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

FEB 17 1982

MEMORANDUM FOR: R. L. Spessard, Director, Division of Project and Resident Programs

C. E. Norelius, Director, Division of Engineering and Technical Programs

J. A. Hind, Director, Division of Emergency Preparedness and Operational Support

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

SUBJECT: MIDLAND COMMUNICATIONS

In the past, the primary contact for entrance and exit interviews at the Midland site has been with the QA Department. The Midland Section has determined that the method of communications has not been effective, possibly due to the similarity in the work performed by the QA Department and the NRC.

We have notified CPCo management that in the future the primary contact for RIII inspectors will be with the management having line responsibility for the activities being inspected. We encourage all inspectors to maintain open communications with the QA Department; this will ensure that QA is aware of all concerns and potential noncompliances before the inspector leaves the site.

Additionally, we request that all inspectors communcating with the licensee by telephone please notify the Midland Section of your plans prior to the notification. This request is made to ensure that the Midland Section is knowledgeable or aware of your division activities as they relate to Midland.

Would you please inform your staff about the above changes. Your cooperation is appreciated.

RF Warnick

R. F. Warnick, Acting Director
Office of Special Cases

cc: J. G. Keppler
A. B. Davis

DRPI FILE COPY

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

MAR 28 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:

By letter dated January 10, 1983, Consumers Power Company described its proposed Construction Completion Program (CCP) for the Midland nuclear facility. This submittal was followed by a public meeting in Midland on February 8, 1983 for the NRC to obtain a better understanding of your proposed program and to obtain public input on the CCP. As a result of our review of the CCP to date, we find we need the following additional information.

A. Please provide a more detailed description of the scope of the CCP and how it is going to function. Your discussions should address the following subjects or concerns:

1. Because of problems identified by the NRC during the special inspection of the diesel generator building and because similar problems were found in other areas of the plant during subsequent inspections by CPCo, we believe that 100% reinspection of accessible safety related structures, systems, and components is warranted. Should you intend doing less than 100% reinspection, please provide the details of your proposed program and the technical rationale for accepting a sampling approach.

2. A description of the reinspection program for accessible systems and components important to safety.

3. A description of the measures you intend to institute to assure that QC reinspection will be sufficiently independent of team controls.

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4. A description of the training that will be provided to all personnel including craftpersons. Concerning QC inspector recertification training, describe the actions you have recently taken to address the adequacy of the review of PQCI's prior to training being initiated on the PQCI's. In addition, describe the steps you have taken to ensure that all questions raised during PQCI training sessions will be resolved prior to certification to affected PQCI's.

5. As a result of the diesel generator building inspection, hold points were established by the NRC for the purpose of determining that you adequately performed all of the actions to which you have committed before allowing the work to proceed beyond the hold point. In view of the total CCP effort, the NRC does not wish to remain in the approval chain; therefore, you are requested to develop measures that will ensure that key hold points are honored and that critical parameters of your program are in place before proceeding to the next step.

6. A description of the controls you will use to ensure all problems have been identified during reinspection of a system or area prior to start of repair work or new work on that system or in that area.

7. A description of the controls you will use to ensure that no new work will be performed that would cause a known nonconformance to be inaccessible.

8. A description of your proposed program for in-process QC surveillance (inspection) of rework and new work.

9. A description of the CPCo management review process for changes to CCP and how CPCo intends to keep the NRC informed of such changes.

B. Please provide a more detailed description of the third party installation implementation overview mentioned in your January 10, 1983 letter. Your description should address the following subjects or concerns:

1. The installation implementation overview appears to focus solely on future construction and rework. We believe the overview should also encompass all aspects of the CCP, including the reinspection work. Please expand the installation implementation overview to include other aspects of the CCP and provide us with additional details of the overview.

2. Weekly reports, similar to those issued by Stone and Webster to inform the NRC of the results of the soils overview, are needed. Please provide your commitment to have the third party CCP overviewer prepare weekly reports similar to the soils overview weekly reports.

3. The CCP overview should continue until CPCo and the NRC have confidence in the adequacy of the CPCo quality assurance program.

C. Please propose a candidate organization that Consumers Power Company considers acceptable for the installation implementation overview together with your rationale for selecting that organization. The NRC will also need the following:

1. Sworn statements from the candidate corporation and all personnel who will be involved in the third party installation implementation overview, addressing the independence factors described in Chairman Palladino's letter of February 1, 1982 to Congressmen Ottinger and Dingell.

2. The resumes of the key personnel to be involved in the third party overview.

3. A description of the experience of the candidate corporation that qualifies the corporation to perform an independent third party overview.

The NRC will determine the acceptability of the candidate corporation and will notify CPCo. Our present view is that the installation implementation overviewer would not be acceptable to also perform the independent design and construction verification program.

In order to ensure adequate communications between the NRC, CPCo, the independent third party proposed or selected to conduct the independent design/construction verification program, and the public, the protocol in Enclosure 1 should be adhered to. This protocol does not apply to the third party overview of the remedial soils work or the third party overview of the CCP.

Should you have any questions regarding this letter please contact Mr. R. F. Warnick of my staff.

Sincerely,

Original signed by
A. Bert Davis

James G. Keppler
Regional Administrator

Enclosure: As stated

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.)

Discussed with IE & NRR. Met Comment from Stress & Heat included.

RIII	RIII	RIII	RIII	RIII	RIII	IE/NRR
Gardner/jp	Shafer	Warnick	Lewis	Davis	Keppler	
3/25/83			3/25	3/25	3/28	

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

PROTOCOL GOVERNING COMMUNICATIONS BETWEEN CONSUMERS POWER COMPANY AND THE ORGANIZATION CONDUCTING THE INDEPENDENT DESIGN/CONSTRUCTION VERIFICATION PROGRAM

1. Recommendations, findings, evaluations and all exchanges of correspondence, including drafts, between the independent reviewer and CPCo will be submitted to the Regional Administrator at the same time as they are submitted to CPCo. For purposes of this protocol, the independent reviewer includes the independent reviewer and any of its subcontractors and Consumers Power Company (CPCo) means CPCo, Babcock and Wilcox, Bechtel, Management Analysis Corporation, S&W, and all of their subcontractors.

2. The independent reviewer has a clear need for prompt access to whatever information is required to fulfill its role. To this end, the independent reviewer may request documentary material, meet with and interview individuals, conduct telephone conversations, or visit the site to obtain information without prior notification to the NRC. All communications and transmittals of information shall, however, be documented and such documentation shall be maintained in a location accessible for NRC examination.

3. If the independent reviewer wishes to discuss with CPCo substantive matters related to information obtained, to provide an interim report to CPCo, or to discuss its findings or conclusions with CPCo in advance of completing its report, or if CPCo desires such communication, such discussions shall be accomplished in meetings open to public observation. In this regard, CPCo shall provide a minimum of five days advance notice to the Regional Administrator of any such meeting. The Regional Administrator shall make reasonable efforts to notify representatives of interested members of the public of the meeting, but the inability of any person to attend shall not be cause of delay or postponement of the meeting. Transcripts or written minutes of all such meetings should be prepared by the organization requesting the meeting and provided to the NRC in a timely manner. Any portion of such meetings which deals with proprietary information may be closed to the public.

4. All meetings between the Staff and CPCo and/or the independent reviewer will be open to public observation, except where the Staff determines that it is appropriate to conduct a meeting(s) in private with CPCo and/or the independent reviewer.

5. All documents submitted to, or transmitted by, the NRC subject to this Protocol, unless exempt from mandatory public disclosure, will be placed in the NRC Public Document Rooms in Midland, Michigan and Washington, D. C., and will be available there for public examination and copying.

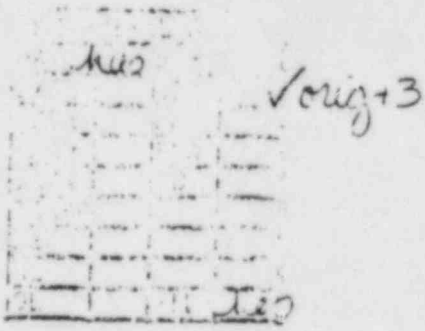
Mr. Ulrich -
I am holding original
Will we be responding? Yes)
Laura

Consumers Power Company

James W Cook
Vice President - Projects, Engineering and Construction

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

April 22, 1983



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

MIDLAND NUCLEAR COGENERATION PLANT -
MIDLAND DOCKET NO's 50-329, 50-330 -
CONSTRUCTION COMPLETION PROGRAM
FILE 0655, B1.1.7 SERIAL 22027

REFERENCES 1. LETTER TO MR J W COOK DATED MARCH 28, 1983 FROM MR J G KEPPLER REGARDING CONSTRUCTION COMPLETION PROGRAM

2. LETTER FROM MR J W COOK DATED APRIL 6, 1983 TO MR J G KEPPLER REGARDING CONSTRUCTION COMPLETION PROGRAM THIRD PARTY OVERVIEW

Your letter of March 28, 1983 regarding the Construction Completion Program (CCP) consisted of Parts A, B and C. My letter of April 6, 1983 to you replied to items A5, all of Part B, all of Part C and to Enclosure 1, the Protocol document for the Independent Design Verification. At the April 13, 1983 meeting in Bethesda on Independent Design Verification (IDV), we provided additional discussion and clarification of the communications between the parties during the IDV.

The enclosure to this letter provides responses to items A1, 2, 3, 4, 6, 7, 8 and 9 of your letter of March 28, 1983.

Based upon this letter and my April 6, 1983 letter, we believe that complete responses have now been provided to your March 28, 1983 letter.

James W. Cook

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oc0483-0426a100

JWC/GSK/bjb

CC Atomic Safety and Licensing Appeal Board (w/o att)
CBechhoefer (w/o att)
FPCowan, ASLB (w/o att)
JHarbour, ASLB (w/o att)
MMCherry (w/o att)
FSKelley (w/o att)
HRDenton, NRC (w/att)
WHMarshall (w/o att)
WDPaton, NRC (w/o att)
BStamiris (w/o att)
MSinclair (w/o att)
LLBishop (w/o att)

Response To NRC Questions On
Construction Completion Program

QUESTION A1

"1. Because of problems identified by the NRC during the special inspection of the diesel generator building and because similar problems were found in other areas of the plant during subsequent inspections by CPCo, we believe that 100% reinspection of accessible safety related structures, systems and components is warranted. Should you intend doing less than 100% reinspection, please provide the details of your proposed program and the technical rationale for accepting a sampling approach."

RESPONSE

Consumers Power Company has developed two major programs already committed to in addition to the Quality Verification Plan (included in the CCP). These two programs include the following 100% verification efforts:

A. Verification of approximately 13,500 closed Inspection Reports through reinspection of approximately 7,000 piping supports and restraints.

B. Reinspection of accessible attributes of approximately 9,000 1-E cables installed to PQCI E-4.0 including cable routing and identification.

The Quality Verification Plan includes the following 100% reinspections:

A. All closed Inspection Reports (IR) that contain In-Process Inspection Notices (IPINs). This involves approximately 4,300 IRs.

B. All closed IRs that contain Deficiency Reports (DR). This includes approximately 4,500 IRs.

C. All closed IRs associated with specific PQCI which have less than 100 IRs.

We disagree. Do 100%.

In addition, the Quality Verification Program also requires that 100% inspection of the remaining PQCIs will be initiated and continued until it has been demonstrated with 95% confidence that 95% of the inspectable elements meet quality requirements. Upon demonstration of the 95% quality level, Consumers Power Company will reconsider the basis on which to continue the verification effort for the remaining population of each PQCI. This may include the statistical sampling techniques as noted below.

Exceptions to the plan may be taken in those cases where other means of verifying quality have been demonstrated as described in the plan details below.

D. Complete reinspection where QC insp failed 1st
E. Address Attachment 1 to Form

Quality Verification Program Description

Consumers Power Company has prepared a Quality Verification Program to confirm the quality status of safety-related equipment and construction activities completed and inspected by the Engineer/Quality Control personnel prior to December 2, 1982.

The program will cover all closed Inspection Records of inspections performed prior to December 2, 1982, except:

A. Remedial Soils Work which has been under the direction of Consumers Power Company quality personnel since it began.

B. HVAC work which has been under the direction of Consumers Power Company QA personnel since the major reorganization in June 1981.

C. Verification of 1-E cable routing and identification and verification of ASME hangers which are being performed under separate reinspection programs as noted previously.

D. B&W Construction Company activities which have been performed under B&W Quality Assurance Programs.

The quality verification program will address safety related equipment, systems and structures in which the prior 100% inspections have been performed and completed under the direct supervision of the Engineer/Constructor. Such inspections were performed in accordance with approximately 100 Project Quality Control Instructions (PQCIs) that specified the inspection requirements to be achieved by quality control personnel. The program will include PQCIs for which no other verification activity has taken place or is scheduled to take place. There are closed IRs for approximately 139,000 primary inspections. Closed IRs are those where the Engineer/Constructor has completed a 100% inspection of installed hardware. Where a reinspection has occurred on a specific commodity, the latest IR will be addressed.

This program will assess the validity of prior inspections and provide assurance of the quality of completed work. To accomplish this, accessible attributes of items covered by completed IRs will be reinspected. For inaccessible attributes, the original inspection documents will be reviewed for evidence of acceptability and additional justification will be developed as required to support the validity of inspections associated with such PQCIs. Each IR relates to a specific PQCI. PQCIs are organized by discipline and further structured to activities within that discipline, eg, there are separate PQCIs and corresponding IRs for preplacement, placement and post-placement inspections of concrete. Closed Inspection Records related to each PQCI provide a population of like activities.

To assess the validity of these past completed inspections, Consumers Power Company will reinspect on a 100% basis, the accessible attributes of all populations where the quantity of closed IRs is less than one hundred. In addition, where the population of closed IRs for a specific PQCI is more than 100, Consumers Power Company will reinspect on a one hundred percent basis a

sufficient number of items to establish a quality baseline and predict with 95% confidence that the quality level is in excess of 95% for the specific PQCIs. Consumers Power Company will then make a determination as to whether further verification of specific PQCI populations can be conducted by a statistical sampling plan. This sampling approach, which is based on a nationally accepted standard and is consistent with past NRC recommendations related to reinspections of safety-related items, is fully described in the Quality Verification Program. The NRC Resident Inspection staff will be informed of such a determination before implementation of a sampling effort.

Any nonconforming condition observed during the implementation of this program other than those previously identified on nonconformance reports, will be identified by a nonconformance report and will be dispositioned in accordance with approved procedures.

Reinspections will be conducted in accordance with PQCIs which have been reviewed-revised since implementation of the Construction Completion Program (CCP) and in accordance with current design drawings and specifications. An acceptable reinspection will validate the installed hardware and, for the purposes of the program will validate the prior IR. If an apparent deficiency exists between the as built condition of the item and the referenced design drawing or specification, a further check will be made to determine the design basis against which the original IR was completed. This check as well as the current stage of construction will allow a determination to be made as to whether a nonconformance of "as built vs design" exists.

Documentation of deficiencies will be noted on the newly initiated IR, entered on a nonconformance report and will be cross referenced to the original IR.

Program elements that differ from that described above will be treated as follows:

1. Exceptions to this program may be taken where objective evidence is available of a CPCo overinspection of the Engineer/Constructor's inspections and where such overinspection demonstrates effective quality control and provides the basis to verify acceptability of the items or attributes covered by past IRs and validate the original inspection with minimal or no further reinspection or review. Where such exceptions are proposed to be taken, a special report will be prepared by the MPQAD-QA Superintendent for review and approval of the Executive Manager-MPQAD. This report will contain full justification for the exception. The Executive Manager-MPQAD will inform the NRC Resident Inspection staff whenever he has made a decision to allow such a exception to the program prior to implementing the exception.

2. There are 55 PQCIs which cover activities that are inaccessible for reinspection. These include rebar installation, placed concrete, containment building tendon reinspection, and PQCIs relating to surveillance of subcontractor actions. Documentation relating to these PQCIs will be reviewed as indicated in this program. These PQCIs, either individually or by groups, will be reviewed and

justification will be developed by a document review to support the validity of completed inspections associated with these PQCIs. This justification or recommendation for additional verification activites, will be provided by the MPQAD-QA Superintendent to the Executive Manager-MPQAD for decision and approval.

3. The Executive Manager may group special populations of PQCIs or IRs that may be treated as a unique population provided all other elements of this program are applied to this unique population.

Reports And Documentation

Results of reinspections and document reviews will be recorded on IRs opened specifically for this pupose. Each such IR will cross-reference to the existing IR. A notation will be made on the new IR to identify whether the existing original inspection covered by the IR was validated, rejected or is indeterminate. The new IR will provide the basis to document the quality status of the items or attributes being reinspected.

A weekly written report will be made jointly by the MPQAD QC and QA Superintendents to the Executive Manager of MPQAD summarizing the results of the program. The Executive Manager will inform the CPCo Site Manager, the Vice President, Projects Engineering and Construction and the Engineer/Constructor Project Manager of the status of the Quality Verification Program on a biweekly basis. The Executive Manager-MPQAD will provide a monthly report of Quality Verification Program results to the CPCo Site Manager and Vice President, Projects Engineering and Construction and the Engineer/Constructor Project Manager. This report will be made available to the Construction Implementation Overviewer and the NRC.

The Executive Manager-MPQAD will have total overall responsibility and authority for the development and implementation of all quality related aspects of this verification program which will be solely under the direction of MPQAD.

QUESTION A2

"2. A description of the reinspection program for accessible systems and components important to safety."

RESPONSE

The Midland Nuclear Plant has been designed and constructed with a two level philosophy of quality classification. Those structures, systems or components which are safety related (such as those identified in Regulatory Guide 1.29, Section C.1, as modified by the Midland FSAR) are designated "Q". All other structures, systems, and components are designated "Non-Q".

Items that are considered important to safety, but that are not classified as "Q" are being addressed by a separate program. This program was developed to address the generic safety task A-17 "System Interaction," and was described in a letter, J W Cook to H R Denton dated January 28, 1983. This Systems Interaction Program will provide assurance that equipment important to safety, because of its potential interaction with safety related (Q) equipment, has been evaluated to ensure that such equipment will not compromise the capability of safety systems to perform their intended functions. The protection of the safety-related systems is part of the design process. In the installation of these systems coupled with the field routing of certain commodities, however, it is possible that new items become important to safety. To this end the Systems Interaction Program describes a comprehensive effort which includes an integrated series of walkdowns to identify potential interactions. The evaluation of these potential interactions will assure that equipment important to safety has been identified, and that its potential for degrading the performance of safety systems has been resolved.

The seismic II/I and proximity walkdown, which forms an important part of the Systems Interaction Program, is being conducted in part by the Engineer/Constructor and in part by the consultant who performed this work for other sites. This inspection is separate from the CCP, but it is being integrated into CCP activities for purposes of scheduling the availability of uncongested areas, areas that are sufficiently complete to warrant inspection and the use of inspection aids such as scaffolding.

Three additional walkdowns identified in the Systems Interaction Program are HELBA, missiles and flooding. These walkdowns serve to further increase our confidence that the primary walkdowns are effective with respect to identifying equipment important to safety. These walkdowns are performed by individuals with perspectives different from the proximity and Seismic II/I walkdown teams. All of these walkdowns are expected to occur in 1983 and early 1984.

The design engineering process, the construction process and the Systems Interaction Program form a multi-layered approach to assuring that systems important to safety will not inhibit safety systems from performing their intended function. Once the plant is complete and turned over to Nuclear Operations Department, equipment important to safety is addressed by Nuclear Operations Department Standards A21 and the QA Topical Report CPC-2A. This

list starts with the construction Q list then adds structures, systems components and chemicals considered important to safety via a detailed review of the equipment data base. Items placed on the operations Q list are then subject to applicable elements of the QA program from then on regardless whether they are safety-related or important to safety.

Why not include the operations Q list for the preinspection program?

QUESTION A3

"3. A description of the measures you intend to institute to assure that QC reinspection will be sufficiently independent of team controls."

RESPONSE

The QC reinspection effort is independent of team controls although work schedules will be coordinated on a team level. This independence is maintained as follows:

Quality Verification Plan

This effort is solely under the responsibility of MPQAD to plan, implement and evaluate results. MPQAD personnel will coordinate with construction for services support. The Quality Verification Program will be implemented under MPQAD Procedures.

Team Activities-Status Assessment And Systems Completion

The Team Quality Representative and other MPQAD members assigned to the teams are independent of team control. The system team charter is defined in Field Engineering Procedure FPG 9.700, which indicates that the team quality representative will only receive schedule input from the team supervisor and that other technical and administrative direction will come from MPQAD management. MPQAD approves this procedure and MPQAD Procedure N-4 defines this interface.

All quality department personnel assigned to the team report to the Team Quality Representative who reports solely through the MPQAD management chain.

In addition, the Team Quality Representative is located, based on his permanent reporting assignment, within the MPQAD organization. He will, of course, be required to spend most of his time with the team on field assignments but nevertheless continues as a permanent member of MPQAD.

Organization charts show the reporting channels for the team quality members to emphasize the independence from team technical control.

Administrative controls for team quality members, such as time card approval, overtime approval, etc, are the responsibility of MPQAD supervision assigned to the team organization. A high level manager within MPQAD is specifically responsible for management and performance of the team quality personnel.

The actual inspections are conducted in accordance with PQCIs and IRs approved by MPQAD.

The above controls assure independence of the team quality representatives from the standpoint of location, organization, procedures.

QUESTION A4

"4. A description of the training that will be provided to all personnel including craftpersons. Concerning QC inspector recertification training, describe the actions you have recently taken to address the adequacy of the review of PQCIs prior to training being initiated on the PQCIs. In addition, describe the steps you have taken to ensure that all questions raised during PQCI training sessions will be resolved prior to certification to affected PQCI's."

RESPONSE

Training Of Construction Personnel

The existing construction training procedure (FPG-2.000) is under revision to incorporate the training requirements of the CCP. The procedure sets down specific requirements for type of training and subject matter for each organization element.

The team training will include the major elements described below:

A. General training will be provided in
   1. Quality requirements for nuclear work
   2. Requirements of the CCP
   3. Safety orientation
   4. Inspection and work procedures

   Training in Items (1) through (3) and selected parts of (4) will be conducted in a formal setting and will be given to all personnel including the craftpersons.

   In addition, a "tool box" training session will be conducted periodically for the craftpersons by the foreman. The subject matter will be developed by the training coordinator, and will include information regarding quality issues across the job.

B. Training in the procedures used to govern the performance of work will be conducted for designated field engineering and support personnel as appropriate. In ~~some~~ cases the training will include the craft foreman.

   Formal training will be conducted for identified procedures that define the control of the designated work process, procedures for control of special processes and requirements for inspection and acceptance of completed work.

C. Training in procedures for selected processes will be conducted for the craftpersons. This will consist of discussion and/or field

demonstrations for the selected process. A list of the selected processes will be maintained by the Training Coordinator.

Training Of MPQAD Personnel

MPQAD initiated a program in late 1982 to retrain and recertify all Engineer/Constructor QCE's (Inspectors) to existing PQCIs. A significant number of QCE's have been recertified under this process. Early in 1983, MPQAD decided to terminate recertification of old PQCIs, except in selected cases; focus efforts on completing the review and revision of PQCIs; and then train and recertify to the new PQCI.

MPQAD current plans are to re-train and re-certify all inspectors to the revised PQCIs. As a part of this activity, the Project Quality Control Instructions (PQCI) are undergoing a complete review to assure:

Attributes required for the safety and reliability of specific components, systems and structures are identified for verification.

Accept/reject criteria are clearly identified.

Appropriate controls, methods, inspection and/or testing equipment are specified.

Requisite skill levels are required per ANSI N45.2.6 or SNT-TC-1A.

After the PQCIs are revised as necessary, Quality Control Engineers (Inspectors) are being trained and must pass a closed-book examination and a demonstration test to assure their proficiency in utilizing the new instruction. Upon successful completion, each inspector is being certified to perform inspections to those PQCIs in which he was trained.

The following actions are ongoing to maximize the effectiveness of recertification training:

Review PQCI Prior To Initiation Of Training

The adequacy of PQCIs prior to training is assured by the following programmatic requirements:

A. The PQCI evaluation effort is being conducted under the direction of MPQAD QA personnel. MPQAD Procedure E-3M was issued April 11, 1983 and establishes the responsibilities and requirements for the preparation, revision, and control of PQCIs by QA personnel.

   As part of the PQCI revision process, Project Engineering does a review of the PQCI to insure that attributes are identified for inspection according to specification requirements and that clarifications are made to specifications wherever necessary.

B. Whenever a PQCI is revised, the revision is evaluated to determine if a pilot run for testing the implementing capability of the PQCI is

required. If a pilot run is required, the PQCI is tested by a team from QA, QC and Training. Based on this pilot run, the PQCI may be further revised.

C. Once the PQCI is ready for issue, an effectivity date is established in conjunction with the Training Department.

1. For PQCIs on which training was not previously conducted, the training and certification process is then started.

2. For PQCIs on which training and/or certification was previously conducted, a determination is made as to the need for retraining or recertification. When a revised PQCI is issued, it is evaluated in accordance with established procedures to determine if retraining and recertification is required. Based on this evaluation, appropriate action is taken.

D. During the training process, student questions (see below) are monitored. Based on this, further revision to a PQCI may be initiated.

Resolution Of Questions Raised During PQCI Training Sessions

Steps taken to ensure all questions raised during PQCI training sessions are resolved prior to certification include:

A. The development of an MPQA Department "Statement of Training Policy." A copy of this Policy is attached.

B. The Policy Statement is handed out at the start of each class and reviewed with the trainees.

C. Statement 2 of the Policy deals with student questions. Instructors handle many questions as a routine part of a class. However, when an instructor is faced with questions he cannot answer, he makes note of them for subsequent resolution with the students.

D. When required, a QA Engineer, Project/Resident Engineer or other resource person is scheduled to participate as part of the class and answer questions raised by the students.

E. If there are unanswered questions at the end of the scheduled class time, an evaluation is made by the instructor as to whether training can nevertheless be considered complete and the examination given without jeopardizing the students opportunity to satisfactorily write the exam.

F. Even if the examination can be given, prior to answering questions, the questions are still tracked and answered prior to certification.

c. Trainees are encouraged to defer taking examinations or performance demonstrations if they feel they have received inadequate instruction.

MPQA DEPARTMENT STATEMENT OF TRAINING POLICY

It is the objective of the MPQAD Training Department to provide training that meets the needs of the trainees. To help meet these needs the following policies apply:

1. Personnel who are required to attend classroom training shall not be administered an examination without 100% classroom attendance. 100% attendance is defined as total classroom time less instructor excused absences for brief periods of time. A lesser percentage may be requested in writing by the trainees supervisor and approved by the appropriate Training Supervisor.

2. When trainees have pertinent questions that relate to the training subject matter the instructor shall take action to answer the questions or obtain the answers and provide them to the students prior to final examination or certification as appropriate.

3. The time required for self-study prior to examination shall be determined and scheduled by the appropriate Training Coordinator, based on the duration of the lesson and complexity of the subject.

4. The instructor will review the class evaluation sheets or a composite to determine the acceptability of the training prior to administering the exam to the class. If judged unacceptable, the exam will not be administered until appropriate action has been taken.

5. When a trainee indicates that he is not prepared to take an examination or a performance demonstration he shall not be administered the examination or performance demonstration until his specific concerns are resolved.

STUDENT HANDOUT

RAWells R A Wells 4/20/83

GFEwert G F Ewert 4-20-83

QUESTIONS A6, A7, AND A8

"6. A description of the controls you will use to ensure all problems have been identified during reinspection of a system or area prior to start of repair work or new work on that system or in that area."

"7. A description of the controls you will use to ensure that no new work will be performed that would cause a known nonconformance to be inaccessible."

"8. A description of your proposed program for in-process QC surveillance (inspection) of rework and new work."

RESPONSE

The process for release of work will be controlled by procedures that ensure that the requirements of the CCP are met prior to initiation of new work. The requirements for release of work include; checking, review and approval to ensure that verification and status assessment activities are completed and that the new work activity will not cover up (make inaccessible) items that have existing nonconformances. These procedures are identified in Figure 1. They define the overall process for identification and approval prior to release of work. These procedures require an identification of equipment or items that may be affected by the new work package and a check to see that there are no existing nonconformances or incomplete inspections on these items.

The interactions between project management, the installation team and the QA/QC organization are as follows. Initially, a list of Q items by area will be prepared by the installation team. The complete and inspected items will be provided to the QA/QC organization for the verification of completed work. The remaining items will be placed in an incomplete category and will be the basis for the status assessment by the completion team. The list will be updated as the verification and status assessment activities are carried out and will result in a complete list for each system/area.

The lists from all systems in an area will be combined and will form the basis for management review prior to release of the area for new work. The combined list will be used in the preparation of construction work packages (CWPs) for new work.

There are several major steps in the preparation and approval of the CWP. Each CWP will have a comparable Quality Work Plan (QWP) that defines the quality activities. Inspection hold points will be identified and included in the CWP. Following intitial preparation of the CWP, the package is taken by the team quality representative. The inspection hold points are reviewed and approved by the MPQAD organization and a QWP is initiated for this work activity. The QWP contains the inspection records that will be required for that work activity. A review will be performed to ensure existing nonconformances are not covered up. The review will be based on the steps in the three procedures listed in Figure 1. After the CWP is returned to construction, and the QWP is prepared, work can proceed.

FIGURE 1

Procedures For Controlling Release Of New Work

Procedure	Organization	Purpose
Area Release for Construction (FIG 7.500)	Construction	These three procedures together ensure proper completion of verification and status assessment activities prior to initiation of new work and ensure no cover-up of existing nonconformances
Construction Work Plans (FPG 7.300)	Construction	
Control, Release and Handling of Construction Work Plans and Quality Work Packages (N-17)	MPQAD	

I'm not sure I understand this sufficiently to be assured the control system will work to accomplish the desired points.

QUESTION A9

"9. A description of the CPCo Management Review process for changes to CCP and how CPCo intends to keep the NRC informed of such changes."

RESPONSE

A procedure (MPPM-19) is being issued to control changes to the CCP. The procedure will provide that Q work activity will meet the requirements of the CCP or will receive management review and approval for any deviation from these requirements. The requirments that must be maintained for work activites under the CCP are:

A. Management reviews are scheduled and held of (1) activity planning for verification and status assessment and (2) results of status assessment and planning for new work activity.

B. A process is in place to ensure that no existing nonconformances will be covered up by new work activities.

C. Procedures to control work definition and release including definition of inspection requirements and hold points are in place.

D. Inspection and contruction personnel involved must have received all required training.

Any work activity that does not meet these conditions will be considered a change. A change will be reviewed by the Construction Implementation Overviewer. The NRC Region III management will be informed prior to implementation.

STONE & WEBSTER MICHIGAN, INC.

P.O. BOX 2325, BOSTON, MASSACHUSETTS 02107

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

Ours 13

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

June 30, 1983
J.O. No. 14509
NRC File #83-06-30

SUBJECT: MANAGEMENT COMMITTEE REVIEW (June 23, 1983)

A copy of observations noted by CIO of the Management Review Committtee of the discussions relating to the Bulk Hanger Organization (BHO) is attached for your review and consideration. CIO has commented upon three subjects and have indicated conditional approval of BHO.

If you have any questions with respect to this report, please contact me at (517) 631-4286, extension 486.

Very truly yours,

S. W. Baranow
Program Manager

Enclosure

SWB/ka

cc: JJHarrison, NRC Glen Ellyn, IL
RCook, NRC Midland (site)
DBMiller, CPCo Midland (site)
RBKelly, S&W
APamaruso, S&W

8307110305

JUL 5 1983

CIO OBSERVATIONS OF MANAGEMENT REVIEW COMMITTEE (MRC)

MEETING SUBJECT: BULK HANGER ORGANIZATION

A meeting was convened by MRC on June 23, 1983 for discussion of the Release of Area and System Teams to start statusing. An agenda was distributed prior to the meeting.

All the members of the MRC were in attendance and actively participated in the proceedings. Key team members of CPCo, MPQAD and Bechtel were present. The handouts and the presentation covered the subject of discussion in definitive and understandable detail.

CIO reports the following observations:

1). Audit responses, once addressed should not be readdressed unless responses are inadequate. In particular the question of all training requiring an examination or qualifying test was raised at an earlier MRC meeting and again, at this session.

There appears to be two schools of thought on requirements for examinations. The audit group (CPCo) is taking the position that examinations are all encompassing while SMO favors examinations only for those personnel having accept/reject responsibilities. The position of across the board examinations or for the accept/reject responsibility only should be clearly established.

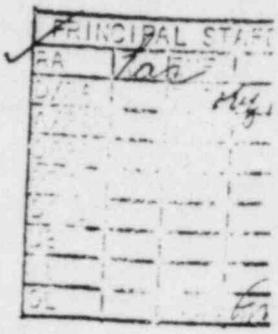
2). Observations by the Review team should be presented to MRC, in one document, several days prior to meeting date. This would enable MRC to respond in full at the meeting and avoid "conditional" approval of the review subject.

3). Restraints require expeditious resolution. The restraints presented to MRC at this session were of a minor nature and should have been cleared prior to the meeting or the meeting postponed until restraints are removed. As in (2) this would allow approval to be considered at the meeting. At present "conditional" approval by MRC is discussed.

CIO considers that preperation for Status Assessment is essentially ready for implementation. Training all personnel to all procedures and waiting for all procedures to be issued is an unnecessary restraint. If sufficient material is available, then a team should start implementation so that the results of that effort may be evaluated and fine tuned as necessary.

STONE & WEBSTER MICHIGAN, INC.

P.O. BOX 2325, BOSTON, MASSACHUSETTS 02107



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

June 28, 1983
J.O. No. 14509
NRC File #83-06-28

RE: DOCKET NO. 50-329/330
MIDLAND PLANT - UNITS 1 AND 2
OVERVIEW OF THE CONSTRUCTION COMPLETION PROGRAM

A copy of a Stone & Webster Quality Control Instruction QCI 10.01, Construction Implementation Overview Assessment Revision I is enclosed for information. The revision to the QCI added verification responsibilities of the Superintendent of verification.

If you have any questions with respect to this report, please contact me at (517) 631-8650, extension 486.

Very truly yours,

S. W. Baranow
Program Manager

SWB/ka

cc: JJHarrison, NRC Glen Ellyn, IL
RCook, US NRC Midland (site)
DBMiller, CPCo Midland (site)
RBKelly, S&W
APamaruso, S&W

JUN 5 1983

8307080453

T-391

STONE & WEBSTER	QCI NO. 10.01	REV. 1	DATE	PREPARED BY J.C. Thompson
QUALITY CONTROL INSTRUCTION	DIVISION FQC		LOCATION MNPP	
	APPLICABILITY N/A		APPROVED BY S.W. Baisden 6/27/83	
	RE: PROCEDURE N/A			
	SUBJECT CONSTRUCTION IMPLEMENTATION OVERVIEW ASSESSMENT			

1.0 PURPOSE AND SCOPE

1.1 To establish a program for management planning, conducting and documenting the Construction Implementation Overview (CIO) assessment of the Construction Completion Program (CCP). This QCI shall be applicable to all phases of the CCP and may cover additonal activities as directed by the SWEC Program Manager.

2.0 REFERENCES

2.1 SWEC Third Party Construction Implementation Overview Procedure 5/19/83

2.2 SWEC Project Quality Assurance Plan

2.3 Construction Completion Program

3.0 ATTACHMENTS

3.1 Evaluation Checklist (Sample)

3.2 Verification Checklist (Sample)

4.0 GENERAL

4.1 This CIO program shall assure proper implementation of the CCP through a systemmatic assessment of procedures, instructions, directives, correspondence, specifications, drawings and commitments as applicable. Assessment shall confirm conformance in the development, approvals and implementation of the CCP and shall encompass program evaluation and physical verification.

4.2 CIO shall provide for the evaluation of the CCP in a planned and systematic manner, i.e., prepare schedules for preparation of checklists, develop checklists applicable to specific Project Quality Control Instructions (PQCI) and perform evaluations of documented inspections/activities.

4.3 CIO shall use the checklists to perform evaluations and/or verification of the documented inspection or activity.

4.4 Results of assessments shall be documented in accordance with Section 6 of this QCI .

5.0 RESPONSIBILITIES

5.1 The Program Manager is responsible for:

- Implementation and control of the overview of the CCP activities
- Evaluating compliance and effectiveness of the program
- Approval of checklists
- Participating in Management Reviews
- Preparation of reports of progress and nonconformances for presentation to the US NRC and CPCo
- Documenting those meetings and telephone conversations that pertain to the CCP

5.2 The Evaluation Supervisor shall be responsible for:

- Developing checklists comprised of attributes based upon activities described in PQCI's, commitments and other project directives.
- Maintaining and up-dating checklist matrices
- Directing the implementation of the Evaluation Program

5.3 The Verification Supervisor shall be responsible for:

- Developing checklists comprised of attributes based upon activities described in PQCI's, commitments and other project directives
- Maintaining and up-dating checklist matrices
- Directing the implementation of the Physical Verification Program

6.0 PROCEDURE

6.1 Evaluation/Verification shall be performed in accordance with the following instructions:

6.1.1 Attribute checklists shall be prepared utilizing the PQCI and appropriate additional data. Attribute checklists may include direction for information and guidance to the evaluator. Attributes shall be numbered sequentially, shall be clear, concise, without ambiguity and shall indicate the precise source of the attribute by page and paragraph. In addition the source data shall address any of the 18 criteria of 10CFR50 Appendix B as applicable. The CPCo team number shall be indicated in the "Responsible Organization" Column.

6.1.2 Review referenced documents, including correspondence, procedures, and inspection records pertinent to the CCP.

6.1.3 Complete the checklist attribute sheets during the assessment by entering the total number of observations made of each attribute and the number of observations found unsatisfactory, noting any remarks under "Comments". Remarks shall contain sufficient information to ensure repeatability of the observation. This information shall include identification of specifications, drawing procedures, reports, test results and nonconforming conditions and shall include copies of supporting documentation as necessary. Attributes determined to be not applicable shall be marked "N/A" and explained.

6.1.4 Each attribute noted as unsatisfactory shall be evaluated by the Program Manager to determine if the unsatisfactory observation warrants the issuance of a Nonconformance Identification Report (NIR).

6.1.5 Checklists with attributes noted as unsatisfactory that do not result in the issuance of an NIR shall be kept in an active file until reinspection determined that the attribute is considered satisfactory.

6.1.6 The checklist attribute sheets shall be considered as a guide for performing assessments. Attributes maybe modified or added or deleted (with explanation) as necessary to satisfy the objectives of References 2.1 and 2.2.

7.0 Records

7.1 Upon completion of all activities asssociated with a specific PQCI, the completed package (with copies of NIRs) shall be transmitted to CPCo Permanent Plant Files.

7.2 CIO shall maintain a working file of all documentation transmitted to CPCo Permanent Plant Files. This file maybe used for reference or review by the US NRC.

STONE AND WEBSTER MICHIGAN INC

MIDLAND ENERGY CENTER PROJECT

EVALUATION ATTRIBUTE CHECKLIST

ATTRIBUTE CHECKLIST N°	TITLE	REV	DATE
PQCI N°/REFERENCE	TITLE	REV	DATE

This Attribute Checklist shall be completed in accordance with the following procedures.

Stone & Webster Quality Assurance Plan Third Party CIO procedure.

QCI 10.01 Construction Implementation Overview Assessment
QCI 15.01 Nonconformance Identification Report

S.W. Baranow
Program Manager

Attribute Checklist prepared by SIGN DATE

Checklist Approved by SIGN DATE

Checklist Completed by SIGN DATE

Completed Checklist Approved SIGN DATE

STONE AND WEBSTER MICHIGAN INC

MIDLAND ENERGY CENTER PROJECT

VERIFICATION ATTRIBUTE CHECKLIST

ATTRIBUTE CHECKLIST N°	TITLE	REV	DATE

PQCI N°/REFERENCE	TITLE	REV	DATE

This Attribute Checklist shall be completed in accordance with the following procedures.

Stone & Webster Quality Assurance Plan Third Party CIO procedure.

QCI 10.01 Construction Implementation Overview Assessment
QCI 15.01 Nonconformance Identification Report

S.W. Baranow
Program Manager

Attribute Checklist prepared by SIGN DATE

Checklist Approved by SIGN DATE

Checklist Completed by SIGN DATE

Completed Checklist Approved SIGN DATE

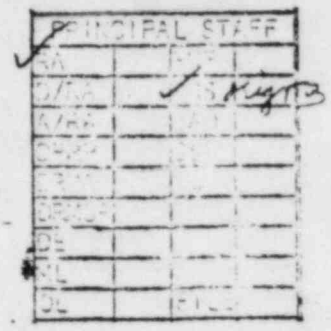
ATTRIBUTE CHECKLIST

ITEM NO.	ATTRIBUTES	RESP. ORG.	OBSERVATIONS		COMMENTS
			NO. CKD.	NO. UNSAT.	

T-090-3 ATTRIBUTE CHECKLIST N° _____ (CONTINUATION SHEET) PAGE ___ OF ___

STONE & WEBSTER MICHIGAN, INC.

P.O. BOX 2325, BOSTON, MASSACHUSETTS 02107



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

June 28, 1983
J.O. No. 14509
NRC File #83-06-28

RE: DOCKET NO. 50-329/330
MIDLAND PLANT - UNITS 1 AND 2
OVERVIEW OF THE CONSTRUCTION COMPLETION PROGRAM
REPORT NO. 3

A copy of the Construction Implementation Overview Report No. 3 for the period June 13, 1983 through June 24, 1983 is enclosed with this letter. Also included are minutes of the meetings attended during this reporting period between members of the Overview Team, CPCo Management Review Committee. A status of the program development is provided herein.

If you have any questions with respect to this report, please contact me at (517) 631-4286, extension 486.

Very truly yours,

S. W. Baranow
Program Manager

Enclosure

SWB/ka

cc: JJHarrison, NRC Glen Ellyn
RCook, NRC Midland (site)
DBMiller, CPCo Midland (site)
RBKelly, S&W
APamaruso, S&W

JUL 5 19

Report No. 3

June 13, 1983 through June 24, 1983

Personnel on Site

Stone & Webster Michigan, Inc.

S. Baranow	W. Miller
F. Bearham	A. Smith
R. Scallan	J. Chawla
J. Langston	J. Thompson

Meetings Attended

Date	Attendees	Purpose
June 16, 1983	Stone & Webster CPCo	CCP Work Schedule
June 23, 1983	Stone & Webster CPCo Bechtel	Release of Area and System Teams to Start Statusing

Meetings

June 16, 1983 - Meeting with D.B Miller to discuss the following:

a) schedule of work

b) listing of priorities for implementation of the CCP by systems/areas

c) listing of CCP commitments

d) computer printout of NCRs

e) scope of Stone & Webster overview other than CCP

f) additional Stone & Webster manpower loading

June 23, 1983 - Management Review Committee meeting for discussion of the Release of Area and System Teams to start statusing. During the meeting an evaluation checklist, MP-MIS-002 was utilized to evaluate the performance of the Review Committee. A total of 28 observations were noted and were judged to be satisfactory. A letter, under seperate cover, will detail CIO comments and concerns on the conduct of the meeting.

Activities

1) System Interaction Walkdown of the Service Water Pumphouse and the Auxiliary Building commenced on June 22, 1983. The walkdown was performed in accordance with WTP-3-Q "Procedure for Performing Walkdowns of SSIP/S Targets."

The CIO evaluation was performed utilizing attribute checklist, MP-MIS-WTP-3-Q. CIO personnel witnessed 6 interactions in the Service Water Pumphouse and 3 interactions in the Auxiliary Building. The evaluation of the implementation of the program was judged to be satisfactory and in compliance with the procedure WTP-3-Q.

2. CIO participated in and evaluated the training of Construction Bulk Hanger Organization non-manual supervisory personnel. The training course subject was titled "Identification and Marking of Embeds affected by Anchor Bolt Proximity Requirements."

   The training session was presented to 33 Bechtel Field Engineers and Supervisors. The duration of the presentation was approximately 30 minutes followed by some of the attendees completing a Course Evaluation Sheet.

   CIO has concerns as to the approach taken in conducting this particular training session. Evaluation sheets were distributed to 15 attendees. The completed evaluation sheets were submitted to the instructor, unsigned. This practice is somewhat unusual and does not provide objective evidence of who correctly or incorrectly answered the questions on the evaluation sheets.

Action Items

1) With reference to our Report No. 2 dated June 14, 1983, we are still waiting for CPCo response to 5 items addressed in the June 1, 1983 meeting. CIO has received a partial listing of commitments (item e). on June 16, 1983. Two further questions were addressed:

2) "Are job descriptions and responsibilities of CPCo personnel engaged to implement the QVP available?" This item has been added to the management evaluation checklist as an attribute.

3) "Has a program been developed and responsibilities established of personnel assigned to process nonconformances?" Upon receipt of the program, CIO shall develop a checklist to evaluate the effectiveness of the program.

Status of Program Development

A) Third Party Construction Implementation Overview Procedure, Rev. 1 at Boston for approval signoff.

B) Stone & Webster Quality Control Instruction, QCI 10.01 Rev. 1 - Construction Implementation Overview Assessment - revised and ready for issue.

C) Of a total of 96 PQCI's scheduled for issue by MPQAD for CIO review, 65 have been submitted for review and checklist development.

D) To date a total of 64 change notices and 16 revisions of the PQCI's has been received by the CIO.

E) Checklist Development Status

a) first draft - 36

b) review cycle - 15

c) typing completed - 7

d) final approval - 7

Personnel

Mr. J.C. Thompson, Superintendent of Field Quality Control reported to the site on June 14, 1983 to assume the duties of Superintendent of Verification. Mr. Thompson was introduced to Mr. R. Cook US NRC and Mr. D.B. Miller (CPCo) Site Manager.

STOP WORK ORDER

PROJECTS, ENGINEERING AND CONSTRUCTION - QUALITY ASSURANCE DEPARTMENT

5. PROJECT: Bechtel Construction

10. SUBJECT OF STOP WORK ORDER: Remedial Soils and soils related work

1. STOP WORK ORDER NO: FSW-24

2. PREPARED BY: Donald E. Horn

11. ORAL STOP WORK ORDER GIVEN TO: JDelarm BY: DEHorn / JDarby / REWheeler DATE: 8/9/82 TIME: 6:00-6:10 PM

12. WORK STOPPED: DATE: 8/9/82 TIME: 6:25 PM

3. DATE: 8/10/82 TIME: 7:50am

4. APPROVED BY: James K. Weisenheimer

5. DATE: 8/10/82

6. FILE: 0.4.9.20.6 & 16.13

13. DESCRIPTION OF CONDITION REQUIRING STOP WORK ACTION:

Additional deep duct bank excavation work was performed based on a Consumers Power Company understanding that regulatory approval to proceed had been obtained. Subsequent discussions revealed that an apparent misunderstanding had occurred. Consequently, all remedial soils and soils related construction and installation work is stopped until communications and the approval process is resolved. Specifically, the following work is stopped:

a) Construction work on the underpinning instrumentation and calibration of underpinning instrumentation. (Operations of the instruments is allowed).
b) Work on non-operating dewatering wells.
c) Work on the Feedwater Isolation Valve Pit, including crack mapping.

(Continued on page 2)

7. THIS STOP WORK ORDER ISSUED TO: LEDavis/JFisher

DISTRIBUTION:

RCBauman	BWMarguglio
WRBird	JKMeisenheimer
AJBoos	DBMiller
JEBrunner	JAMooney
JWCook	JARutgers
MLCurland	MJSchaeffer
MADietrich	JRSchaub
JDarby	ESmith
JAHorsch	REWheeler
DEHorn	REWhitaker

14. CORRECTIVE ACTION TAKEN:

1) Issue of NRC and CPCo Work Authorization Procedure, dated August 12, 1982.

2) Receipt of letter WDShafer to DBMiller, Remedial Soils Work Activities, dated August 12, 1982 which authorizes work on specific line items.

3) Issue of letter, Serial 17575, WRBird to AJBoos, Quality Plan for Underpinning Activities, dated August 13, 1982.

NOTE: Lifting the Stop Work on all soils activities does not authorize work. Authorization of work is only through the work permit system.

15. METHOD OF CORRECTIVE ACTION VERIFICATION:

1) Verification of the issue of Items 1 through 3 above.

2) Telecon WRBird and JRSchaub with WDShafer at approximately 10:15am, August 13, 1982. Mr. Shafer concurred with:

   a) the wording on Item 3..

   b) the proposed wording as reflected on this Stop Work Order (Blocks 14 & 15).

   c) that the items listed in Block 14 constitutes basis for lifting the Stop Work.

Mr. Shafer gave verbal authorization for lifting the Stop Work.

16. VERIFICATION OF CORRECTIVE ACTION VERIFIED BY: Donald E. Horn for Walter R. Bird DATE: August 13, 1982

17. STOP WORK ORDER LIFTED BY: Donald E. Horn DATE: 8/13/82 TIME: 12:03 p.m.

13. DESCRIPTION OF CONDITION REQUIRING STOP WORK ACTION: (Continued)

d) Crack mapping of any structure.
e) Excavating and/or backfilling in "Q"-areas per Drawing C-45, Revision 7.
f) Removal of waterproofing membrane from the Borated Water Storage Tank.
g) Work on the 72" line repair.
h) Scanning for embedded items in the Borated Water Storage Tank.
i) Probing for the Service Water Building dewatering wells.
j) Work in the access shafts.

The following activities shall continue:

Operation of the freezewall, operation of the dewatering wells, operation of underpinning instrumentation (no adjustment or calibration is permitted).

STOP WORK ORDER

PROJECTS ENGINEERING AND CONSTRUCTION - QUALITY ASSURANCE DEPARTMENT

5. PROJECT: Sechtel Construction

10. SUBJECT OF STOP WORK ORDER: Remedial Soils and soils related work

1. STOP WORK ORDER NO: FSW-24

2. PREPARED BY: Donald E Horn

11. ORAL STOP WORK ORDER GIVEN: JDarby TO: JDelarm BY: DEHorn BY: REWheeler DATE: 8/9/82 TIME: 6:00-6:10 PM

12. WORK STOPPED: DATE: 8/9/82 TIME: 6:25 PM

3. DATE: 8/10/82 TIME: 7:50 am

4. APPROVED BY: James K Wolstenholme

5. DATE: 8/10/82

6. FILE: 0.4.9.20.6 & 16.13

13. DESCRIPTION OF CONDITION REQUIRING STOP WORK ACTION:

Additional deep duct bank excavation work was performed based on a Consumers Power Company understanding that regulatory approval to proceed had been obtained. Subsequent discussions revealed that an apparent misunderstanding had occurred. Consequently, all remedial soils and soils related construction and installation work is stopped until communications and the approval process is resolved. Specifically, the following work is stopped:

a) Construction work on the underpinning instrumentation and calibration of underpinning isntrumentation. (Operations of the instruments is allowed).
b) Work on non-operating dewatering wells.
c) Work on the Feedwater Isolation Valve Pit, including crack mapping.

(Continued on page 2)

7. COPIES STOP WORK ORDER ISSUED TO:
LEDavis/JFisher

DISTRIBUTION:

RCBauman	BWMarguglio
WPBird	JKMeisenheimer
AJBoos	DEMiller
JEBrunner	JAMooney
JWCook	JARutgers
MLCurland	MJSchaeffer
MADietrich	JRSchaub
JDarby	ESmith
JAHorsch	REWheeler
DEHorn	REWhitaker

8. CORRECTIVE ACTION DATE:

9. METHOD OF CORRECTIVE ACTION VERIFICATION:

14. COMPLETION OF CORRECTIVE ACTION VERIFIED BY: DATE:

17. STOP WORK ORDER LIFTED BY: DATE: TIME:

13. DESCRIPTION OF CONDITION REQUIRING STOP WORK ACTION: (Continued)

d) Crack mapping of any structure.
e) Excavating and/or backfilling in "Q"-areas per Drawing C-45, Revision 7.
f) Removal of waterproofing membrane from the Borated Water Storage Tank.
g) Work on the 72" line repair.
h) Scanning for embedded items in the Borated Water Storage Tank.
i) Probing for the Service Water Building dewatering wells.
j) Work in the access shafts.

The following activities shall continue:

Operation of the freezewall, operation of the dewatering wells, operation of underpinning instrumentation (no adjustment or calibration is permitted).

Consumers Power Company

ORAL COMMUNICATIONS RECORD

PROJECTS, ENGINEERING AND CONSTRUCTION - QUALITY ASSURANCE DEPARTMENT

CHRON. FILE NO 18293 (0.4.2)

QA5-O

PAGE 1 OF 1

DATE OF COMMUNICATION 8/5/82

TIME OF COMMUNICATION 11:00AM

PREPARED BY W R Bird

QA-P&C PERSONNEL PARTICIPATING W R Bird, MPQAD

OTHER PARTY(S) R B Landsman, NRC Region III Inspector

R Gardner, NRC Region III Inspector

PROJECTS AND/OR SUBJECTS DISCUSSED 82-03 REPORT, AND SOILS QA PLANS

SUMMARY OF CONVERSATION 1) Confirmed with Dr Landsman and Mr Gardner that we would extend the response due date to August 13, 1982.

2) Mr Gardner wanted to be certain that my transmittal letter for the Subject Plans did not indicate that we thought the QA Plans had NRC approvals. I said I used the word "coordinated" and really mean what the word implies. In person with Mr Gilroy, and by phone with Mr Gilroy and Dr Landsman I went over word by word the full content of those plans. Wording was changed where it was agreed to, by marking up our respective copies. The last words of the meeting with Mr Gilroy, in which Dr Landsman was participating by phone, was that CPCo should issue the plans prior to going onto Phase 2. No discussion occurred which addressed a further need for formal NRC approval of the plans. I agree that we have not received a formal approval on the plans and that up to the other day when Daryl Hood talked to J A Mooney, I didn't know one was needed.

CC JWCook, P26-336B
AJBoos, Bechtel-AA
JEBrunner, M-1079
DMBudzik, P24-517A
DEHorn, Midland
BWMarguglio, Midland
JKMeisenheimer, Midland
JAMooney, P14-115A
JARutgers, Bechtel-AA
JRSchaub, P13-309A

ATTACHMENT C-2

0.4 4.2

PROJECTS, ENGINEERING AND CONSTRUCTION - QUALITY ASSURANCE DEPARTMENT

Consumers Power Company

ORAL COMMUNICATIONS RECORD

CONT. FILE NO Serial 11065

To R Ross Landsman Ph 388-2587 PAGE 1 of 2

DATE 3/31/81 QA-PQAE PERSONNEL PARTICIPATING WRBird, DEHorn, RCHirzel, NRamanujam

TIME 12:30 PM CONTACT(S) CCWilliams, KCBoyd, RCKnop, RLandsman, RLSpessard

BY WRBird of NRC

CONSUMERS POWER COMPANY

SOIL BORINGS

RECEIVED APR 06 1981 FIELD QUALITY ASSURANCE MIDLAND MICHIGAN

PRINT	ROUTE	
	DMT	
	SMT	
✓	DEH	

FILE: 0.4.2

I returned Mr Williams 12:00 phone call in which he stated it was urgent that I call him back within the next 15 minutes. I placed a conference call such that Site QA could participate and I also asked N Ramanujam to join us.

1. Mr Williams painted a picture wherein if the NRC had not come to the site Wednesday we would have been deficient in having identified all the actions necessary to be put in place prior to the start of the borings. It is their perception that CPCo was ready to go Wednesday if they (NRC) hadn't been there and there would have been problems.

2. I responded that such a scenario was absolutely incorrect. Consumers Power recognizes the need to start the borings as soon as possible in order to support both Consumers and NRC's interests in having the results available for the soils bearing but that we fully recognize the necessity to accomplish the borings under an appropriate QA program. My management is fully supportive of the conservative approach that QA has been taking to assure that all elements are in place, and they concur with not starting any borings until we (QA) say we are ready. We had just received the detailed procedures (for which most of the comments were generated) at [illegible] the NRC had the opportunity to look at them, and there was no way work

would have started until those procedures were reviewed and approved by QA. I stated that I felt the characterization that work would have started prior to our being completely ready was an inaccurate perception on NRC's part.

3. Mr Spessard then stated that his feelings echo Mr Williams. They don't share the view that all the technical requirements would have been identified by CPCo. They hoped that whatever work we perform will be done in conformance with procedures and will be under control. It is their belief that if we had started work without Mr Landsman's input, we would have been found in noncompliance.

A discussion was then held concerning when we would be starting work and how we could give the NRC 12-24 hours notification. The final conclusion was that we would only have to notify (by telephone) Mr Williams when we did start the borings.

WRB/lr

CC: JWCook
RCBauman
MADietrich
[redacted]
GSKeeley
FWMarguglio
DBMiller
NRamanujam
DTurnbull
File: 0.4.9.20