Gardner/Landsman

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

OCT 4 1983

PRINCIPAL STAFF			
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D/RA		SCS	
A/RA		PAO	
DPRP		SLO	
DRMA		RC	
DRMSP			
DE			
ML			
OL		FILE	

Docket No. 50-329
EA 83-03

Consumers Power Company
ATTN: Mr. John D. Selby
President
212 West Michigan Avenue
Jackson, MI 49201

Gentlemen:

This will acknowledge receipt of your letter dated September 26, 1983 and your check for $116,500 in payment for the civil penalty imposed by Order dated August 29, 1983. We will continue to examine, during future inspections, your corrective actions described in your letters dated March 10, and July 12, 1983.

Jane A. Axelrad, Director
of Enforcement
Office of Inspection and Enforcement

OCT 6 1983

OCT 4 1983

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Consumers Power Company

James W Cook
Vice President - Projects, Engineering and Construction

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

September 6, 1983

Mr J G Keppler, Regional Administrator
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND PROJECT
RESPONSE TO DRAFT SALP REPORT
FILE 0.6.1 SERIAL 25682

Consumers Power Company has received and reviewed the NRC's Systematic Assessment of Licensee Performance (SALP Report) for the Midland Nuclear Plant, Units 1 and 2, for the period July 1, 1981 through March 31, 1983 and acknowledges the NRC's comments.

Consumers Power Company recognizes the purpose of the SALP Report and is committed to accomplish the improvements necessary to achieve the quality performance level that both the NRC and the Company desire.

The Company is particularly concerned about the SALP evaluation in the Remedial Soils work and will devote the management attention necessary to establish improved overall performance in this area. Efforts will be focused on addressing the NRC's concern regarding attention to detail and implementation of the Quality Assurance Program. Our managment team is dedicated to assuring that future Remedial Soils work will conform to the requirements of the Midland QA Program.

The Company believes that the elements of the CCP Program are sound and that it will result in a well controlled process by which to both verify the quality of past completed construction and ensure the quality of construction work yet to go.

The CCP may need some refinement as we gain experience with it, but as a management team we are dedicated to give it the attention and support needed. We will modify it, as change is needed, to ensure that it works. The successful implementation of this program will clearly support the Company's goal of meeting the requirements of the Midland QA Program.

8309200262

DRD883-0001A-QL07

SEP

In conclusion the Company has evaluated the contents of the SALP III Report and the management team will take whatever steps are necessary to achieve the quality performance level that both the NRC and the Company desire.

James W. Cook

CC DSHood, US NRC
RJCook, Midland Resident Inspector

DR0883-0001A-QL07

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Ms Carole Steinberg, Esq
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Babcock & Wilcox
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Mr Steve Gadler, Esq
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Chief, Docketing & Services
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Ms Lynne Bernebei
Government Accountability Project
1901 Q Street, NW
Washington, DC 20009

9/3/83
m 0583-0429a100

Consumers Power Company

James W Cook
Vice President - Projects, Engineering and Construction

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

September 8, 1983

Mr J G Keppler, Regional Administrator
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND ENERGY CENTER
INSPECTION REPORT NO 50-329/83-11(OSC) AND 50-330/83-11(OSC)
File: 0.4.2 UFI: 70*01 Serial: CSC-6869
0485.16 42*05*22*04

REFERENCE: (1) R F Warnick letter to J W Cook, dated August 4, 1983 Inspection Report No 50-329/83-11(OSC) and 50-330/83-11 (OSC)

This letter, including Attachment 1, provides our response to Reference 1, which transmitted the subject Inspection Report and requested our written response to the item of noncompliance therein.

James W. Cook

JWC/BHP/dmh

Attachment

cc: RFWarnick, NRC Region III
JJHarrison, NRC Region III
RNGardner, NRC Region III
RBLandsman, NRC Region III
RJCook, NRC Senior Resident Inspector, Midland Site
RLBurgess, NRC Resident Inspector, Midland Site

NOV0783-0001A-CN02

~~8309190085~~

SEP 12 1983

Attachment 1
Serial: CSC-6869

CONSUMERS POWER COMPANY'S RESPONSE TO
US NUCLEAR REGULATORY COMMISSION, REGION III
INSPECTION REPORT NO 50-329/83-11(OSC) & 50-330/83-11(OSC)

Appendix (Notice of Violation) to Inspection Report No. 50-329/83-11(OSC) and 50-330/83-11(OSC) provides one item of noncompliance to 10 CFR 50, Appendix B. The NRC statement and our responses are given below:

NRC STATEMENT

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

CPC-1-A Policy 13, Handling, Storage, and Shipping; Section 3.3, RECEIPT AND STORAGE, states, in part, "Suppliers provide plans, . . ., procedures and personnel to . . ., store, . . . items upon arrival at the site."

Bechtel Power Corporation field Procedure FPG 4.000, Revision 10, Storage - Maintenance/Inspection of Equipment and Materials, states in part in Section 6.2.4 "Items shall be stored on dunnage or cribbing to allow for air circulation and to minimize the trapping of water."

Contrary to the above, structural items stored in various areas of the Poseyville Road laydown area were not stored on dunnage or cribbing to allow for air circulation and to minimize the trapping of water as required by Bechtel Field Procedure FPG 4.000, Revision 10.

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

CONSUMERS POWER COMPANY RESPONSE

In accordance with this Notice of Violation, an explanation of corrective action is as follows:

1. Corrective Action Taken and the Results Achieved:

   As clarification to the item of noncompliance the structural I-beam identified in your report was intended for use as a pipe storage rack and was a spare setting alongside others being used as such.

   Work orders for placing on dunnage the stock steel and unistrut pieces welded to base plates were issued June 20, 1983, and June 7, 1983, respectively. The work was completed June 21, 1983, and verified by CPCo.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

Dedicated crews of craftsmen were established July 20, 1983, to maintain the laydown area in accordance with the requirements of FPG 4.000.

Additional supervision has been added at the Poseyville laydown area to direct the crews and implement access control for entrance into the laydown area.

3. The Date When Full Compliance Will be Achieved:

Full compliance has been achieved.

All the items identified in the Notice of Violation were placed on dunnage June 21, 1983. The unistrut pieces were subsequently moved to the scrap area for salvage on July 23, 1983.

The manning of the dedicated crews and additional supervision have been completed and are presently functioning.

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

Letter Serial CSC- Dated September 8, 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 the response to R F Warnick letter to J W Cook dated August 4, 1983.

CONSUMERS POWER COMPANY

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

Sworn and subscribed before me this 8 day of September, 1983.

Barbara R Lewis
Notary Public

My Commission Expires September 3, 1984

NOV0783-0001A-CN02

OL/OM SERVICE LIST

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Washington, DC 20009

SEP 8 1983

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RScroggins

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 18-21, 1983, NRC staff visit to assess construction completion scheduled 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 Consumer's request, the staff would be scheduling this meeting in September, 1983.

On September 2, 1983, [illegible] Consumers Power Company called Darl Hood to advise 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. They also noted that [illegible] for the Construction Completion Program.

Accordingly, the followup meeting will not occur in September. Consumer Power's part this delay may affect our willingness to schedule other [illegible] meetings which might be difficult by Consumer's [illegible] decision.

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

SEP 12 1983

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Con

SEP 0 8 1983

MEMORANDUM FOR: James G. Keppler, Regional Administrator

FROM: R. F. Warnick, Director, Office of Special Cases

SUBJECT: MONTHLY STATUS REPORT FOR AUGUST, 1983

Attached is the status report for the Midland Project for the period of August 1 - August 31, 1983.

Should you have any questions regarding this information, please contact J. J. Harrison of my staff.

"Original signed by R. F. Warnick"

R. F. Warnick, Director
Office of Special Cases

Attachment: As stated

cc w/attachment:
D. G. Eisenhut, NRR
J. H. Sniezak, IE
A. B. Davis, RIII
DMB/ Document Control Desk (RIDS)

8309130004

20367
119

OFFICE	RIII	RIII	RIII	RIII	RIII		
SURNAME	Cook	Landsman for	Gardner for	Harrison	Warnick for		
DATE	9/7/83	9/8/83	9/9/83	9/9/83	9/9/83		

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

September 7, 1983

MEMORANDUM FOR: R. F. Warnick, Director, Office of Special Cases

FROM: R. J. Cook, Senior Resident Inspector, Midland Site

SUBJECT: MONTHLY STATUS REPORT

Attached is the status report for the Midland Nuclear Construction Site covering the period of August 1, 1983, through August 31, 1983.

The status report contains the input from each member of the Midland Inspection Site Team of the Office of Special Cases.

R. J. Cook

R. J. Cook
Senior Resident Inspector
Midland Site Resident Office

cc/attachments
J. J. Harrison
R. B. Landsman
R. N. Gardner
B. L. Burgess

8309130004

SUMMARY OF SIGNIFICANT MIDLAND ISSUES

1. Heating, Ventilation, and Air Conditioning (HVAC)

Investigation into allegations associated with HVAC equipment by Region III is continuing. A plan has been developed and approved by NRC Region III to determine adequacy of HVAC equipment. The plan involves a random sampling of various pieces of installed ducting and hangers and a sampling of items in storage. After marking, removal and packaging the HVAC pieces, they will be shipped to Argonne National Laboratory in Argonne, Illinois for chemical, physical and nondestructive examination (NDE). Argonne Laboratory test results will be used to formulate a basis to address allegations associated with installation of HVAC equipment by the Zack Company.

2. Remedial Soils Work Authorization

During the report period, the following remedial soils work activities were authorized using the NRC approved work authorization procedure:

a. Exploratory probing for UAT (East and West).

b. Pregrout from UAT (East and West).

c. Drift to excavate and install Piers 14 East and West.

d. Excavate and install Piers 13 East and West.

e. Install east and west side level C wales.

3. Significant Meetings

On August 11, 1983, the Director, Division of Licensing; Regional Administrator, Region III; Director, Office of Special Cases; and other members of their staffs met with the Midland ASLB Intervenors to discuss technical aspects of the Construction Completion Plan (CCP). A second meeting to discuss the CCP was held with the public later the same day to provide the public with an opportunity to comment.

On August 12, 1983, a meeting was held with Consumers Power Company and the public to discuss the Midland Systematic Appraisal of Licensee Performance (SALP).

On August 25, 1983, a working meeting with Stone and Webster, attended by the public, was held to clarify the methodology used by Stone and Webster to perform their overview of the CCP.

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

SEP 9 1983

Docket Nos. 50-329/330

PRINCIPAL STAFF			
RA		ENF	
D/RA		SCS	
A/RA		PRO	
OPRP		BLD	
DRMA		PC	
DRMSP			
DE			
ML			
OL		FILE	

+3

MEMORANDUM FOR: G.E. Lear, Chief, Structural & Geotechnical Engineering Branch,

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

SUBJECT: CLARIFICATION OF NRR ASSISTANCE IN RESOLVING MIDLAND SOILS ISSUES

Recent discussions with Region III have occurred to clarify R. F. Warnick's memorandum of March 16, 1983 (Enclosure 1) addressing NRR assistance in resolving Midland soils issues. The clarification focused on the statement that "Region III has assumed all responsibility for reviewing the remedial soils work at the Midland site" Region III agrees that this statement does not apply to changes representing a significant departure from the Midland SER and its supplements or associated hearing testimony. Such changes are to be handled through the normal licensing process (i.e., by formal request from CPCo to NRR and SER supplements).

Accordingly, in the execution of the Task Interface Agreement 83-40 (TAC #51341; accomplishment No. 141433) included in Enclosure 1, NRR should be alert to recognize early where changes requested by CPCo represent a significant departure from our earlier evaluation, and to assure that such requests and reviews are accomplished in accordance with NRC regulations for licensing reviews and documentation requirements. Please assure that any such changes are identified promptly to the Licensing Project Manager, Darl Hood, in order that proper coordination and documentation be achieved.

Elinor G. Adensam

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

Enclosure:
As stated

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SEP 16 1983

TASK NO. 83-40
DATE: APRIL 18 1983
TAC #: 51341

TASK INTERFACE AGREEMENT

PROBLEM: Midland 1/2 - Soils Issue

LEAD OFFICE: /__/ I&E /__/ NRR /X/ REGION III /__/ JOINT

NOTIFICATION:

REFERENCES: Memo to TNovak fm RWarnick dated 03/16/83, subject: NRR Assistance in Resolving Midland Soils Issue

ACTION PLAN:

NRR: 1. Assist Region III in reviewing the remedial soils work at Midland. Assistance is expected to include evaluation of possible deviations from licensee commitments in the SER, advice to the Region III reviewer, and occasional site visits. (SGTE's)

The exact schedule cannot be defined but the PM forcasts that NRR assistance after ~~12/83~~ 6/84 is unlikely.

Region III will contact NRR (PM) on case basis.

NRR: Designate Lead Project Manager to assign TACS and coordinate correspondence, meetings, and reports (GRB# /LB#4 - D. Hood).

OFFICE COORDINATORS:

T. Ippolito (X27415)

R. Vollmer 4/5/83 (X27207)

APPROVED:

T. Novak 4/5 (X27425)

_____ (X)

_____ (X)

C. Norelius I&E

Region- III

F. J. Miraglia 4/5 (X27492)

NRR

cc: V. Stello, ROGR
Regional Admin.
J. Taylor, I&E
E. Jordan, I&E
R. Starr, I&E
N. Mills, I&E
J. Sniezek, I&E
R. DeYoung, I&E
J. Heltemes, AEOD
H. Denton, NRR
E. Case, NRR
R. Vollmer, NRR
H. Thompson, NRR
T. Speis, , NRR
D. Eisenhut, NRR
R. Vollmer, NRR
G. Lainas, NRR
T. Novak, NRR
F. Miraglia, NRR
G. Wohletan, NRR
Lead Project Manager
R. Purple, NRR

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

MEMORANDUM FOR: T. Novak, Assistant Director for Licensing, Division of Licensing

FROM: R. F. Warnick, Director, Office of Special Cases

SUBJECT: NRR ASSISTANCE IN RESOLVING MIDLAND SOILS ISSUE

Region III has assumed all responsibility for reviewing the remedial soils work at the Midland site. However, we expect the licensee to periodically request relief from commitments made in the SSER. NRR's assistance will be requested when this occurs.

The expertise of NRR will also be required from time to time for consultation with Mr. Ross Landsman during his review of the remedial soils activities. A schedule cannot be defined at this time. NRR's assistance will be requested on a case by case basis as the need arises.

We also recommend that periodic site visits be made in order for your personnel to maintain their awareness of the underpinning effort. These visits could be limited to observations of critical work activities such as the pier 11 load tests and the drift work to the control tower. The schedule for these activities can be obtained from Ross Landsman.

Should you have any questions please contact Wayne Shafer (FTS 384-2656).

RF Warnick

R. F. Warnick, Director
Office of Special Cases

cc: A. B. Davis
J. H. Sniezek, IE
J. C. Stone, IE
D. Hood, NRR M/S-116

8312140044

NRC FORM 151

TECHNICAL ASSIGNMENT CONTROL FORM

U.S. NUCLEAR REGULATORY COMMISSION

TACS NUMBER: F1041

NEW ASSIGNMENT | NEW INFORMATION

SECTION I. REQUEST DATA

PREPARED BY: Darl S. Hood

DATE PREPARED: MO DAY YR

TITLE/GENERAL DESCRIPTION (Limit to 120 characters): NRR Support of RE Midland Soils issue

PLANNED ACCOMPLISHMENT NUMBER: 141433

REQUEST CONTACT: D. Hood

REQUESTER'S INITIALS: DSH

REQUESTING ORGANIZATION: NRR/DL/LB-4

REQUESTING TARGET DATE: MO DAY YR 6 30 84

REQUESTING REMARKS (Limit to 120 characters):

MULTI-PLANT ACTION NUMBER:

SECTION II. SYSTEMS CONTROL DATA

A. OPERATING REACTOR ACTIONS (Used with Activity Code 31)

FACILITY NAME: Midland Plant Units 1 & 2

DOCKET: 50-329/330

INITIATION DATE: MO DAY YR 4 15 83

AMENDMENT FEE CLASS: I ☐ II ☐ III ☐ IV ☐ V ☐ VI ☐

B. TOPICAL REPORT REVIEWS (Used with Activity Code 51)

VENDOR'S NAME:

REPORT IDENTIFICATION SYMBOL:

PROPRIETARY (P):

REPORT DATE: MO DAY YR

ADDITIONAL INFORMATION REQUEST DATE: MO DAY YR

NON-PROPRIETARY VERSION (NP):

SUBMIT DATE: MO DAY YR

LETTER TO VENDOR DATE: MO DAY YR

ACCEPTED ☐ NOT ACCEPTED ☐ WITHDRAWN ☐

NON-PROPRIETARY REPORT:

SECTION III. REVIEW DATA

ACTIVITY CODE (Enter "S" for Safety and/or "E" for Environmental review, "UNK" for unknown ...)

OPERATING REACTOR ACTIONS	(31)	GENERIC ACTIVITIES	(55)
SYSTEMATIC EVALUATION PROGRAM	(40)	UNRESOLVED SAFETY ISSUES	(57)
TOPICAL REPORT REVIEWS	(51)	CORRESPONDENCE	(UNK)
DESIGNATED GENERIC	(57)		

REVIEWER'S SURNAME	REVIEWER'S INITIALS	ESTIMATED HOURS	COMPLETION DATE ESTIMATED MO DAY YR	COMPLETION DATE ACTUAL MO DAY YR
D. Hood	DSH	150	6 30 84	
J. Kane	JXK	250	6 30 84	
F. Rinaldi	FYR	[illegible]	6 30 84	

for Bob

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

SEP 14 1983

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

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

Gentlemen:

Thank you for your letter dated September 8, 1983, informing us of the steps you have taken to correct the noncompliance which we brought to your attention in Inspection Report No. 50-329/83-11(OSC); 50-330/83-11(OSC) forwarded by our letter dated August 4, 1983. We will examine these matters during a subsequent inspection.

Your cooperation with us is appreciated.

Sincerely,

RF Warnick

R. F. Warnick, Director
Office of Special Cases

cc w/ltr dtd 09/08/83: See attached
distribution list

8309190079

cc w/ltr dtd 09/08/83:
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.)
Howard Levin (TERA)
Billie P. Garde, Government
Accountability Project
Lynne Bernabei, Government
Accountability Project

RIII	RIII	RIII	RIII
Gardner/ls	Landsman	Harrison	Warnick
09/13/83	09/14/83	09/14/83	9/14

Consumers Power Company

James W Cook
Vice President - Projects, Engineering and Construction

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

September 8, 1983

Mr J G Keppler, Regional Administrator
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND ENERGY CENTER
INSPECTION REPORT NO 50-329/83-11(OSC) AND 50-330/83-11(OSC)
File: 0.4.2 UFI: 70*01 Serial: CSC-6869
0485.16 42*05*22*04

REFERFNCE: (1) R F Warnick letter to J W Cook, dated August 4, 1983
Inspection Report No 50-329/83-11(OSC) and 50-330/83-11 (OSC)

This letter, including Attachment 1, provides our response to Reference 1, which transmitted the subject Inspection Report and requested our written response to the item of noncompliance therein.

James W. Cook

JWC/BHP/dmh

Attachment

cc: RFWarnick, NRC Region III
JJHarrison, NRC Region III
RNGardner, NRC Region III
RBLandsman, NRC Region III
RJCook, NRC Senior Resident Inspector, Midland Site
RLBurgess, NRC Resident Inspector, Midland Site

SEP 12 1983

NOV0783-0001A-CN02

8309190083

Attachment 1
Serial: CSC-6869

CONSUMERS POWER COMPANY'S RESPONSE TO
US NUCLEAR REGULATORY COMMISSION, REGION III
INSPECTION REPORT NO 50-329/83-11(OSC) & 50-330/83-11(OSC)

Appendix (Notice of Violation) to Inspection Report No. 50-329/83-11(OSC) and 50-330/83-11(OSC) provides one item of noncompliance to 10 CFR 50, Appendix B. The NRC statement and our responses are given below:

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

CPC-1-A Policy 13, Handling, Storage, and Shipping; Section 3.3, RECEIPT AND STORAGE, states, in part, "Suppliers provide plans, . . ., procedures and personnel to . . ., store, . . . items upon arrival at the site."

Bechtel Power Corporation field Procedure FPG 4.000, Revision 10, Storage - Maintenance/Inspection of Equipment and Materials, states in part in Section 6.2.4 "Items shall be stored on dunnage or cribbing to allow for air circulation and to minimize the trapping of water."

Contrary to the above, structural items stored in various areas of the Poseyville Road laydown area were not stored on dunnage or cribbing to allow for air circulation and to minimize the trapping of water as required by Bechtel Field Procedure FPG 4.000, Revision 10.

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

CONSUMERS POWER COMPANY RESPONSE

In accordance with this Notice of Violation, an explanation of corrective action is as follows:

1. Corrective Action Taken and the Results Achieved:

   As clarification to the item of noncompliance the structural I-beam identified in your report was intended for use as a pipe storage rack and was a spare setting alongside others being used as such.

   Work orders for placing on dunnage the stock steel and unistrut pieces welded to base plates were issued June 20, 1983, and June 7, 1983, respectively. The work was completed June 21, 1983, and verified by CPCo.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

Dedicated crews of craftsmen were established July 20, 1983, to maintain the laydown area in accordance with the requirements of FPG 4.000.

Additional supervision has been added at the Poseyville laydown area to direct the crews and implement access control for entrance into the laydown area.

3. The Date When Full Compliance Will be Achieved:

Full compliance has been achieved.

All the items identified in the Notice of Violation were placed on dunnage June 21, 1983. The unistrut pieces were subsequently moved to the scrap area for salvage on July 23, 1983.

The manning of the dedicated crews and additional supervision have been completed and are presently functioning.

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

Letter Serial CSC- Dated September 8, 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 the response to R F Warnick letter to J W Cook dated August 4, 1983.

CONSUMERS POWER COMPANY

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

Sworn and subscribed before me this 8 day of September, 1983.

Barbara R Turner
Notary Public

My Commission Expires September 3, 1984

NOV0783-0001A-CN02

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NOV0783-0001A-CN02

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

SEP 16 1983

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

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

Gentlemen:

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) of the Midland Nuclear Plant, Units 1 and 2, and our meeting of August 12, 1983, to review the results of that assessment covering the period July 1, 1981, through March 31, 1983. A copy of the SALP 3 Report was provided for your review in advance of the meeting. Enclosed is the final SALP 3 Report that incorporates the SALP Board Chairman's letter to you and your letter of September 6, 1983.

From my perspective, your efforts to implement your Quality Assurance (QA) program at the Midland Nuclear Plant during the assessment period clearly were ineffective. This was exemplified by our rating the Soils and Foundations functional area as Category 3 and by our identification during the Diesel Generator Building inspection of numerous weaknesses in the implementation of your QA program. I am encouraged by your commitment to accomplish the improvements necessary to achieve the quality performance level that the NRC expects as addressed in your letter of September 6, 1983. However, until improved performance is demonstrated, the NRC will continue to require strong oversight through third party inspections as well as its own inspections. Furthermore, while it is my desire to move away from our role of literally approving day-to-day activities in the remedial soils work to implement the ASLB Board Order, I do not intend to seek relief from that Order until we have the needed confidence that work in that area will be carried out effectively.

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 SALP Report will be placed in the NRC's Public Document Room.

8709220268

SEP 16 1983

No reply to this letter is required; however, should you have any questions concerning these matters, we will be pleased to discuss them with you.

Sincerely,

for James G. Keppler
Regional Administrator

Enclosure: SALP 3 Report
No. 50-329/83-09; 50-330/83-09

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.)
Howard Levin (TERA)
Billie P. Garde, Government
Accountability Project
Lynne Bernabei, Government
Accountability Project
J. M. Taylor, IE

SALP 3

U. S. Nuclear Regulatory Commission

Region III

Systematic Assessment of Licensee Performance

Consumers Power Company

Midland Nuclear Generating Station, Units 1 and 2

Docket Nos. 50-329; 50-330

Report Nos. 50-329/83-09; 50-330/83-09

Assessment Period

July 1, 1981 through March 31, 1983

CONTENTS

I. INTRODUCTION

The NRC has established a program for the Systematic Assessment of Licensee Performance (SALP). The SALP is an integrated NRC Staff effort to collect available observations and data on a periodic basis and evaluate licensee performance based upon those observations. SALP is supplemental to normal regulatory processes used to insure compliance to the rules and regulations. SALP is intended, primarily from a historical point, to be sufficiently diagnostic to provide a rational basis for allocating future NRC resources and to provide meaningful guidance to the licensee's management to promote quality and safety of plant construction and operation.

An NRC SALP Board, composed of the staff members listed below, met on June 7, and July 11, 1983, to review the collection of performance observations and data to assess the licensee performance in accordance with the guidance in NRC Manual Chapter 0516, Systematic Assessment of Licensee Performance. A summary of the guidance and evaluation criteria is provided in Section II of this report.

This report is the SALP Board's assessment of the licensee safety performance at Midland Nuclear Station, Units 1 and 2, from July 1, 1981 through March 31, 1983.

Inspections were conducted in March and April 1982 to evaluate the significance of the quality control (QC) inspection deficiencies identified during the special team inspection of May 1981. These followup inspections indicated that QC inspections were not properly identifying deficiencies in the installation of equipment. As a result of these deficiencies and due to recurring problems in the licensee's remedial soils work activities, increased NRC inspection effort was initiated through the formation of a special Midland Section comprised of inspectors dedicated solely to the Midland plant. Additional inspection assistance was obtained through a special contract with a Department of Energy Laboratory.

To aid in the evaluation of the as-built condition of the plant, a special inspection of the Diesel Generator Building was conducted during the period of October 12 through November 25, 1982. This inspection identified significant violations which demonstrated a breakdown in the implementation of the licensee's Quality Assurance (QA) program. In addition, it resulted in the licensee's decision to suspend some safety-related work activities (December 3, 1982) and to formulate a construction completion program to provide assurance that safety-related structures and systems were constructed as designed. Due to the significant violations, the NRC imposed a civil penalty of $120,000.

In view of the suspension of portions of safety-related work activities and the licensee's proposed construction completion program, the Region III Regional Administrator determined that the SALP 3 appraisal for

Midland would address only areas where work activities continued; namely Remedial Soils (Soils and Foundations), the Nuclear Steam Supply System (Safety-Related Components and Piping Systems and Supports), the Heating, Ventilating, and Air Conditioning System (Support Systems), and Licensing Activities.

The results of the SALP Board assessments in the selected functional areas will be presented to the licensee at a meeting in the near future.

SALP Board for Midland Nuclear Station:

J. A. Hind, Chairman, Director, Division of Radiological and Materials Safety Programs
C. E. Norelius, Director, Division of Project and Resident Programs
R. L. Spessard, Director, Division of Engineering
T. N. Tambling, Chief, Program Support Section
R. F. Warnick, Director, Office of Special Cases
E. G. Adensam, Chief, Licensing Branch 4, NRR
J. J. Harrison, Chief, Midland Section
R. N. Gardner, Project Inspector
R. B. Landsman, Reactor Inspector
R. J. Cook, Senior Resident Inspector, Midland
B. L. Burgess. Resident Inspector, Midland
R. W. Defayette, Reactor Engineer

II. CRITERIA

The licensee performance is assessed in selected functional areas depending upon whether the facility is in a construction, pre-operational or operating phase. Each functional area normally represents areas significant to nuclear safety and the environment, and are normal programmatic areas. Some functional areas may not be assessed because of little or no licensee activities or lack of meaningful observations. Special areas may be added to highlight significant observations.

One or more of the following evaluation criteria were used to assess each functional area.

1. Management involvement in assuring quality

2. Approach to resolution of technical issues from safety standpoint

3. Responsiveness to NRC initiatives

4. Enforcement history

5. Reporting and analysis of reportable events

6. Staffing (including management)

7. Training effectiveness and qualification

However, the SALP Board is not limited to these criteria and others may have been used where appropriate.

Based upon the SALP Board assessment, each functional area evaluated is classified into one of three performance categories. The definition of these performance categories is:

Category 1: Reduced NRC attention may be appropriate. Licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved.

Category 2: NRC attention should be maintained at normal levels. Licensee management attention and involvement are evident and are concerned with nuclear safety; licensee resources are adequate and are reasonably effective such that satisfactory performance with respect to operational safety or construction is being achieved.

Category 3: Both NRC and licensee attention should be increased. Licensee management attention or involvement is acceptable and considers nuclear safety, but weaknesses are evident; licensee resources appear to be strained or not effectively used such that minimally satisfactory performance with respect to operational safety or construction is being achieved.

III. SUMMARY OF RESULTS

Functional Area Assessment	Category 1	Category 2	Category 3
1. Soils and Foundations			X
2. Containment and other Safety Related Structures	NOT ADDRESSED IN THIS REPORT*		
3. Piping Systems and Supports		X	
4. Safety Related Components		X	
5. Support Systems		X	
6. Electrical Power Supply and Distribution	NOT ADDRESSED IN THIS REPORT*		
7. Instrumentation and Control Systems	NOT ADDRESSED IN THIS REPORT*		
8. Licensing Activities		X	
9. Quality Assurance	NOT ADDRESSED IN THIS REPORT*		
10. Preoperational Testing	NOT ADDRESSED IN THIS REPORT*		

*For Functional Areas "Not Addressed In This Report" see Section I, Introduction.

IV. Performance Analyses

1. Soils and Foundations

a. Analysis

During this SALP period the licensee finalized the Remedial Soils program and initiated steps to implement the Remedial Soils measures necessary to correct previously identified soils deficiencies. The NRC's review and approval of the design of the Remedial Soils measures is documented in Supplement No. 2 to the Midland Safety Evaluation Report issued in October 1982. The steps taken by the licensee to implement the Remedial Soils measures during the SALP period include the following:

- The excavation of the access shafts to elevation 609
- The installation of six temporary underpinning piers
- Preparatory work for the Service Water Pump Structure underpinning
- Initiation of temporary dewatering system for the Service Water Pump Structure
- Initiation of probing for buried utilities adjacent to the Service Water Pump Structure
- The installation of the permanent dewatering system wells
- The installation of the auxiliary building underpinning instrumentation system

Thirteen inspections (or portions of inspections) were performed in this area. During this SALP period a total of nine noncompliances and two deviations with NRC requirements were identified as follows:

(1) Severity Level IV - examples of failure to follow procedures and failure to develop adequate procedures (329/82-03; 330/82-03)

(a) Failure to revise design drawings according to site procedural requirements

(b) Failure to develop an adequate excavation procedure

(c) Failure to assure design verification according to site procedural requirements

(2) Severity Level IV - examples of failure to develop adequate procedures (329/82-05; 330/82-05)

(a) Access shaft work was initiated without having a reviewed and approved procedure

(b) Failure to develop adequate procedures to control specification design changes

(c) Failure to develop adequate specification for permanent dewatering wells

(d) Failure to develop an adequate procedure to prepare or implement overinspection plans

(3) Deviation - failure to provide a qualified civil QA staff (329/82-05; 330/82-05)

(4) Severity Level IV - failure to establish a QA program which provided controls over the underpinning monitoring system (329/82-06; 330/82-06). This finding resulted in the issuance of a Confirmatory Action Letter (CAL) on March 31, 1982

(5) Severity Level V - failure to install anchor bolts in accordance with site procedures (329/82-11; 330/82-11)

(6) Deviation - failure to use approved installation/coordination forms to document the installation of underpinning monitoring instrumentation (329/82-11; 330/82-11)

(7) Severity Level IV - failure of specifications to identify the location of well sampling points (329/82-18; 330/82-18)

(8) Severity Level IV - failure to assure that the slope layback at the Auxiliary Building access shaft was constructed in accordance with design (329/82-18; 330/82-18)

(9) Severity Level IV - examples of failure to establish measures to control the issuance of documents (329/82-21; 330/82-21)

(a) failure to use a controlled copy of a Project Quality Control Instruction (PQCI) to prepare a QC recertification examination. This finding resulted in the issuance of a CAL on September 24, 1982

(b) Failure to control QC manuals

(10) Severity Level III - failure to translate applicable regulatory requirements concerning the purchase of armor stone for a "Q" portion of the perimeter dike into appropriate specifications and design documents (329/82-22; 330/82-22)

(11) Severity Level III - failure to maintain current remedial soils drawings (329/83-03; 330/83-03)

The noncompliances identified during this rating period are evidence of the licensee's continued lack of attention to detail in assuring that the requirements of the Midland QA program were properly implemented. Furthermore, these noncompliances indicate the lack of management attention to quality in this area.

As a result of noncompliance item (4) an investigation was performed by NRC to determine whether material false statements had been made by the licensee's staff in regard to the installation status of the auxiliary building underpinning monitoring instrumentation. The investigation failed to provide conclusive evidence that a material false statement had been made.

An investigation by NRC was initiated during this evaluation period to determine whether the licensee violated the April 30, 1982, Atomic Safety and Licensing Board (ASLB) Order which suspended all remedial soils activities on "Q" soils for which the licensee did not have prior explicit NRC approval. This investigation, which is continuing, focuses on the licensee digging below the "deep Q duct bank" allegedly without NRC approval. A management meeting was held at the site on August 11, 1982, to discuss the potential violation of the Board Order. A CAL was issued on this matter on August 12, 1982.

Noncompliance items (10) and (11) are individual examples related to the soils area taken from much broader items of noncompliance not associated with this functional area. (Items 10 and 11 were part of two separate citations for failure to adequately implement a quality assurance program.) The two individual examples taken by themselves would not have been rated as severity level III.

In view of continuing deficiencies in the soils area, the ASLB issued an Order on April 30, 1982, suspending all remedial soils activities on safety-related (Q) soils for which the licensee did not have prior NRC approval. Subsequent to this order the licensee resumed remedial soils activities with NRC approval. During the following months numerous problems occurred due to miscommunciation/misunderstanding between the licensee and the NRC. To resolve these issues a Work Authorization Procedure was developed. This procedure requires the licensee to request and obtain written NRC authorization prior to the initiation of each remedial soils work

activity. In addition, the scope of the Work Excavation Permit System was expanded to include all remedial soils work including underpinning. Due to the NRC's concerns with the licensee's ability to properly implement the quality program in the remedial soils area an indepehdent third party overview was established. All the preceding actions occurred at the direction of the NRC, and were not a result of the licensee's initiative.

b. Conclusions

The licensee is rated Category 3 in this area. Although this is the same rating as the previous assessment period, the licensee's overall performance in this functional area has continued to decline. NRC findings during this assessment period indicate a continued lack of attention to detail by the licensee and the continuing inability on the part of the licensee to implement properly the requirements of the Midland QA program. A rating of less than minimally acceptable (Not Rated) was considered by the Board; however, a Category 3 rating was assigned because of the stringent controls instituted to govern work in this area, i.e., the Work Authorization Procedure, the Work Excavation Permit System, the independent third party overview, and continued scrutiny by the NRC staff.

c. Board Recommendations

The Board recommends that the licensee thoroughly review the performance of construction, engineering, and Quality Assurance managers in the Remedial Soils area. The implementation of measures to provide closer attention to detail in remedial soils work activities and to provide assurance that future remedial soils work will conform to the requirements of the Midland QA program should be a continuing management goal. Based on information provided to the Board subsequent to the evaluation period, the Board notes that the licensee has continued to have performance problems in this area.

3&4. Safety-Related Components and Piping Systems and Supports

a. Analysis

Portions of ten inspections were performed in the Nuclear Steam Supply System area during the evaluation period. The inspections involved the observation of large and small bore hanger installations (including snubbers and restraints), receipt and installation records, modification of the reactor pressure vessel supports, auxiliary feedwater internal header modification, and containment structural steel welding. Within the scope of this effort one item of noncompliance was identified as follows:

- Severity Level V - Failure to follow procedures regarding the tagging of a valve located in the welding fabrication area (329/83-01; 330/83-01).

The licensee's resources appear to be adequate. The management controls being utilized, the records, and the records control system met requirements. The overall effectiveness and attitudes of licensee personnel in complying with requirements were considered acceptable.

b. Conclusion

The licensee is rated Category 2 in this area. This is the same rating as the previous assessment period.

c. Board Recommendations

The Board notes that subsequent to this evaluation period the NRC has indications that quality problems exist with installed components, piping, and piping supports. These indicators include the Independent Design and Construction Verification Program (TERA's Monthly Status Report dated May 27, 1983) and the licensee audit conducted February 23, 1983 through March 10, 1983 (including the R. Pember memo to D. Miller dated March 13, 1983).

NRC inspection activities should focus on assuring that installed items meet the design and regulatory requirements.

5. Support Systems

a. Analysis

Portions of four inspections were performed covering Heating, Ventilation, and Air Conditioning (HVAC) welder certifications, welder procedure qualification, and material traceability. No items of noncompliance or deviations were identified during these inspections.

As a result of a licensee audit of Photon Testing, Inc., the licensee suspended welding of safety-related HVAC work. Photon Testing, Inc. had previously been contracted by the licensee to qualify welding procedures and certify welders for HVAC fabrication and installation. The cumulative audit findings made the credibility of some of the certifications of previously certified welders, as well as the adequacy of some of the welding procedures, indeterminate. Due to the audit findings, the NRC imposed a hold point for the restart of safety-related HVAC welding.

An initial attempt by the licensee to demonstrate to the NRC that affected HVAC welding procedures had been qualified and were ready for implementation demonstrated that the welding procedures were still inadequate. As a result, the NRC did not authorize the licensee to restart safety-related HVAC welding.

No other problems in the HVAC area were identified.

b. Conclusion

The licensee is rated Category 2 in this area. This is a lower rating than the previous assessment due to the licensee's failure to initially take adequate corrective action to resolve the deficiencies identified in the Photon Testing, Inc. audit and the licensee managements failure to identify the inadequate initial corrective action.

c. Board Recommendations

Licensee management involvement should be increased in the area of ensuring proper and timely followup to correcting identified deficiencies. The board notes that subsequent to this evaluation period the licensee successfully demonstrated the adequacy of welding procedures and welders to perform to those procedures. Based on the demonstration, the NRC authorized the resumption of HVAC welding.

8. Licensing Activities

a. Analysis

The assessment was based on our evaluation of the following licensing activities:

- Soils and Structures
- Emergency Planning
- Equipment Qualification
- Quality Assurance Program
- Natural Gas Pipeline
- Auxiliary Feedwater System
- Instrumentation and Control Systems Review
- Seismic Spectra
- Fire Protection
- Implementation of NUREG-0737 Items

For the licensing activities evaluated, there appeared to be appropriate management attention with decision making taking place at adequate levels. During numerous audits conducted by NRR, including audits relating to the soils issue, emergency planning, instrumentation and control systems, fire protection and equipment qualification, the records maintained by the licensee were generally complete,

well maintained and available. In almost every area, the appropriate level of management participated in meetings with the NRC on safety, technical, and licensing issues and demonstrated knowledge on the meeting's subject matter. In the soils remedial areas, a reorganization provided an executive manager fully dedicated to this area; however, some difficulties occurred in the early phases of this reorganization.

Clear lines of responsibility were established in support of the staff's safety evaluation and subsequent issuance of the Safety Evaluation Report. Priorities established by the licensee management were generally consistent with and supportive of those priorities established by the staff. Commitments made to incorporate resolutions into FSAR revisions were kept and were generally timely. The licensee also made an objective and extensive effort to track open issues related to the safety evaluation. One issue which involved implementation of a TMI Action Plan Item (Item I.B.1.2) reached an apparent impasse between the staff and applicant. However, when the proper level of NRC and licensee management attention was focused on the issue, both sides were able to reach an acceptable resolution. On the other hand, licensee's management failed to recognize the safety significance of constructing a high pressure gas facility in close proximity to safety structures until after construction completion.

Generally, licensee personnel involved in resolution of technical questions were knowledgeable and clearly understood the issues. During the appraisal period, the technical submittals by the licensee to the NRC were usually complete and conservative. Resolution of two technical issues during the safety evaluation required elevation to the Division Director appeals level. In one of these issues, relief was given to the licensee. In the other, the licensee was required to commit to installation of a third auxiliary feedwater pump. In both cases, however, the licensee prepared reasonable technical justification for their position. In addition, the licensee's response once the appeals decision on the auxiliary feedwater pump had been made was excellent.

The licensing area of soils and structures needs improvement insofar as the approach to technical issues. There was reluctance by the licensee to perform certain soils remedial work utilizing accepted quality assurance procedures until required by the NRC. In regard to the buried piping issue, the licensee appeared to lack a thorough understanding of the safety issues involved resulting in the submission of additional information several times before acceptable resolution was

achieved. Improvement in the soils area over the appraisal period has been evidenced by more specific and clearer submittals to the NRC.

Responses to the NRC were generally timely and thorough. The licensee was particularly responsive in the area of instrumentation and control systems. Additionally, in questions concerning the natural gas pipeline, the licensee demonstrated a willingness to address NRC concerns effectively and responsiveness increased accordingly. Responsiveness was rated poorly for those licensing issues which remained unresolved for a long period of time such as resolution of the buried piping problem.

With respect to licensing staff, positions appear to be well defined and responsibilities identified. Staff is adequate and at levels consistent with the activity for the licensing activities evaluated. The licensee effected reorganizations and personnel replacements within a reasonable time insofar as key positions are concerned. In some cases, however, the staff considers that too much reliance was placed upon representation by consultants and by the architect/engineer.

b. Conclusion

The licensee is rated Category 2 in this area.

Generally, in licensing activities, the licensee expressed a willingness to respond to NRC initiatives. Submittals were usually timely and thorough. Especially notable is the degree of management attention directed toward licensing activities as evidenced by meeting participation and the level at which decisions occur. Areas of above average performance in all criteria include instrumentation and control systems reviews. Conversely, although improvement in the soils area has been seen during this appraisal period, it is imperative for the licensee to continue to focus a high level of management attention in the soils area in order to maintain an acceptable level of performance insofar as licensing activities are concerned.

c. Board Recommendations

A high level of licensee management attention should be continued in resolving the adequacy of responses to technical issues and improvement of management controls in the area of remedial soils and underpinning activities.

V. Supporting Data and Summaries

A. Noncompliance Data

Facility Name: Midland, Units 1 and 2 Docket Nos. 50-329
50-330

Inspections: No. 81-14 through 83-05

Functional Area Assessment	Noncompliance and Deviation Severity Levels					
	I	II	III	IV	V	Dev
1. Soils and Foundations			2	6	1	2
2. Containment and Other Safety-Related Structures	NOT ADDRESSED IN THIS REPORT					
3. Piping Systems and Supports						
4. Safety-Related Components					1	
5. Support Systems						
6. Electrical Power Supply and Distribution	NOT ADDRESSED IN THIS REPORT					
7. Instrumentation and Control Systems	NOT ADDRESSED IN THIS REPORT					
8. Licensing Activities						
9. Quality Assurance	NOT ADDRESSED IN THIS REPORT					
10. Preoperational Testing	NOT ADDRESSED IN THIS REPORT					
TOTALS	0	0	2	6	2	2

B. Report Data

1. Construction Deficiency Reports (CDR)

During this SALP period, 19 CDR's were submitted by the licensee under the requirements of 10 CFR 50.55(e).

a. Operating procedures must be modified to require at least one reactor cavity cooling fan in service during normal plant operation.

b. For certain control circuits, a voltage below the limits for proper operation of the motor control center starter coils was calculated. This line voltage drop is a direct result of currents passing through long control cables.

c. The design of electrical components associated with the main steam isolation valves does not conform to the channel separation criteria in Reg. Guide 1.75; also, satisfactory seismic qualification reports have not been submitted.

d. Rodent damage has occurred in electrical penetration wiring and cables.

e. The auxiliary feedwater level control valves are fed from Class 1E instrument control power instead of Class 1E preferred power supplies as specified in the FSAR.

f. The existing design of the auxiliary feedwater system pump turbine driver steam admission valve interlock system would block steam entry and prevent proper operation.

g. It has been determined that instrument string error in the steam generator level circuits, under accident conditions, exceeds that allowed to establish steam generator ECCS control setpoints.

h. Recent inspections at three operating B&W plants indicated damage to the internal auxiliary feedwater header assemblies. New external headers will provide all functional requirements.

i. During an engineering review it was discovered that some Q-related equipment is located in the auxiliary building that is cooled by a non-safety grade HVAC system. During an accident, this could result in some Q-equipment being lost.

j. B&W supplied non-seismically qualified transmitter mounting brackets for transmitters forming part of the reactor coolant pressure boundary.

k. Approximately 80% of the radiation monitoring modules, manufactured by Victoreen, Inc. were found to be nonconforming. This was due to a significant QA breakdown at the supplier.

l. During field modifications of 460V Class 1E motor control centers supplied by ITE-Gould it was discovered that some of the control power transformers were undersized.

m. The incorrect size class 1E power cables were pulled and installed.

n. ACI 349, Appendix B, issued August 1979 specifies that shear lugs in embedment designs shall be considered effective only in compression zones. Some Midland embedment designs, which were completed and installed prior to this date, do not meet this new criterion.

o. No specific features to mitigate frazil ice formation on the service water intake structure are contained in the design of the service water intake structure.

p. The design of the suction piping for the auxiliary feedwater system did not include overpressurization protection.

q. Unacceptable workmanship conditions have been identified on electrical control panels and cabinets supplied by various suppliers.

r. Bailey Controls Company NI/RPS and ECCAS cabinets have terminal blocks which are fastened to the termination panels by Tinnerman Nuts. These nuts could become loose.

s. Class 1E electrical control cabinets appear to have insufficient clearances from adjacent equipment or walls.

The licensee's threshold for reporting is considered to be appropriate and the total number of items reported is not considered to be excessive.

2. Part 21 Reports

The licensee issued no Part 21 reports during the reporting period.

C. Licensee Activities

The main construction areas during the evaluation period were NSSS work, electrical equipment, conduits, cable trays, cables, HVAC, remedial soils work, small and large bore piping, pipe hangers and snubbers. As a result of the diesel generator building inspection, the licensee halted on December 3, 1982, safety-related work with the exception of the following: system layup, hanger and cable reinspections, post system

turnover work, HVAC work, NSSS work, remedial soils work, and design engineering. Preoperational testing was conducted on the Component Cooling Water System, the Decay Heat Removal System, and the Fuel Transfer System.

Units 1 and 2 were reported by the licensee to be 79% complete per the licensee's letter to Hatfield (NRC) dated May 6, 1983. Fuel load dates are estimated by the licensee to be February 1985 and October 1984, respectively.

D. Inspection Activities

The routine inspection effort by the NRC consisted of 39 inspections during the evaluation period.

In addition a special team inspection (329/82-22; 330/82-22) was conducted to assess the adequacy of implementation of the quality assurance program. This assessment was done for the most part in the diesel generator building where the majority of work was performed subsequent to 1980. This inspection resulted in the licensee suspending some safety-related work on December 3, 1982.

E. Investigations and Allegations Review

1. An investigation was conducted to determine whether material false statements had been made by the licensee's staff in regards to the installation status of the auxiliary building monitoring instrumentation. The investigation report (329/82-13; 330/82-13) failed to provide conclusive evidence that a material false statement had been made.

2. An investigation was being conducted during this SALP period to determine whether the licensee violated the April 30, 1982, ASLB order which suspended all remedial soils activities on "Q" soils for which the licensee did not have prior explicit NRC approval. The report was not issued during this SALP period.

3. A number of allegations were received during this SALP period regarding HVAC work by Zack, welding, electrical work, and deficiencies in the implementation of the CPCo QA/QC program. Investigations or special inspections to resolve some of the issues identified within these allegations were initiated during this SALP period.

F. Escalated Enforcement Action

1. Civil Penalties

A Civil Penalty for $120,000 was issued during this evaluation period in regard to the adverse findings identified during the diesel generator building inspection (329/82-22; 330/82-22). The licensee's request for mitigation of the amount is under review by the NRC staff.

2. Orders

The ASLB issued an order on April 30, 1982, which suspended all remedial soils activities on "Q" soils for which the licensee did not have prior explicit NRC approval. The ASLB issued a subsequent clarifying order on May 7, 1982.

G. Administrative Actions

1. Corrective Action Letters

a. A letter of understanding was issued by the licensee on March 31, 1982, in response to deficiencies observed during the inspection of the auxiliary building monitoring instrumentation. (329/82-06; 330/82-06). This matter is also discussed in Section V.E.1. of this report.

b. A Confirmatory Action Letter (CAL) was issued on August 12, 1982, in response to a potential ASLB order violation (329/82-18; 330/82-18). This matter is also discussed in Sections IV.1.a and V.E.2 of this report. Resolution of these concerns was still under investigation at the end of the SALP period.

c. A CAL was issued on September 24, 1982, in response to deficiencies observed during the inspection of remedial soils QC inspectors recertifications (329/82-21; 330/82-21).

d. A letter of understanding was issued on December 30, 1982, in response to deficiencies observed during the diesel generator building inspection (329/82-22; 330/82-22). This matter is also discussed in Sections V.C and V.F.1 of this report.

2. Management Conferences

During this SALP period eighteen conferences were held between NRC and licensee management:

a. On July 24, 1981, a management meeting was held to discuss inspection findings pertaining to irregularities in control and review of small bore piping system design packages.

b. On January 12, 1982, a management meeting was held to review and discuss recent changes to the Midland QA organization and the QA program for the remedial soils work.

c. On March 30, 1982, a management meeting was held to discuss NRC findings in the installation of underpinning monitoring instrumentation.

d. On April 26, 1982, a meeting was held to present to CPCo management the SALP 2 findings.

e. On May 14, 1982, a meeting was held during which the licensee presented a preliminary report of the results of the electrical cable reinspections.

f. On June 21, 1982, a meeting was held to discuss CPCo's response to SALP 2.

g. On August 5, 1982, a meeting was held to further discuss CPCo's responses to SALP 2.

h. On August 11, 1982, a management meeting was held to discuss a potential violation of the ASLB order of April 30, 1982.

i. On August 26, 1982, a management meeting was held to discuss Midland QA problems.

j. On September 2, 1982, a management meeting was held to discuss the Quality Improvement Plan.

k. On September 29, 1982, a management meeting was held to discuss the integration of QC activities into Midland Project Quality Assurance Department (MPQAD).

l. On October 5, 1982, a meeting was held to discuss the CPCo-TERA proposal concerning the Independent Design Verification Program (IDVP).

m. On October 29, 1982, a meeting was held to discuss Bechtel performance/problems.

n. On November 5, 1982, a meeting was held to discuss Stone and Webster (S&W) qualifications for performance of remedial soils third party overview.

o. On January 18, 1983, an enforcement conference was held to discuss the diesel generator building findings.

p. On February 8, 1983, a management meeting was held to discuss the CCP and the IDVP as well as CPCo and Bechtel performance and desire to take proper corrective action. In addition, the NRC announced the imposition of a $120,000 fine due to diesel generator building findings.

q. On March 7, 1983, a meeting was held to further discuss the CCP.

r. On March 15, 1983, a meeting was held to discuss the INPO Self Imposed Evaluation results.

3. Construction Permit Amendment

On May 26, 1982, the NRC amended the Construction Permits, CPPR-81 and CPPR-82, to implement the ASLB April 30, 1982, Order suspending all remedial soils activities on "Q" soils without prior explicit NRC approval.

VI. ENCLOSURES

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

JUL 21 1983

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

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

Gentlemen:

This refers to the NRC's Systematic Assessment of Licensee Performance (SALP) for the Midland Nuclear Plant, Units 1 and 2, for the period July 1, 1981 through March 31, 1983.

A meeting will be scheduled with you in the near future in which Mr. James G. Keppler and members of the NRC staff will present the observations and findings of the SALP Board. The more significant SALP Board findings are summarized in Enclosure 1. The enclosed SALP Report which documents the analyses, conclusions and recommendations of the SALP Board is for your review prior to the meeting.

Since this meeting is intended to be a forum for the mutual understanding of the issues and findings, you are encouraged to have appropriate representation at the meeting. As a minimum we would suggest you, the Site Manager, Site QA Manager, and managers for the various functional areas where problems have been identified attend the meeting. Any comments you may have regarding the SALP Report, as well as the SALP process, may be discussed at the meeting. Additionally, you may provide written comments within 20 days after the meeting.

Following our meeting and receipt of your written response, if any, the enclosed report will be issued. The letter issuing the report will provide you a characterization of your overall safety performance along with any appropriate supplemental information regarding the report.

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, the SALP Report, and your comments, if any, will be placed in the NRC's Public Document Room when the SALP Report is issued.

8308200277

If you have any questions concerning the SALP Report we will be happy to discuss them with you.

Sincerely,

J. A. Hind, Chairman
Region III SALP Board
Director, Division of Radiological
and Materials Safety Program

Enclosures:
1. Summary of Significant Findings (5 cys)
2. Preliminary SALP Report (5 cys)

cc w/encls:
Director, OIE
Resident Inspector, RIII
Project Manager, NRR
PAO, Region III

Enclosure 1

Significant SALP Report Findings for the Midland Nuclear Generating Station Units 1 and 2

General Observations

Inspections were conducted in March and April 1982 to evaluate the significance of the quality control (QC) inspection deficiencies identified during the special team inspection of May 1981. These followup inspections indicated that QC inspections were not properly identifying deficiencies in the installation of equipment. As a result of these deficiencies and due to recurring problems in the licensee's remedial soils work activities, increased NRC inspection effort was initiated through the formation of a special Midland Section comprised of inspectors dedicated solely to the Midland plant. Additional inspection assistance was obtained through a special contract with a Department of Energy Laboratory.

To aid in the evaluation of the as-built condition of the plant, a special inspection of the Diesel Generator Building was conducted during the period of October 12 through November 25, 1982. This inspection identified significant violations which demonstrated a breakdown in the implementation of the licensee's Quality Assurance (QA) program. In addition, it resulted in the licensee's decision to suspend some safety-related work activities (December 3, 1982) and to formulate a construction completion program to provide assurance that safety-related structures and systems were constructed as designed. Due to the significant violations, the NRC imposed a civil penalty of $120,000.

In view of the suspension of portions of safety-related work activities and the licensee's proposed construction completion program, the Region III Regional Administrator determined that the SALP 3 appraisal for Midland would address only areas where work activities continued; namely, remedial soils (Soils and Foundations), the Nuclear Steam Supply System (Safety-Related Components and Piping Systems and Supports), the Heating, Ventilating, and Air Conditioning System (Support Systems), and licensing activities.

Functional Areas

1. Soils and Foundations

Overall performance in this functional area has continued to indicate a declining trend and remains an area of concern. The decline was due to the continued lack of attention to detail and the continuing inability on the part of the licensee to implement properly the requirements of the Midland QA program.

3.&4. Safety-Related Components and Piping Systems and Supports

Performance in this functional area remains adequate. However, the NRC plans to conduct a special inspection to evaluate this area in the near future.

5. Support Systems

Performance in this functional area has declined from category 1 to category 2. The decline was due to the lack of management attention to identified problems and the lack of timely corrective action to resolve these problems.

8. Licensing Activities

Performance in this functional area remains adequate. Generally, responses are timely and technically correct. However, while the licensing aspect of the soils issue has shown improvement over the appraisal period, the licensee should continue to focus a high level of management attention on this area.

Consumers Power Company

James W Cook
Vice President - Projects, Engineering and Construction

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

September 6, 1983

DRTH

Mr J G Keppler, Regional Administrator
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND PROJECT
RESPONSE TO DRAFT SALP REPORT
FILE 0.6.1 SERIAL 25682

Consumers Power Company has received and reviewed the NRC's Systematic Assessment of Licensee Performance (SALP Report) for the Midland Nuclear Plant, Units 1 and 2, for the period July 1, 1981 through March 31, 1983 and acknowledges the NRC's comments.

Consumers Power Company recognizes the purpose of the SALP Report and is committed to accomplish the improvements necessary to achieve the quality performance level that both the NRC and the Company desire.

The Company is particularly concerned about the SALP evaluation in the Remedial Soils work and will devote the management attention necessary to establish improved overall performance in this area. Efforts will be focused on addressing the NRC's concern regarding attention to detail and implementation of the Quality Assurance Program. Our managment team is dedicated to assuring that future Remedial Soils work will conform to the requirements of the Midland QA Program.

The Company believes that the elements of the CCP Program are sound and that it will result in a well controlled process by which to both verify the quality of past completed construction and ensure the quality of construction work yet to go.

The CCP may need some refinement as we gain experience with it, but as a management team we are dedicated to give it the attention and support needed. We will modify it, as change is needed, to ensure that it works. The successful implementation of this program will clearly support the Company's goal of meeting the requirements of the Midland QA Program.

SEP 12 1983

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In conclusion the Company has evaluated the contents of the SALP III Report and the management team will take whatever steps are necessary to achieve the quality performance level that both the NRC and the Company desire.

James W. Cook

CC DSHood, US NRC
RJCook, Midland Resident Inspector

DR0883-0001A-QL07

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9/3/83
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

September 16, 1983

MEMORANDUM FOR: D. H. Danielson, Chief, Materials and Processing Section

THRU: R. J. Cook, Senior Resident Inspector, Midland Site

FROM: R. C. Janke, Assistant Inspector (Co-op), Midland Site

SUBJECT: SAMPLING OF THE ZACK COMPANY HVAC MATERIAL

This memo refers to the cutting of samples by the Zack Company for NRC destructive examination inspection. On August 31 and September 1, 1983, Messrs. D. H. Danielson and Wm. J. Key selected samples of HVAC structural material from various locations in the Midland Plant. Zack Company and Consumers Power MPQAD personnel witnessed the sample selection to insure an accurate listing would be made. By Tuesday, September 6, 1983, the necessary travelers were prepared by Zack Company and cutting of the samples commenced on Wednesday, September 7, 1983. The sixty eight samples had been removed and cataloged by September 12, 1983. The attached list is a revised addition including drawing numbers and sample descriptions. As per your request, I personally observed the cutting and inscription of information on each piece of material.

It is anticipated that shipment to the Region of these samples will occur on September 21, 1983.

If there are any questions, please contact me.

Randy C. Janke

R. C. Janke
Assistant Inspector (Co-op)
Midland Site

cc/w attachment

J. J. Harrison
R. N. Gardner
W. J. Key

8410020042

SEP 19 1983

ZACK - HVAC MATERIAL SAMPLING LIST

I. Control Room

Sample No.	ID No.	Traveler	V Drawing	Sample Description	Welds
1.	Duct 209A	P4582	25 sh 3	Long. seam weld	Yes
2.	Hgr. 75A	F17525	25 sh 3	3/8 x 3½ x 3½ angle (structural)	No
3.	Duct 231	P3730	25 sh 3	Long. seam weld	Yes
4.	Duct 33C	F21555	25 sh 3	Sheet sample	No
5.	Hgr. 88B	F9835	25 sh 3	3½ x 3½ x ¼" angle	No
6.	Hgr. 21	F720	25 sh 3	3½ x 3½ x ¼ angle	No
7.	Duct 61	F788	25 sh 3	Sheet sample	No
8.	Duct 44A End Cap	F19839	25 sh 3	3/8" bolt	No
9.	Duct 44A End Cap	F19839	25 sh 3	3/8" bolt	No
10.	Duct 251	F17595	25 sh 3	Sheet sample	No

II. Diesel Generator Bldg.

A.	Bay 4				
11.	Duct 29	F11601	85	Long. seam weld	Yes
12.	Duct 63	F13735	85	Sheet sample	No
B.	Bay 3				
13.	Duct 115	F11075	85	Sheet sample	No
14. 15. 16.	Hgr. 102	F11230	85	3 - structurals Intersection of Vert., Horz. & Transverse members	Yes

III. Service Water Bldg.

Sample No.	ID No.	Traveler	V Drawing	Sample Description	Welds
17.	Hgr. 4A	F2213	83	3 x 3 x ¼ angle	No
18.	Hgr. 1.5	F16702	83	2 x 2 x ¼ tube steel	No
19.	Duct 93	F10349	83	Longitudinal corner weld	Yes
20.	Duct 86.5	P553	83	Sheet sample	No
21.	Hgr. 18B	F14377	83	3 x 3 x ¼ angle	No
22. 23.	Hgr. 39A	F9991	83	3½ x 3½ x ¼ angle	Yes
24.	Hgr. 36A	F14378	83	3 x 3 x ¼ angle with 1" Shim Plate	Yes
25.	Duct 77A	F12145	83	½" ϕ Bolt	No
26.	Duct 76A	F12143	83	½" ϕ Bolt	No

IV. Battery Room

A.	Room 357				
27.	Hgr. 12A	F14911	22 sh 2	2 x 2 x ¼" angle	No
28.	Duct 11	F7246	22 sh 2	Sheet sample	No
B.	Room 353				
29.	Duct 39	F7331	22 sh 2	Sheet sample	No
30.	Hgr. 20A	F9530	22 sh 1	2 x 2 x ¼ angle & 5/16" plate	Yes
C.	Room 356				
31.	Duct 3A	P5250	22 sh 1	Sheet sample	No
32.	Hgr. 8	F14196	22 sh 1	2 x 2 x ¼" angle	No

V. Auxiliary Bldg.

Sample No.	ID No.	Traveler	V Drawing	Sample Description	Welds
A.	Cable Chase E5.6				
33.	Hgr. 4	F2507	22 sh 1B	1½ x 1½ x ¼ angle	No
34.	Duct 9A	P4644	22 sh 1B	Sheet sample	No
B.	Cable Chase W7.8				
35.	Hgr. 25	F3755	22 sh 2B	2 x 2 x ¼ angle	Yes

VI. Containment - Unit 2

36.	Hgr. 4	F15721	34 sh 1	4 x 4 x ¼ angle	No
37.	Hgr. 19	F7565	32 sh 2	3 x 3 x ¼ angle	No
38.	Hgr. 10	F6130	12 sh 2	4 x 4 x 3/8" angle	No
39.	Hgr. 22	F17084	13 sh 1	3 x 3 x ¼ angle	No

VII. Auxiliary Bldg. (Filter System)

40.	Hgr. 22	F19959	9 sh 2	4 x 4 x ¼ tube steel	No

VIII. Material Issue Room - Job Site Stock

41.
42. — 2 - Bolts 3/8" ϕ x 2 1/2"

43.
44. — 2 - Bolts 1/2" ϕ x 3 1/2" - Non Q Item - Seismic Class II

45.
46. — 2 - Bolts 5/8" ϕ x 2 1/2"

IX. Fabrication Shop - Job Site Stock

Sample No.	MCN No.	Description of Material	
47.	855-8	C Channel	C6 x 13#
48.	935-5	C Channel	C5 x 9#
49.	1163-2	C Channel	C4 x 5.4#
50.	1018-1	Tube Steel	6 x 4 x ¼"
51.	1937-1	Tube Steel	1 x 1 x ¼"
52.	C2410-5	WF	8" I Beam
53.	1462 -2	Plate	3/4" x 4"
54.	C1064	WF	I Beam
55.	1687-3	Plate	5/8" x 2"
56.	C2560-5	Plate	1" Plate x 14½"

X. Fabrication Shop - Weld Coupons

Sample No.	No. of Pieces	Coil No.	Description
57.	2	720	18 gauge
58.	2	711	22 gauge
59.	2	C2547-5	10 gauge
60.	2	C2619-1	12 gauge

XI. Poseyville Laydown Area

Sample No.	ID No.	Traveler	V Drawing	Sample Description	Welds
61.	Duct 37	P3642	25 sh 1	Sheet Sample	No
62.	Duct 66	F14202	25 sh 1	Sheet Sample	No

XII. Restocked Material

Sample No.	ID No.	Traveler	V Drawing	Sample Description	Welds
63.	Duct 109	R8792	27 sh 3	Stitch welds	Yes
64.	Duct 152	F13738	85	Seam weld gored elbow	Yes
65.	Duct 250	F13749	85	Seam weld gored elbow	Yes
66.	Duct 40	F4613	11 sh 2	Corner weld, fire damper sleeve	Yes
67.	Duct 20	F5863	27 sh 4	Seam weld; sq. to round (Non Q Material)	Yes

XIII. Fabrication Shop - Job Site Stock

68.	MCN # 812-5	C Channel	3 x 5.4#