation, if admitted; (3) the corrective steps which have been taken and the results achieved; (4) the corrective steps which will be taken to avoid further violations; and (5) the date when full compliance will be achieved. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

Within the same time as provided for the response required above under 10 CFR 2.201, Consumers Power Company may pay the civil penalties in the cumulative amount of \$64,000 or may protest imposition of the civil penalties, in whole or in part, by a written answer. Should Consumers Power Company fail to answer within the time specified, the Director, Office of Inspection and Enforcement will issue an order imposing the civil penalties proposed above. Should Consumers Power Company elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalties, such answer may: (1) deny the violations listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalties should not be imposed. In addition to protesting the civil penalties, in whole or in part, such answer may request remission or mitigation of the penalties. In requesting mitigation of the proposed penalties, the five factors contained in Section IV(B) of 10 CFR Part 2, Appendix C should be addressed. Any written answer in accordance with 10 CFR 2.205 should be set forth separately from the statement or explanation in reply pursuant to 10 CFR 2.201, but may incorporate statements or explanations by specific reference (e.g., giving page and paragraph numbers) to avoid repetition. Consumers Power Company's attention is directed to the other provisions of 10 CFR 2.205, regarding the procedures for imposing a civil penalty.

Notice of Violation

- 9 -

Upon failure to pay any civil penalties due, which have been subsequently determined in accordance with the applicable provisions of 10 CFR 2.205, this matter may be referred to the Attorney General, and the penalties, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282.

FOR THE NUCLEAR REGULATORY COMMISSION

James G. Keppler
Regional Administrator

Dated at Glen Ellyn, Illinois
this day of 1983

23
NRR Comments on proposed letter from J. Keppler
to Consumers Power Co on Midland QA Program
("Get Well" program)

A. Comments on Keppler letter:

1. Letter states that we find the concepts outlined in the Consumers Power letter "to be acceptable." NRR doesn't understand by what criteria the proposal was judged to be acceptable and in fact disagrees with this conclusion for reasons discussed below (under "B").
2. Comment #1 in the Keppler letter discusses the importance of QA/QC supervisor and manager attitudes towards problem resolution. This comment reeks of "motherhood" and would not be necessary if we really thought CPC's attitude and program were acceptable. If a comment of this type is made, we should discuss our reason for making it such as we don't think their proposed program assures ^{or reflects} proper attitude by their QA/QC personnel.
3. Item 4.C. in the Keppler letter states that the master list of commitments relating to soils problems should be in place prior to the start of major remedial soils work. NRR considers it appropriate to caution CPCo to not get

so involved in bookkeeping and "bean counting" that they lose sight of why these commitments were made in the first place.

4. NRR considers a more appropriate format for the Keppler letter to be a summary of which aspects of the CPO proposed program the staff likes and which aspects the staff disagrees with.

B. Comments on Consumers Power "Get Well" program

1. Soils Remedial QA Program Implementation (Letter # 18845)

a. Page 2, last paragraph - the fact that ACRS subcommittee commented favorably on the soils remedial program is irrelevant and inappropriate to a statement of how CPO will implement their QA program

b. Page 2, last paragraph - it is also inappropriate to state that NRC is about to issue an SSER on soils. CPO's letter should state what they are doing

c. Page 3, 2nd paragraph under "Implementation... commitments" - this paragraph focuses too much on bookkeeping of "commitments made to the NRC" and the concept of

what Consumers Power and Bechtel's goals (and how they are going to meet those goals) is not even mentioned. It has the flavor of the only reason the computerized commitment list exists is to make the NRC happy. NRC feels that CPCo may get so involved in keeping track of the commitments that they may overlook the root causes of why the commitments were necessary in the first place. We think the Keppeler letter should emphasize this.

d. Page 4, top of page - this paragraph discusses a 3-hour training session given to personnel "down to the foreman level". The only training apparently given to the "workers" is an "indoctrination".

e. The 3-hour training session lists federal regulations and the NRC as the first two topics to be taught. This makes it ~~sound~~ sound almost like CPCo is "blaming the NRC" for the need for quality. The emphasis should be why it is important to and cost-effective for Consumers Power Company to get a quality job. This paragraph should have stated who presented this session, what his qualifications are, and to what extent senior management was directly involved in this training. If presented in the wrong way, this training may have been detrimental.

rather than beneficial, particularly if C.P.C.O.'s poor attitude towards quality was propagated down to the foreman level.

- f. Page 4, end of 2nd full paragraph - it is not clear how a mock-up test pit will allow "various quality organizations to inspect the work...".
- g. Page 4, 4th full paragraph - states an indoctrination will be given to "all personnel". It is not clear who all is included (secretaries, general manager?), also, there is no mention, specifically, that company policy with regard to possible punitive action against violators will be discussed during this indoctrination.
- h. Page 5, 2nd full paragraph - the term "minimum interfaces - particularly at the working level" is not understood. Does it mean they don't want people talking to each other?
- i. Page 5, 3rd full paragraph - Since this is probably Consumers Power Company's most crucial problem at the present time, it would seem that the CEO would want to be briefed more frequently than bi-monthly. The way it is worded, it doesn't sound like soils will be a major agenda item during these briefings. Will not quality be specifically discussed at these briefings?

j. Page 5, 4th full paragraph - It is totally inappropriate, in a presentation of what CPO is going to do to implement their QA Plan, to discuss the NRC's statutory requirement to overview construction of the Midland Plant! This is also inappropriate to mention in the following paragraph entitled "conclusions":

2. Overall QA Program Implementation (Letter # 18850)

No comment - everything in this letter is also covered in EPO's October 5th submittal on Independent Design Verification.

II
E. Adensam's Personal Notes

Handwritten notes pertaining to the GAP discovery request on Midland for B. Stamiris.

Item 5. Documents relating to independent audits at Midland.

1. 2-24-83 Notes on telecon with B. Garde. Follow-up on Midland meeting.
2. 4-18-83 Notes from meeting with TERA on IDCVP
3. Undated notes on TERA IDVP
4. Undated notes on TERA IDVP
5. Undated notes on ACRS requested report on design quality and construction adequacy.

Item 7. Documents relating to the March 1982 SALP

6. Undated notes on Midland Salp meeting with Licnese and Region III
7. 4-26-82 Notes on Midland SALP Licensee Meeting.

8 Record book with notes on telecons and meetings from 5-12-82 to present. Not complete.

1) Dave
2) ...

Telecon w/ Billie Garde 2/24/83

Follow-up on Drifland meeting -

GAP wants to provide a more technical analysis of CLo's proposal -

Some kind of forum to present analysis
Wants to meet w/ PRC.

in next week or couple of days →

Reg. III + NRR people in Wash., D.C.

^{Major}? Details being worked between Cook + Eschenhut
on S+W + CAP -
* GAP would prefer a meeting or would

~~present~~ present analysis in letter.

GAP analysis of CCP →

• ACRS - Late March

28258

MEMORANDUM OF CALL

TO: E. Tinot

YOU WERE CALLED BY - YOU WERE VISITED BY -

Billie Garde

OF (Organization) Coast. Accountability

PLEASE PHONE FTS AUTOVOI

937-2897

WILL CALL AGAIN IS WAITING TO SEE YOU


RETURNED YOUR CALL WISHES AN APPOINTMENT

Previous editions usable

(2)

Article -

4/13/83 -

- Program plans for HUAC / Standby for Rep.
by early May -
Do we approve the Program plan? 

Protocol approval -

ID reviewer approval -

6/1/83 plan on program -

(3)

Relative to TERA IDUP -

Division of responsibility between
Reg. III + NRR. re implementation
of the plan.

OCR reports; ^{no} status reports CC/NRR
Leave w/ Region lead. findings; finding
resolution

- No CPC audits of TERA.
- Warrick may not come.

4

Midland -
~~Rate to:~~

TERA IDCUP plan for review.
All inputs are in → Request for info.
Address @ a meeting -

TERA independence ^{& qual. -} R'd 3/18.
Requested more info. ^{mid 3/30}
TR input to DL
[Initiation/Monitor] 4/8/83

Ltr to CPO.

Mtg. 4/13/83

- To discuss staff review of IDCUP plan
 • TR question
 • CAP question / comment
 • ~~TR~~ level of replg. - com.
- To listen to TERA proposal to
 expand IDCUP plan to other syst.
- To get WRC initial reactions to
 proposed expansion.

Attendees: T Reimer - Gilroy, Sullivan, LeFave,
 - Reg. III rep.; GAP(?); CPO

5

The ACRS asked for a report on design quality and construction adequacy. They are looking for assurance that w/all the QA problems @ Milland in specific areas that we have not overlooked problems in other areas that have not ^{yet} reared their head. Is CPO addressing this ^{from} ~~the~~ AFW review?

Part the IWPO effort address "work in progress" only
But ~~it~~ when integrated with TERA effort, you get ~~that~~!

Only for the AFW system! Never as a "sample" (audit)

Part it doesn't answer Okrent's problem with hidden problems. IWPO goes from today & does only address forward fit. They do not investigate what happened previously TERA looks backward too.

Part only for the AFW system! (W) is come full circle

(6)

Bob.

Midland SACP meeting w/ license + Reg III.

SACP report is pretty negative in some respects. (Copy attached). Keppler told CCo he was concerned w/ the finding for the period 7/80 - 6/81 as that was the period just preceding his testimony on QA before the Licensing Board. He told CCo he'd have to go home & try to reconcile the differences & meet w/ them again. Stamiris was there w/ friend. We got a copy of the preliminary report w/ the letter sent to CCo. We are preparing a Board notification to send it to the Board.

Keppler asked about deferring the 5/11-14/82 hearing session until CCo has a chance to respond / comment on the ^{SACP} report. They have until 5/16 to comment. We have a telecon w/ Paton (0600) + Keppler planned for tomorrow (4/27) to discuss the hq. session. I told Keppler that any delay was up to the Board, but I think Board members are booked for the rest of the month. We (you + I) need to talk re generic issues which were @ the time the Midland FSAR / OL application was noticed.

but have been relegated to the back burner
as not qualifying as USI's. They are all
contentions in this OC hearing.

As an aside, were you aware of a remand
issue on the CP that is currently before
the Appeals Board on this case?

4/26/82 Midland SALP Licensee Mtg.
on annual Chapter on SALP.
Hinds' memoranda -

- Copy of prelim. SALP to Hinds.

Cook - CPC -

"applauding the purpose of the SALP".

Post inspection - May '81 - optimistic about
ability to meet reqts. - R-III backsliding
in opinion of CLC

- Objected to findings on design contract

- Lic. activities - "selling short" amt. of work
& qual. of work earlier submitted. Work w/
staff to develop....

Want R-III to do PA work before
initiation. (∴ R-III liable + recitations.)

Soils area - what's required needs to be
defined.

Keppler - reconcile # Assessment period
Pont - Hinds no letter.

KFW
8/11/82 B

Purpose of Meeting Consumers Power Co, NRC, RIII
(Horn, Shafer, Lardman, Götner)

1. Violation of the 4/30 ASLB order in that they excavated beneath the deep @ duct bank w.o. prior NRC approval. in spite of ~~reported~~ three warnings by Ross Lardman not to do so.

possibility:

excavation for rerouting of a fire protection line.

It is our position that neither NRC nor Region III granted approval for this work either orally or in writing.

If our position is correct, this is quite serious since it would be a violation of a board order and your construction permit.

If our position is not correct, at the very least it represents another misunderstanding between you and us. The Board order was meant to eliminate such misunderstandings and apparently hasn't.

We would like you to address why you proceeded with these excavations without prior approval

Questions

- Since they sent letter to NRC on Jan 6 concerning deep & duct bank, does this constitute an item which could be construed to have been approved before the order?
- The NRR 2/12/82 ltr. which approved excavating below deep & duct bank made approval contingent upon RTH review of procedures for excavating and monitoring. Did we do this review?

Notes

- ① verbal — routine and/or relatively small in scope
- ② ~~is~~ critical (if staff agrees), do according to approved QA program.

excavation down to 22' was critical but was prior approved.

- ③ MPQP1, MPQR2 approval was a misunderstanding
Excavation below deep Q duct banks * -1

④ Sequence of deep Q duct bank excavation

- 5/24/82 mtg w I, Bechtel, Hoid, Kane, Ross
 - expressed concern over I plans to excavate below the duct bank w.c. approval
 - I told they could not excavate below w.c. prior approval
 - I indicated they would submit something for approval
- 5/24/82
 - reiterated above twice during exit meeting
- The next week
 - reiterated again.
- 7/28/82
 - Ross found excavation in progress.

- ⑤ In 3/12/82 Mr NRC approved 1/6/82 I proposal to excavate a little bit below duct banks. Approval was contingent upon ~~an~~ audit of the procedures for excavating and monitoring.

at the very least, no RIII approvals will be given orally. All approvals will be in writing.

→ The purpose is to clarify the extent and scope of activities for which it is requesting staff approval, so both the staff and applicant understand what the extent of the approval is to be. This is what the order says. All work specified in the order require prior NRC approval.

Notes from meeting

1. They thought Ross' concern was with refilling under duct bank not excavating under the duct bank.
2. They thought they had Ross' blessing based on small work done in the past which Ross said he didn't want bothered with. They thought they had developed a working relationship.

3. Remedial ^{soils} ^{work} ^{at} ^{plant} W. R. Procedure

- Bechtel writes to CPE. for approval.
- reqd for all remedial soils work.

4. On May 22 meeting they say they got discussed and got approval for excavating below duct bank. NCR - we says they expected a submittal requesting approval.

Excavation Permit Procedures

- to protect what is being excavating around + over.
- must be authorized by NRC

5. Rep from Constr, wage, GA mgmt.

E. Adensam's Record Book

MIDLAND PROJECT TELECONF MEETINGS.

5/12/82 - Telecon w/ D. Budzik 4:39 P.M.

Topic - Past 4 weeks - Soil treated like mushrooms.

Wants to know what schedule projections are.

- Constr. dewatering wells + DSB - 5/13/82
- Telecon re approval issues - before issuing letter.

Letter on submitted & address correct path and affirmation -

Would like to know ahead if there are any design questions on P. 2.

5/13/82 Telecon w/ Reg. III - Norelius et al
Gilray, Hood, Farn, Adensam.

Subject: Implementation of Board Order
QA-plans.

What's approved and what's not approved.

April 5 - ltr. to Keppler - non-p status of
permanent dewatering system has been
approved by NRR.

Already installed dw wells will be monitored for fines.

- Reg. III to send us their understanding of what's approved.

- G.A. plan - \$2.0K. Assume other activities under that plan.

5/17/82. Review of Marsilio, Reg III.

Comments will be in play.

Little - G.A. & Const. prog. Reg III plans to write out as much as possible. General time will be - in that costs - Hot team last May - slip between surge by - increasing views. Program/People at. Implementation review.

1744 w/ CPls. Fri. Elec. over inspection -

+ Results of re-inspection of Elec. & C inspectors -

- 35 problems. "misreporting". "5% error should be expected anywhere." - CPls.

955 more safety problems.


Major potential for prob. ident'd. Inspect. prog. Transition points + analysis for his risk scenarios. ∴ Issues closed.

100% re-inspection except for one guy.

1000 inspect. this guy - 3000 out of a 4000 inspectors

Req. what ^{is} balance of guys inspect.

- W/ similar errors approach is reasonable.
- Inspect. record for transmitting point inspect
- Crit. for identifying hi risk assignments
- Some point. NRR involvement. FSAR - all direct. cables installed properly. Some ITO in error.

No immediate actions discussed. 

5/18/82 - Telecon w/ R. Cook / D. Eisenhut. Ltr. confirming. Ed. to call Cook regularly to see what problems arise.

Telecon w/ R. Cook re Attainment @ HRS sub committee

5/20/82 + 5/21/82. HRS Subcommittee.

5/25/82 - I spoke w/ H. Kealey re letter on completion of job review. Told him if his people would take to me first, before HRS, that it might simplify their life some.

7/25/82 Telecon w/ C. Koroluk re Ltr to CPO (in error).

6/2/82 - 17345 in summer 1982 -

Question on SER

- Question on Natural circulation analyses -
 - Not inc. under small break LWRs

Review committee note transmitted 6/2/82
 City not in the SER? attention!

- Review of PWR - Question of the ability
 of accident to that area.

- Study of accident to reactor in connection with plant
 suggest an emergency plan. It is a...

- Review of some studies.

- Terminology of NPPH - Accuracy of calculations
 every time in each group

- Reliability practice in test isolation.

- Test of surge valve - Modified @ Dept of...

- Test of problem - ...
 in low water impacts - Prevention of ...
 ... (1) FMEA - ...

- ... in ...

Committee Agenda -

30 mins report
Doubtless (C) (L)

11. - Staff status review - < 15 min.
Circulation + other relevant + etc.

30 Q & A issues -

- exp. lesson to team 15-20 min summary
of next exp. Const. from ATO

Method for illustrative review -
check in areas where attention not normal.
from

10 min. Dept review
" " " " " "
" " " " " "

30 Minutes Review

summary of results, 1.6.4, 1.7.4
of SSE + more general eq. 10 min.

10 min. C/Ps + log
line.

- JCC duties advert.
- 1) Staff positioning 15 min.
- 2) special " " "
- disc

① Rep w/ the U.S.

10 min meeting CPC

disc.

11:35 AM

List of items for committee choices
Q: P P

SI Interaction

ICS

Hi Cu Well

Process sm

A. WS → CPT. then. ^{1-2 day} ~~part~~ ^{improvement}

RC's

PRA

ATWR

Req. programing

* EOP

Chatter Missile

Division RCRS item

XEROX Copy.

6/3/82 - mtg. w/ Reg. III + Kilroy

7:00 am w/ CPC's ability to manage 7# of activities.

Idea for suggested changes - Largely management problems.

14/82 ACR Meeting w/ Millard

Key comments -
Priority execution -

press to get set writing (Chapman) etc.

Turbine misalignment -
Seawall protection
Net line w/ SBLOCA -
All on weld
AFW Reliability -

Water response is > 60% turbine position during quench
seal movement w/ MS Break -

Gap value ^{failure} -> Turbine disk failure | (4) we
of value failure - ^{missed} protection of "ignoring"

not for Centre report speaking to adequacy of design
costs. But design verification
essential design identified & for in time cost -
more as to design costs in accordance of appl.
quality of design for plant.

After 600,000 use per get. Leave QA out
if they want. Everything but I series

Harbin Missile - user review by contractors
not normally funded by IAC.

3/13/82 Monique (to) NKIS - Page support

* ICC & head vents - Will provide bulletins prior to
issuing. Mattson -

Bolting

151 copy letters

Most ASTM bolts → deterioration in using
to modify using an effective code.
Resisting in low force.

→ Bulletin - Requiring Surveys est.

ASTM spec "inadequate" totally -

Don't need design for delayed failure -?

Should ASME code include delayed failure?

AC/DC reliability.

AC Batteries - Extend life of batteries.

1) Low Picking

Turbine Missions 4

AC - $P_1 - 10^{-4}$

$P_2, P_3 - 10^{-1} \Rightarrow 10^{-5}$

Other P_2, P_3 criteria of 10^{-3} to 10^{-4}

now considered 10^{-1} ?

Dr. Mark does not understand the discrepancy?

Meyer letter + TWT line w/ S. Beck's.

Department (w/ Subcommittee -

worked and consultants -

Cost problem +

Admin. problem.

D.O. Does not feel Tech. info. is available
to get a warm feeling re this issue.

Would rather not go beyond 59's paper -
Come back on TWT line + E.A.

B+W

Thurs. summer

16 - Transformer explosion & fire
Cin handle design.

Fire protection (consulsific.) on Transformer -
Water -

6-14-82 Telecon w/ Reg. III.
Tom Jambling - CFCo & Midland SALP
Continuation of SALP @ CFCo's request.
To continue dir. based on their response &

Causes as to what will be discussed
prior to mtg. w/ CFCo.

Jack Hine / Carl Paparella. Op. Support Sect.

- Mtg. w/ Selby subsequent to SALP continuation
#6/14/82. Do we wish to amend the 12/79 order to reflect
correctly "Material false statement" issue? - Paton -

6/14/82 - Mtg. w/ JK re schedules.
& additional Q's.

Draft SER Supplement \rightarrow ^{to DC} July 9 \rightarrow ^{to CFCo} July 16
mtg. w/ Appl \rightarrow w/ July 19
Site (Am. Bior) Audit \rightarrow w/ July 26
Issue SER \rightarrow ^{to DC} 8/6 \rightarrow Issue 8/20/82

6/15/82 - Mtg. W. Schant-Mooney (CFC) re schedules.
Propose Monday mtg. to review new today's addition to
schedule -

Need dates -

SSWFS - July 10.
ULB Piping - July 10.

BWST - July 10. (Foundation Ring).

Φ3 - ~~August~~ July 31 -

* Φ2 - Can not start critical path work w/o
staff approval of FIVP proof load test
i.e. need to tunnel under FIVP & want
to assure overhead support.
Believed covered at an audit in January

- FIVP

Addition of nodes - June 23 start
jacking - July 3 ⇒ 11.

Excavation under FIVP ⇒ July 12 -

Expect overall approval June 30 ←
No new technical issues raised -

DGB - CFC says no new design ∴ 1.5 SSE vs.
SSRS not applicable.

CFCo wants timely approval w/ conditions.

Info mtg. - June 25 - 8:30 A.M.

Draft SEER -

CFCo review -

Mtg. to agree or disagree - (ask to sign off -

Ad. dit mtg. -

Approval based on Draft SEER understood.

CFCo proceeds @ their own risk unless they comply w/ the condition.

Audits to be conducted while prelim const. work goes on -

6/17/82 - Telcon w/ Little, Reg. III.

Statement for inclusion in SEER addressing ACRS concern -

Ask CFCo for reports first.

Library problems w/ QA program (plan)

Norahus, et al -

6/22/82 - Telecon w/ Sullivan re ACRS letter -

- Lower probability ethnops. Want to talk w/ staff when we reach a decision (Wolf Creek) - asks that CFC have flexibility if we require a further program. on E.g.

- PRA + Systems Interaction program.

Want to preserve idea that CFC initiated study. Limerick contentions ^{argument} did not relate to lic. process but ^{had} since PRA was required it did relate. Want staff to be sensitive to not defining a lic. decision making.

6-22/82 - Talked w/ Herron re FES comments.

NRC comments have not yet been distributed to the reviewers. I spoke w/ Ballard; Connell; Passey. Conykt asked their cooperation in expediting. Also promised the comments by 6-23 AM. They all agreed to do the best they could. Mitchell (AEB) is on AC until 7-7-82.

Knight - telecon -

6-22-82 - Jay's questions as mtg. agenda - @ a min. on structural. Geo Tech @ later date next Tue. or Wed. will know better tomorrow -

6/25/82 mtg. w/ Sullivan-

- 1) Slip in FES issue date.
- 2) Analysis on Seismic + LOCA in April 83.
impact
- 3) Phil's. no Confidence that CP Co. (any utility knows what going on -
- 4) 5-3 - Draft on FES.

6/25/82 mtg. w/ OELD - Paton, Rutherg, Wilmore

Keppeler was one to recommend that the Board be notified.

OELD to draft letter to Board.

~~Phil's~~ Eickholt's off. Dir. Conf. call w/ Keppeler.

10 AM - Telecon. - We will call Keppeler. -

Telecon w/ Morelino ~~A~~

GAP called 6/24/82 plus news conf
Tues 9:30 Midland to give their views -
Say all what they had identified.

Looked @ wbr prob. facing coming
forward / requests. Midland sit.

worse than ^{found @} genuine.

Fed. X pres. to Reg. III copies of
signed affidavits etc. as soon as
they have it.

Delay in PN until info. r'c'd from GHP.
to add more substance!

6/28/82 - Mtg/telecon w/ DGE, RLT, Keppeler
Paton, Wilcox, Hood -

How propose to supplement testimony? Yes -

Some of SALP findings in sails areas conflicts
w/ testimony.

Non-Committal.

Regmt. tech. Ch. gvt.

Enforcement act:

Document from DD's in Reg. III. Recommendation:

1) Act. to improve reg. perform @ Mid -

Co. aware & emphasized on countries
ident prot.

2) Is it possible to mng. const.
diverse as mid.

a) Cut back work One Unit. ^{hair}

b) Separate Mngt. grp. => UP

for soils
2) Design / const. verification
3) independent reviewer -

Mt. w/ NRE/ED w/ recommendations

7/1/82 - Release w/ Myron Flight in
Gonzales assignments. Promised
Call Berlin 1st time.
Conflict between FES comments &
Soils work.

(Action) - Give w/ doc & requested FES comment
be given priority on grounds that

- 1) FES issuance is limited date
- 2) Gonzales work on soils matter
not directly related to construction
(Tech Spec development)
- 3) The work on other soils will be
forthcoming 7/23/82 (could discuss
w/ Flight). & would not impact
8/20/82 SSER issuance date.

7-2-82 Release w/ Te. Sullivan. Promising
in exp. construction matter.

7-6-82 - Telecon w/ Mooney - (Schau & J. 11/5

Where things are? Problem area: Calc. aux. B.
Spring count. of 30 kgf. - Asked to use 70 kgf.

June 14 submitted new results. M.H. June 25
Rinaldi agreed w/ way sales done & results. No
questions. Had reviewed submittals.

Thurs. telecon (7-1) w/ Kane disagreed w/
results. Kane/Ponlos suggested settlement
criteria based on eng. judgment. Asked
Kane to talk w/ Rinaldi. 7-2 telecon
from Kane - no internal agreement.

Δ Deflection during underpinning.

Do not want draft SER w/ open issue on this.

* Plans const. FIUP. Mod. in 11 install
piers that require a drift under FIUP.
Landman disagreed w/ sequence -
Mods. to FIUP first. Rinaldi agreed
w/ const. & sequence. Landman
wanted Kane's input.

Returned telecon to Mooney - 5:15 P.M.
no answer.

7-7-82 Communication w/ Patten/Walton

more SSER 8/20/82

Reported by testimony 8/27/82 at
in L. Day One was later (~ 9/27/82)
Est. with staff testimony 8/27/82

7-7-82 Telcon w/ Mooney + CPO ←

Told him all communications were to be
through PL. No longer to contact reviewers

Telcon w/ Handman - informed him of
communications w/ CPO.

Structural steel supports (FIVP) not as
in drawing. Rock anchors may have been
installed correctly. May have been over
stressed - No Q/C/QA. Handman asked
for pull test on rock bolts.

7/12/82 - Telcon w/ Pagano. Losing people (5 spaces)
New man from Nat. Lab. offered to do what I
can - IP/Shoreham/Byron → Will get back w/
me sometime soon.

7-12-82 - Telcon w/ Lear -

Gonzales time not available to do
interrogatories by 7-19 + SSER by 7-25
Both can be done by 7-30.

Called back ← Interrogatories - 7/19/82
SSER by 7/30/82.

7-13-82 Telecon w/ J. McConley ← return.

7/13/82 - No depositions from GAP people until
Reg. has had time to review -

supponas.

Depositions from GAP reps - ~~Lucy Hall~~
Included in list of people - she is an affiant
Published name in paper.

7/13/82 ← Asked him to coordinate his staff's
calls better ←

7/14/82 - Telecon w/ David Sedgwick (517-752-7171 x182)
Saginaw News

Evacuation Plans - Saginaw Co. State Police
to coord. 9/24/81 - EPZ 12/81 response

Reduction of 10 mi. EPZ to 5 mi. EPZ

Revised by NRC - NUREG-0654 - Rev 1.

Have there been any exceptions to 10-mi EPZ
requirement.

Referred to Pagano -

7/16/82 Telecon w/ J. Mooney - re draft SSER

7 Hood indicated no open items significant enough in SSER to preclude constr. release -

* BWST foundation ring Crack repair completed

* Instr. sys. aux Bldg. in service - middle of next wk.

Today baseline of instr. Need deflection points. Complete baseline by 7-28-82. ∴ cannot start #2 w/o completing baseline.

Alarm setpoints go into computer program

Called back to clear up w/ Mooney re constr. release. Do not see authorizing a constr. release on the basis of re draft SSER.

7/20/82 - Telecon w/ Bonnah re AFW Header
Telecon w/ R. Cook / K. Ward re
AFW Header

7/20/82 - Mtg. w/ Tech. staff re Mtg. w/ CPC
for 7/21/82.

Differential settlement - Analysis + Eng. judge.

Analysis of DGB based on displacements
HGB does not agree w/.

Copy of Mtg. minutes.

SEB
5 concerns - Identified in memo
June 15, May 18, July 9, June 28.

Recol. pier + plate load tests

⇒ HGB anticipates additional submittals
Schedule for long overdue submittals.

UG piping - 36" pipe - Plans for ex. ar.
& backfill.

7/21/82 - Cong. of C/Co.

"Stop limit" -

Action limit -

Alert limit - Begin a re-evaluation. No stop work

Additional
audit will be
available.

What I see this morning is that... if the
structures, they cannot control the buildings
lighter displacement because of how the building
itself moves.

... 1/3 of work - building...
Following that, contractor can control
building to 1/3 allowance.

7-22-82 Telecom w/ Paton

Board comments on Draft SSEE

Table S-3 -

7-22-82 Telecom w/ R Cook → AF/Head

Continuing liability for licensing a plant
which caused ^{the} litigation of Co. facilities
a retrospective program.

As ising aspects apply - to schedule & time
not severe enough to severely impact what
- time.

Change of ^{type of} increasing water

Water quality -

Storage of spent fuel

21 Stat. Sec. 4

2000 01/15/00

New law NRC reverts criticality
mixing zones in this area.

Ditrated water - Another tritiated
compounds

How likely to happen in sediment etc?
in the Tritiated water -
when & how they get info?

Condition for interchange occur in a
natural environment.

.50 mile zone for ingestion for off site plating
HAC would verify design of culverts to
the river -

7-24-82 - Call w/ Peter re Keppeler pt. 7-26-82
Require FDV - Can't find out details, Novel, R. 160, Park
Mtg w/ APC - so time overrun QA type.
Keppeler provide write upon what QA answer
will be being.

7-28-82 - Hainick -

Public mtg to discuss SAMP report
Aug. 5, Midland, Holiday Inn -

8/2/82 - Telecon w/ Mooney / Schank / Sullivan

⊙ Suggest formal request for early
construction release.

Had a problem w/ sending a letter?

Mtg w/ Hilroy / Bird re QA revisions.
20/12 to 3/12 wks. ago.

Freeze wall excavation issue w/ Reg III. Not WRR

11/3/82 - Mtg w/ North People Existent, and Thomas

re CRR license in place on coast.
+ discuss w/ Keyfile re GH. Still many
supplementation & how it goes together
w/ coast. in place.

- Have not finished Tech job. No budget
review. in approval

- Want mtg. w/ CP Co. before approval.
(Warwick section?)

+ discuss w/ Jim Manning

Topic already defined.

Outline what we think we need for
approval

11/4/82. Mtg w/ Bondzik -

need - no. mtg. to keep staff informed of
progress & things. Sept. 11th. 11th. 11th.

Day for Bondzik or some release.

8/5/82 Telecon w/ J. Mooney

Timing on crack mapping -
aux. Blog. + SWPS.

Mooney - @ Site Friday -

5/7/82 - Mooney wants to meet on approval letter

Knights - SSER - York @ all input on a phy. Review

diplomatic criteria - revised.

1/2 blog just - color - long gestation -

3rd phase - review - Miller & ...
Doubt approval letter - but work up the

development

Interim -

- DEB - Kuo reviewing SSER input - R. Whitehead 12/20/82

- HSEF - Kuo & ... by CSE ... AL 8/23 = 9/6

Wagner - ... 8/23 ... input in typing

- HSEF - ... input telecopied ...

Mooney - ... to meet ...

Review of CPE. → ... could the
staff be ready to meet w/ CPE?

Anything they can do?

Agreement
Kepler's list:

No 1) Agreement NRE inspection next 6-12 mos.

Yes in principle
+ CFC has people reporting to NRE and from
Ar. III.

Yes 2) Give independent 3rd party critical slice

Yes 3) Get Bechtel GC report to NRE & HD

No 4) Offensive/Defensive must go. - changes must be made in mgmt
No Poss.

Yes 5) All int. inspections will be conducted w/
both source & QA.

Yes 6) All commitments & NRE approvals will be
in writing sent to NRE for review &
re-approval.

Yes 7) Kepler plus to meet w/ Pres. of Bechtel
& tell him he is to step up.

COC. Item ③

SEPT 2

8/17/82 - 714g. of C.P.C. Budzich, Murray, Solman
Knight, Linn, Hiller, Herd, Hanner,

Area of apparent difference -

Let's believe the Applicants request
should follow same position (SSER)

Options:

1) strong request. Special SSER to letters.
Subj. of interpretation.

2) Review SSER & state what they contain
to do.

3) Cover letter to / from statement of procedure
w/in scope of SSER -

* Call Knight re procedure for valuation review of SSER
(Maltzman?)

2/11/82 - Solman of Murray - re letter content.

emphasized time of copy delay somewhat the letter was
to be -

J. Linn in DC holding -

Requested again a chance to review SSER

before distribution.

Confusion re object of Selby/Kipple mtg.
CPL's understanding -

- S, D, R letter

- Cont. Mkt. Capital analysis
& other QA activities that apply
to the total plant.

8-23-82 Telecon w/ D. Budzik

Levels set @ last audit for allowed
for FIVP

8-23-82 - Telecon w/ Bert Davis - Midland

8-24-82 - Mtg. w/ Hans Jensen, Harold Helms,
Peters, Wierne, Visentin, Harold Egan Knight -

All approvals before settling @ next mtg w/
Reg. III.

Ming. athletic question.

RET - risks, integrated program - Liles -
JPK -

8/27/82 - Selby, Cook, Moore, Kippel, K.C., Moore

1) Kirk reviewed last year testimony & explanation
not yet done

2) CFC showed new work exp. - Commission Ed
people proceed -

3) Selby wants to be responsible for G.H.

4) G.H. person @ CFC - Good. Very highly controlled.

5) One rule, CFC's some back w/ get need plan
int. w/ DCE next Thurs. Ch.

6) Encouraged @ Palumbo DeKrisson @ Mill to

7) Under G.H. decision SEER. Won't start
until we have CFC proposal & report to
work.

8) Plat' of NCR - Things are getting better
CFC - Selby.

9) ~~Selby~~ turnover look good - Disting on Equip.
it works

Things to Knight some cc's. as in
memo.

Nothing out until L&E meets w/ Kelly-
Kupper again

^{not} Review w/ Reg. III before issuance

9/1/82 L&E in Lic. Board. Decker is retiring

Board Conf. call Fri. 9/10/82
10 A.M.

mtg w/ ^{Head} Reg. III on Thursday. 9/9/82
- Communication.

3rd mtg. in p.m. 9/9/82
on "EPC's" "Ready"?

9/1/82 - mtg w/ Novak - see EPC's mtg in Clin.
Left letter due today.

Review Brinckhoff Guide & Douglas - Dick -
N. J.

Review w/ Reg. III. Main concern - Make sure
proposal satisfies the staff for overall
GH @ the plant. Not "presidential".

9-16-82 - Johnson vs / P. Gardner - Reg. III.

QA testimony

Reg. III

Request to delay contention relating to Zack.

2 CAP affidavits =

Begging the question.

no work just Q2. Work release suicidal
to review & evaluate ability to implement QA.

9/24/82 Telson w/ Wayne Shafer

Oral qual. test ~~begin~~ being conducted by
CPLs for ~~SA~~^{QC} inspectors. Margulis's
people doing the testing.

2 cases - Inaccurate & uncontrolled
QCI's.

cert on remedial skills
- Tech / Programmatic parts of exam
(What is the job?)

Failed prog. Passed tech - Level 2?
High up.

- repeated question several times

Oral cert, prog. unacceptable

- Security - (Skills)

- Written exams

- non-compliance on doc. control.

- why not shut down all safety related

activities 2:30 PM 9/24/82. Response

Tepler in Atlanta - going thru line.

Slds don't require written cert.

9-27-82 - Mtg. w/ Norde -

Schell. mtg. w/ HRB. ?

Prepared for. re what report is supposed to
do. Green light from Villmer Do.

Earlier comments -

eg. factoring
the region
Define bases.

Outline - title
content -

10-13-82 - 1.5FSAR does not envelope SSRS - Penelli

SSRS is enveloped

10/25/82 - Mtg. w/ Region + DE. Look at work in progress.

1) Vertical slice not broad enough.
Should another person other than visit

2) IHD ^{assessment} ~~audit~~ of remedial soils work should be expanded to include balance of plant. ^{Time} Gain assurance that we have confidence that the program is being implemented.

3) IN PO examination needs to be expanded or made longer (needed?)
- MAC weak in independence
- Group comments.

Biennial audits - not appropriate

Goal effectiveness of implementation of QA program
Adequacy of QA program Performance

P. 8 Statement on audits.

CPC to review final report - notes should be attached as to any alterations that can be made
They should receive interim report

1st
Pg 19, "design elements to include 'samples'" -
Clarify "samples". Problems with this on other plants.
Vertical slice - need to describe in this letter how they will assess the extent of evaluating the QA program in effect at that time

10/35/82 w/ CPO - IDVP meeting.

Report request from A&S

S&P mtg/eval. to inspect.

2-9/17/82 ltr re implementation program.

Oct. 5 ltr re IDVP.

CPO request for concurrence or redirection.

- Reference to previous assessments - referring to biennial G&H ltr?
 - "Six-month margin review" →
 - Early '82 commissioned IDVP of their own "feared, most to loss if there were something wrong @ Midland" = Bechtel is used them to do the independent (!?) evaluation.
- Papers to give to 3rd party consultants

~~CPO memo to~~

Chickens -

- General ABC response - X-axis guidance
 - some indication as to start w/ INPO review. Complete in 1982. as a minimum.
- Route ltr program.

CPO thinks their program (10/5 ltr) is unique.
(Doesn't sound too different from TAP's own B to me.)

INPO team will still oversee implementation of INPO program.

MAC presentation: Total Effort 40 man. wks.

INPO study is of work in progress. Is not a historical evaluation.

Will 'look' @ whole plant activities including soils & turnover as well as other source work in progress.

15 people for 2 wks. to gather facts -

ERR Presentation.

Evaluate quality of P&T Design.

3 to 50 man wks

Configuration verification

→ Do the design files we look back to assure that the construction practices now used & reviewed under the WPO program were used in the past? Is one can draw some conclusion about the quality of what already built? ←

GAP Presentation (Summary)

Lack of discussion on E&W assessment.

Point of view they "got" E&W. E.g. NA sinking problems.

Suggest rejecting proposal.

Only in Jackson / Millers -

single point of accountability.

Midland mtg. - Contractors w/charter.
Citizens to comment.

1) LaSalle model - Simultaneously submit reports to
all parties. Cook - final report only. Other available
Committed to NRC policy.

GAP - requested raw data from NRC review be
sent to WRC. Independent review does not
permit sufficient public oversight.

NRC - Mtg. to cover NRC's independence -

DGE - Req. report to provide cost of program
NRC

GAP - Supplement to letter - by next CPO
mtg.

DGE. Is it go far enough? Open question is
construction. & S&W contract on site
- Did NRC "approve"?

Warnick - Req. weighs vertical slice heavier than other
aspects ^{although} another system or broadening
proposed system.

* Feedback to CPO later this week re ID PO program
DGE promises -

10/28/82

Jelison w/ Cook -

- 1) Another system
- 2) What's going on w/ Construction. (you on)
- 3) Ind. 3rd party to do ongoing Const.
look - QA.
- 4) Inty w/ CPCs + STW
- 5) All communication to NRC @ same time as
CPCs. - Mtop. announced. *public release*
mtp).

@ Mty. STW side first.

10/29/82 - Mtg. w/ Bagchi, Knight, Johnston, Paton (?),
Hood, ~~...~~

* Demonstrate ability to shutdown / cooldown w/ Ekgos
that meets SSRS.

FSAR commitment -

"Comparison to current NAC criteria" - IEEE 374-1971
1974.

* Each piece of equip type in SS App. develop
floor response spectra consistent w/ SSRS.

Assuming substantial margin - should show
functionality @ SSRS.

Qualification requirement -

11/5/82 Mtg. w/ CPO re S+W program.

Objective: To allow programs to be selected by S+W.
Qualifications + Charter. Scope review → ?

Mtg? Internal -

Criteria for independence?

Written reports to S+W? Independence?

Who will have final word - Program or S+W? Both will →

Reg III involvement in S+W / Passive work?

S+W - How involved? (Account question) Parsons?

How involved in CPO report? Further action

→ Investigate about ^{off-site} already in place? Environmental impact.

S+W plant will return to resolution of all non-conformances.

Kahn - / Stahl -

Locations -

Ita re S+W A

Plant sites where team members -

Lake → All S+W. Technical work (incl.

with Anna)

Relation in IA / Midland - Ho.

Scott - Over Bend -

Time when resumes are avail. public?

CPO has.

11-16-82

Jordan - Keppler, Jordan, Axelrad Conf. call w/
Paton Wed.

QA hearing Jan. 4-14.

Rutberg ^{to get} ~~has~~ Board request.

Pat to file motion on amending order re
material false statement -

Murray, Lieberman, Rutberg, Christakou
directed Paton to not file.

11-17-82 Shafer telecon. Pat yet communicated to Keppler.

Field changes w/o electronic - Seismic cat. 1 - logs installed
Nov. 9 & 10, 1982 - Seismic cat. 1.

Midland

Stop all further Const. acts. on BOP. until

1) B. qualified report all 5 C inspectors

Complete reinspection ident. all problems. Const. to

correct ident. problems first, then upon...

May ^{permit} continue to test. No "inspect".

Close soils work.

Investigation re Boss lying to Ron Cook / Landman.

CELD Recommendations against pursuing because
our "case is weak".

Testimony filed refers to Reg. III concerns
re lying. Will probably look bad before the

board if we do not pursue. Investigator
believes Boss did lie.

'82. Subcom w/ Reg III - Kupples - 12/7 availability.
w/ prefers to go w/ 12/7. - Benton, Dirick, I+E.

occurrence on letters.

-15-83. Midland hearing 517-631-0570

3-7-83

mtg w/ GAO - Garle, Warnick, Fienholt, ~~Wood~~, Kovak -

3rd party review of CLP. -- Public mtg.

Overall Assessment \leftarrow How will it be conducted?

100% re inspection vs. Audit sampling.

- TERA / S+W \leftarrow Philosophically unacceptable
because they are already there

- CLP flaws + shortcomings -
Awaiting details

1) Starts too late

2) Details of ATQC repty process \rightarrow Staff the same ^{CPC}

b) 2nd level of org. - Back to Berlinet,

3) Team concept for ATQC - Too much a part
of the team - not separate enough from team p

4) TNP QAD - Set up to repeat 2nd error.

Expand TERA review to cover a "troubled" system.

Letter to CLC on 2nd system. DGE to sign
this week.

What debate between NAR + SAC?

3-9-83

QAB - Comments on EG+G report - time to respond.

* Check w/ Youngblood re reviews for acceptability of TERA

4-18-83 - Telecon w/ R. Warnick

INPO report - Review by Reg. III

Like inspection module - look for open items Reg. should follow up on.

4/24/83 Telecon w/ Stambing - 384-2548
SALP.

Directed to be an abbreviated SALP on
mechanics in response to Keppie's request.

was to cover:

- Soils, etc., any primary (safety-related) system that they have continued work on

- Period: July 1, 1981 - March 31, 1983.

- Mtg. w. lic. on file by June 30, '83.
(Keppie's contract).

Board in May. -

Lic. mtg. ~ 6-27 to 30 time frame -

* NRR input on May 6 -

Board notification issue ← ?

Warwick - not sure it's a big point.

Meeting w. O.P. re Midland
January - Public Mtg.

file -
Midland
~~1982~~

Midland - 12/7/82

Cadwelding problems - stop work
order of HAC - hearing -
summer '74

Problems - omission of rebar, mis-
location of rebar, omission of
tendon sheaths -

we said isolated breakdowns
overall QA program not bad

Consumers began 100% overview of
Bachtel work & they were
finding problems themselves

1978 - Diesel generator building
problems - came in & talked
to WRE

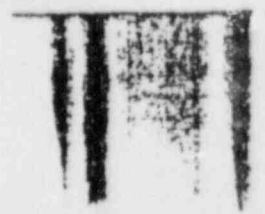
Began to be aware of problems
with soils work, HAC etc.

Came into HQ in 1979 - Order issued
re soils & got into hearing -

Extensive inspection -
Upgrade of QA - program looks
good on paper -
Strong endorsement of program
in June, 1981.

March/April 1982 - things
looking not so good -

May 83 SAC meeting - Report bad



3 in sails area -

Memo from Lon Cook ^{Resident Engineer} re problems

John Kelly - CEO of CPCo. -
meeting w. Kippel - end of August -
led to proposals how to deal w. it
Sept. 17th + Oct. -

3rd party involvement - ongoing
work & past work

GAAP has been involved in early
submittals -

submitted written testimony
on submittals saying they
are under review

Met w. CPCo. twice - GAAP
had opportunity to submit
written comments -

Call from Dick's office saying
submittals haven't cut it -
must do more -

Agreed to have meeting in
Michigan -

Inspection of diesel generator
building - lots of problems -
them - 15 NRC inspectors - 400
man hours - 4 contract engineers
from Argonne - 240 hours



MAC did look 2 years ago + found nothing
(But it was a big look)

- 3 -

not same ^{residual problems} milland had to take them by the
re-welding problems

Met with ^{concerns} ^{appreciated} ^{program}
concern - CFCO setting Zimmerman
issued construction completion
did they have

85% -

Nowhere near as bad as Zimmerman!

What do we need to ^{do} ^{to be}
sure it's done right

N&S wants to
fully system based on PRA +
have it checked -

MAC did 2 week management
review -

70 systems
likely
used over

IDVP -

Ongoing 3rd party check -

Systems turnover has been
working well -

Quite complete forward-looking
program needed -

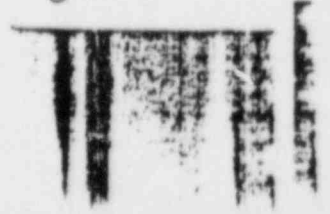
100%
inspection
of all
safety
related
work

Why more overview in soils
necessary than in balance
of plants?

Why didn't management know about
these ^{things} ^{particular}
No in-process inspections -

TARA -

SAP says Milland as bad as Zimmerman





UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 20, 1983

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PAO	SCS
SGA	ML
ENF	File

Docket Nos: 50-329
and 50-330

Mr. J. W. Cook
Vice President
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Cook:

Subject: NRC 1983 Schedule for Midland

Your letter of October 28, 1983, recommends deferring further Case Load Forecast Panel (CFP) meetings for Midland Plant, Units 1 and 2 pending completion of your new Unit 2 schedule shortly after the first of the year. You note that Dow's termination and delays in approval of the CCP have invalidated the plan set forth and reviewed with the CFP in April 19-21, 1983. You provide no estimate when your decision for Unit 1 will be available.

Based upon the information and observations as of April 19-21, 1983, the staff concluded that some months beyond the second quarter of 1986 was the earliest date that completion of Unit 2 could reasonably be expected, and that Unit 1 was expected to be completed about 6 to 9 months thereafter. The staff's 1983 projection assumed approval of the Construction Completion Plan in May 1983. The actual approval occurred on October 6, 1983. Subsequently, several stop work orders were issued by CPCo which are currently impacting all safety-related construction.

In a November 9, 1983, press release, CPCo announced preliminary indications that commercial operation of Unit 2 may be delayed until mid-1986, rather than February 1985, based upon the study to be completed by the end of 1983.

Accordingly, for our planning purposes, we intend to use September 1986 as our planning date for completing the licensing review process for Unit 2. We will reevaluate our projection in 1984.

Sincerely,

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

cc: See next page

DEC 23 1983

~~8403190186~~

MIDLAND

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Mr. J. W. Cook

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**Consumers
Power
Company**

James W Cook
Vice President - Projects, Engineering
and Construction

General Offices: 1945 West Parnell Road, Jackson, MI 49201 • (517) 788-0453

November 10, 1983

Harold R Denton, Director
Office of Nuclear Reactor Regulation
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND ENERGY CENTER
MIDLAND DOCKET NOS 50-329, 50-330
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 82-33
FILE: B13.3 SERIAL: 26468

PRINCIPAL STAFF	
RA	DEPP ✓
D/RA	DE
A/RA	DR/SP
RC	DR/A
PAO	ES <i>orig</i> x 3
BSA	IL
ENF	File <i>for</i>

- REFERENCE: (1) CPCO LETTER, SERIAL 21649, DATED APRIL 13, 1983,
RESPONSE TO GENERIC LETTER 82-33
(2) CPCO LETTER, SERIAL 26237, DATED OCTOBER 28, 1983,
CONSTRUCTION COMPLETION SCHEDULE

This letter provides Revision 1 to the Midland Emergency Response Capabilities (ERC) Schedule (see attached). In accordance with our previous commitment, provisions for this schedule revision were documented per Reference 1.

As you may be aware, the impact of the Dow termination and the delays in the approval of the CCP has changed many of the major schedule assumptions in the Midland Plant Schedule. As a result, we are presently re-evaluating that schedule for the completion of Unit 2. Where possible, we have given dates in the ERC Schedule for information submittal, completion of construction, implementations of procedures and personnel training. As the schedule for plant completion is established, it may become necessary to adjust these dates. Wherever completion dates are not given, "prior to fuel load" has been provided. Within six months following our new schedule announcement, we will submit a subsequent revision to this table modifying any dates as necessary.

James W. Cook

JWC/CLH/mdb

CC RJCook, Midland Resident Inspector
JGKepler, Administrator, NRC Region III

NOV 17 1983

oc1183-0658a100

~~831180121~~

CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 26468 Dated November 10, 1983

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits Revision 1 to the Midland Emergency Response Capabilities (ERC) Schedule.

~~CONSUMERS POWER COMPANY~~

By /s/ J W Cook
J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 14 day of November, 1983

/s/ Barbara P Townsend
Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984

TABLE 1: REVISION 1

MIDLAND ERC SCHEDULE

FORECAST DATESPDS

- | | |
|------------------------------|--------------------|
| A. Safety Analysis Submittal | March 1984 |
| B. System Operational | March 1984 |
| C. Operators Trained | Prior to fuel load |

DCRDR

- | | |
|--|----------------------------|
| A. Submittal of Program Plan | Completed January 15, 1983 |
| B. Final Report Describing Control Room Improvements | Completed March 31, 1983. |
| C. Implementation of Recommendations | Prior to fuel load |

R.G. 1.97

- | | |
|--------------------------------------|--------------------|
| A. Implementation Report | February 1984 |
| B. Implementation of Recommendations | Prior to fuel load |

EOPs

- | | |
|---|--------------------|
| A. Submittal of Technical Guidelines | June 1984 |
| B. Submittal of Procedures Generation Package | June 1984 |
| C. EOP Implementation | Prior to fuel load |

Integrated Training Plan

- | | |
|------------------------|---------------------|
| A. Training Completion | Prior to fuel load* |
|------------------------|---------------------|

ERFs

- | | |
|--|---|
| A. Submittal of Plan | |
| 1. NUREG - 0814 Response | Completed Feb 19, 1982 |
| 2. Staffing Information & GOCC Description | Completed Feb 15, 1983 |
| B. Completion date for fully functional | |
| 1. TSC | Prior to NRC Emergency Planning Appraisal |
| 2. OSC | Prior to NRC Emergency Planning Appraisal |
| 3. EOF | Prior to NRC Emergency Planning Appraisal |
| 4. GOCC | Prior to NRC Emergency Planning Appraisal |

*Training completion dependent upon final resolution of the SPDS/DCRDR/EOF's/Accident Monitoring Instrumentation/ERF submittals



**Consumers
Power
Company**

Harrison

James W Cook
Vice President - Projects, Engineering
and Construction

General Offices: 1945 West Parnell Road, Jackson, MI 49201 (517) 788-0453

October 28, 1983

Harold R Denton
Office of Nuclear Reactor Regulation
U S Nuclear Regulatory Commission
Washington, DC 20555

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D/PA	
A/PA	
PC	
PAO	
SSA	
ENF	<i>File</i>

orig + 3

MIDLAND ENERGY CENTER
MIDLAND DOCKET NOS 50-329, 50-330
CONSTRUCTION COMPLETION SCHEDULE
FILE: 0652.1 SERIAL: 26237

This letter is in response to T M Novak's letter of November 4, 1983 regarding a follow up meeting with the Case Load Forecast Panel on the schedule for the completion of the Midland Nuclear Plant. As indicated to your staff during the summer, we had hoped to meet with them last July to continue the schedule discussions initiated in April. However, the plan we set forth and reviewed with the Case Load Forecast Panel in April is no longer valid. The impact of the Dow termination and the delays in the approval of the CCP has significantly changed many of the major schedule assumptions in that plan. As a result, we do not believe that it is useful for either your staff or our own to participate in additional schedule reviews until we complete the new project plan now under preparation.

It is our intent to issue a new Unit 2 schedule shortly after the first of the year. This new schedule will incorporate a number of developments and information that were not able to be incorporated in our prior plan. In addition to the actual construction activities still to be completed, our new schedule will be able to incorporate a model of the actual CCP activities which have been developed in considerably more detail since the prior plan was released. In addition, now that the CCP has been released, we have an actual starting point from which to proceed and we will have the benefit from the results of preliminary walkdowns to more accurately identify the quantity of work in specific areas. In addition, the new plan will incorporate the conclusions of our work in decoupling the construction of Unit 1 from Unit 2 as a result of the Dow termination. We have also developed additional information and data on the test program portion of the schedule as a result of our discussions with your staff last spring. However, even that information will be modified somewhat in our new schedule. While our new schedule cannot resolve all of the uncertainties associated with our to-go activities, I believe it is a significant enough change that would warrant postponing a further Case Load Forecast Panel meeting until this new schedule is announced.

NOV 4 1983

OC1083-0074A-MP04

~~8311020429~~

The above discussion indicates the basis for our recommendation to defer further Case Load Forecast Panel meetings until our new schedule work is completed. This letter documents the discussions I have had on this subject with Mr Novak and Ms Adensam during the past two weeks. We are anxious to provide the staff with any information they may need as soon as it is available and, if necessary, we can provide a partial interim briefing if that will assist the staff in their immediate planning needs.

We will await your direction on how to proceed in bringing this matter to a conclusion.

James W. Cook

JWC/JNL/dlm

CC RJCook, Midland Resident Inspector
JGKepler, Administrator, Region III

CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 26237 Dated October 28, 1983

At the request of the Commission and pursuant to the Atomic Energy Acts of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits information concerning project scheduling matters.

CONSUMERS POWER COMPANY

By /s/ J W Cook
J W Cook, Vice President
Projects, Engineering & Construction

Sworn and subscribed before me this 28 day of October, 1983

/s/ Barbara P Townsend
Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 4, 1983

Docket Nos. 50-329/330 OM, OL

Johnson

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A/PA	PAO
OPRP	SL
OPMA	IC
DRMSP	
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ML	
OL	FILE <i>file</i>

orig + 3

Mr. J. W. Cook
Vice President
Consumers Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Cook:

SUBJECT: Followup Meeting on Construction Completion Dates

My letter of August 9, 1983, noted that since the April 19-21, 1983, NRC staff visit to assess construction completion schedules for Midland, Consumers Power Company had requested a followup meeting to review the material previously provided, to provide additional information, and to discuss reconsideration of scheduling priorities between Units 1 and 2 in light of recent actions by Dow Chemical Company. The letter also noted that at Consumers' request, the staff would be scheduling this meeting in September 1983.

On September 2, 1983, Messrs. B. Hershe, N. Leech and others from your Company advised us that the week of October 24, 1983, would be the earliest time that Consumers would be prepared to discuss scheduling priorities between Units 1 and 2, and that some months beyond this may be needed to establish a scheduling projection basis.

The staff views this as a significant delay in our efforts to consider your views regarding the schedule for plant completion at Midland. Unless your dates for establishing a firm schedule for plant completion are substantially improved, the staff will consider the estimate it developed based upon the April 19-21, 1983 visit to be appropriate for its planning purposes. Please advise me of your intent in this regard within two weeks of receipt of this letter.

Sincerely,

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

cc: See next page

OCT 6 1983

~~8310170721~~

MIDLAND

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Mr. J. W. Cook

- 2 -

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Supplemental page to the Midland OM, OL Service List

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NOTE TO: Elinor G. Adensam, Chief
 Licensing Branch No. 4
 Division of Licensing

FROM: Darl Hood, Project Manager
 Licensing Branch No. 4
 Division of Licensing

SUBJECT: RECORD OF SEPTEMBER 2, 1983 TELEPHONE CALL ON SCHEDULING
 OF FOLLOWUP MEETING ON CONSTRUCTION COMPLETION DATES

The NRC's letter to the applicant dated August 9, 1983, noted that since the April 19-21, 1983, NRC staff visit to assess construction completion schedules for Midland, the applicant had requested a followup meeting to review the material previously provided and to provide additional information, and to discuss reconsideration of scheduling priorities between Units 1 and 2 in light of recent actions by Dow Chemical Company. The letter also noted that at Consur's request, the staff would be scheduling this meeting in September, 1983.

On September 2, 1983, Messrs. G. Henshe, W. Leach and others from Consur's Power Company called Darl Hood to advise that the week of October 24, 1983, would be the earliest time that Consur's would be prepared to discuss scheduling priorities between units 1 and 2. They also noted that some work is being done to establish a sufficient data base for scheduling projection purposes. The data base of interest is associated with production for the Construction Completion Program.

Accordingly, the followup meeting will not occur in September. Consur realizes that this delay may impact our willingness to schedule other technical meetings which might be affected by Consur's eventual schedule decision.

Darl Hood, Project Manager
 Licensing Branch No. 4
 Division of Licensing

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Consumers Power Company

DOCKETED USNRC

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August 30, 1983

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Mr. Charles Bechhoefer, Esq.
 Atomic Safety & Licensing
 Board Panel
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Dear Chairman Bechhoefer:

On August 5, 1983 I forwarded to the Board and parties a press release announcing the decision of Consumers Power Company's Board of Directors to revise the construction schedule for Unit 1 of the Midland facility. Unit 1 is the second of the two Midland units to be completed. Carrying out the Directors' decision, the Company has placed certain construction activities regarding Unit 1 on hold, and is discussing whether other Unit 1 activities should be postponed. The Company also established a task force to consider which portions of the plant need to be complete for full power operation of Unit 2. Since the Company still plans to complete both units, construction of certain Unit 1 systems which are required for Unit 2 operation or which could not be conveniently carried out once Unit 2 is in operation will continue. I am advised also that the Company is presently reviewing the schedule for constructing Unit 2, in light of delays associated with the NRC Staff approval of the construction completion plan and possible improvements resulting from the decision to slow down Unit 1.

Very truly yours,

James E. Brunner
 James E. Brunner

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**Consumers
Power
Company**

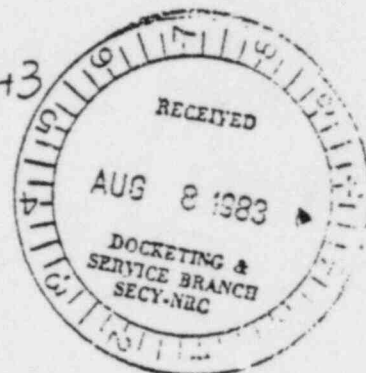
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NRC UTIL. DIV.

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August 5, 1983

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Mr. Charles Bechhoefer, Esq.
Atomic Safety & Licensing
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U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Chairman Bechhoefer:

Attached is a copy of a press release by Consumers addressing the point discussed at the end of the last hearing session.

According to Mr. Selby's statement, both units of the Midland facility will be continued. The press release also indicates that the first unit to be completed at Midland will be constructed in "very much the same time frame as previously planned."

Very truly yours,

James E. Brunner
James E. Brunner

CC OL/OM Service List

AUG 16 1983



Consumers Power Company



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Jackson, Michigan 49201 (517) 786-0333

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AUG 5 1983

C. P. Co. Legal

FOR IMMEDIATE RELEASE

JACKSON, Mich., Aug. 3, 1983 -- At its regular August meeting today, Consumer Power Company's board of directors endorsed the decision of management to complete both units of the Midland nuclear plant despite Dow Chemical Company's attempted withdrawal from its contract to buy steam from the plant. After reviewing the situation, the board concluded that the need for electricity in the company's service area requires completion of both units and that the company should continue with construction.

In its quarterly earnings release last week, the company indicated that industrial electric sales for June 1983 were almost 11 percent higher than those for June 1982. In addition, on July 15, the demand for electricity on the company's system reached 4,757 megawatts -- only 3 megawatts below the company's projected summer peak for 1986. Later in July, the company surpassed its all-time main system high for one week's electric sendout.

In confirming that work will continue on both Midland units, John D. Selby, chairman, president, and chief executive officer of the company, said that the first unit (the all-electric unit) will be finished as close as possible to the presently scheduled February 1985 commercial operation date. Construction work will continue on the second unit but the schedule will be revised.

Selby said that the final construction schedule of the second unit will be based on several considerations. Among them are final cost, need for power, company cash flow, and work necessary so that operation of the first

--more--

unit is not hampered by construction activities on the second. The second unit has always been a combination unit to provide both process steam and electricity. It can be converted to an all-electric unit by the addition of another turbine generating unit.

The company announced on April 12 that the first unit would become operational in February 1985 and the second unit in August 1985. The total cost of the project at that time was estimated at \$4.430 billion.

Selby said that new cost figures have not been developed but he does not anticipate a significant change in the cost of the first unit since it will be constructed in very much the same time frame as previously planned. "The ultimate goal of Consumers Power Company," he said, "is to provide a reliable electric supply to the company's service area at a reasonable price. Completion of both units should assure such capability well into the 1990's."

###

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UNITED STATES
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Jay Harrison
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AUG 09 1983

Docket Nos. 50-329/330 OM, OL

Mr. J. W. Cook
Vice President
Consumer Power Company
1945 West Parnall Road
Jackson, Michigan 49201

Dear Mr. Cook:

Subject: Construction Completion Schedule for Midland

On April 19-21, 1983, the NRC staff visited the Midland Plant to evaluate construction completion schedules. The meeting discussed the basis for Consumer's revised estimates of October 1984 (Unit 2) and February 1985 (Unit 1). On April 20, 1983, the staff conducted an tour of both units to observe construction progress.

The staff believes that your estimate of 14 months to complete preoperational and acceptance testing for both units is unduly optimistic. Recent experience for a single unit has indicated that this activity will require at least 24 months to complete. Moreover, the staff believes that your forecast does not realistically account for large uncertainties in the work that must precede start of critical path testing, and that this can be expected to add some months to your schedule. These factors alone would infer that your October 1984 projected completion date is optimistic by at least a year.

Since the staff's visit, you have requested an opportunity to meet with the staff to review the material previously provided as well as to provide any additional information for its further consideration in this matter. We also understand that you plan to reconsider your scheduling priorities between Units 1 and 2 in light of recent actions by Dow Chemical Company. At your request, we will be scheduling this meeting in September. A final staff position for Midland's construction completion date will be developed following this further meeting.

Sincerely,

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing
Office of Nuclear Reactor Regulation

cc: See next page

AUG 12 1983

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