



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

SADNER

August 6, 1982

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

THRU: <sup>RFW</sup> R. F. Warnick, Acting Director, Office of Special Cases

THRU: W. D. Shafer, Chief, <sup>WS</sup> Midland Projects Section

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

SUBJECT: SALP III EVALUATION PERIOD

Ref: T. N. Tambling memo dated July 12, 1982

During our discussions with you and Mr. D. C. Boyd on July 19-20, 1982, it was my understanding that you were in favor of extending the SALP III evaluation period for the Midland Site from June 30, 1982 to December 31, 1982 for the following reasons:

- 1) The SALP II report was given to the licensee on April 26, 1982 and some of the issues are still being resolved between the licensee and the NRC. The last meeting conducted on these issues was on August 5, 1982.
- 2) With the late issuance of the Cycle II SALP report and some of the more controversial aspects of the SALP report being discussed at the present, the NPC could come under criticism for not allowing enough time for the effects of the SALP II comments to be implemented into the licensee's performance. A cursory review of the inspection and enforcement records for the period July 1, 1982 through June 30, 1982, indicates that in some of those areas identified as Category 3 during SALP II would remain Category 3 during SALP III.
- 3) Lengthening the SALP III evaluation period to December 31, 1982 can be used as a performance motivator in the following form: If the licensee is informed that he now has an additional six months to show improvement - the licensee may take advantage of the time and SALP III could reflect that there were difficulties in the first portion, but as a result of the findings for SALP II, the licensee was responsive. Should the record show that there is no or little improvement even after the results of SALP II, then this is an indicator without much doubt as to the steps the NRC needs to take in dealing with this utility.

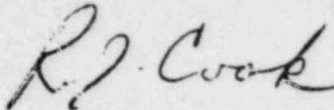
R. L. Spessard

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August 6, 1982

The above concepts were discussed with Mr. T. N. Tambling on July 19 or 20, 1982 and he (Mr. Tambling) appeared to be receptive to these ideas and to extending the SALP III period to December 31, 1982.

Sincerely,

A handwritten signature in cursive script that reads "R. J. Cook". The signature is written in dark ink and is positioned above the typed name and title.

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

cc: D. C. Boyd  
T. N. Tambling



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

*Cardner*

ECO 2 1092

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 letters dated May 28 and June 11, 1982, informing us of the steps you have taken to correct the noncompliance which we brought to your attention in Inspection Report No. 50-329/82-05(DETP); 50-330/82-05(DETP); 50-329/82-06(DETP); 50-330/82-03(DETP) forwarded by our letters dated April 26, 1982.

Regarding noncompliance item 82-05-02, parts a. and b., we still perceive these matters as valid items of noncompliance and, as such, do not consider the corrective actions delineated in your letter to be fully responsive as described below.

1. With respect to example "a", we consider this a valid item of noncompliance. The technical basis for this is that the soldier piles in question were being installed in "Q" soil, thus making the activity "Q".
2. With respect to example "b", we consider this a valid item of noncompliance. We do not consider the statements in EDPI 4.49.1 to be adequate. An established time limit is needed to assure that a more timely update of specifications on site is obtained.

The corrective actions delineated in your letter are unacceptable, and an additional response is required.

Regarding noncompliance item 82-05-02, parts c. and d., we will review your actions during a subsequent inspection.

Regarding deviation 82-05-01, we perceive this matter as a deviation and, as such, do not consider the statements made in your letter to be responsive to the inspector's concern. It is our position that your civil QA and Resident Geotechnical staff is not adequately qualified for the complex remedial soils work. The basis for our conclusion is (1) your staff's academic qualifications are not in soils engineering and (2) their work experience in this area is not sufficiently broad.

~~82-05-01-02-03-04-05-06-07-08-09-10-11-12-13-14-15-16-17-18-19-20~~

Regarding noncompliance 82-06-01, we consider your response to be unacceptable. In regard to Section IV, paragraph 14, of your June 4, 1982 report, we have contacted NRR and have determined that an FSAR revision to allow less than 100% assurance that all class 1E cables are installed in accordance with design will not be acceptable. We request that you submit an additional response which identifies the date by which you will complete a 100% overinspection of all class 1E cables installed (or partially installed) before March 15, 1982 so as to satisfy your commitments as stated in the Midland FSAR. In addition, we request that a sample over inspection program be developed for those cables installed after March 15, 1982 to ensure their compliance with the FSAR.

With respect to noncompliance item 82-06-02, we will review your actions during subsequent inspections.

Therefore, we request that you submit a second letter to this office within 25 days of the date of this letter to respond to our concerns regarding noncompliance items 82-05-02, parts a. and b., and 82-06-01. Your response should be submitted under oath or affirmation and should include (1) corrective action taken and the results achieved; (2) corrective action taken to avoid further noncompliance; and (3) the date when full compliance will be achieved.

Your cooperation with us is appreciated.

Sincerely,

*151 for E. N. Gardner*  
 for R. F. Warnick, Director  
 Office Special Cases

- cc w/ltrs dtd 5/28 & 6/11/82:
- 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
- Michael Miller
- Ronald Callen, Michigan  
 Public Service Commission
- Myron M. Cherry
- Barbara Stamiris
- Mary Sinclair
- Wendell Marshall
- Colonel Steve J. Gadler (P.E.)
- Consumers Power Company

RIII  
*RL*  
 Landsman/jp  
 8/27/82

RIII  
*RNS*  
 Gardner

RIII  
*RNS*  
 Shafer

RIII  
*RNS*  
 Warnick



**Consumers  
Power  
Company**

James W Cook  
Vice President - Projects, Engineering  
and Construction

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

May 28, 1982

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

MIDLAND PROJECT -  
INSPECTION REPORTS NOS 50-329/82-05(DETP) & 50-330/82-05(DETP) AND  
50-329/82-06 & 50-330/82-06  
FILE: 0.4.2 SERIAL: 16182

References: (1) NRC Letter, C E Norelius to J W Cook, dated April 26, 1982,  
transmitting Inspection Report 82-05  
(2) NRC Letter, C E Norelius to J W Cook, dated April 26, 1982,  
transmitting Inspection Report 82-06

This letter, including all attachments, provides our response to References 1  
and 2, which transmitted the subject Inspection Reports and which requested  
our written response on the items of noncompliance therein.

Attachment 1 to this letter provides our response to the violation notice in  
Report No 82-05.

No response is required by Reference 1 to the item in Report No 82-05  
concerning QA civil staffing. However, Consumers Power believes that this  
item needs to be addressed; and Attachment 2 to this letter does so.

The first item of Report No 82-06 is addressed in Attachment 3 to this letter.

~~8209080656~~

Our response to the second item given in Report No 82-06 will be provided in the detailed report to be submitted the week of June 7th. The contents of this report were discussed with your Staff at a meeting on this subject on May 14, 1982.

Consumers Power Company

By James W. Cook  
James W Cook

Sworn and subscribed to before me on this 1th day of June, 1982.

Beverly A. Avery Beverly A. Avery  
Notary Public, Jackson County, Michigan

My commission expires Jan 16, 1985

WRB/vsh

CC: RJCook, USNRC Resident Inspector, Midland Site  
RLandsman, NRC Region III

CONSUMERS POWER COMPANY'S RESPONSE TO  
US NUCLEAR REGULATORY COMMISSION, REGION III  
INSPECTION REPORT NO 50-329/82-05 (DETP); 50-330/82-05 (DETP)  
DOCKET NOS 50-329 AND 50-330

Appendix A (Notice of Violation) to Inspection Report No 50-329/82-05 and 50-330/82-05 provides an item of noncompliance to 10 CFR 50, Appendix B, Criterion V, with four examples. Our response to each example is given in turn, as follows:

1. NRC Statement

Example "a" states:

"Mergentine's Field Procedure FPC-1.00, Revision 3, dated January 26, 1981, was not reviewed and approved prior to initiation of access shaft work as required by Site Procedure FPG-1.000. This was the result of Consumers Power Company allowing Mergentine to proceed without having an approved procedure to prepare procedures."

This item is labeled 50-339/82-05-02A and 50-330/82-05-02A.

Consumers Power Company Response

The Mergentine procedure in question, FPC-1.000, Rev 3, covered a non safety-related activity and, as such, should not be the basis for an item of noncompliance.

Consumers Power agrees the condition represented by this example required corrective action. The Mergentine procedure was approved by the vendor drawing review stamp. The format of the cover page was borrowed from the existing Bechtel format for field procedures, which provides signature blocks which are inapplicable to a Mergentine procedure. These signature blocks were blank for the Mergentine procedure in question.

Bechtel Site Procedure FPG-1.000 covers the approval of Bechtel field procedures, not the approval of Mergentine procedures.

The Mergentine procedure for preparing procedures (MGP 1.000 Q) now provides for a specific cover sheet format appropriate for Mergentine procedures.

2. NRC Statement

Example "b" is given as follows:

"Site Procedure EDPI 4.49.1 does not have time limits established from engineer approval of the SCN, to distribution of the controlled copies of the specifications on site. This results in untimely delays for important changes."

This item is identified as 50-329/82-05-02B and 50-330/82-05-02B.

Consumers Power Company Response

We agree the concern raised by the NRC inspector must be addressed in the Quality Program. Provision meeting this concern is made in existing EDPI 4.49.1 under Section 3.1, which states (in relevant part) as follows:

"For specifications which have been issued for construction, it is imperative that the responsible engineer or designer ascertain the status of construction prior to the release of specification changes. If construction activity in the area affected by the change is imminent, the Group Supervisor shall determine whether a construction hold should be initiated, a retrofit should be planned, or the proposed change canceled or revised. If retrofitting is planned, the point (effectivity) of retrofitting shall be clearly identified in the design change document. Where possible, amplifying instructions shall be given regarding material or equipment no longer needed as a result of the design change. Holds or releases of the holds shall be by written communications between the project engineer and the project superintendent, or by appropriate SCN action covering the affected areas."

The above paragraph does not provide specific time limits for each step in the preparation and distribution of SCNs. Instead, it describes the actions required to be taken by the responsible engineer/designer to insure specification changes accommodate the actual circumstances in the field. Other requirements exist for implementation timeliness once the change notice is received in the field.

3. NRC Statement

Example "c" is given as follows:

"Specification C-88, for the initial 20 dewatering wells, does not have acceptance criteria for determining if the actual amount of gravel pack/grout used in the dewatering wells was within an acceptable range. This resulted in inadequate assurance that the wells are acceptable. Furthermore, Specification C-118, for the remaining 40 wells, does not have acceptance criteria for this attribute."

This item is identified as 50-329/82-05-02C and 50-330/82-05-02C.

Consumers Power Company Response

Specification C-118 supersedes Specification C-88 for the installation of the site permanent dewatering system. Specification C-118 is in the process of being revised to include the following requirement:

"Upon completion of dewatering well installation, the measured versus calculated amounts of gravel pack and grout material used will be



compared. If the measured quantity differs from the calculated quantity by 25 percent, an engineering evaluation is required by the contractor."

Both the issuance of this revision to the specification and the actual required calculations, on wells installed to date, are anticipated to be completed by early June 1982. Results of comparisons thus far (which includes all wells installed under Specification C-88) indicate that the difference between measured and calculated values are well within acceptable limits. Consumers Power Company (Design Production Geotechnical Engineering) will review the comparisons and will determine if any additional evaluations are deemed necessary.

#### 4. NRC Statement

Example "d" is given as follows:

"Site Procedure E-1M does not have adequate instructions to prepare or implement overinspection plans in that it did not address how SCNs, FCNs, FCRs and DCNs are incorporated into the plans. This resulted in Overinspection Plan C-17B having contradicting and unclear acceptance criteria. As a result, the inspection reports document erroneous results."

This item is identified as 50-329/82-05-02D and 50-330/82-05-02D.

#### Consumers Power Company Response

This example deals with two concerns -the first with procedure E-1M, which did not specifically identify how attachments to contract specifications, drawings and procedures (SCNs, FCNs and DCNs) are used in both the preparation and implementation of the Overinspection Plans; and the second with Overinspection Plan C-17B, which, as a result of the first concern, had conflicting statements for activities 4.3D and 4.4A/C17B.

#### First Concern

Procedure E-1M was revised and approved on an interim basis on March 12, 1982 and on a final basis on April 25, 1982. This revision was made to address the use, in overinspection plans, of attachments to reference documents (including contract specifications, drawings, procedures, etc.) which contain acceptance criteria.

#### Second Concern

Overinspection Plan C-17B was revised and approved on February 16, 1982. This revision eliminated the conflicting statements. The completion of this corrective action was documented in the CP Co minutes of the NRC exit meeting held February 19, 1982.

A summary of corrective actions for the above items and date when full compliance was achieved is as follows:

1. Procedure (MGP 1.000 Q) for preparing procedures was approved by Bechtel on May 6, 1982 and was distributed to the field for use on May 10, 1982, which provides for full compliance of this Mergentime activity.
2. The concern raised in this example is adequately addressed by the controls in EDPI 4.49.1 which provides for compliance to the QA Program requirements.
3. Specification C-118 was revised on May 7, 1982 by SCN 12003 which incorporated the acceptance criteria which was the subject of this item. Full compliance with requirements was achieved by this revision although compliance to the individual specification requirement will be a continuing on going activity.
4. Full compliance was achieved with the implementation of the Program changes to E-1M on April 25, 1982. The specific problem with Overinspection Plan C-178 was corrected on February 16, 1982.

CONSUMERS POWER COMPANY'S RESPONSE TO  
US NUCLEAR REGULATORY COMMISSION, REGION III  
INSPECTION REPORT NO 50-329/82-05(DETP); 50-330/82-05(DETP)  
DOCKET NOS 50-329 AND 50-330

NRC Statement

Appendix B (Notice of Deviation) of Inspection Report No 50-329/82-05 and 50-330/82-05 provides the following:

"As a result of the inspection conducted on February 3-5, 17-19 and March 17-19, 1982, the following was cited as a deviation.

During IE Inspection No 81-12, the licensee committed to provide additional qualified QA civil staff prior to the initiation of the remedial soils work.

Contrary to the above, it was determined that certain of the assigned personnel do not satisfy the commitment to provide qualified staff needed to support the remedial soils work."

This item is identified as 50-329/82-05-01 and 50-330/82-05-01.

Section 1 of the "DETAILS" portion of the Inspection Report No 50-329/82-05 and 50-330/82-05 states the following:

"During this inspection, a review of the quality assurance staff for the civil work activities was made to determine that adequate technical, quality assurance depth and personnel availability exist for the planned remedial measures to be performed as a result of the soil settlement issue.

The onsite QA group is divided into two sections; (1) Quality Assurance Engineering (QAE), and (2) Inspection-Examination and Testing Verification (IE&TV). The QAE section presently consists of a supervisor (an industrial engineer) and three civil engineers. The IE&TV section presently consists of a supervisor (a civil engineer), one civil engineer, a geologist, and two other individuals, one of which has an associate degree in environmental studies. The following determinations were made:

- a. The QAE section supervisor does not have the technical experience to implement the MPQAD program for the required remedial measures.
- b. The IE&TV staff has very limited technical depth for the complex nature of the remedial actions.

Staffing problems were previously discussed with the licensee (as described in IE Reports No 81-01 and No 81-12). CP Co committed to provide, prior to the initiation of the complex remedial activities, additional qualified staff to participate in these activities. It is the

assessment of the inspector that the staff is not fully adequate and are judged not to be commensurable with the complexity of the task. Therefore, it has been determined that CP Co is in deviation from an NRC commitment as described in Appendix B of the report transmittal letter (50-329/82-05-01; 50-330/82-05-01).

Subsequent to the inspection, CP Co informed the Region III office that the civil QA section will be reorganized into a remedial soils group and a structural group. The remedial soils group, will have a qualified civil engineering staff. Additional qualified staff will also be provided. This action will be verified during a subsequent inspection."

#### Consumers Power Company Response

This deviation appears to be based, at least in part, on an erroneous perception of facts forming the subject matter of previous inspection reports.

Report 81-01 contained a deviation for "failure to supply an on-site Geotechnical Engineer." The history of events leading up to this citation were fully described in Consumers Power Company's "Response to Draft SALP Report," Attachment 1, p 1-11. On the basis of that description, there clearly was no "staffing problem".

NRC Inspection Reports 50-329/81-12; 50-330/81-12, also referred to by the inspection report as a "staffing problem," merely indicated the NRC's advice to the effect that additional QA/QC personnel were needed to accommodate the forthcoming remedial soils work. We agreed with this NRC observation. The inspection report itself (81-12) did not cite us on this score. We always had an adequate number of QA/QC personnel to cover the job. We now have 12 full time and 1 part time QA/QC persons employed in MPQAD and 30 QA/QC persons employed by both MPQAD and Bechtel Quality Control to cover remedial soils work. This staffing is appropriate for the current workload, including the time necessary to assure their adequate training and certification. Several more persons are expected to be on site in June. Additional personnel are being sought to fill the 2 remaining authorized positions. We will continue to assess our staffing needs as the job progresses to assure that appropriate staff is in place.

Regarding present staffing, the inspection report also cites the fact that the QAE Supervisor lacks a degree in civil engineering and specific soils engineering experience. The NRC Inspector was advised that this individual was, and is, not involved in the technical direction of the Quality Assurance Engineers assigned to the support of the remedial work. This information was also presented to Region III and NRR Staff in Glen Ellyn at a meeting on January 12, 1982. At that meeting a viewgraph was shown of the total MPQAD Civil Section with an annotation of those individuals involved in support of the remedial work.

The conclusion reached in NRC Inspection Report that "the IE&TV staff has very limited technical depth for the complex nature of the remedial actions" is one with which we disagree. Each member of our staff must be

certified in accordance with NRC regulations, national standards and our own procedures before he can perform inspection or audit functions. We are continuing to staff in preparation for future work. It should also be noted that our Design Production Department has several highly qualified individuals in structural and geotechnical engineering who have supported, and will continue to support, MPQAD.

In summary, it is Consumers Power's position that the Notice of Deviation is not appropriate. It is our hope that NRC will, in time, come to the same conclusion as the remedial work goes forward.

CONSUMERS POWER COMPANY'S RESPONSE TO ITEM 1 OF  
US NUCLEAR REGULATORY COMMISSION, REGION III  
INSPECTION REPORT NO 50-329/82-06(DETP); 50-330/82-06(DETP)

NRC Statement

Appendix (Notice of Violation) to Inspection Report No 50-329/82-06 and 50-330/82-06 provides the following for Item 1:

"10 CFR 50, Appendix B, Criterion II states, in part, 'The Quality Assurance Program shall provide control over activities affecting the quality of the identified structures, systems, and components, to an extent consistent with their importance to safety. Activities affecting quality shall be accomplished under suitably controlled conditions.'

"Consumers Power Company Quality Assurance Program Policy No 2, Revision 11, Paragraph 1.0 states, in part, 'The Quality Assurance Program assures that activities affecting quality are accomplished by use of appropriate equipment and under suitable environmental conditions. The program establishes the requirements for special controls, processes, test equipment...'

"Contrary to the above, the Midland Project Quality Assurance Department has not adequately established a Quality Assurance Program which provides controls over the installation of underpinning instrumentation. This condition is exemplified by the installation of underpinning instrumentation cables without documented procedures, approved drawings, or the development and implementation of inspection and audit requirements."

This item is identified as 50-329/82-06 and 50-330/82-06. Consumers Power Company is disappointed with this citation because it is apparently based upon incorrect conclusions derived from the March 10, 1982 meeting and subsequent conversations with the Staff. The matter was partially addressed in Attachment 3 to Consumers Power Company's "Response to Draft SALP Report". The citation is based on the Company's classification as non Q of the installation of the instrumentation system. However, as a result of the NRC inspection of March 17-19 and the management meeting in Glen Ellyn on March 30th, the instrumentation is being, and will be, installed under the Quality Program in line with the now in-place agreements and Quality Program Requirements. Appropriate specific quality assurance requirements, which have been coordinated with Mr R Gardner of your staff, are being applied. This includes ripout and replacement of the cables pulled prior to implementation of the additional requirements.



**Consumers  
Power  
Company**

**James W Cook**  
Vice President - Projects, Engineering  
and Construction

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

June 11, 1982

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

MIDLAND PROJECT -  
INSPECTION REPORT NO 50-329/82-06 & 50-330/82-06, ITEM 2  
FILE: 0.4.2 SERIAL: 17513

- References: (1) NRC Letter, C E Norelius to J W Cook, dated April 26,  
1982, transmitting Inspection Report 82-06
- (2) CPCo Letter, J W Cook to J G Keppler, dated May 28,  
1982, Serial 16182, responding to Inspection Report 82-06

Reference (1) deals with misinstalled cables and incomplete cable reel numbers. A meeting was held in Glen Ellyn on May 14, 1982, at which time Consumers Power presented a draft report on misinstalled cables. This letter, as promised by Reference (2), provides the released report on misinstalled cables. The released report has been updated to address the comments generated during the May 14 meeting. The report also provides the dates for which the corrective actions will be completed in order to put the plant in full compliance. A special training session (QCT-1616) was conducted for Bechtel Quality Control on PQCI E-4.0, "Cable Pulling," on March 15, 1982. This training emphasized Activity 2.5 of the PQCI which concerns itself with cable vias, especially in regard to the type of problems identified during the Special Overinspection of cable routing. This training along with the continued emphasis in the training and certification of new electrical QC engineers provides the process corrective action to help assure better performance in this area.

With regard to cable reel numbering, the following actions have been taken to correct the specific instances and to preclude recurrence:

1. The cable reel numbers have been corrected, as necessary.
2. A cable reel list, with a cross-reference between the old numbers recorded and the real numbers that incorporate the purchase order number and the manufacturer's reel number, has been made a part of the E-4.0 "Cable Installation" record files in the QC vault.

~~82-07080665~~

JUN 14 1982

3. The number being recorded on inspection records at this time does incorporate the purchase order number and the manufacturer's reel number.

NCR M01-9-2-022 which documents these actions was closed on 5/17/82 and the plant is now in full compliance.

Consumers Power Company

By James W. Cook  
James W Cook

Sworn and subscribed to before me on this 14th day of June, 1982.

Barbara Townsend  
Notary Public, Jackson County, Michigan

My commission expires September 8, 1984

WRB/BWM/lr

CC: RJCook, NRC Resident Inspector, Midland Site (w/enc)  
RLandsman, NRC Region III (w/enc)  
RGardner, NRC Region III (w/enc)

Enclosure: "Report on Cable Installation, Midland Plant Units 1 and 2,  
June 4, 1982"





James W Cook  
Vice President - Projects, Engineering  
and Construction

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

October 15, 1982

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

MIDLAND NUCLEAR COGENERATION PLANT -  
INSPECTION REPORTS NOS 50-329/82-06, 82-07 AND 50-330/82-06, 82-07  
FILE: 0.4.2 SERIAL: 19071

- References: 1) JW Cook letter to JG Keppler, Serial 19052, dated  
September 30, 1982, Re Inspection Report Nos 82-05  
& 82-06
- 2) JW Cook letter to JG Keppler, Serial 19057, dated  
September 30, 1982, Re Inspection Report No 82-07

Reference 1 committed to providing you the schedule for accomplishing reinspection of cable routing. There are approximately 6,000 Class 1E cables installed prior to March 15, 1982, which remain to be reinspected. We plan to complete the reinspection of cable routing by the end of April, 1983, utilizing six teams working three teams per shift. These teams will also conduct a sample overinspection for cables installed after March 15, 1982.

Reference 2 contains an error in the body of the letter in that in paragraph 2, the date in the first line should be January 1, 1981.

~~8210290163~~

OCT 20 1982

Consumers Power Company

By James W. Cook

Sworn and subscribed to before me on this 15th day of October, 1982.

Patricia A. Puffer  
Notary Public, Bay County, Mich

My commission expires 3-4-86

JWC/WRB/ljr

- CC RWarnick, NRC Region III
- WDShafer, NRC Region III
- ✓ RNgardner, NRC Region III
- RJCook, NRC Resident Inspector, Midland Site
- RBLandsman, NRC Region III
- BLBurgess, NRC Region III



Midland Project: PO Box 1963, Midland, MI 48640 • (517) 631-0961

May 5, 1982

Messrs W R Bird and B W Marguglio  
Consumers Power Co  
1945 Parnall Road  
Jackson, MI 49201

Mr M A Dietrich  
Bechtel Power Corp  
PO Box 2167  
Midland, MI 48640

MIDLAND PROJECT - USNRC EXIT MEETING (Isa Yin) OF APRIL 23, 1982  
File 0.4.2 Serial 17009

An unannounced NRC inspection by Mr I T Yin took place from April 21 through April 23, 1982. Entrance and exit meetings were held on April 21 and April 23 respectively. The lists of attendees for each of those meetings are attached to this letter.

The stated (by Mr Yin) purpose of this inspection was to close infractions and unresolved items from the 81-12 inspection and other older items, if time permitted.

I. The following old items were addressed:

1. Infraction 81-12-11/12 Large Bore Pipe Supports Not Installed Per Drawings/Specifications. This item remains open and is the subject of an additional violation (See Section II on the following page for details).
2. Infraction 81-12-12/13 Pipe Hanger Inspection and Acceptance by Quality Control. This item remains open and is the subject of an additional violation (See Section II on the following page for details).
3. Infraction 81-12-13/14 Installation of Small Bore Pipe Without Committed Preliminary Design Calculations. Closed.
4. Infraction 81-12-14/15 Small Bore Pipe Design Document Control Not Maintained. Closed.
5. Infraction 81-12-16/17 Inadequate QA Audits. Closed.
6. Infraction 81-14-01 Inadequate Design Control (Redlines). Closed.
7. URI 81-12-10/11 Bechtel Specification Applicability. Closed.
8. URI 81-12-15/16 Mechanical Rework Controls. Closed.

## II. New Items

1. Infraction - Severity Level IV. Piping Suspension QC Inspection Breakdown. In view of the large number of hangers (43.9% of sample) identified as nonconforming in MPQAD NCRs as a result of the MPQAD overinspection of hangers which had been previously inspected and accepted by Bechtel QC, Mr Yin determined that there was breakdown in Quality Control in 1980 and that MPQAD had failed to report this as required by 10 CFR 50.55(e). He noted that a deficiency in 127 of 9401 characteristics served only to demonstrate the complexity of the hangers, not the overall acceptability of the installed condition. Review of the records indicated that 1649 hangers were inspected/accepted in 1980, 3270 in 1981 and 789 to date (through March) in 1982.

The NRC has determined that they will require the licensee to do a 100% (re)inspection of the hangers installed in 1980 and a sample (undetermined size) of those inspected/accepted in 1981 and 1982. Any alternate proposals by MPQAD should be discussed with USNRC Region III management.

2. Unresolved item. Design of large bore hangers and other mechanical items. Mr Yin plans to visit Ann Arbor in the near future to review the design process and records in these areas.

*RE Whitaker*

R E Whitaker, Section Head  
Fluids and Mechanical  
Midland Project QA Department

REW/lrb

CC BJCole, Midland  
JWCook, P26-336B  
MLCurland, Midland  
LHCurtis, Bechtel-Ann Arbor  
LEDavis, Bechtel-Midland  
WDGreenwall, Bechtel-Ann Arbor  
DEHorn, Midland  
JAHorsch, Midland  
GSKeeley, P14-113B  
HPLeonard, Midland  
REMcCue, Midland  
DEMiller, Midland  
JARutgers, Bechtel-AA  
MJSchaeffer, Midland  
RAWells, P14-113A  
REWhitaker, Midland  
JLWood, P14-416  
Great Lakes QA Managers

5/17/83

Answer to NRC Questions # -

1

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.

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.

### 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 I-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 (PQCI) that specified the inspection requirements to be achieved by quality control personnel. The program will include PQCI 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.

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need more  
info.

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 PQCI. Each IR relates to a specific PQCI. PQCI are organized by discipline and further structured to activities within that discipline, eg, there are separate PQCI 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

} sampling

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 PQCI. 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 PQCI 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 an exception to the program prior to implementing the exception.

*No credit for overinspections unless these inspections completely covered all IR items. Also no retroactive items to items which were not overinspected.*

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

*what about UT, etc*

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

what?

- 3. The Executive Manager may group special populations of PQCI's 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 purpose. 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.

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 PQCI 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 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."

RESPONSETraining 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 PQCI's. A significant number of QCE's have been recertified under this process. Early in 1983, MPQAD decided to terminate recertification of old PQCI's, except in selected cases; focus efforts on completing the review and revision of PQCI's; and then train and recertify to the new PQCI.

MPQAD current plans are to re-train and re-certify all inspectors to the revised PQCI's. 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 PQCI's 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 PQCI's 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 PQCI's 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 PQCI's 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.

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

STATEMENT OF TRAINING POLICY

Original filed with Originator.



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 initial 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 1Procedures For Controlling Release Of New Work

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

QUESTION A9

"9. A description of the CCo Management Review process for changes to CCP and how CCo 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 requirements that must be maintained for work activities 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 construction 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.



**Consumers  
Power  
Company**

~~W. J. ...~~  
~~...~~  
W. J. ...  
~~...~~

James W Cook  
Vice President - Projects, Engineering  
and Construction

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

April 6, 1983

letter only. ✓

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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 THIRD PARTY OVERVIEW -  
FILE 0655, B1.1.7 SERIAL 22268

- REFERENCES
1. LETTER TO J W COOK DATED MARCH 28, 1983 FROM NRC REGION III REGARDING CONSTRUCTION COMPLETION PROGRAM
  2. LETTER FROM J W COOK DATED MARCH 10, 1983 TO MR R C DEYOUNG REGARDING MIDLAND PROJECT RESPONSE TO NRC NOTICE OF VIOLATION EA83-3 DATED FEBRUARY 8, 1983

Your letter of March 28, 1983 regarding the Construction Completion Program (CCP) consisted of Parts A, B and C. The following is in partial reply to the referenced letter:

- A. Items A1. through A9. will be addressed in a subsequent letter to you except for Item A5. for which our response is as follows:

Mr Keppler has asked that we develop measures that will ensure that our key hold points are honored and that critical parameters of our program are in place before proceeding to the next step. In order to ensure the Project's readiness to undertake the various steps in the CCP, the CCP includes provisions for management review at key points in the process. The review will examine plans for future implementation and ensure that programs and processes are thorough, complete, and correct. To provide the NRC with additional assurance that the CCP processes have, in fact, been and will be implemented as described in my January 10, 1983 letter, this letter, and the forthcoming response to Questions A1-A9 of Mr Keppler's March 28 letter, we will include in the duties of the third party construction overviewer responsibility for audits of our performance of these management reviews of the CCP process. We will not proceed with the CCP implementation beyond these points until the third party overviewer has documented their satisfaction with our readiness to proceed, including satisfaction with our initial response to any audit

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findings, in their weekly reports. This commitment will also assure that the CIO is in place in time to audit the management review of Phase I planning, and hence before any physical verification under Phase I takes place. (Note: The title of this particular third party overview is now being entitled Construction Implementation Overview, CIO).

The Company has or will provide information regarding all items which the NRC wished to review through the normal exchange of information with the NRC Staff. This information was provided through the response to the Notice of Violation regarding DGB inspection, through the forthcoming response to Questions A1-A9 of Mr Keppler's March 28 letter, and through daily interaction with the NRC Resident Inspector (the adoption of the QC organization within MPQAD and the resolution of the CP Co stop work order on Zack welding).

- B. A more detailed description of the third party installation implementation overview (now titled CIO) is provided in the enclosed proposal (3 copies attached) from Stone and Webster (S&W).
1. The CIO will encompass all aspects of the CCP from the point that the CIO is mobilized onsite (including the process aspects discussed in A above and the reinspection work). The exception is that the CIO will not include an overview of the other third party evaluations being conducted as described in my letter to Region III dated January 10, 1983.
  2. As defined on Page 2 of Section 2 of the S&W proposal, there will be weekly meetings with S&W, Consumers Power and the NRC and weekly minutes (reports) of these meetings will be issued. The protocol for communications between the parties will be the same as used by S&W on the soils remedial activities.
  3. The CIO will continue until Consumers Power and the NRC have confidence in the adequacy of the Consumers Quality Assurance Program for the Midland Project.
- C. Consumers Power Company proposes that Stone and Webster be the organization to perform the CIO. This is based on the fact that we consider S&W technically capable to perform the activities both in terms of the individual team proposed and in the corporate depth to support this effort. They are presently conducting what we believe is a highly professional overview of the soils remedial activities and have been found acceptable by the NRC for corporate independence. In addition, your letter indicated that it would not be acceptable for the CIO organization to also be involved with the IDV, thereby disqualifying the other evaluated bidder, Tera Corporation.

The proposal submitted by S&W addresses Items C1, 2 and 3 of your letter except that the statements provided in the attachment concerning corporate and personnel independence were inadvertently not notarized. This situation will be immediately corrected and the sworn statements of independence will be sent to you directly by S&W by approximately April 8, 1983.

Enclosure 1 to your letter of March 28, 1983 discussed protocol for IDV on the Aux Feedwater System, Electric Power System (diesel generator), and the HVAC system assuring control room habitability. This protocol will be adopted by asking Tera Corporation to prepare a detailed procedure implementing this protocol.

Based on the need to have the S&W team audit our pending initial management reviews, we have requested S&W to be able to mobilize their team as soon as possible. This is currently scheduled to occur the week of April 18, 1983. We plan to proceed at our risk unless instructed otherwise by your office. However, we would very much appreciate your expeditious review of S&W as a satisfactory contractor for the third party overview of the CCP.

*James W. Cook*

JWC/GSK/lc

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)

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All non-compliance conditions must be  
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Define all systems for documenting  
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# Comments from Hood

30 July 82

NAR met with CAC on June 82 to discuss Hydroach. Transfer Program. Several key questions could not be answered then and were identified for May 1983 completion:

1) What criteria and restrictions are to be used by the teams to identify when a given interaction is deemed significant? (What are the items to go on the list for evaluation or review)

2) Since that Appendix C has not been applied because of the FSAR exception taken to RC 1.29, what assumptions will be made <sup>in the evaluation</sup> regarding quality of workmanship for such things as needed integrity, etc., and how will these assumptions be justified?

this is  
a key  
question

The NRC should consider whether a requirement address would be to ask that the CEC oversee the walkdown. Since to not the walkdown have the potential for being viewed as a white wash. The issue involves an moral and complex and a 3<sup>rd</sup> party could be a key help.



Attribute system

request vs report form

① Page 1; item C: The Quality Verification Plan shall include all closed <sup>checked</sup> IRs. No allowance can be made for stopping reinspection activities when a sample size, corresponding to that necessary to ensure 95% confidence that 95% of the inspectable elements meet quality requirements, has been reinspected. The quantity of IRs reinspected, before requesting relief from the NRC, shall be significantly greater than the sample corresponding to a 95/95 criteria.

② Page 1: need to add item d. which will address previous licensee commitments to reinspect 100% the IRs previously completed by QC inspectors who since failed a recertification exam.

③ Page 1: need to add item e. which will address the reinspection of closed IRs for which nonconformities were identified on attachment 10 forms

④ Page 8: licensee needs to develop a training matrix as the matrix developed by the Sola group. Also licensee must ensure that all personnel involved in performing work activities are trained prior to of those activities.

