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*Note*

August 10, 1982

Note to: Elinor G. Adensam

From: William D. Paton

Subject: Quality Assurance Issues to be Addressed at an Evidentiary Session in the Midland Proceeding

Attached to this note is the July 7, 1982 Memorandum and Order (hereafter "July Order") by the Midland licensing board in which they comment on issues they wish to have addressed at the forthcoming evidentiary session on quality assurance and quality control matters. Those issues are:

1. As discussed on page 3 of the July Order, Staff testimony should discuss "in detail" the basis for the Staff's position set forth in our June 29, 1982 letter in which we expressed our conclusion that it was necessary to supplement the testimony previously submitted with respect to quality assurance. The Board suggests that not only Mr. Keppler be available but also any QC inspectors who might have more detailed knowledge of significant matters dealt with by Mr. Keppler to the extent that their presence might assist in creating an adequate record. We will have to consult with Mr. Keppler to determine precisely what he had in mind when he concluded that it was necessary to supplement his previous testimony, but it appears at this point that one of the major factors was the apparent discrepancies in the facts set forth in our recent SALP report and Consumers' response to that report.
2. Qualifications of QC inspectors. (July Order, p.4)
3. Questions asked by the Board concerning the adequacy of the QA program for underpinning activities. (July Order p.4) ←
4. "Certain matters" discussed in the Licensing Board's April 30, 1982 Memorandum and Order (hereafter April Order). (I also attached a copy of the April Order).
  - A. The coverage of the QA program for soils related activities.

*Gilkey*

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- B. The matter referred to by the Licensing Board beginning at page 16 of its April Order concerning a 42 inch diameter hole that was drilled to a depth of 40 feet within the "Q" fill area apparently without proper authority without the development of or adherence to written procedures without the participation of the onsite geotechnical engineer and without adequate QA/QC surveillance.
- Hood* C. The matter referred to at page 17 of the Board's April Order concerning loose sands.
- D. Staff inspection reports 82-05 (Detp) and 82-06 (Detp).  
*MOI-4-2-008; MOI-9-2-033*
- E. NCR #MOI-9-2-051 (April 21, 1982), Bechtel Non-Conformance Reports Nos. 4199 (including Stop Work Order FSW-22) and 4245.
- F. The suggestion in the interim ACRS report of June 8, 1982 that there be a broader assessment of Midland's design adequacy and construction quality.
- G. The results of the Staff evaluation of Drawing 7220-C-45 (See Memorandum and Order of May 7, 1982).

The above subjects were addressed by the Licensing Board in its April 30, and July 7, 1982 Orders. There are other QA matters that will have to be addressed at the evidentiary hearing. One is fairly extensive testimony concerning the impact of the subject matter of the "management meeting" that is to take place with CPC sometime within the next 3 weeks. If Mr. Keppler believes that the outcome of that meeting remedies CPC's QA problems, he will have to explain that to the Board.

We may also have to address the subject of recent affidavits provided NRC by GAP and other documents provided Region III concerning ZACK (provided by T.Howard).

Region III confirmed yesterday that they expect to be able to prepare their QA testimony by October 31, 1982.

  
William D. Paton  
Midland Counsel

Enclosures:  
July Order  
April Order

cc w/enclosures:  
Robert F. Warnick (Reg. III)  
Ross B. Landsman (Reg. III)  
Darl Hood

## MIDLAND SUMMARY REPORT

### Facility Data

Docket Numbers	- 50-329 and 50-330
Construction Permits	- CPPR-81 and CPPR-82
Permits Issued	- December 14, 1972
Type Reactor	- PWR; Unit 1, 492 MWe*; Unit 2, 818 MWe
NSSS Supplier	- Babcox & Wilcox
Design/Constructor	- Bechtel Power Corporation
Fuel Load Dates	- Unit 1, 11/81; Unit 2, 11/80
Status of Construction	- Unit 1, 52%; Unit 2, 56%; Engineering 80%

\*Approximately one-half the steam production for Unit 1 is dedicated, by contract, to be supplied to Dow Chemical Corporation, through appropriate isolation heat exchangers. Capability exists to alternate to Unit 2 for the steam source upon demand.

### Chronological Listing of Major Events

July 1970	Start of Construction under exemption
9/29-30 & 10/1/70	Site inspection, four items of noncompliance identified, extensive review during CP hearings
1971 - 1972	Plant in mothballs pending CP
12/14/72	CP issued
9/73	Inspection at Bechtel Ann Arbor offices, five items of noncompliance identified
11/73	Inspection at site, four items of noncompliance identified (cadweld problem) precipitated the Show Cause Order
12/3/73	Show Cause Order issued suspending cadwelding operation
12/6-7/73	Special inspection conducted by RIII & HQ personnel
12/17/73	Show Cause order modified to allow cadwelding based on inspection findings of 12/6-7/73
12/29/73	Licensee answers Show Cause Order commits to improvements on QA program and QA/QC staff

12/5/74

CP reported that rebar spacing out of specification 50 locations in Unit 2 containment

3/5 & 10/75

CP reported that 63 #6 rebar were either missing or misplaced in Auxiliary Building

3/12/75

RIII held management meeting with CP

8/21/75 CP reported that 42 sets of #6 tie bars were missing in Auxiliary Building

3/22/76 CP reported that 32 #8 rebar were omitted in Auxiliary Building. A stop-work order was issued by CP

3/26/76 RIII inspector requested CP to inform RIII when stop-work order to be lifted and to investigate the cause and the extent of the problem. Additional rebar problems identified during site inspection

3/31/76 CP lifted the stop-work order

4/19 thru 5/14/76 RIII performed in-depth QA inspection at Midland

5/14/76 RIII management discussed inspection findings with site personnel

5/20/76 RIII management meeting with CP President, Vice President, and others.

6/7 & 8/76 RIII follow up meeting with CP management and discussed the CP 21 correction commitments

6/1-7/1/76 Overall rebar omission reviewed by R. E. Shewmaker

7/28/76 CP stops concrete placement work when further rebar placement errors found by their overview program. PN-III-76-52 issued by RIII

8/2/76 RIII recommends HQ notice of violation be issued

8/9 - 9/9/76 Five week full-time RIII inspection conducted

8/13/76 Notice issued

10/29/76 CP responded to HQ Notice of Violations

12/10/76 CP revised Midland QA program accepted by NRR

2/28/77 Unit 2 bulge of containment liner discovered

4/19/77 Tendon sheath omissions of Unit 1 reported

4/29/77 IAL issued relative to tendon sheath placement errors

5/5/77 Management meeting at CP Corporate Office relative to IAL regarding tendon sheath problem

5/24-27/77 Special inspection by RIII, RI and HQ personnel to determine adequacy of QA program implementation at Midland site

6/75 - 7/77 Series of meetings and letters between CP and NRR on applicability of Regulatory Guides to Midland. Commitments by CP to the guides was responsive

7/24/78 Construction resident inspection assigned

8/21/78 Measurements by Bechtel indicate excessive settlement of Diesel Generator Building. Officially reported to RIII on September 7, 1978

12/78 - 1/79 Special investigation/inspection conducted at Midland sites, Bechtel Ann Arbor Engineering offices and at CP corporate offices relative to Midland plant fill and Diesel Generator building settlement problem

## Selected Major Events

### Past Problems

#### 1. Cadweld Splicing Problem and Show Cause Order

A routine inspection, conducted on November 6-8, 1973, as a result of intervenor information, identified eleven examples of four noncompliance items relative to rebar Cadwelding operations. These items were summarized as: (1) untrained Cadweld inspectors; (2) rejectable Cadwelds accepted by QC inspectors; (3) records inadequate to establish cadwelds met requirements; and (4) inadequate procedures.

As a result, the licensee stopped work on cadweld operations on November 9, 1973 which in turn stopped rebar installation. The licensee agreed not to resume work until the NRC reviewed and accepted their corrective action. However, Show Cause Order was issued on December 3, 1973, suspending Cadwelding operations. On December 6-7, 1973 RIII and HQ personnel conducted a special inspection and determined that construction activity could be resumed in a manner consistent with quality criteria. The show cause order was modified on December 17, 1973, allowing resumption of Cadwelding operations based on the inspection results.

The licensee answered the Show Cause Order on December 29, 1973, committing to revise and improve the QA manuals and procedures and make QA/QC personnel changes.

Prehearing conferences were held on March 28 and May 30, 1974, and the hearing began on July 16, 1974. On September 25, 1974, the Hearing Board found that the licensee was implementing its QA program in compliance with regulations and that construction should not be stopped.

#### 2. Rebar Omission/Placements Errors Leading to IAL

Initial identification and report of rebar nonconformances occurred during an NRC inspection conducted on December 11-13, 1974. The licensee informed the inspector that an audit, had identified rebar spacing problems at elevations 642' - 7" to 652' - 9" of Unit 2 containment. This item was subsequently reported per 10 CFR 50.55(e) and was identified as a item of noncompliance in report Nos. 50-329/74-11 and 50-330/74-11.

Additional rebar deviations and omissions were identified in March and August 1975 and in April, May and June 1976. Inspection report Nos. 50-329/76-04 and 50-330/76-04 identified five noncompliance items regarding reinforcement steel deficiencies.

Licensee response dated June 18, 1976, listed 21 separate items (commitments) for corrective action. A June 24, 1976 letter provided a plan of action schedule for implementing the 21 items. The licensee committed not to resume concrete placement work until the items addressed in licensee's June 24 letter were resolved or implemented. This commitment was documented in a RIII letter to the licensee dated June 25, 1976. Although not stamped as an IAL, in-house memos referred to it as such.

Rebar installation and concrete placement activities were resumed in early July 1976, following completion of the items and verification by RIII.

Additional action taken is as follows:

a. By the NRC

- (1) Assignment of an inspector full-time on site for five weeks to observe civil work in progress
- (2) IE management meetings with the licensee at their corporate offices
- (3) Inspection and evaluation by Headquarter personnel

b. By the Licensee

- (1) June 18, 1976 letter committing to 21 items of corrective action
- (2) Establishment of an overview inspection program to provide 100% reinspection of embedments by the licensee following acceptance by the contractor QC personnel

c. By the Contractor

- (1) Personnel changes and retraining of personnel
- (2) Prepared technical evaluation for acceptability of each identified construction deficiency
- (3) Improvement in their QA/QC program coverage of civil work (this was imposed by the licensee)

3. Tendon Sheath Placement Errors and Resulting Immediate Action Letter (IAL)

On April 19, 1977, the licensee reported, as a Part 50, Section 50.55(e) item, the inadvertent omission of two hoop tendon sheaths from a Unit 1 containment concrete placement at



elevation 703' - 7". The tendon sheaths were, for the most part, located at an elevation in the next higher concrete placement lift, except that they were diverted to the lower placement lift to pass under a steam line penetration and it was where they were omitted. Failure to rely on the proper source documents by construction and inspection personnel, contributed to the omission.

An IAL was issued to the licensee on April 29, 1977, which spelled out six licensee commitments for correction which included: (1) repairs and cause corrective action; (2) expansion of the licensee's QC over view program; (3) revisions to procedure and training of construction and inspection personnel.

A special QA program inspection was conducted in early May 1977. The inspection team was made up of personnel from RI, RIII, and HQ. Although five items of noncompliance were identified, it was the consensus of the inspectors that the licensee's program was an acceptable program and that the Midland construction activities were comparable to most other construction projects.

The licensee issued its final report on August 12, 1977. Final review on site was conducted and documented in report No. 50-329/77-68.

#### Current Problems

##### 1. Plant Fill - Diesel Generator Building Settlement

The licensee informed the RIII office on September 8, 1978, of per requirements of 10 CFR 50.55(e) that settlement of the diesel generator foundations and structures were greater than expected.

Fill material in this area was placed between 1975 and 1977, with construction starting on diesel generator building in mid-1977. Filling of the cooling pond began in early 1978 with the spring run-off water. Over the year the water level has increased approximately 21 feet and in turn increasing the site ground water level. It is not known at this time what effect (if any) the higher site ground water level has had on the plant fill and excessive settlement of the Diesel Generator Building. It is interesting to note however, that initially the PSAR indicated an underdrain system would be installed to maintain the ground water at its normal (pre pond) level but that it later was deleted.

The NRC activities, to date, include:

- a. Transfer of lead responsibility to NRR from IE by memo dated November 17, 1978
- b. Site meeting on December 3-4, 1978, between NRR, IE, Consumers Power and Bechtel to discuss the plant fill problem and proposed corrective action relative to the Diesel Generator Building settlement
- c. RIII conducted an investigation/inspection relative to the plant fill and Diesel Generator Building settlement

The Constructor/Designer activities include:

- a. Issued NCR-1482 (August 21, 1978)
- b. Issued Management Corrective Action Report (MCAR) No. 24 (September 7, 1978)
- c. Prepared a proposed corrective action option regarding placement of sand overburden surcharge to accelerate and achieve proper compaction of diesel generator building sub soils

Preliminary review of the results of the RIII investigation/inspection into the plant fill/Diesel Generator Building settlement problem indicate many events occurred between late 1973 and early 1978 which should have alerted Bechtel and the licensee to the pending problem. These events included nonconformance reports, audit findings, field memos to engineering and problems with the administration building fill which caused modification and replacement of the already poured footing and replacement of the fill material with lean concrete.

2. Inspection and Quality Documentation to Establish Acceptability of Equipment

This problem consists of two parts and has just recently been identified by RIII inspectors relative to Midland. The scope and depth of the problem has not been determined.

The first part concerns the adequacy of engineering evaluation of quality documentation (test reports, etc.) to determine if the documentation establishes that the equipment meets specification and environmental requirements. The licensee,

by the licensee's  
oversight program

on November 13, 1978, issued a construction deficiency report (10 CFR 50.55(e)) relative to this matter. Whether the report was triggered by RIII inspector inquiries or by IE Circular or Bulletin is not known. An interim report dated November 28, 1978 was received and stated Consumers Power was pursuing this matter not only for Bechtel procured equipment but also for NSS supplied equipment.

The second part of the problem concerns the adequacy of equipment acceptance inspection by Bechtel shop inspectors. Examples of this problem include: (1) Decay Heat Removal Pumps released by the shop inspector and shipped to the site with one pump assembled backwards, (2) electrical penetrations inspected and released by the shop inspector for shipment to the site. Site inspections to date indicate about 25% of the vendor wire terminations were improperly crimped.

Inspection History

The construction inspection program for Midland Units 1 and 2 is approximately 50% complete. This is consistent with status of construction of the two units. (Unit 1 - 52%; Unit 2 - 56%) In terms of required inspection procedures approximately 25 have been completed, 33 are in progress and 36 have not been initiated.

The routine inspection program has not identified an unusual number of enforcement items. Of the selected major events described above, only one is directly attributable to RIII enforcement activity (Cadweld splicing). The other were identified by the licensee and reported through the deficiency report system (50.55(e)). The Midland data for 1976 - 78 is tabulated below.

<u>Year</u>	<u>Number of Noncompliances</u>	<u>Number of Inspections</u>	<u>Inspector Hours On Site</u>
1976	14	9	646
1977	5	12	648
1978	11	18	706

A resident inspector was assigned to the Midland site in July 1978. The on site inspection hours shown above does not include his inspection time.

The licensee's QA program has repeatedly been subject to in-depth review by IE inspectors. Included are:

1. July 23-26 and August 8-10, 1973, inspection report Nos. 50-329/73-06 and 50-330/73-06: A detailed review was conducted relative to the implementation of the Consumers Power Company's QA manual and Bechtel Corporation's QA program for design activities at the Bechtel Ann Arbor office. The identified concerns were reported as discrepancies relative to the Part 50, Appendix B, criteria requirements.

2. September 10-11, 1973, report Nos. 50-329/73-08 and 50-330/73-08: A detailed review of the Bechtel Power Corporation QA program for Midland was performed. Noncompliances involving three separate Appendix B criteria with five different examples, were identified.
3. February 6-7, 1974, reports No. 50-329/74-03 and 50-330/74-03: A followup inspection at the licensee's corporate office, relative to the items identified during the September 1973 inspection (above) along with other followup.
4. June 16-17, 1975, report Nos. 50-329/75-05 and 50-330/75-05: Special inspection conducted at the licensee's corporate office to review the new corporate QA program manual.
5. August 9 through September 9, 1976, report Nos. 50-329/76-08 and 50-330/76-08: Special five-week inspection regarding QA program implementation on site primarily for rebar installation and other civil engineering work.
6. May 24-27, 1977, report Nos. 50-329/77-05 and 50-330/77-08: Special inspection conducted at the site by RIII, IE and RI personnel to examine the QA program implementation on site by Consumers Power Company and by Bechtel Corporation. Although five examples of noncompliance to Appendix B, Criterion V, were identified, the consensus of the inspectors involved was that the program and its implementation for Midland was considered to be adequate.

Although the licensee's Quality Assurance program has under gone a number of revisions to strengthen its provisions, no current concern exist regarding its adequacy. Their Topical QA Plan has been reviewed and accepted by NRR through revision 7. Implementation of the program has been and continues to be subject to further review with the mid-construction program review presently scheduled for March or April 1979.

Consumers Power Company expanded their QA/QC auditing and surveillance coverage to provide extensive overview inspection coverage. This began in 1975 with a commitment early in their experience with rebar installation problems and was further committed by the licensee in his letter of June 18, 1976, responding to report Nos. 50-329/76-04 and 50-330/76-04. This overview inspection activity by the licensee has been very effective as a supplement to the constructor's own program. Currently, this program is functioning across all significant activities at the site.

#### Enforcement History

Approximately 6 months after restart of construction activities (11 months after CP issuance) an inspection identified four noncompliance items regarding cadwelding activities. This resulted in a show cause order being issued on December 3, 1973. This enforcement action was aired publicly during hearings held by the Atomic Safety Licensing Board in May 1974. The hearing board issued its decision in September 1974

that concluded that construction could proceed with adequate assurance of quality.

Identification of reinforcing bar problems began in December of 1974 with the licensee reporting improper spacing of rebar in the Unit 2 containment wall. Further reinforcing bar spacing and/or omission of rebar was identified in August 1975 and again in May 1976 with the citations of 5 noncompliances in an inspection report. An IE:HQ notice of violation was issued regarding the citations in addition to the licensee issuing a stop work order. The licensee issued a response letter dated June 18, 1976 committing to 21 items of corrective action. A Bechtel prepared technical assessment for each instance of rebar deficiency was submitted to and review by IE:HQ who concluded that the structures involved will satisfy the SAR criteria and that the function of these structures will be maintained during all design conditions. The RIII office of NRC performed a special five week inspection to assess the corrective action implementation without further citation.

The licensee reported that two hoop tendon sheaths were omitted in concrete placements of Unit 2 containment wall in April 1977. An Immediate Action Letter was issued to the licensee on April 29, 1977 listing six items of licensee commitments to be completed. A special inspection was performed on May 24-27, 1977 with four NRC inspectors (1-HQ, 1-RI, and 2-RIII). Although five items of noncompliance were identified, it was the consensus of the inspectors that the QA/QC program in effect was adequate. The constructors nonconformance report provided an alternate method of installation for the tendon sheaths that was accepted.

The RIII office of inspection and enforcement instituted an augmented on site inspection coverage program during 1974, this program has continued in effect ever since and is still in effect. It is noted that the noncompliance history with this program is essentially the same as the history of other RIII facilities with a comparable status of construction. Further on site inspection augmentations was accomplished with the assignment of a full time resident inspector in August, 1978.

The noncompliance history for the Midland Project is provided in the following table.

ENFORCEMENT ACTIONS

Noncompliances

<u>Year</u>	<u># Total</u>	<u>Criteria (10 CFR 50 Appendix B)</u> <u>( ) Number of Occurrences</u>
1970	4	V, X, XI, XVI
1971-1972	0	Construction halted pending CP
1973	9	II V(5) XIII, XV, XVII
1974	3	V(2) XI
1975	0	
1976	10	V(4) X, XII, XV, XVI, XVII, XVIII
1977	5	V(5) 10 CFR 50.55(e) item
1978	11	V(4) VI(2), VII, IX(3), XVI

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Criteria

II	QA Program
V	Instructions Procedures Drawing Control Work
VI	Document Control
VII	Control of Purchased Material
IX	Control of Special Processes
X	Inspection
XII	Control Measuring - Test Equipment
XIII	Handling - Storage
XV	Nonconforming Parts
XVI	Corrective Actions
XVII	QA Records
XVIII	Audits

## Summary and Conclusions

Since the start of construction Midland has experienced some significant problems resulting in enforcement action. In evaluating these problems they have occurred in clumps: (1) in September 1970 relative to improper placement, sampling and testing of concrete and failure of QA/QC to act on identified deficiencies; (2) in September 1973 relative to drawing control and lack of or inadequate procedures for control of design and procurement activities at the Bechtel Engineering offices; (3) in November 1973 relative to inadequate training, procedures and inspection of cadweld activities; (4) in April, May and June 1976 resulting from a series of RIII in-depth QA inspections and meetings to identify underlying causes of weakness in the Midland QA program implementation relative to embedments. (The noncompliance items identified involved inadequate quality inspection, corrective action, procedures and documentation, all primarily concerned with installation of reinforcement steel); (5) in April 1977 relative to tendon sheath omissions; and (6) in August 1978 concerning plant soil foundations and excessive settlement of the Diesel Generator Building.

Following each of these problem periods (excluding the last which is still under investigation), the licensee has been responsive and has taken extensive action to evaluate and correct the problem and to upgrade his QA program and QA/QC staff. The most effective of these licensee actions has been an overview program which has been steadily expanded to cover almost all safety related activities.

The evaluation both by the licensee and IE of the structures and equipment affected by these problems (again except the last) has established that they fully meet design requirements.

Since 1974 these problems have either been identified by the licensee's quality program or provided direction to our inspectors.

Looking at the underlying causes of these problems two common threads emerge: (1) Consumers Power historically has tended to over rely on Bechtel, and (2) insensitivity on the part of both Bechtel and Consumers Power to recognize the significance of isolated events or failure to adequately evaluate possible generic application of these events either of which would have led to early identification and avoidance of the problem including the last on plant fill and diesel generator building settlement.

Notwithstanding the above, it is our conclusion that the problems experienced are not indicative of a breakdown in the overall quality assurance program. Admittedly, deficiencies have occurred which should have been identified earlier by quality control personnel, but the licensee's program has been effective in the ultimate identification and subsequent correction of these deficiencies. While we cannot dismiss the possibility that problems may have gone undetected by the licensee's overall quality assurance program, our inspection program has not identified significant problems overlooked by the licensee --- and this inspection effort has utilized many different inspectors.

The RIII project inspectors believe that continuation of: (1) resident site coverage, (2) the licensee overview program including its recent expansion into engineering design/review activities, and (3) a continuing inspection program by regional inspectors will provide adequate assurance that construction will be performed in accordance with requirements and that any significant errors and deficiencies will be identified and corrected.



# ORAL COMMUNICATIONS RECORD

CRKCH.FILE NO 0.4.9.20.6

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QA5-0

DATE OF CONVERSATION 11-8-82 RA-PLAC PERSONNEL PARTICIPATING JK Meisenheimer, TDOrrnen, LAGouveia R A Wells, Executive Manager of MPQAD

NO OF CONVERSATION PM OTHER PARTY(S) Wayne Shafer, Ron Cook, Ron Gardner, Bruce Burgers

PREPARED BY [Signature]

TOPICS AND/OR SUBJECTS DISCUSSED REINSPECTION REQUIREMENTS BASED ON RESULTS OF CERTIFICATION-TESTING CONSUMERS POWER CO.

NOV 10 1982

REVIEW OF CONVERSATION At the request of <sup>Medical Project</sup> Consumers a meeting was held with the NRC, to discuss certification examination results and clarify the need for reinspection of past work of inspectors who do not pass portions of the exam sequence.

Mr. Wayne Shafer of the NRC stated that it was the NRC's understanding that Consumers had committed to reinspect work of inspectors who failed any portion of the certification examinations. Mr. Wells indicated that it was CPCo's understanding that we would reinspect work of those who failed to be recertified. Thus the need for the meeting to clarify our mutual understanding.

Subsequent discussion occurred. Agreements and understandings can be summarized as follows: 1) If failures occur during any part of the examination process for recertification, the significance of failed portions of the exam will be evaluated in regard to previous work performed by the inspector. A determination will be made as to whether and to what extent reinspection is required. Also, a determination will be made as to whether the inspector should be considered for further recertification. 2) If failure occurs during testing for new certification, this failure will be evaluated with respect to similar certification held by the inspector. 3) For each exam failure, results of the evaluation as to whether reinspection is required and the extent necessary will be shared with the NRC. 4) The recertification process can continue in parallel with the reinspection effort if desired. Recertification will not be granted until results of the reinspection effort are evaluated.

TURNOVERS · 573/870 = 66%

SYSTEM CHECKOUT BY DISCIPLINE

ELEC	91% T/O	85% Initially C/O Systems
I&C	52% T/O	37% Initially C/O Systems
NSSS	25% T/O	4% Initially C/O Systems
AUX	32% T/O	10% Initially C/O Systems
Feed/Cond	61% T/O	27% Initially C/O Systems
Turb/HVAC	59% T/O	28% Initially C/O Systems
Process Stm	80% T/O	15% Initially C/O Systems

PROCEDURES	51% Approved	87% In Review Cycle
Procedure Tests Complete		4%

MILESTONES

Unit 2

Process Stm            5 Partial to Go            Expect to maintain 9-1 Heat-up

Turbine Roll Unit 2 [82% ECO, 50% I&C, 40% Mech C/O, 30% Flushed]

Condensate Pump Runs	T/O's Complete	Complete Commencing
Feedwater/Condensate	1 System (AEA)	Flush Preparations
Flushes thru Demins		
Condenser Vacuum	2 Systems (AFD,ALA)	AFD FCST 8-4
Turbine Roll	13 Systems to go (2-Q)	Expect by 9-30 Non-Q

Auxiliary Flushes Unit 2    7 System to go  
[90% ECO, 50% I&C, 40% Mech C/O, 10% Flushed]

RCS Hydro Unit 2            27 Systems to go

Unit 1

Unit 1 Turbine Roll

Condensate Pump Runs	1 System (1ADA)	FCST 7-22
Feed/Cond Flush Thru	2 Systems (1ADD,1AEA)	1ADD FCST 7-29
Demin		
Condenser Vacuum	6 Systems (Non-Q, ALA)	Non-Q by 8-31
Turbine Roll	15 Systems (2-Q)	Expect Non-Q by 10-15

Auxiliary Flushes Unit 1    10 Systems to go  
RCS Hydro Unit 1            21 Systems to go

MANPOWER

GSC	60 Non Manual
(current)	78 Mechanical
	32 Electrical

Operations

TEST PROGRAM STATUS  
AND  
REVISION 12 - TEST SCHEDULE

PREPARED BY: TECHNICAL DEPARTMENT  
MIDLAND ENERGY CENTER  
CONSUMERS POWER COMPANY  
April 12, 1983

Dupe ~~83110700069~~ 117pp.

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- d. Auxiliary Systems
- e. Feedwater/Condensate
- f. Turbine/HVAC
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- h. Programmatic Testing

#### 3. Procedure Development

- a. Status -- Procedure Development and Approval
- b. Status - Tests Completed

### III. PROJECT TEST SCHEDULE - REVISION 12

#### A. Rev 12 Test Schedule Philosophy

1. 95% of Unit 1 testing will be performed prior to Unit 2 Fuel Load
2. Inherent time frames are built into the merged schedule to absorb Punchlist Open Items following major Milestone Testing.
3. No two Unit 1 & 2 Milestone events are required to be performed simultaneously (except ILRT and HFT).
4. Separation of Fuel Loads.
5. LLRT/ILRT/SIT are performed nearly piggy-back during the same time frames.
6. Integrated ESFAS Test would be a common Test Phase.
7. Rev 11 disadvantages have become less significant in Rev 12
8. Initial Turbine Roll - Milestone added to allow early testing prior to HFT.

#### B. Rev 12 Test Program Plans

1. Planned Activities Leading to the Next Target Milestones
2. Auxiliary System Flushes into Reactor Vessel
3. Refueling Canal Hydro and Wet Fuel Handling Test
4. Reactor Coolant System Cold Hydro
5. Feedwater System Flush
6. Condenser Vacuum
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CASE LOAD FORECAST REPORT - APRIL 1983

TEST PROGRAM

I. INTRODUCTION

This report contains;

1. The status of the Test Program Schedule as of March 31, 1983, and
2. Revision 12 of the Test Schedule based upon the Two-Unit startup concept.

The basic premise in the development of this schedule is to establish a safe, organized, and logical approach to meeting the Project Objectives in a timely manner without sacrificing quality.





II. TEST PROGRAM SCHEDULE STATUS

The status of the Test Program Schedule as of March 31, 1983 is presented in this section in terms of System Turnovers, what we have accomplished so far in the Test Program, and where we are relative to Test Program Milestones leading to initial fuel load.

1. System Turnovers - Summary

Total scoped Systems (approximate)	-	850	870
Total System Turnovers Accepted	-	543	573
Remaining System Turnovers	-	307	297
%			
% complete =	$\frac{543}{850}$	= 64%	66%

Figure 1 shows a graph of actual number of systems accepted thru March 31, 1983. It also shows the remaining system turnovers based upon Revision 12 Turnover demand dates. The numbers in parenthesis show ACTUAL % complete.

2. TESTING ACTIVITIES SUMMARY

The status of the Test Program Network as of 3-31-83 is presented below. It should be noted that "checkout complete" as reported in this Section may not be necessarily 100% complete due to remaining punchlist open items such as design changes, corrective actions, and turnover exceptions requiring checkout and/or retest.

a. ELECTRICAL SYSTEMS

321 of 371 Electrical Systems have been turned over to CPCo. (87 %).

83 % have been initially checked out and energized. No

3

Preoperational tests or Acceptance Tests have started.

Significant activities completed and/or in progress include:

- BOTH UNITS' MAIN POWER XFMRs and STATION POWER XFMRs have been turned over and checked out. The Common Startup Power XFMRs are energized and in operation. Final "Pre-energize" testing will be performed in 1983. Backfeed from 345 KV System is dependent on Turnover of Main Generator Protection and Microwave Systems.
  
- all 6.9 KV BUSSES, 4.16 KV Busses, have been energized; major portions of 480 VAC Load Control Centers, 460 VAC Motor Control Centers, 250 VDC Motor Control Centers, 125 VDC Control Power Panels, 120 VAC Instrument Power Panels, and 480 VAC Distribution Panels have also been energized and are in operation.
  
- QA overinspection of class 1E cable routing is 91% complete.
  
- Electrical Reactor Building penetration repairs and replacement resulting from rodent damage and faulty Bunker-RAYMO modules is 95% complete.

b. Instrumentation and Control (I&C) Systems

36 of 69 I&C Systems have been turned over to CPCo  
(52 %).

37% of I&C Systems have been checked out.

No Pre-operations/Acceptance Tests have started. Six specific procedures have been completed.

Significant Activities completed and/or in progress include:

- Plant computer installation, checkout, energization, and vendor acceptance test are complete. Computer points input verification is in progress and will continue throughout the Preoperational Test Program.
  
- Unit Control Room Annunciator Cabinets (both Units), Evaporator Building Annunciator Logic cabinets, and Radwaste annunciator logic cabinet, have been energized and logic verification completed. The HVAC Annunciator logic cabinet has been energized.
  
- Non-Nuclear Instrumentation (NNI Cabinets and Modules both units)
  - The electrical checkout and initial energization of NNI cabinets are complete.
  
- Incore Monitor Remote Analog Peripherals (both units) - partial I&C checkout is complete. The Incore Guide Tube Clearance checks have been completed.



- Digital Isolation Cabinets 1C47, 2C47 - Electrical and I&C checkout are complete.
  
- Process Steam Transfer Instrument Rack, including power supply and peripheral - electrical checkout, I&C checkout of power supply, and energization of Instrument Racks OC391 and OC386 are complete.
  
- Boron Recovery and Liquid Waste Programmatic Controller System including remote I/O Cabinets - Prepower checks, and electrical checkout of I/O cabinets are complete, ladder checks are essentially complete except for design changes requiring retest.
  
- Radwaste Gas System Programmatic Controller System including remote I/O cabinets - prepower checks, Part 1 - Power ON preliminary checks, and Part 2 Ladder checks are complete.

C. Nuclear Steam Supply Systems (NSSS)

14 of 56 systems have been turned over to CPGCo (or 25 %.)

No Preop or Acceptance Tests have been started. One specific procedure (Unit 2 Decay Heat Removal Initial Pump Run) has been completed.

Significant Activities completed or in progress include:

RTC B

May Can use at next  
forecast panel  
Whenever that is.

REQUEST FOR APPROVAL FOR USE OF PRIVATELY OWNED VEHICLE OR RENTAL CAR FROM THE OFFICE OR FROM HOME FOR OFFICIAL BUSINESS

NAME: \_\_\_\_\_ DATES OF TRAVEL: \_\_\_\_\_

DESTINATION: \_\_\_\_\_ PURPOSE: \_\_\_\_\_

POINT OF DEPARTURE: OFFICE: \_\_\_\_\_ RESIDENCE: \_\_\_\_\_  
(CITY) (CITY)

APPROVAL IS REQUESTED FOR USE OF PRIVATELY OWNED VEHICLE FOR TRAVEL IDENTIFIED ABOVE IN LIEU OF TRANSPORTATION BY:

COMMON CARRIER (AIR, RAIL, BUS)

GOVERNMENT-OWNED AUTOMOBILE

I UNDERSTAND THE REIMBURSEMENT WILL BE ON THE FOLLOWING BASIS:

MILEAGE RATE 20c PER MILE BUT LIMITED TO THE COST OF TRAVEL BY COMMON CARRIER

MILEAGE RATE 20c PER MILE WHICH IS LESS COSTLY THAN TRAVEL BY COMMON CARRIER AND RENTAL CAR/LIMO

MILEAGE RATE 20c PER MILE - PRIVATELY OWNED VEHICLE IS ADVANTAGEOUS TO THE GOVERNMENT BECAUSE: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

MILEAGE RATE 16.5c PER MILE - GOA IS AVAILABLE; USE OF POA IS PREFERRED

APPROVAL IS REQUESTED FOR USE OF RENTAL CAR IN LIEU OF GOA BECAUSE:

GOA IS NOT AVAILABLE

OTHER \_\_\_\_\_  
(STATE REASON)

\_\_\_\_\_  
(SIGNATURE OF TRAVELER)

\_\_\_\_\_  
(DATE)

APPROVED \_\_\_\_\_  
(SECTION/BRANCH CHIEF)



REPORT ON REVISION 12 SCHEDULE

CONSUMERS POWER COMPANY

MIDLAND ENERGY CENTER

WHY CONSUMERS POWER COMPANY BELIEVES  
THAT REV. 12 SCHEDULE IS ACHIEVABLE

I. COMPARISON OF NRC CASELOAD FORECAST PANEL VISITS

(See Transparency #1)

The results of the August 1981 Caseload Forecast Panel visit agreed reasonably well with CPCo's own estimate (3 month's difference). At that time, 164 System Turnover's (T/O's) had been accepted (or 19%), less than 7% of systems had been checked out, and no flushes, preoperational, acceptance, specific tests were completed. The time span between the 1st Test Milestone (2A-Fuel Handling Dry Index Test) and Unit 1 Fuel Load was 22 months.

When compared to the recent Caseload Forecast meeting (April 1983), it is apparent that CPCo has made considerable progress in the Test Program with 64% of System T/O's accepted, 45% of system checkouts completed, 4% of Preoperational/Acceptance/Flush/Specific Tests completed, and 17 Flushes and 23 Specific Tests in progress. Despite these achievements, we maintained the same time span (22 months) of the Test Program Schedule through Unit 1 Fuel Load. This indicates that the Rev 12 workload will be considerably less compared to Rev 11 within the same time frame of 22 months. Based upon the NRC Caseload Forecast Panel's conclusion in August 1981, we see no reason why the schedules that we projected then, cannot be reaffirmed by the NRC for Rev 12 of the Project Schedule.

Further breakdown of Test Program Status - Turnovers, Checkout, and Testing is shown on Transparency #2

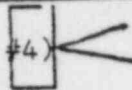
II. TEST PROGRAM - PROCEDURE DEVELOPMENT STATUS

(See Transparency #3)

Procedure Development to support the Test Program is at least two months ahead of the Rev 12 Test scheduled start dates. Considerable progress has been made in Procedure Development (50% complete). This implies that, in terms of Procedure Development, we foresee no problem that could impact the Test Schedule. Note that progress in Procedure Development was recognized as a problem in support of the earlier schedule (Rev 11); but this is no longer the case with Rev 12.

### III. PRE-OPERATIONAL & ACCEPTANCE TEST SCHEDULED START DATES

(See Transparency #4)



The graph shows the Preop and Acceptance Tests for Revision 12 of the Test Program. <sup>Four</sup> ~~Two~~ curves are shown:

- (1) The first curve depicts scheduled Early Test Start. This curve represents the earliest time that tests can start based upon Rev 12 Forecast T/O dates. Therefore, the number of Test Starts are front-end loaded, i.e. it is an optimistic curve.
- (2) The second curve depicts LATE TEST START - i.e., the latest time that Tests can start without impacting the fuel load date. This curve is just the opposite of early starts. The number of Test Starts is very small in the front end, gradually slopes up, then becomes progressively steep as we conduct HFT and approach Fuel Load.
- (3) The ideal case is a curve that falls between the EARLY and LATE start curves. Our target @ Midland is to fall on this "middle" curve (#3 graph), since it will insure that prerequisites to Tests are met before starting the Test; will allow resource leveling; and will allow leeway (or slack) before the Tests will start to impact the Fuel Load date. This goal is achievable, we believe, since plants that utilized this concept (ex. Davis-Besse), were able to achieve a time span of under 8 months between Cold Hydro and Fuel Load.

(continued)

III. PRE-OPERATIONAL & ACCEPTANCE TEST SCHEDULED START DATES (continued)

- (A) The Fourth curve on the graph shows the Davis-Besse actual Test Completions. At Cold Hydro, 19% of Tests were completed; at HFT, 33% and prior to Fuel Load 75%. By scheduling RCS Cold Hydro at a later date, this will allow as much Turnovers as possible, Checkout, and Testing as possible, thus shortening the time span between Cold Hydro and Fuel Load. Midland's goal is on curve #3, which has a projected Test Schedule above the Davis-Besse Curve.

IV. SYSTEM TURNOVER (REV. 12)  
(See Transparency #5, 6, 7)

1. There are 322 remaining System T/O's spread out over 15 months. Twenty Four (24) of these have already been accepted (shown in green, Transparency #5) vs two (2) required in May, of 1983, and Fourteen (14) required in June of 1983.
2. Bechtel's performance in 1982 was 320 System T/O's in a 12 month period. Therefore, it is conceivable that Bechtel can meet Rev 12 T/O dates for the same number in 1982, but this time, spread over a 15 month period vs 12 month. For the Month of May-1983, alone, the number of required T/O's Two (2) was surpassed (13 T/O's). Therefore, we already have a good head start.
3. The Rev 12 T/O dates are levelized. The maximum number of T/O's in one month is 32, with an average of 22 T/O's per month. This is definitely achievable, considering that in 1982, Bechtel turned over an average of 27 T/O's per month; one month alone, there were 46 System T/O's (May 1982). In addition the levelized approach ensures that no more than 13 System T/O's per month is required for any Discipline (see Transparency #6). Levelization of T/O's have the affect of minimizing resource peaks and valleys, maintaining steady work load, and eliminating "crashing" of System T/O's close to the Milestone.

TURNOVER SCHEDULE CONCERNS:

4. Transparency #7 shows the Q Systems (highlighted in Red) for the months of May, June, July, and August. Since Q work was not released in accordance with our original projections, these turnovers are in jeopardy. We have attempted to relieve any possible schedule impact by partialing some of these systems. Additional steps can be taken when the full impact of this delay is determined. The critical concern however is still release of Q work to allow construction to finish these systems.

Curves are being updated

## I. MASTER PUNCHLIST ITEMS.

At the time the NRC Caseload Forecast Panel met with CPCo (April 1983), the total open items in the Punchlist was 9500. Since then, the number of open items has dropped to 8676 (end of May 1983) indicating significant progress towards reducing the punchlist items to support the Test Program.

Note that  
~~As you are aware~~ the count of total open items in the Punchlist contains double and sometimes triple accounting of some items. This can occur when one type of item (ie a Turnover Exception) is being worked off using another type of document to authorize the work (ie a Contractor Work Request). Since both documents are tracked on the Punchlist they both get counted into the total open items number. ~~In an effort to eliminate this inaccuracy we~~ <sup>double-accounting the following approach has been</sup> implemented, ~~the following plan~~ Total open items will be comprised of Turnover Exception items (TOE's), Design Change Packages (DCP's), and Corrective Action Report (CAR's). This then would reduce the total open items count to only those items which must be worked off and the item should be counted only once. Using this method Total Open Items at the end of June are \_\_\_\_\_. Attachment \_\_\_\_\_ shows the status of the above open punchlist items by type using the new method for the Total Open Item curve.

### Expecting Reasons for expecting significant Punchlist reduction

- A. Turnover Exceptions (TOE's) - This represents the largest number of open items. Attachment 5 shows a downward trend starting at the beginning of the year primarily due to lack of system T/O's pending implementation of the CCP.

We have reason to believe that despite the 322 remaining T/O's, the number of open TOE's will continue to decline because we predict that more items will be closed out than items being added (as more T/O's occur). We have seen the effect of this recently based upon 19 T/O's in 1983 - the average number of TOE's per System was 3, compared to 1982 System T/O's in which the average number was 29 TOE's per System.

"Cleaner" System T/O's can be directly attributed to the CCP and the basic premise that System T/O's will be free of <sup>major</sup> construction deficiencies as much as possible.

GSO's performance over the past 5 months has been 237 TOE close-outs per month on the average, despite the "hold" on Q-work. When the Q-work is fully released, we project that the number of TOE closeouts will increase. GSO is manned to support this work effort.

Significant number of TOE's on Mechanical Systems are due to insulation installation and adjustment of hangers during initial fill and vent or System Heatup. As the tempo of the Test Program increase, the number of TOE's that can be closed out will subsequently increase.

- B. CWR's - CWR's are not included in the count for total open items in Punchlist, these items represent double accounting of items since these are work related to TOE's, CAR's, DCP's, or NCR's.



C. DCP's - Based upon the Hardware Configuration Task Force recommendations, DCP's on non-turned over Systems will be worked off prior to Turnover with minor exceptions. What this means is that there will be fewer DCP's issued in the future against Turned-over Systems.

D. CAR's/NCR's - These types are projected to increase because of the nature of the Test Program. As more checkouts and Testing occur, deficiencies (if any) will be written and resolved. The Rev 12 Schedule has helped in providing more time to respond to CAR's/NCR's. Management attention on non-conformances has been increased. This increased awareness will lead to an effective control by Management in dealing with timely response of non-conformances by the respective action organization.

NT NAME	RCS HYDRO START DATE	FUEL LOAD START DATE	$\Delta(MO)$	COMMENTS (SEE ATTACH)
ER VALLEY 2	1-28-85	12-31-85	11	✓
EFONTE 1	3-84	5-85	14	
EFONTE 2	4-85	5-86	14	
DWOOD 1	9-82	4-85	31	✓
DWOOD 2	6-83	4-86	34	✓
ON 1	7-81 A	4-83	21	✓
ON 2	3-83	4-84	13	
LAWAY 1	<del>6-23-82</del> A	<del>4-82</del>	10	✓
TAWBA 1	2-84	10-84	8	✓
TAWBA 2	1-86	10-86	9	✓
EROKEE 1	NOT GIVEN	NOT GIVEN	—	
EROKEE 2	" "	" "	—	
EROKEE 3	" "	" "	—	
IANCHE PEAK 1	6-82	6-83	12	
IANCHE PEAK 2	NOT GIVEN	NOT GIVEN	—	
ABLO CANYON 1	6-75 A	" "	—	✓
ABLO CANYON 2	NOT GIVEN	NOT GIVEN	—	
ARRIS 1	5-1-84	12-84	7	
ARRIS 2	11-1-87	6-1-88	7	✓
ARBLE HILL 1	8-85	6-86	13	
ARBLE HILL 2	2-87	12-87	10	
CGUIRE 2	5-24-82 A	4-1-83	10	✓
HILLSTONE 3	3-85	12-85	9	✓
ORTH ANNA 3	9-26-88	4-89	6	✓
ALO VERDE 1	7-82 A	8-83	11	✓
ALO VERDE 2	7-83	8-84	13	✓
ALO VERDE 3	2-85	11-85	9	✓
AN ONOFRE 3	3-10-82	11-1-82	8	✓
EABROOK 1	7-83	11-30-83	5	✓
EABROOK 2	10-85	2-28-86	5	✓
OUTH TEXAS 1	6-86	12-86	6	✓
OUTH TEXAS 2	6-88	12-88	6	✓
ST LUCIE 2	5-19-82 A	10-28-82	5	✓
SUMMER 1	11-1-79 A	8-82 A	33	✓
OGTLE 1	3-1-86	9-1-86	6	✓
OGTLE 2	9-1-87	3-1-88	6	✓
WASHINGTON NUCLEAR 1	6-85	NOT GIVEN	—	✓
WASHINGTON NUCLEAR 3	10-84	6-85	8	✓
WATERFORD 3	6-15-82	1-83	7	✓

VATTS BAR 1	10-15-81	8-83	22	✓
VATTS BAR 2	10-83	8-84	10	✓
WOLF CREEK 1	<del>12-28-83</del>	<del>8-16-84</del>	8	
YELLOW CREEK 1	11-30-87	7-1-89	19	
YELLOW CREEK 2	NOT GIVEN	NOT GIVEN	—	
FARLEY	7-79 A	3-91 A	21	✓

Cl. 2 source.  
 NC. Police Dept. 6 30 82

# FUEL LOAD DATE CHANGES - REASONS

<u>PLANT NAME</u>	<u>REASONS</u>
BEAVER VALLEY 2	1. FINANCING PROBLEMS 2. SOIL FOUNDATION PROBLEMS 3. FINANCIAL PROBLEMS AND REDUCED LOAD FORECASTS 4. " " CAUSED REDUCED CONSTR. LEVEL
BRADWOOD 1	1. FINANCIAL CONSIDERATIONS
BRADWOOD 2	1. " " "
BYRON 1	1. REVISED LOAD DEMAND FORECAST
CALLAWAY 1	1. FINANCING IMPACT OF PROPOSITION 1 PASSAGE BY STATE OF MISSOURI VOTERS. 2. UNABLE TO MEET CONSTR. SCHEDULES. REAPPRAISAL OF WORK LEFT TO BE COMPLETED.
CATAWBA 1 CATAWBA 2	1. FINANCIAL PROBLEMS 2. REVISED LOAD FORECASTS. 3. REASSESSMENT OF REMAINING WORK.
DIABLO CANYON 1	1. STRIKES BY UNIONS 2. RETUBING OF MAIN CONDENSER 3. REBLADING OF LOW PRESSURE TURBINES.
DIABLO CANYON 2	1. REASONS 1 AND 2 FROM ABOVE 2. ELECTRICAL INSTALLATION PROBLEMS
HARRIS 1	1. REVISED DEMAND FORECASTS.
HARRIS 2	1. " " " 2. EXPANDED CONSERVATION AND LOAD MANAGEMENT PROGRAM.
HOGUIRE 2	1. INITIAL CONSTR. DELAY BY MATERIAL DELIVERY 2. FINANCIAL PROBLEMS 3. REGULATORY REQUIREMENTS CHANGED. 4. DESIGN MODS.

JNE 3

1. UNCERTAIN FUEL SUPPLY
2. CHANGES IN LOAD DEMAND
3. INCREASE IN PROJECT COST
4. MODS. IN LONG RANGE PLANNING.

ANNA 3

1. ECONOMIC FACTORS
2. EFFORTS AT CONSERVATION AND LOAD MANAGEMENT

VERDE 1

1. AUGMENTATION OF PLANTS EMERGENCY RESPONSE SYST. BECAUSE OF TMI.

VERDE 2

1. DELAYS IN UNIT 1.

ONOFRE 3

1. ISSUANCE OF PERMIT
2. LABOR PROBLEMS

BROOK 1  
BROOK 2

1. EPA REVERSED APPROVAL OF ONCE THROUGH CIRC. WATER SYS. & SUBSEQ. NRC WITHDRAWAL OF CONSTR. PERMIT, & TIME TO REMOBILIZE

TH TEXAS 1  
TH TEXAS 2

1. SCHEDULE REEVALUATION
2. CHANGE IN A/E AND CONSTRUCTOR

LUCIE 2

1. LWA HALTED BY COURT ORDER
2. PROJECT AUTHORIZED TO USE TWO SHIFTS

JMMER 1

1. POWER NEEDS DEFERRED; FINANCIAL PROBL.

DGTL 1  
DGTL 2

1. FINANCIAL REASONS
2. OVERESTIMATED POWER NEEDS

WASHINGTON NUCLEAR 1

1. ENG. COMPL DELAYED, LABOR PROBLEMS
2. POOR LABOR-PRODUCTIVITY.
3. INCREASE IN PLANNED DURATIONS FOR PREOP. TESTING TO COMMERCIAL OPER.

WASHINGTON NUCLEAR 3

1. LATE PIPING START.
2. REVISED PRODUCTIVITY AND QUANTITY ESTIMATE
3. 4 MO. SCHEDULE RECOVERY BASED ON REASSESSMENT OF PROJECT CAPABILITY AND CONTRACT INCENTIVES FOR PRIME

STERFORD 3

1. INORDINATELY LENGTHLY LICENSING  
PROCEEDING, CURRENTLY BEING PROLONGED  
BY ANTI-TRUST ISSUE.

2. REEVALUATION OF CONSTR. SCHEDULE.

WATTS BAR 1

WATTS BAR 2

1. INABILITY TO OBTAIN STEEL ANCHOR BOLTS  
AND REINFORCING RODS.

2. REDISIGN OF CONTAINMENT TO ACCOMMODATE  
HIGHER TRANSIENT PRESSURES. INCREASE IN  
TIME TO ERECT STEEL PLATE THICKER THAN  
ORIGINAL DESIGN.

3. LATE DELIVERY OF PRINCIPAL PIPING,  
VALVES, AND HANGERS WHICH FORCED  
IMPOSSIBLE PEAKS IN STEAMFITTER MANPOWER.

4. LATE DELIVERY OF ICE CONDENSER EMBEDMENTS.

5. STEAM GENERATOR PROBLEMS AND PIPING.

St Lucie II - Bob Dawson - Asst SU Supt

Steve Marshall - 305-464-7990 x 258

St Lucie II schedule logic is similar to our plans at Midland. Cold Hydro was performed after RCS support systems were checked out, shaken down, & in most cases prepped. Checkout & preps on systems not required to support Cold Hydro were completed prior to HFT (HVAC, piping supports, snubbers).

RV internals were inspected & installed prior to hydro, head installed, & not removed until after HFT (our plan).

Hydro Complete	5/25/82	} → 5 month Δ - complete HFT support preps
HFT Start	10/21/82	
Fuel Load	4/6/83	(5 months from finish of HFT)

Chuck Tomaszek - Byron I

introduced conversation giving history. In '81 they were in the middle of licensing process & TMI mode were going to bite them. They made a Mgmt decision to reduce work force & slow down the job until that got sorted out. However, they had an RCS that would support hydro, so they did it.

(Probably equivalent to us doing hydro on Dec 5, then stopping Q work on 12/12)

RCS Hydro

7/81

HFT

4/4/83 - began valve lineups

4/25/83 - began procedure - heatup

Presently still in it -

- 3 week outage - RCP bearings

- 1 week " MSIV problems

- must complete 28 day soak for corrosion layer

- complete HFT ~ 7/10

Fuel Load → Nov '83

→ ILRT / Int EsFAS Testing - Between HFT & Fuel Load

→ Structural Steel Mods - delaying Fuel Load

For Hydro, they used normal systems, but their own procedures. Systems were not prepped.



Summer

Hydro 12/79 } 33 month  $\Delta$   
Fuel Load 8/82 }

1<sup>st</sup> Hydro - Political - they knew this prior to performing it. They had some more work to do which would require another RCS Hydro.

HFT  $\rightarrow$  Summer 1980 - lasted 100 days (complete in Aug '80)  
They had major problems with Rx Bldg Cooling - 150°F in containment  $\rightarrow$  120°F limit - required major jury rig to complete.

2<sup>nd</sup> Hydro - 8/81  $\rightarrow$

mini HFT - complete on 11/81 - complete left over items  $\&$  to complete checkout of RB Cooling mod work.

Major delays were due to seismic reanalysis hanger problems required mods  $\&$  additions to 1/4 of 4000 hangers. This occurred from 8/81 -- 8/82.

Fuel Load 8/82.

TEST PROGRAM STATUS SUMMARY

	<u>AUGUST 1981*</u>	<u>APRIL 1983*</u>
SYSTEM TURNS	164 (19%)	543 (64%)
SYSTEM CHECKOUT	LESS THAN 7%	45%
TESTS COMPLETE (PREOP, ACCEPTANCE, FLUSH, SPECIFIC)	0	28 (4%) DOES NOT INCLUDE: 17 FLUSHES STARTED 23 SPECIFIC TESTS STARTED
TEST MILESTONES COMPLETED	0	4
TIME SPAN BETWEEN 1ST MILESTONE (UNIT 2 DRY INDEX TEST) AND UNIT 1 FUEL LOAD	22 MONTHS	22 MONTHS

\* DATES REPRESENT NRC CASELOAD FORECAST PANEL VISITS.

TRANSPARENCY #1

BREAKDOWN OF TEST PROGRAM STATUS

	<u>AUGUST 1981</u>	<u>APRIL 1983</u>
ELECTRICAL SYSTEMS	-145 SYSTEM T/O's (39%) -30% ELECTRICAL SYSTEMS ENERGIZED	-321 T/O's (87%) -83% ENERGIZED
I & C	-3 SYSTEM T/O's (4%) -2% SYSTEM C/O COMPLETE	-36 T/O's (52%) -37% SYSTEM C/O COMPLETE  -9 SPECIFIC TEST PROCEDURES COM- PLETE
NSSS	-0 SYSTEM T/O's -0 SYSTEM C/O	-14 T/O's (25%) -4% C/O COMPLETE  -1 SPECIFIC TEST PROCEDURE COMPLETE
AUXILIARY	-0 T/O -0 C/O	-26 T/O's (31%) -8% C/O COMPLETE  -2 FLUSHES COMPLETE  -1 SPECIFIC TEST PROCEDURE COMPLETE  -2 PREOP TESTS STARTED
FEEDWATER/CONDENSATE	-4 SYSTEM T/O (4%) -2% C/O COMPLETE	-55 T/O's (55%) -25% C/O COMPLETE -6 FLUSHES COMPLETE -1 SPECIFIC TEST PROCEDURE COMPLETE
TURBINE/HVAC	-12 SYSTEM T/O (8%) -2% C/O COMPLETE	-76 T/O's (50%)  -24% C/O COMPLETE -7 FLUSHES COMPLETE -1 ACCEPTANCE TEST COMPLETE
PROCESS STEAM	-0	-12 T/O's (80%) -15% C/O COMPLETE -1 FLUSH COMPLETE

TRANSPARENCY # 2

TEST PROGRAM

PROCEDURE DEVELOPMENT STATUS

<u>PROCEDURE TYPE</u>	<u>CASELOAD F/C 8/81</u>	<u>CASELOAD F/C 4/83</u>	<u>PRESENTLY 5-30-83</u>
PRE-OPERATIONAL	0	21%	24%
ACCEPTANCE	0	33%	50%
FLUSH	3%	69%	72%
SPECIFIC	6%	66%	70%
% TOTAL	2%	45%	50%

# 3

EARLY START/ MONTH

LATE START/ MONTH

22	20	17	17	34	25	36	18	26	36	25	29	15	21	10	6	17	7	3
3				6	14	6	17	11	12	10	49	29	33	42	69	88	9	

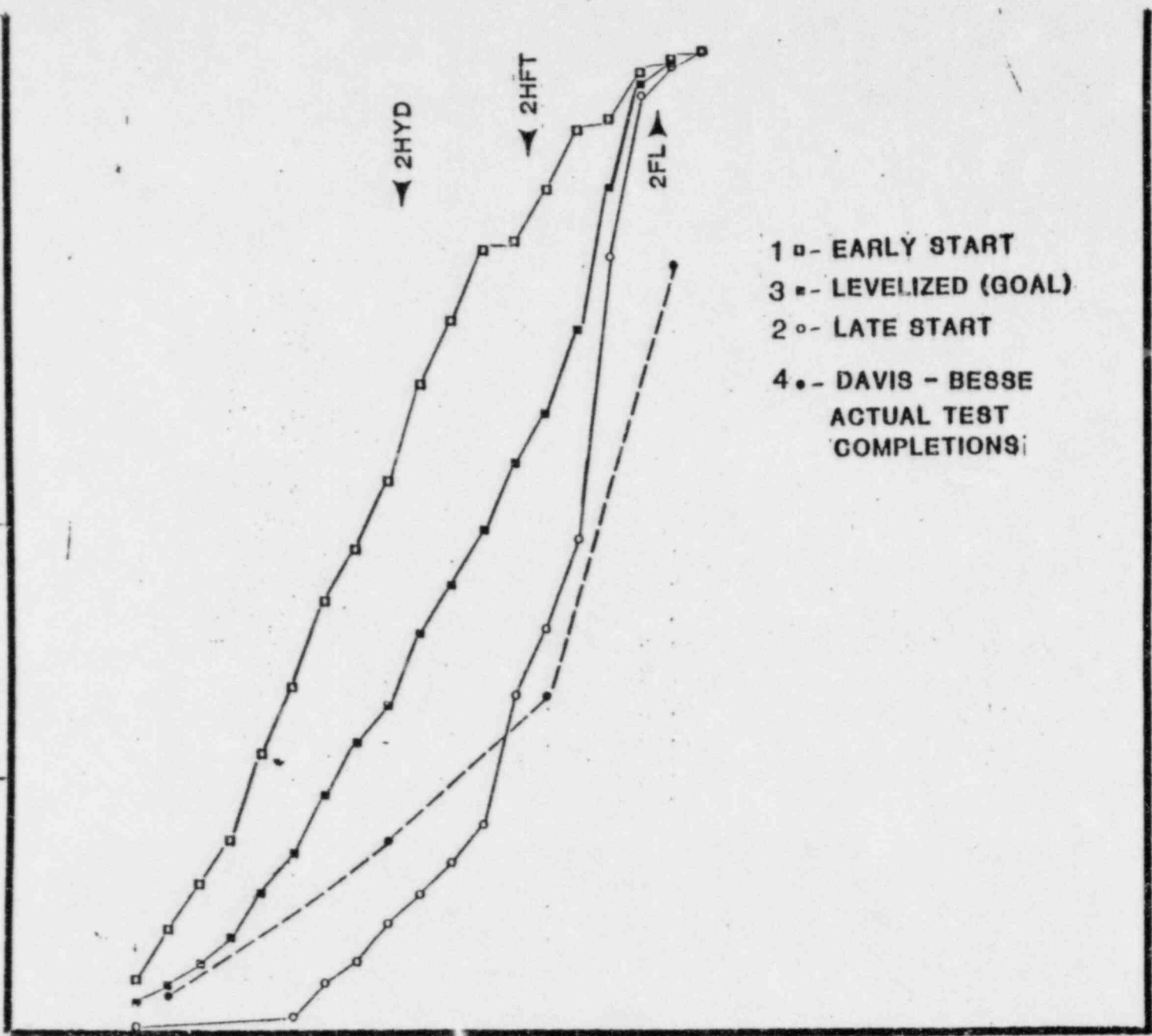
NUMBER OF PREOP & ACCEPTANCE TESTS

400

200

100%

50%



- 1 - EARLY START
- 3 - LEVELIZED (GOAL)
- 2 - LATE START
- 4 - DAVIS - BESSE ACTUAL TEST COMPLETIONS

#4

J F M A M J J A S O N D J F M A M J J A S O N D



SYSTEM TURNOVER REV. 12 BY CPCo TECH DEP'T DISCIPLINE

	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL
I & C	0	1	1	4	2	4	4	4	4	5	5	2	5	5	4
ELEC	0	7	2	4	2	5	2	4	1	2	4	2	0	1	0
AUX	0	0	1	1	5	11	8	11	9	5	7	5	0	0	0
I/T/P	1	0	0	0	0	0	0	0	0	0	0	2	0	0	0
HSS	0	1	0	7	9	8	5	3	5	2	2	0	0	1	0
FW/CONT	1	3	11	7	5	0	1	7	1	2	2	0	1	6	1
PSS	0	1	4	0	0	0	0	0	0	0	0	0	0	0	0
TURB/HVAC	0	1	7	5	3	4	6	1	7	11	6	13	8	1	0
TOTAL	2	14	26	28	26	32	27	30	27	27	26	24	14	14	5

MAX. No. of T/O's / MONTH

REV. 12 AVERAGE T/O / MONTH = 22

IN 1982.

ACTUAL AVERAGE T/O's = 27

PEAK T/O (MAY '82) = 46

LIST OF Q-SYSTEMS TURNOVERS THROUGH AUGUST

SYSTEM DESIGNATOR	SYSTEM DESCRIPTION	REV 12 T/O DATE
1-QRA	ELECTRICAL PENETRATIONS	30 JUNE 83
2-QRA	ELECTRICAL PENETRATIONS	30 JUNE 83
2-AEA-3	Q-PORION OF FEEDWATER PIPING	15 JULY 83
2-FCB	MN. FEEDWATER PUMP TURBINE	26 JULY 83
2-ALA-2	AUX. FEEDWATER PUMP & LINE	14 AUG. 83
2-BGB	LETDOWN PURIFICATION SYSTEM	15 AUG. 83
2-SAB	ESFAS CABINET & CONTROLS	15 AUG. 83
0-SSA	MULTIPLE SYSTEM CONTROL PANELS	15 AUG. 83
0-DDA-1	HYPOCHLORATE STORAGE TANK	15 AUG. 83
1-AEA-2	Q PORTION OF FEEDWATER PIPING	21 AUG. 83
2-ABB-2	BA'ANCE OF MAIN STEAM ISOLATION	21 AUG. 83
2-BGA	LETDOWN	28 AUG. 83
2-BGE	HIGH PRES SAFETY INJECTION	31 AUG. 83
2-SFB-2	CRDC CABINETS/CNTLS/ MG SET	31 AUG. 83
2-BCA-3	BALANCE OF DECAY HEAT REMOVAL	31 AUG. 83
2-SAA	ECCAS CAB & CNTLS	31 AUG. 83
1-ALA-4	AFW PUMP & LINE	31 AUG. 83
1-BKA-1	R B SPRAY SYSTEM TO RING HEADER	31 AUG. 83
0-RGE	FIRE PROTECTION SUPERVISORY INST.	31 AUG. 83

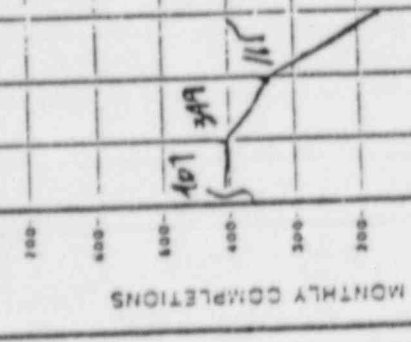
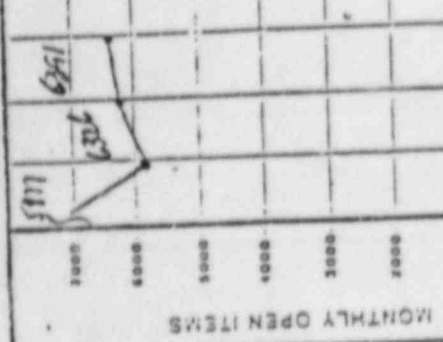


AS OF: 6-21-87

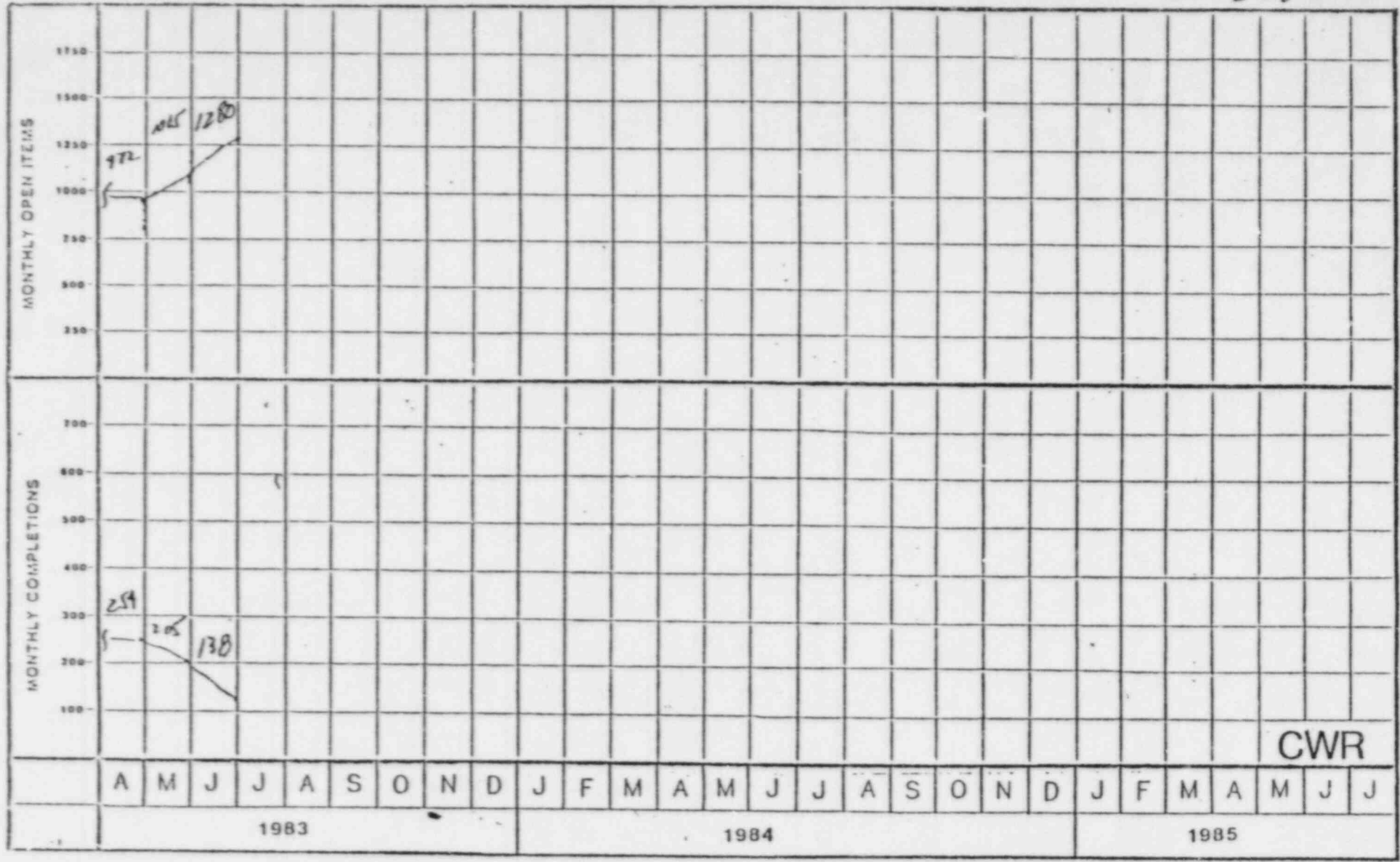
PUNCHLIST OPEN ITEMS VS. COMPLETION

TECHNICAL DEPARTMENT  
PUNCHLIST CONTROL

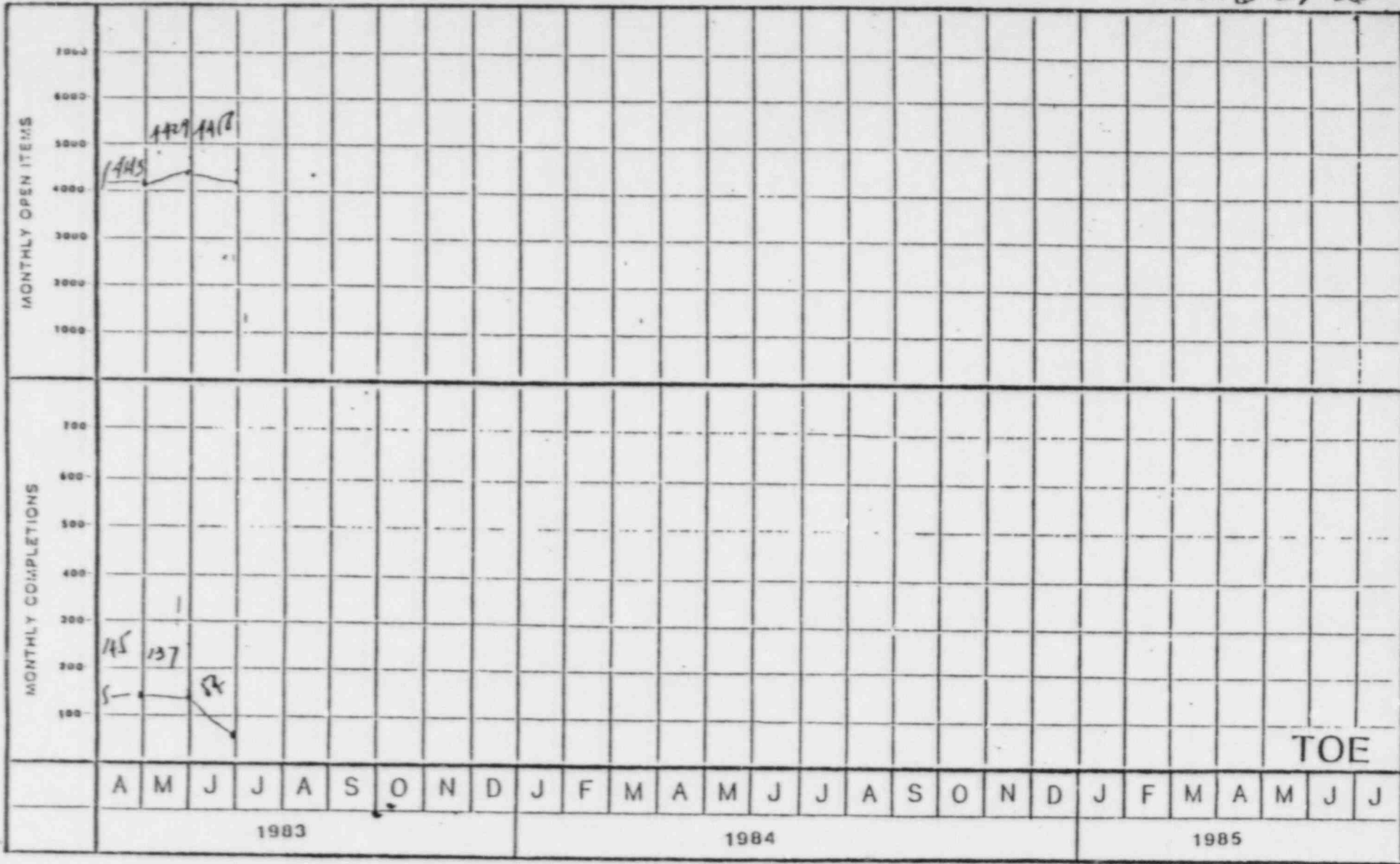
ONLY ONE ITEM MAY BE COUNTED MORE THAN  
ONCE IN THE DIFFERENT TYPES.



1983												1984												1985											
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J								
TOTAL																																			



CWR



MONTHLY OPEN ITEMS	1983												1984												1985																			
	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J				
1750																																												
1500																																												
1250																																												
1000																																												
750																																												
500																																												
250																																												
0																																												
MONTHLY COMPLETIONS																																												

162 506 528

74  
 32 33

DCP

- Turbine Bypass Valves - Unit 1 Electrical and I&C checkout complete; Unit 2 electrical checkout complete.
  
- Unit 1 Reactor Vessel Internals Modification is in progress
  
- Unit 2 Reactor Vessel Internals Modification complete; the HFT Flow screen is installed/attached to the PLENUM; the CRD dummy guide assemblies being installed in the PLENUM.
  
- Unit 2 Reactor Coolant Pump Motors - partial electrical checkout complete; all 4 RCPM's have been bumped for proper rotation and anti-rotation devices have been installed. Preparations are underway for initial motor runs.
  
- Unit 2 Decay Heat Removal System (portions in the Auxiliary Building) - Electrical and I&C checkout are essentially complete; Initial Pump Runs-Recirc Mode, complete; Gravity flush to suction of DH Pumps and Velocity Flush of lines from pump discharge to BWST recirc lines complete.
  
- Unit 2 Makeup System (High Pressure Injection Pumps) - Gravity flush to MU pump suction complete; two of the 3 HPI pump motors have been run and preparations are underway to run the third HPI pump motor.

- Unit 1 & 2 Boronometer - Electrical checkout complete.
  
- Unit 2 - Boric Acid Addition - The mix tank has been cleaned; electrical and I&C checkout in progress
  
- Unit 1 & 2 Hydrazine and Lithium hydroxide - Electrical I&C, and mechanical checkouts complete. Nitrogen blow to hydrazine drums complete. Unit 2 flush to suction of LIOH and Hydrazine Pumps complete.
  
- Unit 2 RB Spray suction piping - partial flush complete.
  
- Unit 2 Borated Water Storage Tank Outlet Piping - Flush to suction of DH pumps complete. The BWST Circulation pump initial run complete.

d. AUXILIARY SYSTEMS

26 of 84 Auxiliary systems have been turned over to CPCo  
(31 %).

Performance of two flush procedures (Unit 1 & 2 FH Bridge Air System Flush) and one Specific Procedure (Receipt of Dummy Fuel Assemblies and Control Rods) have been completed.

Significant Activities completed and/or in progress include:

- Service Water Sluice Gates - I&C checkout complete; electrical checkout in progress.
  
- component cooling water - Portions of the system (B-Loop) required to provide cooling water to the RCP motors have been checked out and flushed; this includes piping to the CCW and Decay Heat Coolers and DH Pump Seal Coolers.
  
- Reactor Building Vent Header - Electrical checkout of valves complete.
  
- Radwaste pump seal water/headers - electrical checkout complete.
  
- Filter Handling - Electrical checkout complete.
  
- Primary Mixed Bed demineralizer - Electrical checkout complete.
  
- New Fuel Elevator - electrical checkout complete.
  
- Spent Fuel Pool Handling Bridge - electrical checkout complete
  
- Unit 1 Reactor Building Fuel Handling (FH) - electrical and I&C checkout complete, portions associated with Dry Indexing  
Preoperational Test (Milestone 1A) complete

- Unit 2 Reactor Building Fuel Handling - Electrical and I&C checkout complete, portions associated with Dry Indexing Preoperational Test (MILESTONE 2A) complete
  
- Unit 1 FH Transfer Mechanism - I&C checkout complete; Fuel Transfer Hydraulic System Flush in progress
  
- Unit 2 FH Transfer Mechanism - Electrical and I&C checkout complete, FH Transfer Hydraulic System Flush in progress.
  
- Service Water System - electrical c/o Main Header valves in progress, I&C checkout of common Header to the Turbine Building Service Water complete; electrical checkout Unit 1 & 2 Turbine Building Service water complete; electrical checkout Unit 2 Turbine Building service water complete.
  
- Initial Pump and/or motor runs completed to date include: Primary Water Storage Transfer and Vacuum Pumps (Motor only), service water Travelling screens, four of the five service water pump motors, four of the five service water strainers, and one of the CCW pumps.

e. Feedwater/Condensate Systems

55 of 100 systems have been turned over to CPCo (55%).



Performance of one Specific Procedure (Aux Boiler Initial Operation and Boilout) and 6 Flush Procedures, described below, have been completed.

Significant Activities completed and/or in progress include:

- Unit 2 Condensate supply and Low Pressure Feedwater Heating - Electrical, I&C, and mechanical checkouts complete; condensate pumps initial run complete.
- Unit 1 & 2 Hotwell makeup and Rejection - Electrical and I&C checkout complete except for Unit 2 I&C checkout which is in progress.
- Unit 1 & 2 Main Condenser - I&C checkout complete.
- Unit 1 & 2 Condenser Hotwell sampling - Electrical checkout complete.
- Common Feedwater crossconnect - electrical C/O complete.
- Unit 2 Condensate Demineralizers and Associated Systems - Electrical and I&C C/O in progress.
- Makeup Demineralizers - all checkouts complete, system is functional.

- Demineralized Water Storage and Transfer - all checkout essentially complete; system is functional and providing primary source of Flush Water; Flushes associated with the storage and transfer header branch lines to all hose stations, and Unit 1 & 2 Reactor Building piping, complete.
- Makeup Demineralizer Chemical Storage and Transfer - all system checkout and flushes complete; system is functional.
- Condensate storage (common system) - partial electrical and I&C checkout complete, flush to Unit 1 & 2 Auxiliary Feedwater Pump recirc lines complete.
- Unit 1 Condensate Storage - Tank has been cleaned; I&C C/O complete.
- Unit 2 Condensate Storage - all system C/O complete except for electrical C/O; tank has been cleaned; flush from tank to Hotwell complete (Milestone 2E).
- Condensate Transfer - For the common system, all electrical and I&C C/O complete; condensate jockey and transfer pumps have been run; flush of the system is complete.  
Unit 1 system electrical and I&C C/O complete.

- Ammonium Hydroxide Storage and Transfer - The common unit electrical and I&C C/O complete; chemical addition pumps have been coupled. The Unit 1 & 2 systems electrical and I&C C/O complete.
  
- Hydrazine Addition System - Unit 1 & 2 Electrical and I&C C/O complete.
  
- Hogging/Exhaust Piping Vacuum Relief - Unit 1 & 2 I&C C/O complete.
  
- Circulating Water Supply - Unit 1 & 2 initial motor run of circulating water pump motors complete.
  
- Water Box Scavenging - Unit 1 & 2 Electrical and I&C C/O complete.
  
- Acid Storage, Supply, Distribution - Electrical checkout complete; pumps have been coupled.
  
- Auxiliary Boiler - all system C/O complete; both boilers have been fired and Auxiliary System flushes completed; boiler tuning and load test is in progress.
  
- Auxiliary Boiler Steam Distribution - all system C/O complete steam blow of main headers complete.

- Air Compressors/Instrument Air Dryer - all system C/O complete; compressors are functional; presently clearing punchlist open items; air blows main header complete.
- Service Air Distribution - all system C/O of the Unit 1, 2 and common headers complete; air blows to subheaders and branch lines in progress.
- Instrument Air Distribution - All system C/O complete; Instrument air is available to Evap Bldg, Miscellaneous Buildings, Dow pump house, Turbine Building (both units), and portions of the Auxiliary Building.
- Fire Water Supply/Distribution - System C/O complete; Diesel Fire and electric pump initial runs is complete. System is supplying site fire water protection.
- Transformer Deluge - I&C C/O complete.
- Carbon Dioxide Fire Protection - I&C and Electrical C/O in progress on those portions that are turned over.
- Building Deluge Protection - Electrical and I&C C/O for portions of the system turned over is complete.

- Hose Station Protection - Checkout of Hose Stations complete (to Warehouse 2, Turbine Building, Reactor Building, and Miscellaneous Buildings.
  
- Nitrogen System - System C/O complete; N<sub>2</sub> blow/purge of system complete; the distribution system is undergoing redesign work and therefore flushing will have to be done over.
  
- Natural Gas Evap Bldg Lab - System C/O complete; flush of system complete.
  
- Vacuum Fume Hood (Evap Bldg Lab) - Elect C/O and piping flush complete.
  
- Acid and Caustic Waste - Unit 2 sumps have been cleaned; I&C and electrical C/O complete; initial pump run of Neutralizing sump pump complete.

f. Turbine/HVAC Systems

76 of 150 systems have been turned over to CPCo (50%).

Performance of one Acceptance Test (D G Electric Heat Test) and 6 Flush Procedures as described below have been completed.

Significant activities completed or in progress include:

- Unit 1 & 2 Turbines - System C/O complete; Turbine has been placed on turning gear.
- Unit 1 & 2 Turbine Generator Bearing Lube Oil Supply - System C/O complete; Oil flush complete; system functional.
- Generator H<sub>2</sub> and CO<sub>2</sub> - Unit 1 & 2 I&C C/O complete; preparations under way to perform Generator Air Drop Test.
- Unit 1 & 2 Hydrogen Seal Oil - System C/O complete except for I&C C/O. Oil flush complete.
- Turbine Lube Oil Storage, Transfer, and Purification (Unit 1, 2, and Common) - All system C/O complete; oil flush complete; system functional.
- Cooling Pond Makeup Screens/Screen Wash - System C/O complete; system is functional.
- Cooling Pond Makeup, traveling screens, sluice gates, trash racks - Cooling Pond has been filled with water, checkout of screen wash pumps, screens, makeup pumps, sluice gate, valves complete. Cooling Pond blowdown system checkout is in progress.
- Hot Water Supply/Chemical Treatment - Electrical C/O complete; initial motor run of hot water pumps complete.

- Plant Hot Water Heat Systems - Unit 1 & 2 Turbine Building electrical C/O and initial motor runs complete; electrical C/O Auxiliary Bldg Hot Water heat complete; Unit 2 electrical, I&C C/O and initial motor runs complete; office, Service Building electrical, I&C C/O complete including initial motor runs; Intake, Hypochlorination, Service Water Building electric heat-system C/O complete; Unit 1 & 2 Diesel Generator Building electric heat - system C/O complete - The Diesel Generator Building Electric Heat Acceptance Test is complete.

Reactor Building Hot Water Heat (Unit 1, common) electrical C/O complete; Process Evaporator Hot Water Heat electrical C/O including initial motor runs complete; Auxiliary Building Safeguard Room Electric Heat - electrical and I&C C/O complete (common Unit; Unit 1 - electrical C/O in progress); Guard House electric Heat - I&C and electrical C/O complete.

- Turbine Building Chilled Water - Unit 1 & 2 I&C C/O complete; chilled water pump motors were run and coupled; the system flushes are in progress.
- Office/Service Building Chilled Water - Electrical and I&C C/O complete; startup of chillers and pumps complete; proof flush is complete.

- Office/Service Building HVAC - System C/O complete, air balancing and setting of dampers complete.
  
- Chlorination Building HVAC, Cooling Pond MU Building HVAC, Cooling Pond Intake Building HVAC, Guard House HVAC, and Pond Blowdown Building HVAC - System C/O is complete.
  
- Evaporator Building HVAC, Circulating Water Intake Building HVAC, Oily Waste Treatment Building HVAC, and Dow Condensate Return Pump House HVAC - electrical C/O in progress.
  
- Refuel Pool Air Supply (Unit 1) - electrical c/o in progress.
  
- Domestic Water Storage, Transfer, and Heating - System c/o complete and system is functional.
  
- Hydrogen Supply - Electrical and I&C C/O complete; purging H<sub>2</sub> system with nitrogen complete (common system); Unit 1 & 2 H<sub>2</sub> system is functional up to the Main Generator and to the RCS MU Tank.
  
- Oily Waste System - Common Unit electrical and I&C c/o complete. Unit 1 electrical and I&C c/o complete and flush is complete; Unit 2 electrical and I&C c/o complete.



- Turbine Bolt Heater Panels - Both Unit 1 heater panels have been turned over; one of the panels have been checked out. Four of the Unit 2 Heater panels have been turned over; of these 1 heater panel has been checked out.

g. Process Steam

12 of 15 Process Steam Systems have been turned over to CPCo (80%). Performance of one Flush Procedure (Demineralized Water Supply) has been completed.

Significant Activities completed and/or in progress include:

- Steam to HP Evaporator - I&C C/O complete, electrical C/O in progress.
- condensate Return/Unit 2 Condenser, HP steam to Dow Isolation Valves - I&C C/O complete
- LP Steam to Dow Isolation Valve - I&C C/O in progress.
- Process Steam Blowdown to Dow - Electrical and I&C C/O complete; motor run has been performed and coupling of pump to motors complete.

- condensate return from Dow - Electrical, mechanical and I&C C/O complete (for C/Co equipment only).
  
- Condensate Chemical addition - electrical c/o complete; HP chemical Feed flush, sodium sulfite chemical feed flush and associated pump runs complete.
  
- condensate Supply/Vacuum Deaerator - system c/o complete; Dow Demineralized Water Tank (2.5 million gal) is filled with water for flushes; initial demin pump run and flush complete, evap deaerator feed pump initial run complete.
  
- Feedwater Supply - Electrical, Mechanical, and I&C C/O is near completion; initial motor run of HP Feed Pump motor is complete.
  
- Iron removal (Condensate Return) - Mechanical and I&C c/o complete.
  
- Iron Removal sump - system c/o and iron removal sump pump run complete.
  
- HP Boilers - Initial checkout, start up, and testing complete, all 3 boilers have been fired up.
  
- Process steam plant sample - I&C c/o complete.

h. Programmatic Testing

3 of 5 systems were accepted by CPCo (60%)

Significant activities completed and/or in progress include:

- The Unit 1 & 2 Reactor Building Tendon Test Facility has been turned over as well as the Unit 2 RB Structural Integrity Test Facility.

3. Procedure Development

- a. The status of Procedure Development and Approval required for the Test Program is summarized below and detailed breakdown of each Procedure type and Discipline is shown on Table 1.

STATUS - PERCENT OF TOTAL

<u>Procedure Type</u>	<u>Total</u>	Drafts Not <u>Written</u>	In Review & Approval <u>Cycle</u>	<u>Approved</u>
Preoperational Test				
Procedure	268	23%	56%	21%
Acceptance Test Procedures	128	29%	38%	33%

Flush Procedures	168	2%	20%	69%
Specific Procedures	119	13%	21%	66%
Generic Procedures	<u>46</u>	<u>4</u>	<u>22%</u>	<u>74%</u>
	729	16%	33%	45%
	(Total)	(Not)	(in)	(Approved)
		(Written)	(Review)	

Our goal is to have all Procedures approved by March 1984. Figure 2 shows a curve of Procedure Development - Actual vs Scheduled. Based upon Rev 12 Test Schedule, we project that procedures required to support Testing Activities will be developed and approved at least 2 months before the scheduled test start date.

b. The status of Test Program Procedure Performance completions is summarized below and shown in detail in TABLE 2 and Figure 3.

PROCEDURES COMPLETED

Preoperational Tests completed -	None
Preoperational Tests started/not complete -	2
Acceptance Tests completed -	1
Acceptance Tests started (not complete)	0
Flushes completed -	16

Flushes started (not complete) -

17

Specific Tests completed -

9

Specific Test started (not complete) -

23

Generic Tests/Checkout - Checkout procedures are performed for all components, subsystems, controls, and similar items to ensure that they function properly and are installed correctly prior to the start of system Preoperational or Acceptance Testing. Due to the nature of checkout (i.e. required for electrical, mechanical, and I&C), the status of checkout is presented below only as an approximate. The "completion" status is assumed that the checkout activity in itself is complete but there may be punchlist items that are still open and require checkout testing. In addition, the following guidelines were assumed in reporting checkout complete:

Electrical - system is checked out and energized

Mechanical System - electrical, I&C, and mechanical C/O are complete

I&C - electrical and I&C C/O are complete

<u>DISCIPLINE</u>	<u>Generic Checkout Percent Complete</u>
Electrical	83
I & C	37
Turbine/HVAC	24
Feedwater/Condensate	25
NSSS	4
Auxiliary System	8
Process Steam	<u>15</u>
Total	45%

In summary, 45% of the Systems (850) in the Plant have been initially checked out, and 4% of required Tests (Preop, Acceptance, Flush, and Specific) have been performed.

## Project Test Schedule - Rev 12

### A. Rev 12 Test Schedule Philosophy

The Rev 12 Test Schedule Philosophy is basically the same as Rev 11 relative to the dual Unit startup concept and is summarized in this section. Figure 4 shows Rev 12 Test sequence through commercial operation for both Units.

1. The majority (95%) of Unit 1 preoperational testing will be performed prior to Unit 2 Fuel Load.

This will relieve Unit 1 preoperational testing of restraints and delays due to Unit 2 license operating restrictions (technical specifications and surveillance testing). This will increase Unit 2 availability for power production owing to fewer interferences from Unit 1 preoperational testing.

2. Inherent timeframes are built into the merged schedule to absorb corrective design and/or maintenance following major periods of integrated initial plant operation and preoperational testing.

Historically, nuclear plant test programs have suffered lengthy delays immediately following the Cold Hydro Test Phase and the Hot Functional Test Phase due to equipment or other operational failures. These failures have in the past slowed and in many cases stopped critical path progression onto the next succeeding scheduled event(s) until repairs and/or design problems were resolved. These timeframes are shown on Figure 2 as "Resolve Punchlist Items---".

3. No two Unit 1 and Unit 2 milestone events are required to be performed simultaneously.

It is impractical to focus site activities on more than one (1) major Unit 1 and Unit 2 milestone activity at the same time. The Midland Site is currently being staffed to permit simultaneous component testing with each Unit but not for simultaneous integrated milestone testing. To do so would require two of every resource including the Testing Group, Operations Group, Bechtel, B&W, and CPCo Management support.

However, one major change in this philosophy is that, on Rev 12 the ILRT on one Unit is now scheduled to be performed simultaneously with HFT on the other unit. Since Testing manpower required to perform ILRT is different from HFT, and since there is no system nor technical relationship between ILRT on one unit and HFT on the other unit, we believe that these two events can occur in parallel.

4. Separation of Fuel Loads

Unit 1 and Unit 2 Fuel Loads are separated in time to support the Dow requirements with regard to process steam availability.

5. LLRT/ILRT/SIT are performed nearly piggy-back during the same timeframes.

Containment leak rate and structural integrity testing would benefit by capitalizing on the commonality of equipment, personnel, and vendor support required to perform these tests.

6. The integrated ESFAS Test would be a common test phase.

The safeguards system for the Midland Project is essentially a common system in that each plant is designed to respond to the others safeguards action. As such, this particular milestone test for each plant will include the other plant to the extent that neither could provide sustained power during conduct of the test. Thus, ESFAS testing will be performed for each plant at approximately the same timeframe to avoid duplication of effort and interruption of power production from the "on-line" plant.



7. Several disadvantages with the Rev 11 schedule at the time it was developed have become less significant in terms of the Rev 12 schedule. These are:

- a. The potential problem of Spent Fuel Pool area work interfering with fuel receipt would be less significant.

Receipt and storage of new fuel on site imposes a number of restrictions on the fuel storage facilities (spent fuel pool area). Typically, this means all activities are limited to either fuel handling itself or to routine maintenance of fuel handling related equipment. Usually, the license for receipt and storage of "special nuclear materials" (fuel) specifically prohibits construction activity or any other dirt generating or heavy maintenance work which could potentially affect cleanliness or structural integrity of the new fuel.

Based upon Rev 12, only 7 systems remain to be turned-over to support fuel receipt. The potential problem of receiving and storing Unit 2 fuel conflicting with construction of Unit 1 (construction access to the inside of the containment) is now much less significant due to large amount of construction work completed. There is no longer the problem associated with Tendon tensioning on the Unit 1 RB interfering with fuel receipt because the Tendon tensioning is complete.

- b. Construction has a better chance of achieving the turnover demand dates since there are only 307 of 850 turnovers remaining. In addition, the CCP concept is predicated on quality work which would result in a more complete system at the time of turnover, i.e. less construction deficiencies.
- c. The feedwater and condensate system will not have to be laid up for a long time between chemical cleaning and the start of HFT.
- d. We have more time to reduce backlog punchlist open items.

8. Initial Turbine Roll - Three temporary high pressure boilers were installed in 1982 and fully tested to primarily allow early testing of the Process Steam Systems which will result in considerable schedule gains during power escalation testing of Unit 1. The Temporary High Pressure Boilers will also be capable of supplying steam to support Secondary Plant Testing including Initial Turbine Roll. Early Testing of the Secondary Steam Side of the plant and the Main Turbine will result in overall test schedule gains in the secondary side of the Plant. A Turbine Roll Milestone (TR) has been added to the Test Sequence which is required to be accomplished approximately 1 to 2 months prior to HFT. The Pre HFT Schedule Gains is expected from being able to perform early testing of relief valves, initial steam leak tests, steam blows and flushes of Secondary Side Systems.

B. REV 12 TEST PROGRAM PLAN

This section describes the Test Program Plan Revision 12, both in narrative form discussing the Testing highlights and Tabular/Chart forms showing details of the Test Program.

Figure 4 shows the Rev 12 Test Program Schedule Sequence showing the major milestones leading to initial fuel load and commercial operation. Figure 5 shows the full-blown Test Schedule in Tabular form listing the projected start dates for Preoperational, Acceptance, and Specific tests as well as system flushes.

The narrative presented below pertain to Unit 2; however, due to similarities between the two units, it is applicable also to Unit 1.

1. Planned Activities Leading to the Next Target Milestones (B-Auxiliary System Flushes and G-Feedwater System Flushes)

The major thrust during this period is to complete system checkouts and flushes for the 543 systems now in the hands of CPCo (as of 3-31-83). In addition, approximately 60 System Turnovers and subsequent checkout and flushing activities are projected to occur during this time frame.

In the electrical area, turnover of the remaining electrical power systems and subsequent energization are scheduled to provide permanent power to run the mechanical systems. Backfeed from the 345 KV lines through the Station Transformers will be a major event to ensure that sufficient power is available to support major test events and their power load requirements, and allow testing of the electrical systems.

In the I&C area, the major effort will be devoted to completing I&C checkout of instrument racks, cabinets, modules, and annunciators that have been turned over to CPCo. The majority of the remaining I&C system turnovers are scheduled during this time frame to allow as much checkout as possible in support of Mechanical systems checkout and startup. Verification of input/output

signals to the plant computer, annunciators, indicators, and controls will be an on-going process.

In the primary systems area, seven (7) systems remain to be turned over to support Milestone B-Auxiliary System Flushes into the Reactor Vessel. The major objective during this period is to checkout and flush the individual auxiliary systems which support the Reactor Coolant System (RCS). These include the DH Removal, High Pressure Injection, RCP seal injection, RC makeup, Core Flood, RCS letdown, and portions of the Reactor Coolant System Cold leg piping.

In the secondary side of the plant, the major testing activities involve checkout and flushing of the entire Condensate system and the Deaerators. Seven (7) Systems remain to be turned over to allow the next target Milestone (G) to start, which is the Main Feedwater Flush.

In the Evaporator Building, major activities in 1983 will include complete checkout and flush of Secondary and Tertiary Systems; complete flushing after remaining five (5) systems are turned over to CPCo; complete Tunnel modifications, and initial piping heatup using the HP Boilers.

## 2. Milestone B-Auxiliary System Flushes into Reactor Vessel

This Milestone involves flushing of the low and high pressure injection, and Core Flooding lines into the Reactor Vessel. Other activities scheduled to be performed/completed during this period include:

- Reactor Vessel internals modification and final clean up
- Reactor Vessel internals pre-HFT baseline inspection
- Reactor Cooling Pump Motor initial runs, seal installation, alignment and coupling to pumps,
- After flushes to the RV, setting the Core Support Assembly and filling the RV up to the flange level.
- Conducting the Reactor internals Vent Valve Test, and surveillance specimen holder tube test.

## 3. Milestone C - Refueling Canal Hydro and Wet Fuel Handling Test

The Milestone will verify the integrity of the Refueling Canal and the seal plate, and the FH equipment and fuel index test with refueling canal water at its full level (simulating refueling operations).

Following CANAL Hydro, several key events take place in preparation for RCS COLD Hydro. Some of the activities include the following:

- Set Plenum in Reactor Vessel
- Install RV Head and Tension Studs
- Couple Control Rod Drive Mechanism lead screws and install closures.
- Fill and Vent Reactor Coolant System
- Draw Pressurizer Bubble, and Run Reactor Coolant Pumps.

4. Milestone D - RCS COLD HYDRO

During this test, the RCS is pressurized to 125% of design pressure to verify system integrity. During the Hydro phase, miscellaneous tests will be conducted such as:

- RCP Flow Tests
- MU/HPI/LPI/CF System Tests
- Secondary Side, Steam Generator Hydro Test

Following Unit 2 RCS depressurization, test and manpower emphasis will be shifted to Unit 1. At this point, resolution of punchlist open items will be vigorously pursued and remaining RCS insulation will be installed in preparation for Unit 2 HFT.

5. Milestone G - Feedwater System Flush

Following the Condensate System flushes and Turnover of the Feedwater System, the Deaerator will be filled and the Feedwater Booster Pumps will be used to flush the feedwater system including piping through the condensate demineralizers. Other activities during this time period include:

- Turnovers, checkout, and flush of remaining systems required for drawing vacuum in Condenser and initial Turbine roll.

6. Milestone H - Condenser Vacuum

Drawing a vacuum in the condenser involves the checkout and operation of the air ejectors, vacuum pumps, and the Circulating Water System. Any air inleakage to the condenser will be identified and required at this time prior to HFT. The permanent Auxiliary Boilers or temporary HP Boilers will be operated to provide steam to the gland seal steam system and blanketing steam on the Moisture Separator reheater, tube side. The HP Heater

Vents, drains and level control system will be in operation. The Turbine will be placed on turning gear with support systems such as Seal and Lube oil, and cooling water, in operation.

7. Milestone TR - Initial Turbine Roll

Due to the availability of the HP Boilers, the Main Turbine initial roll can be accomplished independent of the Reactor Coolant System and Steam Generators. To support initial Turbine roll the Condensate and portions of the Feedwater System have to be in operation and the Condenser in a vacuum. In addition, the following systems have to be functional:

- Main Turbine Steam Supply and drains.
- Moisture Separator Reheater supply and drains
- Stator Cooling
- Turbine EHC System
- Main Turbine Supervisory Instrumentation
- Main Generator Protection
- Microwave System



8. Milestone J - Hot Functional Testing

During HFT, operation of the NSSS and secondary systems is integrated for the first time: The test will be conducted at ambient conditions, heatup, hot shutdown conditions (2,155 psig and 532F), and cooldown. A significant number of Preoperational and Acceptance Tests will be conducted during this time.

9. Milestone K - Integrated Leak Rate Test

The ILRT involves pressurizing the Containment above the Design Bases Accident Pressure and conducting a leak integrity check to ensure that the building and penetrations are air tight and capable of isolating the structure in the unlikely event of an accident involving release of radioactivity. Prior to this test, the Local Leak Rate Test of all containment penetrations will be conducted. Based upon the two-Unit startup concept, the ILRT for Unit 1 will precede Unit 2 ILRT.

10. Milestone L - Integrated Safeguards Features Activation System Test

Upon completion of HFT and ILRT, the next major milestone is the SFAS Test. The prerequisites for this test involve:

- Reactor Vessel Head Removal

- RV internals removal
  
- Turnover, checkout, and testing of all system/components that receive a signal from the SFAS cabinets.

During the SFAS test, operation of all emergency core cooling systems is checked. An emergency condition will be simulated which will cause the plant's automatic safeguard systems to start in response to the signal. The Diesel Generators, HPI and LPI pumps, and containment spray pumps will be actuated. Required flow conditions will be verified as well as the order in which systems respond and the length of time elapsed before the response is initiated.

11. Milestone M thru O - Fuel Load and Post Fuel Load Activities

This phase of the Test Program is called the Startup phase and will not be described in this report. For planning purposes, Figure 2 shows the Major Milestone Target dates beyond Fuel Load, and shows a duration of approximately 4.5 months from Fuel Load to Commercial Operation (UNIT 2) and approximately 6 months for Unit 1.

C. Manpower Requirements - Revision 12

Figure 5 shows manpower resource curves for Test Engineers, operators, electrical checkout (ECO) personnel, I&C Technicians, Maintenance Mechanics, Maintenance electricians, and Chemistry and Health Physics Technicians required to support Revision 12 of the Test Schedule.

The Midland Plant has been staffed to support the Dual Unit Startup Plan. The resource availability for each of the above resources has been superimposed on the appropriate curves. It is also worth noting that a separate organization, Construction General Service Organization (CGSO), will perform the majority of work associated with Post Turnover Punchlist items. The present load of CGSO personnel is:

Non-Manual - 55

Manual (Crafts) 100

Breakdown of Manual:

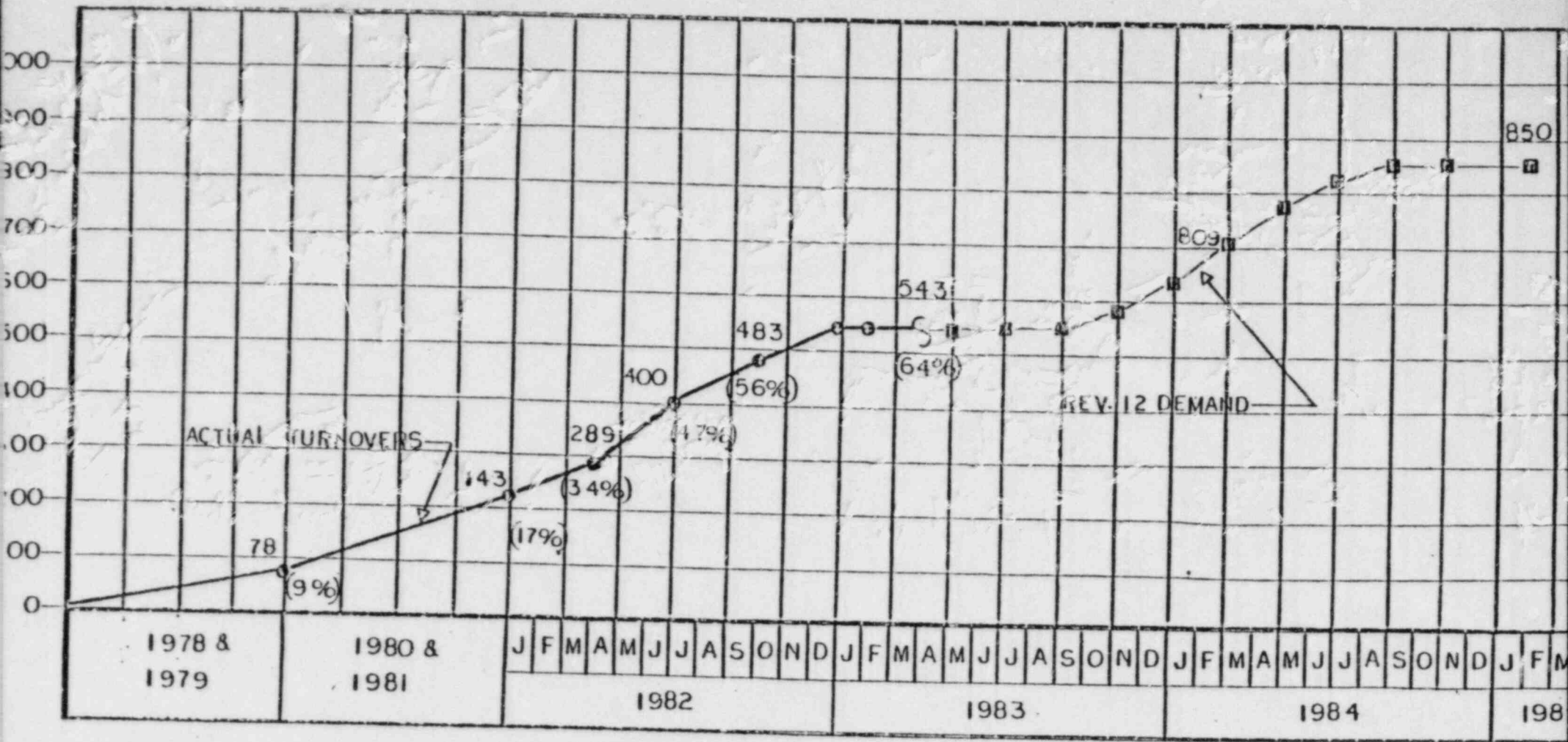
Pipefitters and Welders - 55

Electricians - 35

Labcrers - 10

In terms of shift work, the estimated durations in the Test Schedule were assumed as follows:

1. The majority of Post Turned-over activities were assigned a 5-day work week, 8 hrs/day.
2. Mainline Activities and Milestones (such as RCS initial fill and vent, RCS Hydro, HFT, etc.) AND key systems (such as Auxiliary Systems required to support RCS Hydro) were assigned a 7 day work week, 24 hrs/day.
3. The majority of System Flushes and initial fill and vent operations requiring Operations support were assigned a 7 day work week, 24 hours/day.

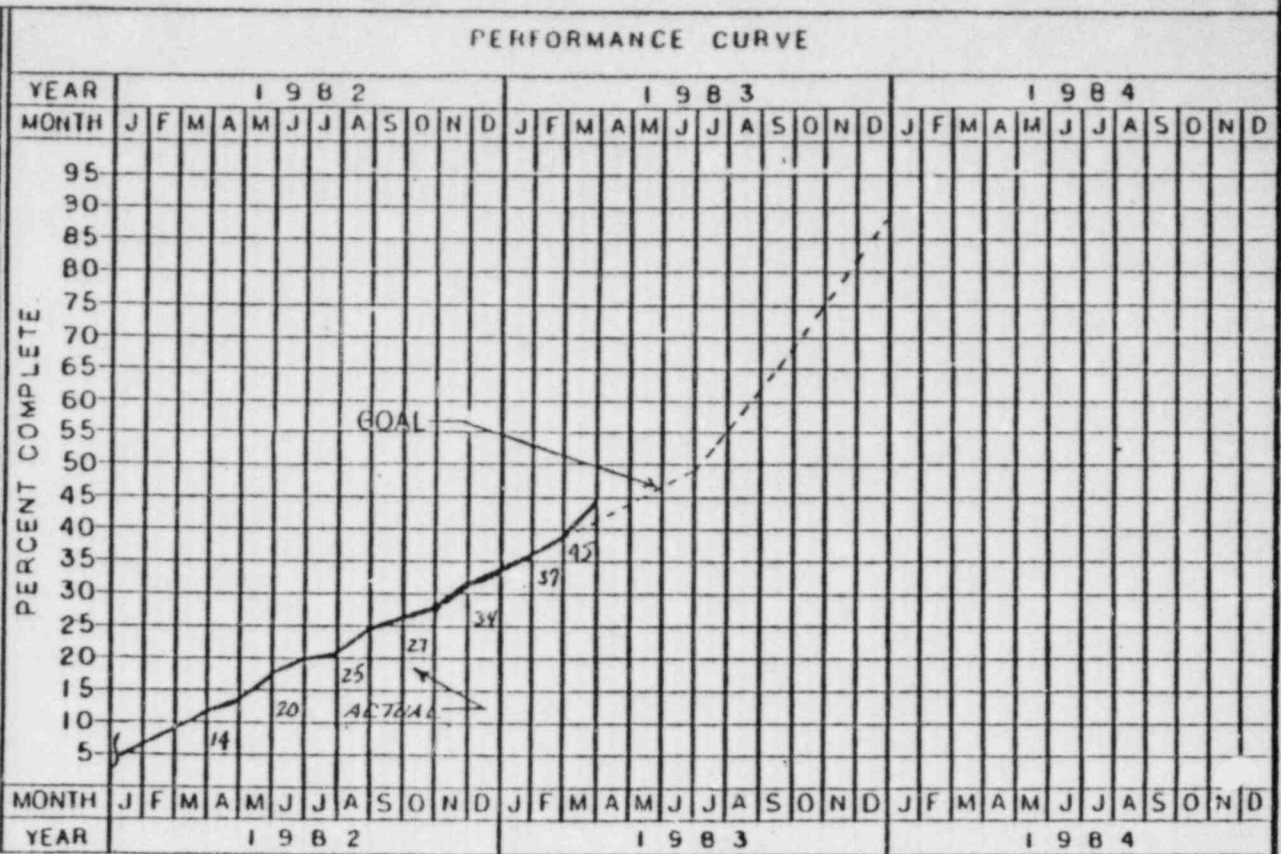


ACTUAL TURNOVERS AND REV. 12 DEMAND TURNOVER CURVE

FIGURE I

PROGRESS SUMMARY			APPROVED	
DISCIPLINE	% COMPLETE 10 20 30 40 50 60 70 80 90	WT FACT	EST % C	ACT % C
AUXILIARY		.154	112	49
ELECTRICAL		.118	86	30
FEEDWATER / CONDENSATE		.146	107	53
INSTRUMENT / CONTROL		.182	133	86
NUCLEAR STEAM SUPPLY SYSTEM		.139	98	57
PROCESS STEAM		.064	47	11
PROGRAMATIC TESTING & PERFORMANCE		.004	47	3
TURBINE / HVAC		.136	99	44
		.371	729	328

AS OF 3-31-83



1	10-27-82	REVISED & RE-DRAWN	BY JRP	APP JRP		
0	2-82	INITIAL ISSUE	BY JRP	APP JRP		
REV DATE		REVISIONS	BY	CHK	APP	APP
SCALE NONE	DESIGNED JRP	DRAWN Klonowski				
<b>MIDLAND PLANT</b>						
PROCEDURE DEVELOPMENT						
	Consumers Power Company		DRAWING NO	REV		
			TPS-5	2		

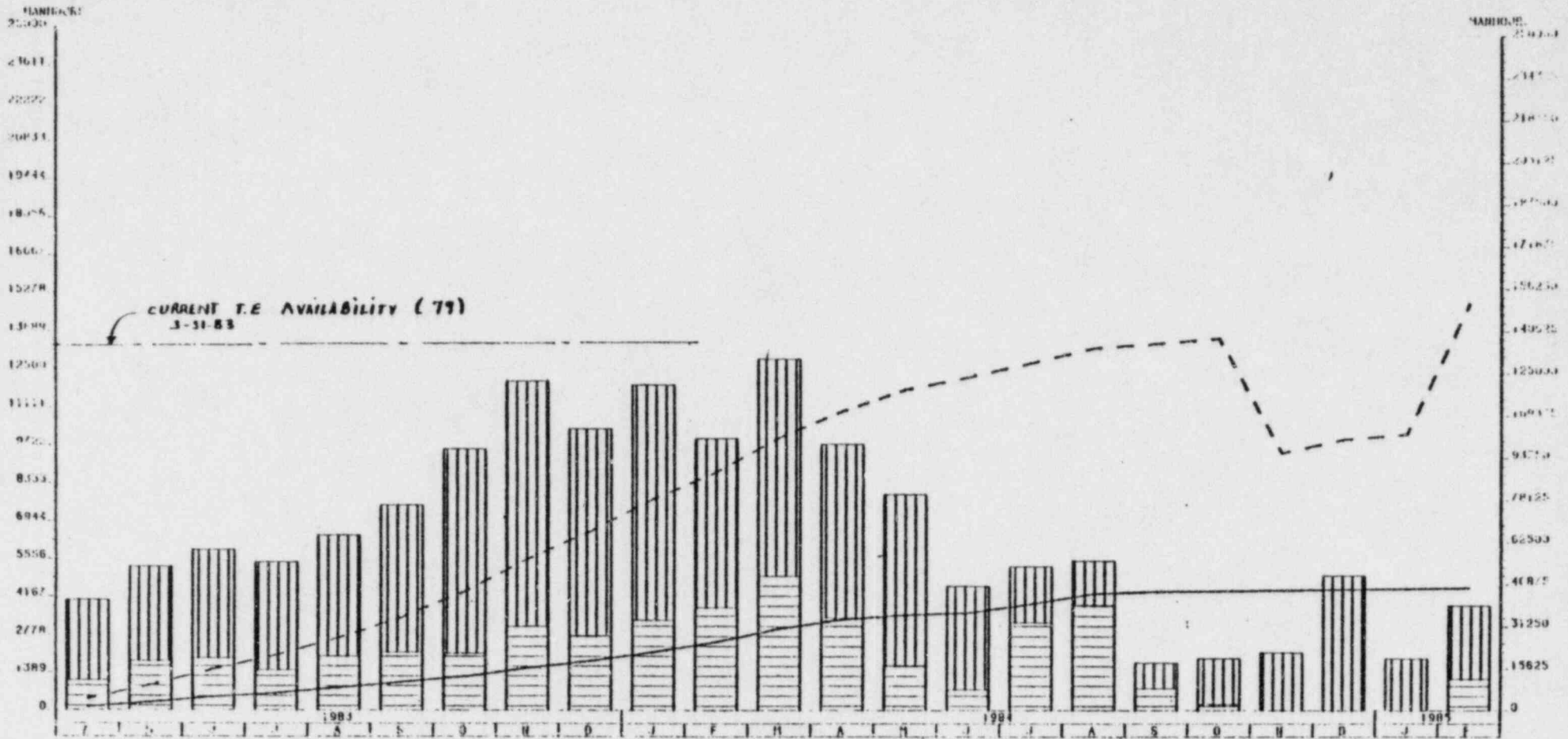
FIGURE 2







MIDLAND PROJECT RESOURCE CURVE - REVISION 12  
 TESTING ENGINEERS  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL SYSTEMS - 41 T.E. /DAY AVERAGE



MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE

CUMULATIVE RESOURCE USAGE  
 MANHOURS INCREASING BASE

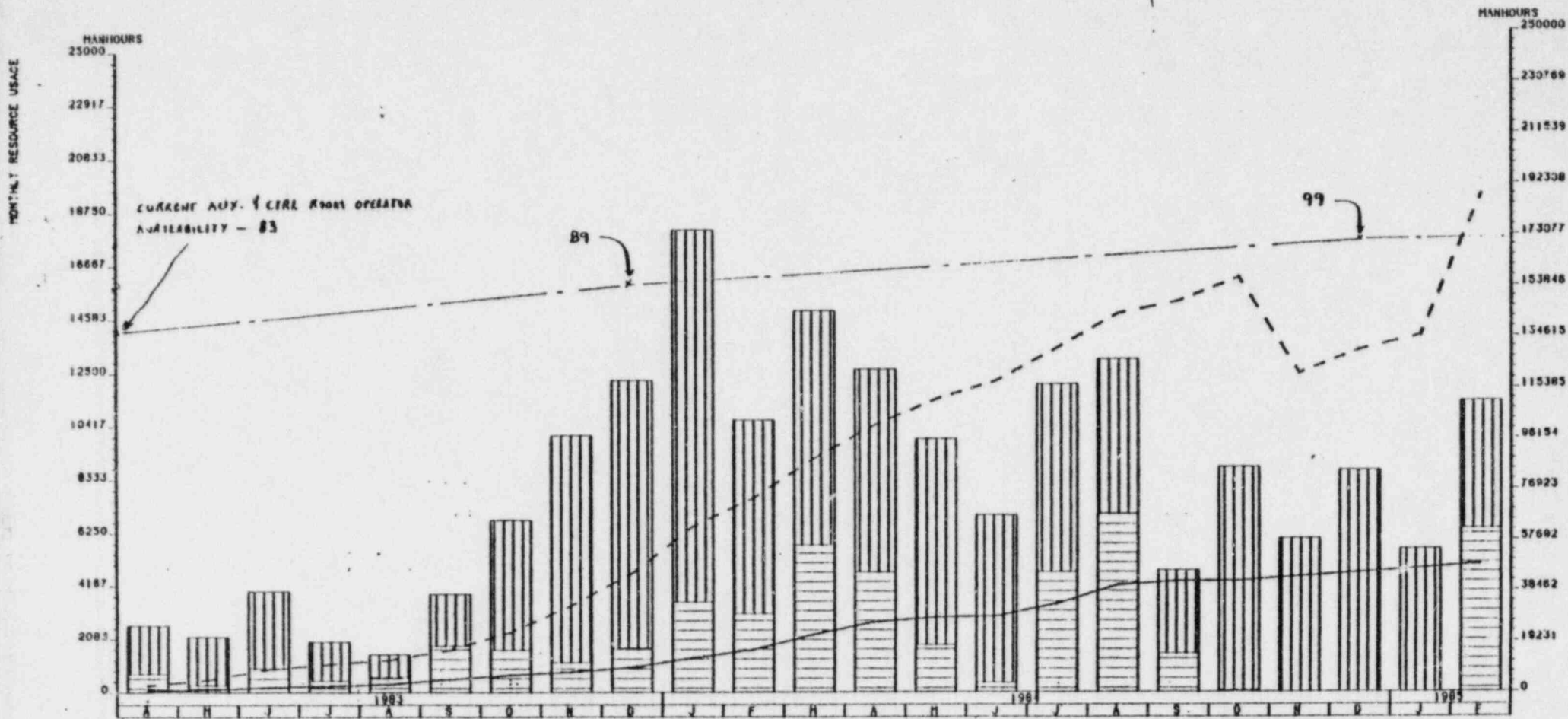
UNIT 2&0 TE FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 21000  
 TARG SCH 32 ES

UNIT 1 TE FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 21000  
 TARG SCH 31 ES

UNIT 2&0 TE CUMULATIVE MANHOURS  
 MANHRS RESOURCE 21000  
 TARG SCH 32 ES CUM

UNIT 1 TE CUMULATIVE MANHOURS  
 MANHRS RESOURCE 21000  
 TARG SCH 31 ES CUM

MIDLAND PROJECT RESOURCE CURVE - REVISION 12  
 OPERATORS  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL SYSTEMS - 50 10PS /DAY AVERAGE



MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE

CUMULATIVE RESOURCE USAGE  
 MANHOURS INCREASING BASE

UNIT 2 & OP FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31100  
 TARG SCH 32 ES

UNIT 1 OP FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31100  
 TARG SCH 31 ES

UNIT 2 & OP CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31100  
 TARG SCH 32 ES CUM

UNIT 1 OP CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31100  
 TARG SCH 31 ES CUM

CURRENT AVAILABILITY - 83

89

99

MANHOURS

25000

22917

20833

18750

16667

14583

12500

10417

8333

6250

4187

2083

0

MANHOURS

250000

230769

211539

192308

173077

153846

134615

115385

96154

76923

57692

38462

19231

0

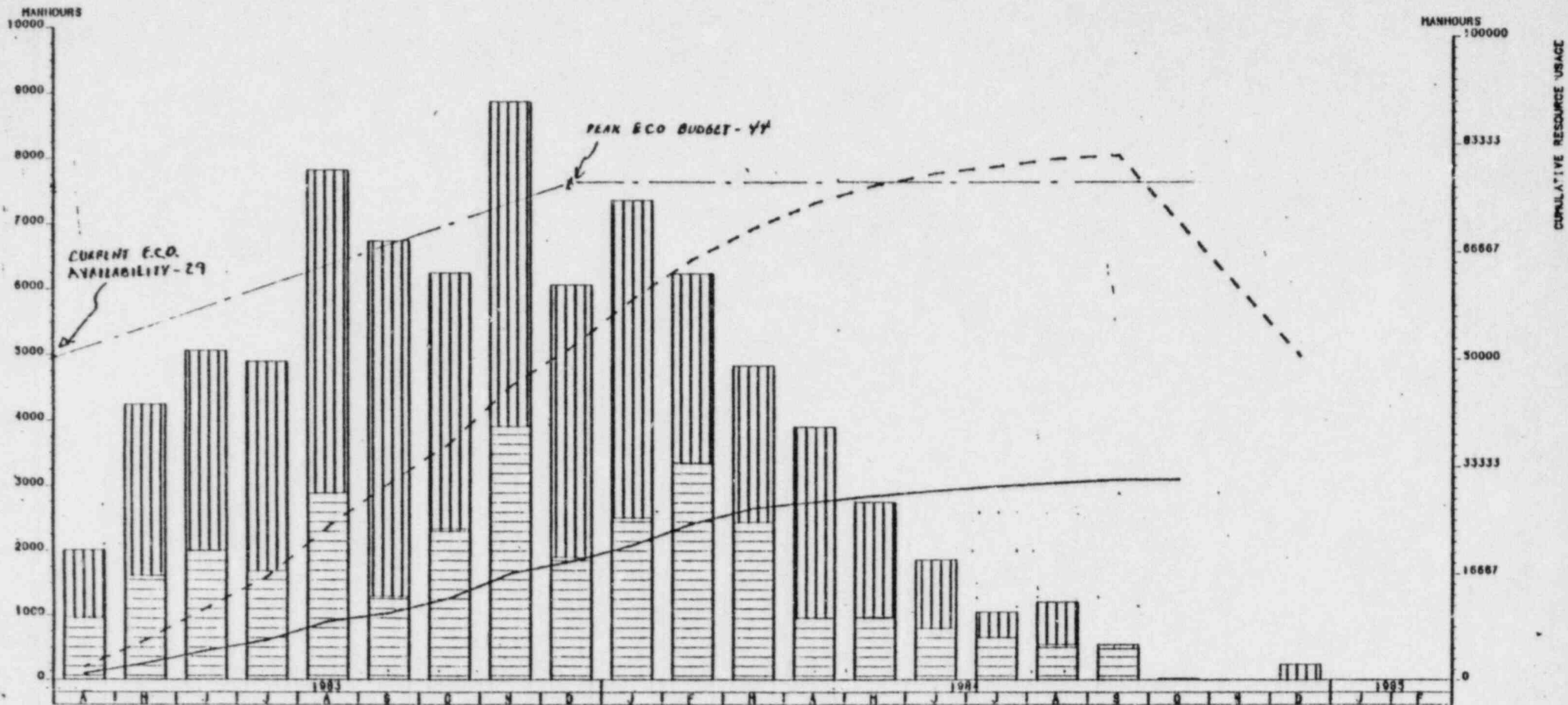
1983

1984

1985

A I H J J J A S I O N D J F H A H J J J A S I O N D J F

MIDLAND PROJECT RESOURCE CURVE - REVISION. 12  
 ELECTRICAL CHECKOUT TECHNICIAN  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL SYSTEMS - 301 E.C.O./DAY AVERAGE



MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE.

CUMULATIVE RESOURCE USAGE,  
 MANHOURS INCREASING BASE.

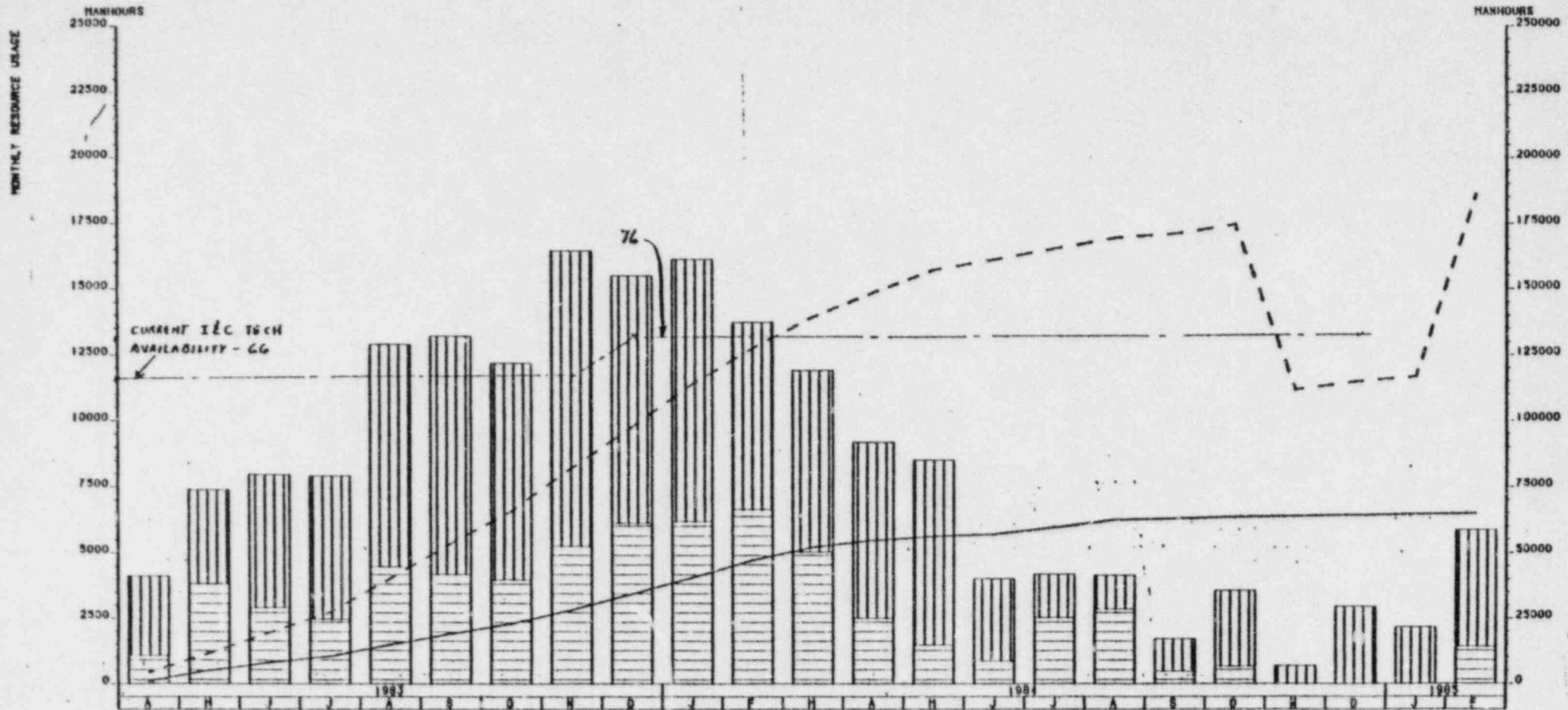
UNIT 2&0 E.C.O. FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 21200  
 TARG SCH 32 ES

UNIT 1 E.C.O. FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 21200  
 TARG SCH 31 ES



UNIT 2&0 E.C.O. CUMULATIVE MANHOURS  
 MANHRS RESOURCE 21200  
 TARG SCH 32 ES CUM

UNIT 1 E.C.O. CUMULATIVE MANHOURS  
 MANHRS RESOURCE 21200  
 TARG SCH 31 ES CUM



MIDLAND PROJECT RESOURCE CURVE - REVISION 12  
 INSTRUMENTATION AND CONTROL TECHNICIANS  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL SYSTEMS - 50 I&C /DAY. AVERAGE



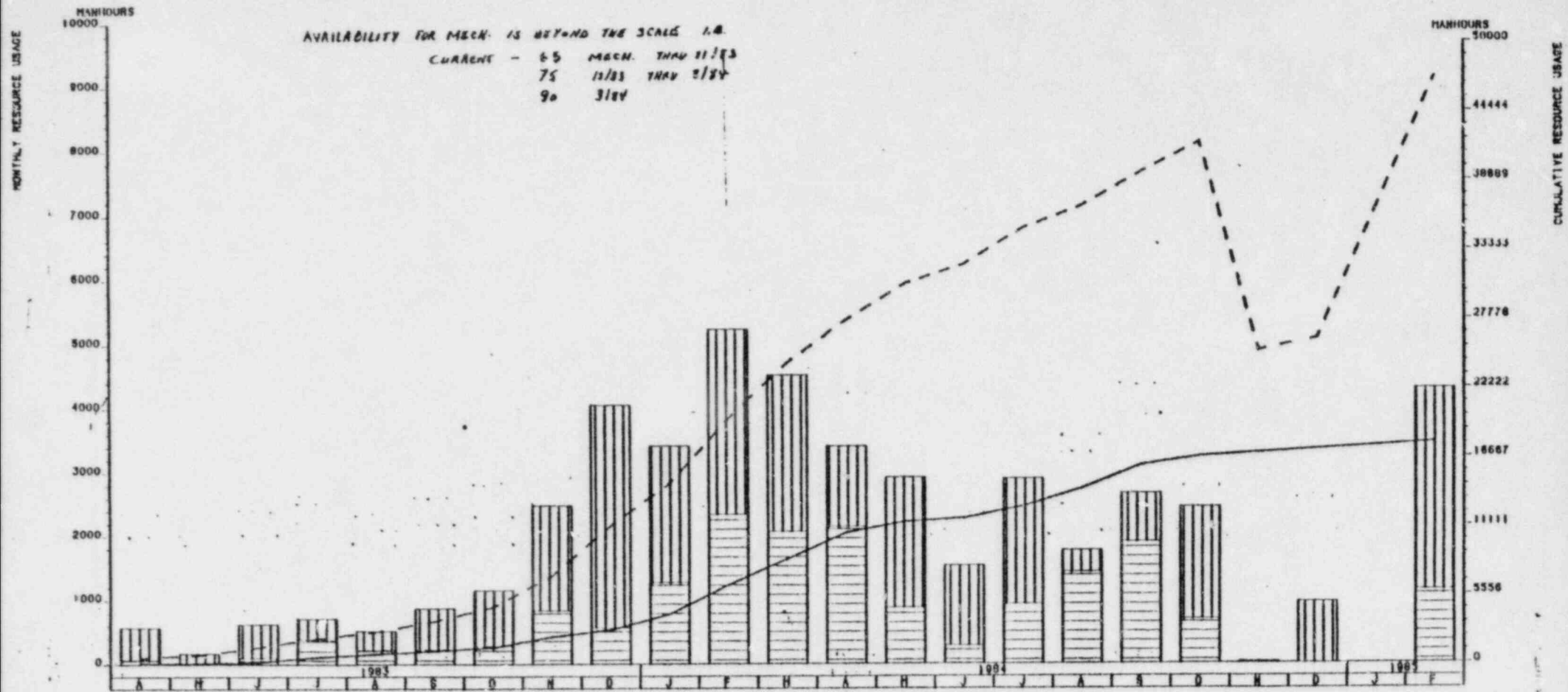
MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE

-  UNIT 2&0 I&C FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31300  
 TARG SCH 32 ES
-  UNIT 1 I&C FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31300  
 TARG SCH 31 ES

CUMULATIVE RESOURCE USAGE  
 MANHOURS INCREASING BASE



-  UNIT 2&0 I&C CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31300  
 TARG SCH 32 ES CUM
-  UNIT 1 I&C CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31300  
 TARG SCH 31 ES CUM



MIDLAND PROJECT RESOURCE CURVE - REVISION 12  
 MAINTENANCE MECHANICS  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL \* SYSTEMS - 13 MM/1/DAY



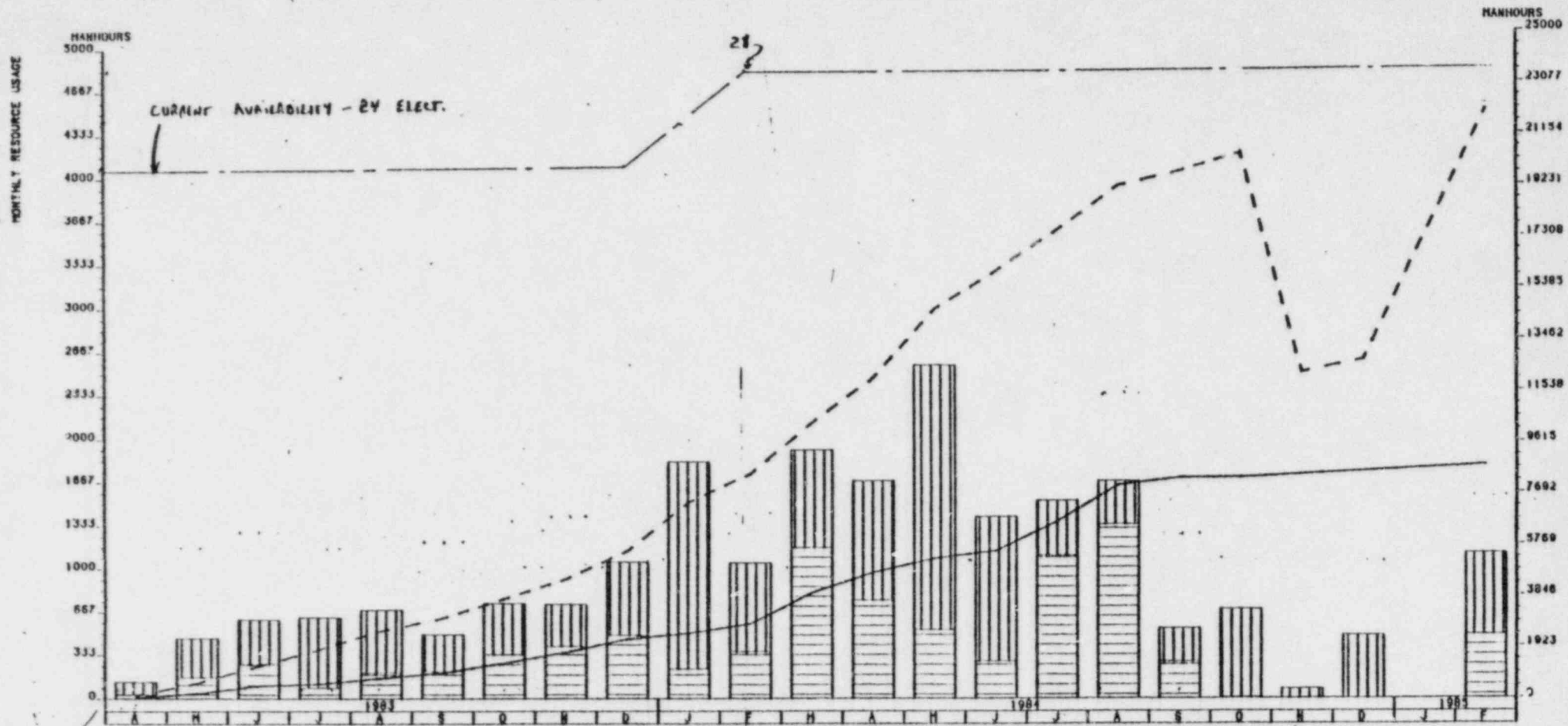
MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE

CUMULATIVE RESOURCE USAGE  
 MANHOURS INCREASING BASE



 UNIT 2&0 MM FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31500  
 TARG SCH 32 ES  
  
 UNIT 1 MM FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31500  
 TARG SCH 31 ES

 UNIT 2&0 MM CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31500  
 TARG SCH 32 ES CUM  
  
 UNIT 1 MM CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31500  
 TARG SCH 31 ES CUM



MIDLAND PROJECT RESOURCE CURVE - REVISION 12  
 MAINTENANCE ELECTRICIANS  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL SYSTEMS - 6 Elect /DAY



MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE

-  UNIT 2&0 ME FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31400  
 TARG SCH 32 ES
-  UNIT 1 ME FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31400  
 TARG SCH 31 ES

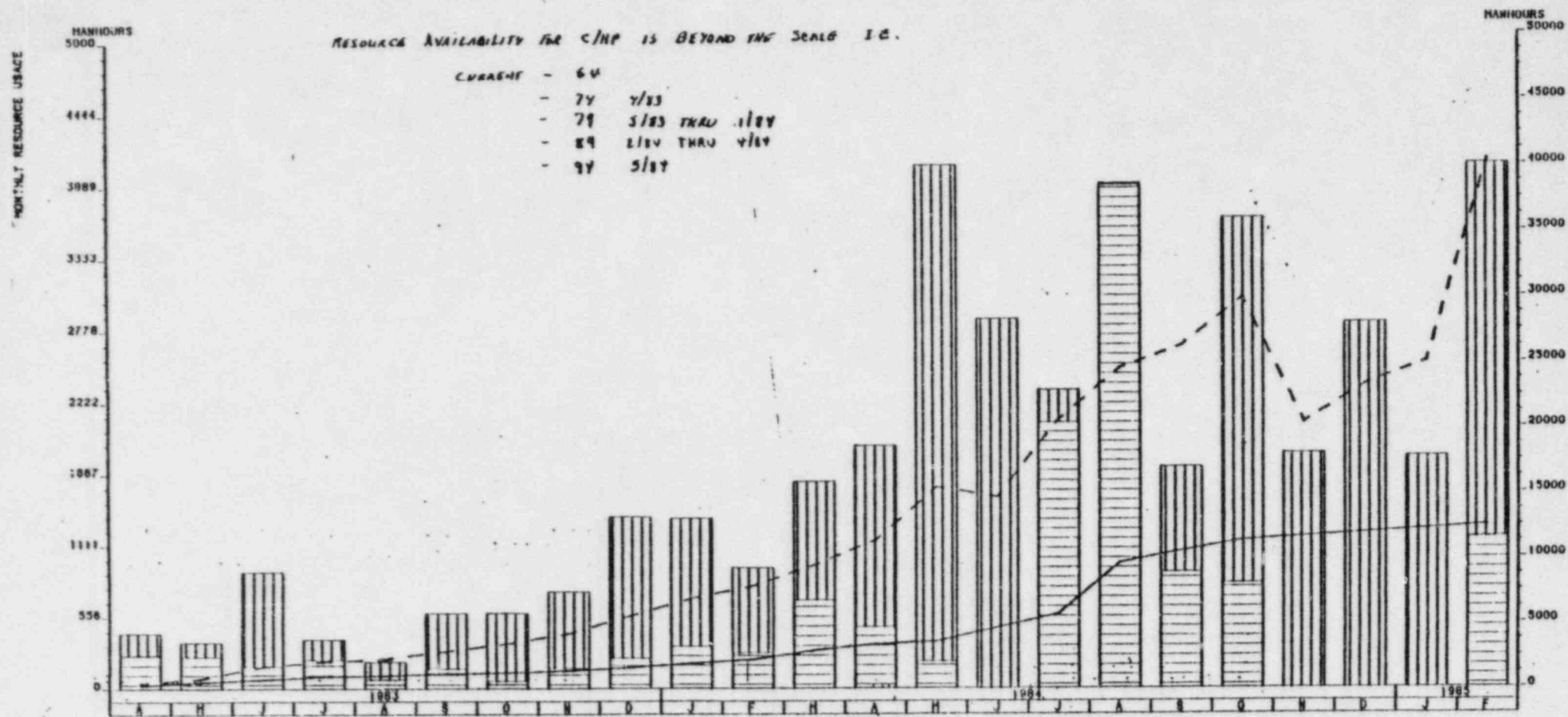
CUMULATIVE RESOURCE USAGE  
 MANHOURS INCREASING BASE

-  UNIT 2&0 ME CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31400  
 TARG SCH 32 ES CUM
-  UNIT 1 ME CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31400  
 TARG SCH 31 ES CUM

MIDLAND PROJECT RESOURCE CURVE - REVISION 12  
 CHEMICAL AND HEALTH PHYSICS TECHNICIANS  
 LEVELIZED MANPOWER PROJECTIONS  
 TOTAL SYSTEMS - 10 C/HP /DAY

RESOURCE AVAILABILITY FOR C/HP IS BEYOND THE SCALE I.E.

- CURRENT - 6V  
 - 7V 7/83  
 - 7V 5/83 THRU 1/84  
 - 8V 2/84 THRU 4/84  
 - 9V 5/84



MONTHLY RESOURCE USAGE  
 MANHOURS INCREASING BASE

CUMULATIVE RESOURCE USAGE  
 MANHOURS INCREASING BASE

- UNIT 2&0 C&H FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31900  
 TARG SCH 32 ES
- UNIT 1 C&H FORECASTED MONTHLY MANHOURS  
 MANHRS RESOURCE 31900  
 TARG SCH 31 ES

- UNIT 2&0 C&H CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31900  
 TARG SCH 32 ES CUM
- UNIT 1 C&H CUMULATIVE MANHOURS  
 MANHRS RESOURCE 31900  
 TARG SCH 31 ES CUM

		PROG	NSSS	AUX	TURB HVAC	FEED COND	ELEC	I & C	PS	TOTAL	REMARKS	
ESTIMATED TO BE DEVELOPED	TP	20	66	43	29	17	44	55	0	268	725 LAST REPORT	
	AP	1	0	5	37	34	10	1	40	128		
	FP	0	26	52	26	54	2	2	6	168		
	SP	19	6	12	1	4	9	68	—	119		
	GP	7	0	0	6	4	21	7	1	46		
TOTAL	GP	7	0	0	6	4	21	7	1	46		
729	SUB-TOTAL	47	98	112	99	107	86	133	47	729		
DRAFTS NOT SUBMITTED BY DISCIPLINES	TP	3	3	9	4	7	26	9	—	61	129 LAST REPORT	
	AP	0	—	2	2	13	10	1	9	37		
	FP	—	0	0	0	1	0	2	1	4		
	SP	11	0	0	1	0	3	0	—	15		
	GP	0	—	—	0	1	0	0	1	2		
TOTAL	GP	0	—	—	0	1	0	0	1	2		
119	SUB-TOTAL	14	3	11	7	22	39	12	11	119		
PROCEDURES IN REVIEW & APPROVAL CYCLE	TP	14	9	21	14	4	5	5	—	72	217 LAST REPORT	
	AP	0	—	2	11	13	0	0	23	49		
	FP	—	3	21	8	13	1	0	2	48		
	SP	6	0	5	0	2	4	1	—	18		
	GP	3	—	—	4	0	0	1	0	8		
TOTAL	GP	3	—	—	4	0	0	1	0	8		
195	SUB-TOTAL	23	12	49	37	32	10	7	25	195		
PROCEDURES IN TWG REVIEW CYCLE	TP	3	26	7	11	0	7	24	—	78	86 LAST REPORT	
	AP	—	—	—	—	0	—	—	—	0		
	FP	—	—	—	—	—	—	—	—	—		
	SP	2	0	1	0	—	0	4	—	7		
	GP	2	—	—	0	0	0	0	0	2		
TOTAL	GP	2	—	—	0	0	0	0	0	2		
87	SUB-TOTAL	7	26	8	11	0	7	28	0	87		
APPROVED TEST PROCEDURES	TP	0	28	6	0	0	6	17	—	57	293 LAST REPORT	
	AP	1	—	1	24	8	0	0	8	42		
	FP	—	23	31	18	40	1	0	3	116		
	SP	0	6	6	0	2	2	63	—	79		
	GP	2	—	—	2	3	21	6	0	34		
TOTAL	GP	2	—	—	2	3	21	6	0	34		
328	SUB-TOTAL	3	57	44	44	53	30	86	11	328		
PERCENT COMPLETE (APPROVED Vs EST. TOTAL)		TOTAL	6	58	39	44	50	35	65	23	45	40 LAST REPORT
TOTAL												
45%												

TABLE I



TABLE 2 - TEST PROCEDURE PERFORMANCE COMPLETIONS

<u>PROCEDURE NO</u>	<u>TEST</u>	<u>RESULTS REVIEW STATUS</u>
<u>PREOPERATIONAL TESTS</u>		
NONE		
<u>ACCEPTANCE TESTS</u>		
OAP-PTH.03	Diesel Bldg Electric Heating Acceptance Test	DS/TE Review
<u>FLUSHES</u>		
OFP-AN.01	Demineralized Water Storage and Transfer Header Flush	Approval Cycle
OFP-AN.02	Demineralized Water Hose Station Flush	Approval Cycle
OFP-AN.04	Demineralized Water Flush of Containment Piping	Approval Cycle
OFP-AT.02	Demineralized Water Supply Flush	Approval Cycle
1FP-CB.01	Turbine Generator Lube Oil And Hydrogen Seal Oil Flush	Approval Cycle
2FP-CB.01	Turbine Generator Lube Oil And Hydrogen Seal Oil Flush	DS/TE Review
OFP-CF.01	Lube Oil Storage Purification And Transfer System	DS/TE Review
1FP-CF.01	Unit 1 Lube Oil Purification System Flush	Approval Cycle
2FP-CF.01	Unit 2 Lube Oil Purification System Flush	DS/TE Review

TABLE 2 - TEST PROCEDURE PERFORMANCE COMPLETIONS

<u>PROCEDURE NO</u>	<u>TEST</u>	<u>RESULTS REVIEW STATUS</u>
OFF-FA.01	Aux Steam Boiler System	Approval Cycle
OFF-GB.02	Admin Bldg Cooling Tower System	Approved
1FP-KE.02	Fuel Handling Bridge Air System Flush	Approved
2FP-KE.02	Fuel Handling Bridge Air System Flush	Approved
OFF-KH.02	Hydrogen Supply System Flush	Approval Cycle
OFF-KH.06	Evaporator Building Lab Natural Gas	Approval Cycle
OFF-KH.07	Evaporator Building Lab Vacuum System Flush	Approved
<u>SPECIFIC TESTS</u>		
OSP-ANN.02	OC173 Annunciator Cab Energization	Approval Cycle
OSP-ANN.03	OC155 Annunciator Cab Energization	Approval Cycle
OSP-AXB.01	Aux Boiler Initial Operation And Boilout	Approval Cycle
1SP-CRD.03	Control Rod Drive Tech Stator Pre-Inst Check	Approval Cycle
2SP-CRD.03	Control Rod Drive Tech Stator Pre-Inst Check	Approval Cycle
2SP-DHR.01	Decay Heat Removal Initial Pump Run	Approval Cycle

TABLE 2 - TEST PROCEDURE PERFORMANCE COMPLETIONS

<u>PROCEDURE NO</u>	<u>TEST</u>	<u>RESULTS REVIEW STATUS</u>
OSP-FHS.06	Receipt of Dummy Fuel Assemblies and Control Rods	Approved
ISP-NNI.01	Non-Nuclear Instrumentation (NNI) Initial Energization	Approval Cycle
OSP-PIN.05	BOP Rack Power Supply Checkout	Approved

<p>...AC DEF-PA... SEC 7.1 (11/5)2E</p> <p>UNIT 2/COMMON</p>	<p>...SLA DSP-PIE... PS RACK C/L 20-99</p> <p>UNIT 2/COMMON</p>	<p>...UGH ZEP-EG... FLUSH DOWNSTREAM PILING</p> <p>UNIT 2/COMMON</p>
<p>JAN</p>	<p>FEB</p>	<p>MAR</p>

1983



<p>           CRMC JEP-AT.04 LOGIC VERIF (ATH)2T            CRPL JEP-PL.01 SYSTEM FLUSH (EPH)1E            CATL JEP-AT.03 FLUSH LOOP 1 (EFS)1T            CATL JEP-AT.01 LP FD DDF FLUSH (EFS)1T            CATL JEP-AT.03 FLUSH LOOP 2 (EFS)1T            CATL JEP-AT.01 LP FD PYP SUCTION FLSH (EFS)1T              UNIT 2/COMMON              UNIT 1         </p>	<p>           CPFL JEP-FHS.05 FUEL XFER EQ C/O/ADJ (EFS)1C            CAER-2 JEP-AT.05 OPEN X-F VAL F/LINE IN (EFS)1T            CRMO JEP-AT.06 LOGIC VERIFICATION (EFS)1C            CATL JEP-AT.05 HP STM FLSH LINE IN TUNNEL (EFS)1T            CATL JEP-AT.03 FLUSH LOOP 3 (EFS)1T            CATL JEP-AT.03 FLUSH LOOP 4 (EFS)1T            CATL JEP-AT.01 LP FD PYP SUCTION FLSH (EFS)1T            CATL JEP-AT.01 MISC. FLUSH LP FD (EFS)1T            CATL JEP-AT.05 HP STM FLSH TO TUNNEL (EFS)1T              UNIT 2/COMMON              UNIT 1            IKEL JEP-FHS.05 FUEL XFER C/O &amp; ADJ (EFS)1C            IKEL JEP-KC.01 FUEL XFER MECH FLUSH (EFS)1C            IKAC JEP-KA.01 BLOW DOWN (EFS)1E         </p>	<p>           CSAB JEP-ESA.01 IAC C/O (EFS)1C            CECA JEP-PC.01 TO FZR/VALP PMP/EX SAMP (EFS)1E            CRCC JEP-OC.02 VELOCITY FLUSH (EFS)1E            CRCC JEP-FHS.02 ABFH BRIDGE (DNY IN) (EFS)1C            CATL JEP-PSS.03 8.04 HAICER CHECK COLD (EFS)1T            CATL JEP-AT.03 EVAP TUBE SIDE CLEANING (EFS)1T            CATL JEP-AT.05 HP STM FLSH FM PRV (EFS)1T            CATL JEP-AT.05 HP STM INSP &amp; CLOSE (EFS)1T            CATL JEP-AT.03 FLUSH LOOP 5 (EFS)1T            CATL JEP-AT.03 FLUSH LOOP 6 (EFS)1T            CATL JEP-AT.05 LP STM DEEP HER EXTRACTIO (EFS)1T            CATL JEP-AT.03 FLUSH LOOP 7 (EFS)1T              UNIT 2/COMMON              UNIT 1            IPLA JEP-PL.01 FLUSH UNIT 1 PRIM WTP SYS (EFS)1E            IBNA JEP-BN.01 FLUSH EMST LINES (EFS)1E            IAPA-2 JEP-AT.05 OPEN BTVS F/IS/P (EFS)1T         </p>
<p style="text-align: center;">JUL</p>	<p style="text-align: center;">AUG</p>	<p style="text-align: center;">SEP</p>

1983

0KEM 2TP-FHS.05 RPHN DRY PREOP & INCDV (EFS)2A  
 0S40 2TP-ESA.01 LOGIC PRE-OP (ESA)2C  
 0KE1 2TP-FHS.04 FUEL XFER PRE-OP (EFS)2C  
 0EGC 2SP-PH.06 MU PMP INIT PGM (EPL)2C  
 0RLK 2SP-PH.06 DCP RACK C/O 20-445 ARR (EFA)2C  
 0SAA 2SP-ESA.02 ECCAS LOGIC TEST (EFS)2C  
 0SFI 2SP-CRE.01 C/O C/D MG SET (EFC)2C  
 0CCA 2FP-CE.01 IPR & EXTERNAL FLUSH (ECS)2P  
 0CGA 2FP-BC.01 FLSH W/CH PMP TO MU TANK (EPL)2C  
 0PGC 2FP-BC.01 FLSH-MU TK TO MU PMP (EPL)2C  
 0PCC 2FP-BC.01 FLSH TO SUCT-OF FILL PMP (EPL)2C  
 0HDE 2FP-EG.01 FLUSH HPI LINES (EPL)2C  
 0BGC 2FP-EG.01 FLUSH MAKEUP SYS (EPL)2C  
 0ENA 2FP-EP.01 FLUSH MUST LINES (EKS)2C  
 0EGA 2FP-EG.01 FLUSH SEAL RETURN COOLERS (ECS)2P  
 0EGR 2FP-EG.01 MU PMP L/O CLRS 2ESR&P (ECS)2P  
 0EAI 2FP-CA.01 PRELIM FLUSH & HAL LOOP E (EKS)2P  
 0AC 2FP-AE.01 CPLT IPR/CCRD SYS FLUSH (EFS)2C  
 0AEA 2FP-AE.01 IPR FWH/RECRC FWH FM OCA (EFS)2C  
 0AFA 2FP-AP.02 GRAY FLSH ELEC APLP SUCT (ECS)2P  
 0NEC 2TP-FHS.01 NEW FUEL ELEVATOR PRE-OP (EFS)2C  
 0HEC 2AP-FPC.05 FULL IPRF SYS DRY ACCEPT (EFS)2C  
 0LH 2AP-HP.01 FILL OT-1M (EPL)2C  
 0EP 2AP-PAS.03 HP AUX PMP INIT STARTUP (EAS)2P  
 0EA 2SP-SWS.02 INIT RUN B & D PUMPS (EAS)2P  
 0PLP 2FP-EL.02 FLUSH TO OT-15 THRU X-GV (EPL)2C  
 0PL 2FP-EL.01 SYSTEM FLUSH (EPL)2C  
 0ECA 2FP-EC.01 VEL FLSH ENTIRE SYSTEM (EFC)2C  
 0ATA 2FP-AT.05 LP STM HBR INSPECT (EFS)2C

UNIT 2/COMMON

UNIT 1

0HE1 1TP-FHS.04 FUEL XFER PRE-OP (EFS)2C  
 0PCA 1FP-EC.01 GRAY FLSH TO EMP SUCT (EPL)2P  
 0ECA 2FP-EC.01 IPR/FWH/RECRC FWH FM OCA (EFS)2C  
 0EGA 2FP-EG.01 FLUSH W/CH PMP TO MU TANK (EPL)2C  
 0EGR 2FP-EG.01 FLUSH RETURN COOLERS (ECS)2P  
 0EAI 2FP-CA.01 PRELIM FLUSH & HAL LOOP E (EKS)2P  
 0ECA 2FP-EC.01 VEL FLSH ENTIRE SYSTEM (EFC)2C  
 0EGR 2FP-EG.01 MU PMP L/O CLRS 2ESR&P (ECS)2P

OCT

0AKC 2FP-AN.01 IPR 0P&P-15&20/CPLT FLSH (ECC)2C  
 0EGA 2FP-EG.01 2 FSH ELN/FIL SPGE TK LA (ECS)2C  
 0EGA 2FP-EG.01 GRAY FLUSH TO PMP SUCT (ECS)2C  
 0AD 2FP-AE.01 DRY/CLN/15P HWELL/02 (EFS)2C  
 0AE 2FP-AE.01 REC FLSH FM THRU COND DEM (EFS)2C  
 0AD 2FP-AE.01 RECRC FLSH COND THRU C (EFS)2C  
 0AKA 2FP-AN.01 SM IPR & COMPLETE FLUSH (ECC)2C  
 0APA 2FP-AP.01 COLD DEM/IN FLSH SM PIPE (EFD)2P  
 0ALA 2FP-AL.01 FLUSH TO POND (EPL)2C  
 0ALA 2FP-AL.01 FLUSH TO OTCG (EPL)2C  
 0ALA 2FP-AL.01 FLSH APLW/CYC CLNUP TO DA (EPL)2C  
 0ENA 2FP-EP.01 FSH TO FWH DISCH FM AFW (EFS)2C  
 0ENA 2FP-EP.01 HLOW H2 TO CF TKS (EFS)2C  
 0AKC 2FP-AN.04 COND DEM INST PPG AIF PLO (ECC)2C  
 0APA 2FP-AP.04 COND DEM INST PPG AIF ELO (ECC)2C  
 0ATL 2FP-AT.01 HP-FU HCP FLUSH (EFS)2P  
 0KCC 2FP-KE.03 SYS FLUSH & C/O (EKS)2P  
 0OCE 2FP-OC.01 JACRET WATER FLUSH (EPL)2C  
 0KHH 2FP-KH.00 VAC (TURB LAE) RE/FUNC (ECS)2C

UNIT 2/COMMON

UNIT 1

0HBA 1TP-PCS.15 REMOVE CORE SUPPORT ASSY (ECS)1C  
 0ECA 1SP-DMP.01 DR IPR & RECRC TO PAST (EPL)2P  
 0HCC 1SP-MUP.05 MU PMP INIT PGM (EPL)2C  
 0SAR 1SP-ESA.01 IAC C/O (ESA)1C  
 0HLP 2SP-PH.06 DCP RACK C/O 10-445 ARR (EFA)2C  
 0SFP 1SP-CRD.01 C/O CRD MG SET (EFD)2C  
 0ECA 1FP-EC.01 FLSH-PZR/MUP PPRS&PX SAM (EPL)2P  
 0CGA 1FP-EC.01 FLSH W/CH PMP TO MU TANK (EPL)2P  
 0EGH 1FP-EG.04 FLUSH DOWNSTREAM PIPING (EPL)2P  
 0EGH 1FP-EG.02 VELOCITY FLUSH (EPL)2P  
 0EGG 1FP-EG.02 FILL IT-6 (EPL)2P  
 0EGC 1FP-EG.02 FLUSH TO 3 FILL IT-7, A, E, C (EPL)2P  
 0EGC 1FP-EG.01 FLUSH (EPL)2P  
 0EGC 1FP-EG.01 MUST FLUSH MU PMP SUCTION (EPL)2P  
 0EGC 1FP-EG.01 FLSH FR MU TANK TO MU PMP (EPL)2P  
 0EGC 1FP-EG.02 GRAY FLSH TO RA ADD PMP S (EPL)2P  
 0PCH 1FP-EG.04 FLUSH SUCTION OF IP-4A (EPL)2P  
 0ECH 1FP-EG.04 FLUSH SUCTION OF IP-4B (EPL)2P  
 0EGA 2FP-EG.01 MU PMP L/O CLRS 1P-SFA (ECS)2P  
 0EGA 2FP-EG.01 FLUSH SEAL RETURN COOLERS (ECS)2P  
 0EAE 2FP-EA.01 PRELIM FLUSH & HAL LOOP E (EKS)2P

NOV

0ACE 1FP-AG.01 PROCF FLUSH & CAP CHECK (EFC)2C  
 0AGE 2FP-AG.01 INST AIR FLOW (EFC)2C  
 0AHP 2FP-RA.02 BLOWDOWN SEC 7.1 (EAS)2C  
 0CEA 2TP-FPC.01 PREOP TEST (EFC)2C  
 0ATE 2AP-PSS.01 INTERLOCK & CONT. TEST (EFS)2P  
 0ATA 2AP-PSS.03 HTUP MU STM-XFER VLVS (EFS)2P  
 0ATA 2AP-PSS.03 HTUP MU STM LIFE TO 150 (EFS)2P  
 0ATO 2AP-PSS.03 HP/LP LINE INIT HEATUP (EFS)2P  
 0ATA 2AP-PSS.03 HTUP LP STEAM TO TURB (EFS)2P  
 0ATA 2AP-PSS.03 SET MU STM HANGERS (EFS)2P  
 0ATE 2FP-AT.06 INSPECT & CLEAN HEADER (EFS)2P  
 0ATA 2FP-AT.05 COND/VENT FLSH FM PSS BLDG (EFS)2P  
 0ATL 2FP-AT.01 MISC FLUSH HP FD (EFS)2P  
 0ATA 2FP-AT.05 COND/VENT FLSH 1/2UPE BLDG (EFS)2P  
 0HCG 2FP-AT.01 FLUSH COOLING WATER LINES (ECS)2P  
 0ATA 2FP-AT.05 LP STM HBR CLOSE EXT (EFS)2P  
 0RCH 2FP-AT.01 FLUSH SAMPLE LINES (EFS)2P  
 0AGA 2FP-AG.01 IPR & FLUSH (EFC)2C  
 0AQA 2FP-AG.01 FILL SYS W/INA CH (EFC)2C  
 0AGA 2FP-AG.01 FILL & VENT SYSTEM (EFC)2C  
 0AGA 2FP-AG.01 DRAIN & FLOW DRY (EFC)2C

UNIT 2/COMMON

UNIT 1

0SAP 1TP-ESA.01 ECCAS LOGIC PRE-OP (ESA)1C  
 0BCC 1TP-PCS.03 RCF IMP & LOGIC C/O (EFS)1C  
 0SAA 1SP-ESA.02 ECCAS LOGIC TEST (EFS)1C  
 0SFF 1SP-CRD.02 INIT ENER/CALB CRD-SYS (EFD)2C  
 0HGE 1FP-EG.01 FLUSH HPI LINES (EPL)2P  
 0EGC 1FP-EG.01 FLUSH-SUCT OF CF FILL PMP (EPL)2P  
 0EGC 1FP-EG.01 FLUSH SEAL INJECTION LINES (EPL)2P  
 0EGC 1FP-EG.01 FLUSH OF FILL PMP TO CF TP (EPL)2P  
 0EBA 1FP-EP.01 PM CF/DN/MU FLUSH TO HCS (EFS)2P  
 0ENA 1FP-EP.01 CF FLUSH TO BX VESSL (EFS)2P  
 0ENA 1FP-EP.01 FLSH MU SUPPLY TO CF (EFS)2P  
 0EGA 2FP-EG.01 FLUSH RCP MOTOR COOLERS (ECS)2C  
 0ADA 1FP-AE.01 FLSH TO C/OA VIA M/S REC (ECS)2P  
 0APA 2FP-AP.01 PARTIAL FLUSH TO HOTWELL (EFS)2P  
 0AEA 1FP-AE.01 FLOW IPR/EL FM GA TO CESH (EFS)2C  
 0AD 1FP-AE.01 FILL DRY/COND PMP ON M/H (ECS)2C  
 0AD 1FP-AE.01 COMPL CON SYS IPR/CCRD FL (ECS)2C  
 0AFA 2FP-AP.01 GRAVITY FL ELEC APLP SUCT (ECS)2P  
 0EAD 2FP-EA.01 PRELIM FLUSH & HAL LOOP E (EKS)2P  
 0ENA 1FP-EP.01 BLOW H2 TO CF TKS (EFS)2P  
 0AKA 1FP-AP.04 COND DEM INST AIR BLOW (ECC)2C

DEC

UNIT 2/COMMON

2GBA 2TP-RCS 16 VENT VLV, SHT & DN TEST (RCS) 20  
 2HBA 2TP-CHP 01 RCS CHEM TEST RCS FILL (RCS) 20  
 2SBD 2TP-CHP 02 OTSG PHEBR CHEM/OTSG FILL (RCS) 20  
 2GBA 2TP-MCP 01 MU/P/RX CHEM AD VV/T/SHT (MCP) 20  
 2GBA 2TP-RCS 10 RX VESSEL STD HGM TEST (RCS) 20  
 2GBA 2TP-RCS 11 SET FLEUP IN RV (RCS) 20  
 2GBA 2TP-RCS 14 PM RCS INITIAL FILL (RCS) 20  
 2GBA 2TP-RCS 15 SET HEAD & TCH/ION (RCS) 20  
 2GBA 2TP-RCS 04 CISO FILL & LVL VEF IF (RCS) 20  
 2HBF 2TP-RCS 05 PZR LVL VERIFY RCS FILL (RCS) 20  
 2GBA 2TP-RCS 09 PRE-HFT INTER INSP/FLEA (RCS) 20  
 2SAA 2TP-ELA 02 ECCAS LOGIC PRE-OP (ELA) 20  
 2SFH 2TP-CPE 01 CRD PRE-OP (CPE) 20  
 2SCP 2SP-MI 06 POWER SUPPLY CALIB. (MI) 20  
 2SCD 2SP-MI 05 PRGB PROXIMETER CALIB. (MI) 20  
 2SCB 2SP-MI 10 DUAL PULSE SHAPER CALIB. (MI) 20  
 2SCR 2SP-MI 07 DUAL RAD VID MON CALIB. (MI) 20  
 2SCD 2SP-MI 08 TS-9 TAPE RECORDER C/O (MI) 20  
 2SCR 2SP-MI 09 BERT HELV 9000 SERIES C/O (MI) 20  
 2AE 2SP-CHP 01 COLG/FW ALKALINE CLFAN (CHP) 20  
 2AF 2SP-CHP 01 CHEM CLEAN COND & FW SYS (CHP) 20  
 2CYA 2FF-CP 01 FILL IPR & FLUSH (CP) 20  
 2AEZ-2 2FF-AL 05 CLOGE MS XFER VALVE (AL) 20  
 2AB 2FF-AL 01 CPWL DOWN STM LINE (AL) 20  
 2AKC 2FF-AK 02 COND DEMIN CHEM ADD FLUSH (AK) 20  
 2ANE 2FF-AK 01 FILL & FLUSH (AK) 20  
 2APA 2FF-AP 02 COND DEMIN FLSH LG PIPE (AP) 20  
 2BBA 2TP-PH 01 INSPECT & CLEAN RCS (PH) 20  
 2BCC 2FF-PH 01 TO SEAL FIN CLR/MU TK (PH) 20  
 2BGB 2FF-BG 01 FLSH EQ VENTS, DRNS W/ 2 (BG) 20  
 2EAD 2FF-EA 01 PRELIM FLUSH & EAR LOOP D (EA) 20  
 2EGA 2FF-EG 01 IPR/FSH CCU/DH HT EXC LP (EG) 20  
 2EGA 2FF-EG 01 IPR CRD ESTP PMP/FSH CRD (EG) 20  
 2EGA 2FF-EG 01 FSH DSTR PMP SUC/FSH CRD (EG) 20  
 2EGA 2FF-EG 01 FLUSH GAC COMPRESSION (EG) 20  
 2EGA 2FF-EG 01 MCP SEAL CLFS 2FSIA (EG) 20  
 2EGA 2FF-EG 01 FUEL FOGL HT EXCHS 3E-7A (EG) 20  
 2EGA 2FF-EG 01 LETDOWN CLPS 2L-5T AXE (EG) 20  
 2EGA 2FF-EG 01 FLUSH RAL WST EVAP 3E-2T (EG) 20  
 2EGA 2FF-EG 01 FLUSH RAC WST EVAP 3E-2A (EG) 20  
 2EGA 2FF-EG 01 FLUSH DECAEFIER DP-4-B/C (EG) 20  
 2EGA 2FF-EG 01 SPR PMP SEAL CLFS 2P-6A (EG) 20  
 2SJA 2FF-SJ 01 IPR & FLUSH (SJ) 20  
 2AQC 2FF-AG 01 FLUSH & PUMP CAP CHECKS (AG) 20  
 2AGC 2FF-AG 01 DRN TKS & REFL W/2HR SCL (AG) 20

UNIT 2/COMMON

2GBA 2TP-RCS 04 PRE-HFT INTERN INSP (RCS) (RCS) 20  
 2BCC 2TP-RCS 05 MCP IM & LOGIC (RCS) 20  
 2GBA 2TP-RCS 04 PRE-HFT INTERN INSP (RV) (RCS) 20  
 2SFA 2SP-CPE 09 PI C/O (CPE) 20  
 2PLG 2SF-FIT 06 WOP PACK C/O 2C-31 (FIT) 20  
 2SFH 2SP-CPE 02 INIT EMER/CALIB CHEM SYS (CPE) 20  
 2CCA 2FF-CC 01 COMPLETE SYS FLUSH (CC) 20  
 2EGC 2FF-EG 01 FLSH CF FILL PMP TO CF TK (EG) 20  
 2EGD 2FF-EG 01 FLUSH SEAL INJECTION LINES (EG) 20  
 2BBA 2FF-BH 01 FLSH MU SUPPLY TO CF (PH) 20  
 2BBA 2FF-BH 01 CF FLUSH TO RX VESSEL (RCS) 20  
 2BBA 2FF-BH 01 PH CF/CH/MU FLUSH TO RCS (RCS) 20

OCT

NOV

DEC

1983 (CONT.)



OCT

NOV

DEC

UNIT 2/COMMON

2BBA 2TP-CFS.31 CF CNR VLVE WV/SSHT 4RF512C  
2BBA 2TP-FHS.02 CANAL HYDR/LET FH 4RCS12C  
2BBA 2TP-FFC.01+ FILL 4EF CANAL 4RF512C  
2BBA 2TP-FCS.XX SET CSA/INDEX N6 POLAR 4RF512C

1985 (CONT.)<sup>2</sup>

1EN1 ZFP-EM.31 FLSH SUCT PIPE TO RW SFRA (EFS)21  
 1ENP ZFP-EM.31 FLUSH HYDRAZINE (EFS)21  
 1ENR ZFP-EM.31 CLR 21-44/27H HYD PMP SUC (EFS)21  
 1LNA ZFP-EM.31 IPR & FLSH TO COOLG FONE (EFS)21  
 1EPA ZFP-EM.31 FSH TO VLV UPS OF LWS DPN (EFS)21  
 1EPC ZFP-EM.31 EMER SUMP FLUSH (EFS)21  
 1EPR ZFP-EM.31 STM BLOW MN STEAM LINES (EFS)21  
 1EQA ZFP-EM.31 STEAM PLOC SEAL LINES (EFS)21  
 1EPP ZFP-EM.31 COND LEM INST PPG AIR FLO (EFS)21  
 1EQD ZFP-EM.31 AIR FLOW PIPING (EFS)21  
 1EQE ZFP-EM.31 HE AIR VLV COMSTN LP TEST (EFS)21  
 1EQA ZFP-EM.31 HAIGE CHECK COLO (EFS)21  
 1EQA ZFP-EM.31 RELIEF VALVE TESTING (EFS)21  
 1EQA ZFP-EM.31 SET LP STM HDR HANGERS (EFS)21  
 1EQA ZFP-EM.31 LP EVAL TULE INTEG CHECK (EFS)21  
 1EQA ZFP-EM.31 PRV PMS 1 1E-9220.9 (EFS)21  
 1EQA ZFP-EM.31 LP EVAL L HEATUP (EFS)21  
 1EQA ZFP-EM.31 STM FLARE SAMPLE ACCEPT (EFS)21  
 1EQA ZFP-EM.31 INITIAL ESCD ENERGIZATION (EFS)21  
 1EQA ZFP-EM.31 CLR. INSE. PLOC LP HDR-DCV (EFS)21

UNIT 2/COMMON

UNIT 1

1EPA ITP-EM.01 CP CPM VLV W/CSHT (EFS)10  
 1EQA ITP-EM.01 DNR PREVVSHT (EFS)10  
 1EQA ITP-EM.01 FILL AIR CATALYTIC IN (EFS)10  
 1EQA ITP-EM.01 PH PHE-IFT INITIALS INSP (EFS)10  
 1EQA ITP-EM.01 VENT VLV/CSHT/ACH TESTS (EFS)10  
 1EQA ITP-EM.01 SET CS/INDEX FE CP/LE (EFS)10  
 1EQA ITP-EM.01 CPO PRE CP (EFS)10  
 1EQA ITP-EM.01 INIT ICS FWER (EFS)10  
 1EQA ZFP-EM.31 FLSH/CLN/FILL SPCE TK LP (EFS)10  
 1EQA ZFP-EM.31 GRAVITY FLSH TO PMP SUCT (EFS)10  
 1EQA ZFP-EM.31 REC FL FL THRU COND DEMIN (EFS)10  
 1EQA ZFP-EM.31 REC FLSH COND THRU DEMP (EFS)10  
 1EQA ZFP-EM.31 COND DEMIN FL SMALL PIPE (EFS)10  
 1EQA ZFP-EM.31 IPR & COMPLETE FLUSH (EFS)10  
 1EQA ZFP-EM.31 FL 2FL/VC CLCATUF TO E (EFS)10  
 1EQA ZFP-EM.31 FLUSH TO OTSGS (EFS)10  
 1EQA ZFP-EM.31 FLUSH TO PCRD (EFS)10  
 1EQA ZFP-EM.31 FLUSH CONDENSATE XFER SYS (EFS)10  
 1EQA ZFP-EM.31 FLUSH-PMP DISCH FM AIR FV (EFS)10  
 1EQA ZFP-EM.31 COND DEMIN INST AIR FLOW (EFS)10  
 1EQA ZFP-EM.31 COND DEMIN INST AIR FLOW (EFS)10  
 1EQA ZFP-EM.31 PLOC CLN (EFS)10

JAN

UNIT 1

1IEA ITP-EM.06 CANAL HYDRO/NET FH (EFS)10  
 1IEA ITP-EM.02 OTSG PREBLR CHN FILL (EFS)10  
 1IEA ITP-EM.01 RCS CHEM TEST RCS FILL (EFS)10  
 1IEA ITP-EM.01 MUMP AIR CHEM FIDVV/VSHT (EFS)10  
 1IEA ITP-EM.01 PPOCFE INTRM EXP RCS FILL (EFS)10  
 1IEA ITP-EM.01 SET HEAD & TENSION (EFS)10  
 1IEA ITP-EM.01 RX VESSEL STD HDL TEST (EFS)10  
 1IEA ITP-EM.01 SET PLEUM IN RV (EFS)10  
 1IEA ITP-EM.01 OTSG FILL/LEVEL VERIFY (EFS)10  
 1IEA ITP-EM.01 PH RCS INITIAL FILL (EFS)10  
 1IEA ITP-EM.01 PZR LEVEL VERIFY RCS FILL (EFS)10  
 1IEA ITP-EM.01 ECCAS LOGIC PPOCF (EFS)10  
 1IEA ITP-EM.01 NU SYS PRE-OP (PARTIAL) (EFS)10  
 1IEA ITP-EM.01 PI C/O (EFS)10  
 1IEA ITP-EM.01 POWER SUPPLY CALIB. (EFS)10  
 1IEA ITP-EM.01 PROB PROXIMETER CALIB. (EFS)10  
 1IEA ITP-EM.01 DUAL RAD VIB MON CALIB (EFS)10  
 1IEA ITP-EM.01 COND/FL ALKALINE CLEAN (EFS)10  
 1IEA ITP-EM.01 COMPLETE SYS FLUSH (EFS)10  
 1IEA ITP-EM.01 IPR & EXTERNAL FLSH (EFS)10  
 1IEA ITP-EM.01 FILL IPR & FLUSH (EFS)10  
 1IEA ITP-EM.01 FILL & FLUSH (EFS)10  
 1IEA ITP-EM.01 IPR & COMPLETE FLUSH (EFS)10  
 1IEA ITP-EM.01 COND DEMIN CHEM ADD FLUSH (EFS)10  
 1IEA ITP-EM.01 PARTIAL FLUSH FROM 1EQA (EFS)10  
 1IEA ITP-EM.01 COND DEMIN FL LARGE PIPE (EFS)10  
 1IEA ITP-EM.01 INSPECT & CLEAN RCS (EFS)10  
 1IEA ITP-EM.01 FLSH EQ VENTS, PMS W/1 (EFS)10  
 1IEA ITP-EM.01 FLSH 55TA PMP SUC/VEP C/O (EFS)10  
 1IEA ITP-EM.01 SPR PMP SCAL CLRS 1E-44 (EFS)10  
 1IEA ITP-EM.01 FLSH LYDWH CLMS 1E-47 AFF (EFS)10  
 1IEA ITP-EM.01 IPR CRU ISTR EMP/FLSH C/O (EFS)10  
 1IEA ITP-EM.01 40 PMP SEAL CLRS 1E-41/40 (EFS)10  
 1IEA ITP-EM.01 IPR/FSH COWDHT HT EX LP (EFS)10  
 1IEA ITP-EM.01 FUEL POOL HT EXCHS 0E-76 (EFS)10  
 1IEA ITP-EM.01 IPR & FLUSH (EFS)10  
 1IEA ZFP-EM.31 FL/MP HEAD CAPACITY C/O (EFS)10  
 1IEA ZFP-EM.31 FLUSH & PMP CAPACITY CK (EFS)10  
 1IEA ZFP-EM.31 DRAIN TK & REFILL W/WH40H (EFS)10  
 1IEA ZFP-EM.31 DRAIN INS & REFILL W/WH2 (EFS)10  
 1IEA ZFP-EM.31 FLSH LVD TO RCS W/DH PUMP (EFS)10  
 1IEA ZFP-EM.31 PLOC/TIC HDR-AP VT 3HAR (EFS)10

FEB

1IEA ZFP-EM.31 FL CHEM WST REC PMP SUCT (EFS)10  
 1IEA ZFP-EM.31 FL W/UTILITY WTP TO POC (EFS)10  
 1IEA ZFP-EM.31 FL CHEM WST DMS TO REC TRILAS (EFS)10  
 1IEA ZFP-EM.31 GRAVITY FLUSH PUMP SUCT/IGL (EFS)10  
 1IEA ZFP-EM.31 FL LIG NET SYS W/UTIL WTP (EFS)10  
 1IEA ZFP-EM.31 IPR/FLSH PMP DIS-MIX BED (EFS)10  
 1IEA ZFP-EM.31 DEGAS INLET USING REC PMP (EFS)10  
 1IEA ZFP-EM.31 GRAY BRN EDT PMP SUC LINE (EFS)10  
 1IEA ZFP-EM.31 GRAY FLSH PUMP SUCT LINE (EFS)10  
 1IEA ZFP-EM.31 FIL LEGAS-FLA IPR FSH-SKS (EFS)10  
 1IEA ZFP-EM.31 3HAR/PAK GAS FLOWS (EFS)10  
 1IEA ZFP-EM.31 N2 BLOW GRS VENT HCP (EFS)10  
 1IEA ZFP-EM.31 N2 BLOW FESIN VENT HCP (EFS)10  
 1IEA ZFP-EM.31 N2 BLOW FM WST GAS DEC TR (EFS)10

UNIT 2/COMMON

UNIT 1

1IEA ITP-EM.01 NU SYS 1EWH CTL TRCFRM (EFS)10  
 1IEA ITP-EM.01 GRAM PZR BUBBLE (EFS)10  
 1IEA ITP-EM.01 PH RCS HYDRO TEST (EFS)10  
 1IEA ITP-EM.01 RCF INTR RUM (EFS)10  
 1IEA ITP-EM.01 (PART) AUX FM PRE-OP (EFS)10  
 1IEA ITP-EM.01 RCS RECIRC & FLOW ALARMS (EFS)10  
 1IEA ITP-EM.01 EMST RECIRC DEFURSTATION (EFS)10  
 1IEA ITP-EM.01 EMS ISOLATION VALVES (EFS)10  
 1IEA ITP-EM.01 PH HPI CSFAS TEST (EFS)10  
 1IEA ITP-EM.01 SM OTSG HYDRO (EFS)10  
 1IEA ITP-EM.01 PH RCP FLOW TEST (EFS)10  
 1IEA ITP-EM.01 PZR LEVEL VERIFY RCS HYDRO (EFS)10  
 1IEA ITP-EM.01 RCP START VOLT DOC TEST (EFS)10  
 1IEA ITP-EM.01 BENT NEW 90GR SERIES C/O (EFS)10  
 1IEA ITP-EM.01 COND/FL SYS FINE (EFS)10  
 1IEA ITP-EM.01 PRELIM FLUSH & BAL LOOP A (EFS)10  
 1IEA ITP-EM.01 HYDRAZINE SYS FLUSH (EFS)10  
 1IEA ITP-EM.01 CLR 1E-45/FLSH HYD PMP SU (EFS)10  
 1IEA ITP-EM.01 FLSH SUCT PPG TO AP SPRAY (EFS)10  
 1IEA ITP-EM.01 FLSH-VLV UPSTN OF LWS TP (EFS)10  
 1IEA ITP-EM.01 IPR AND FLSH TO COOLG FAD (EFS)10  
 1IEA ITP-EM.01 EMER SUMP FLUSH (EFS)10  
 1IEA ZFP-EM.31 PRELIM FLUSH & BAL LOOP A (EFS)10  
 1IEA ZFP-EM.31 PRELIM FLUSH & BAL LOOP B (EFS)10  
 1IEA ZFP-EM.31 PRELIM FLUSH & BAL LOOP A (EFS)10  
 1IEA ZFP-EM.31 STM BLOW PH STEAM LINES (EFS)10  
 1IEA ZFP-EM.31 BLOW SERVICE AIR TO 7-HAR (EFS)10  
 1IEA ZFP-EM.31 BLOW N2 TO 3HAR (EFS)10

MAR

1984

UNIT 2/COMMON		
2PFA 2TP-THF.01	MC LTOW CENTL ZCP RUP	4PES10E
2PFA 2TP-HEE.01	PH FCI HYDR	4FES10E
2PFA 2TP-RES.01	DRAL PZR PUR 4PZF LVL W	4PES10E
2PFA 2TP-NEF.02	INIT RC PUMP RULS SEC W	4FES10E
2PFA 2TP-AFL.01	(PART) AUX FM PPE-OP	4FES10E
2PFA 2TP-HEF.01	DUMP TO SUMP FLOW TEST	4FES10E
2PFA 2TP-HEF.01	RCS RECIRC & FLOW ALARMS	4FES10E
2PFA 2TP-EMF.01	GWST RECIRC DEMONSTRATION	4FES10E
2PFA 2TP-DMF.01	COMMON REPAIR NOTE RECH	4FES10E
2PFA 2TP-ESS.01	EMS ISOLATION VALVES	4FES10E
2PFA 2TP-HEF.01	PH EFFAS TEST	4FES10E
2PFA 2TP-PHF.01	PH SYSTEM PNEF	4FES10E
2PFA 2TP-FCF.01	PZR LEVEL VENT RES HYDR	4FES10E
2PFA 2TP-FCF.01	PH RCP FLOW TEST	4FES10E
2PFA 2TP-HEE.01	SM DISC HYDR	4FES10E
2PFA-2 2AP-ESS.03	HEATUP HS LINE TO XREF	4FES10E
2PFA-2 2AP-AXX.01	CAN OPER VALVE/DCP COLD	4FES10E
2PFA 2AP-EGG.02	GEN AIR TRCP TEST	4FES10E
2PFA 2AP-EGD.01	HYDROGEL SEAL OIL ACCEPT	4FES10E
2PFA 2SP-CHP.01	CGO/VEG SYS PLANE	4FES10E
2PFA 2SP-CHP.02	HWT LINE LOSS TEST	4FES10E
2PFA 2SP-ICF.01	INIT ICS EMER	4FES10E
2PFA-2 2FP-AD.01	CRAWL STR LINE NET MSIV & TUGEN	4FES10E
2PFA 2FP-AC.01	GRAIL TR & REFILL	4FES10E
2PFA 2FP-PC.01	FLCH L/O TO RES W/DN PHF	4FES10E
2PFA 2FP-ER.01	* INITIAL PMP RUP	4FES10E

JAN

2PFA 2TP-CEP.01	PH OF Cr VLV OPER TEST	4FES10E
2PFA 2TP-CHP.01	PH LPI ECFAS TESTS	4FES10E
2PFA 2TP-THR.03	THR ESAP TEST	4FES10E
2PFA 2TP-EMH.01	BACKUP SR COOLING CLMO	4FES10E
2PFA 2TP-EGG.01	EMER BFP STOR	4FES10E
2PFA 2TP-ICF.01	ICS OPER LOOP PNEOP	4FES10E
2PFA 2AP-GGS.01	GENERATOR GAS SYS ACCEPT	4FES10E
2PFA 2AP-GSS.01	STEAM SEAL SYS ACCEPT	4FES10E
2PFA 2AP-TGS.03	CHARGE PM TUR L/O	4FES10E
2PFA 2FP-EA.01	PRELIM FLUSH & PAL LOOP A	4FES10E
2PFA 2FP-EC.01	FLUSH LINES TO SF FOOL	4FES10E
2PFA 2FP-CJ.01	FILL FM RPP L/O SYS	4FES10E
2PFA 2FP-EP.01	IPR & PNEOF FLUSH	4FES10E
2PFA 2FP-JF.01	IPR & FLUSH	4FES10E
2PFA 2FP-JE.01	DRAIN & CLEAN DAY TRAYS	4FES10E
2PFA 2FP-PE.01	FLUSH F/A SYS	4FES10E
2PFA 2FP-PL.01	FLUSH F/A SYS	4FES10E
2PFA 2FP-HA.05	N2 BLOW PH & AUX FLOW VENTILATION	4FES10E
2PFA 2FP-NA.01	MCC/CGWA SEC 7.0	4FES10E
2PFA 2TP-FHC.01	PNEOF TEST	4FES10E
2PFA 2TP-LWF.02	SEAL WATER SYS PNEOF	4FES10E
2PFA 2TP-PWC.01	RESIN STOR & HDNL PNEOF	4FES10E
2PFA 2TP-PLF.02	FILL/VIT SEPT RESIN SYS	4FES10E
2PFA 2AP-FSS.17	LP STM HDR SET HGRS HGT	4FES10E
2PFA 2AP-FSS.15	LEAK TEST THA STEAM LINE	4FES10E
2PFA 2FP-DC.01	FLUSH	4FES10E
2PFA 2FP-ML.01	TRAZEL T/MPF FLANGES/FILL	4FES10E
2PFA 2FP-HE.01	FL FMP SUCT LINE TO CH1	4FES10E
2PFA 2FP-PC.01	FILL & FLUSH	4FES10E
2PFA 2FP-PC.01	IPR & FLUSH	4FES10E
2PFA 2FP-PC.01	IPR & FLUSH	4FES10E
2PFA 2FP-CC.02	FUEL OIL LINE FLUSH	4FES10E
2PFA 2AP-CA.01	DOMESTIC WATER FLUSH	4FES10E

UNIT 2/COMMON

FEB

UNIT 2/COMMON		
2PFA 2AP-AXT.01	F/W TUBE NO LOAD TEST	4FES10E
2PFA 2AP-CAG.01	SM CADSR EVAC ACCEPT	4FES10E
2PFA 2AP-FLD.01	FWPT LUPE OIL ACCEPT	4FES10E
2PFA 2SP-CWS.01	FUNCTIONAL TEST	4FES10E
2PFA 2SP-PCS.01	C/O AIR START SYS	4FES10E
2PFA 2SP-RES.01	C/O AIR START SYS	4FES10E
2PFA 2FP-RC.01	FLUSH SAMPLE LINES	4FES10E
2PFA 2FP-CJ.01	FLUSH FWPT L/O SYSTEM	4FES10E
2PFA 2FP-EP.01	PRELIM FLUSH & PAL LOOP A	4FES10E
2PFA 2FP-EP.01	PRELIM FLUSH & PAL LOOP A	4FES10E
2PFA 2FP-GJ.01	SPGRD CHILL WTR TRN 2A	4FES10E
2PFA 2FP-GJ.01	SPGRD CHILL WTR TRN 2B	4FES10E
2PFA 2FP-PC.01	FLUSH J/W SYS	4FES10E
2PFA 2FP-PE.02	FLUSH S/A SYS	4FES10E
2PFA 2FP-PE.04	FLUSH L/O SYS	4FES10E
2PFA 2FP-PE.04	FLUSH L/O SYS	4FES10E
2PFA 2FP-PE.02	FLUSH S/A SYS	4FES10E
2PFA 2FP-EG.01	STM BLOW AIR L/EJECTOR FPL	4FES10E
2PFA 2FP-EP.01	STM BLOW AIR HOGGER PIFT	4FES10E
2PFA 2FP-EG.02	BLOW AIR TO DHAG	4FES10E
2PFA 2FP-EG.01	BLOW SERVICE AIR TO D-HAI	4FES10E
2PFA 2TP-DF.01	FILL ECT W/CEMIN WTR	4FES10E
2PFA 2TP-LVS.01	FILL RCVE TM FM MGA & HE	4FES10E
2PFA 2TP-LVS.01	LITOUED WASTE SYS PNEOF	4FES10E
2PFA 2TP-FST.01	EVAP SLEG PIPE TRCY EXP	4FES10E
2PFA 2AP-FTH.02	MISC ELPG ELECTRIC ACCEPT	4FES10E
2PFA 2AP-FSS.26	LP EVAP P REL VLVE TEST	4FES10E
2PFA 2AP-FSS.12	LP EVAP G HEATUP	4FES10E
2PFA 2AP-FSS.14	"M" EVAP BOILOUT	4FES10E
2PFA 2AP-FSS.12	LP EVAP C HEATUP	4FES10E
2PFA 2AP-FSS.24	LP EVAP C REL VLVE TEST	4FES10E
2PFA 2AP-FSS.12	LP EVAP C POWER RUN UP	4FES10E
2PFA 2AP-FSS.12	LP EVAP D HEATUP	4FES10E
2PFA 2AP-FSS.12	LP EVAP B FOLEP RUN UP	4FES10E
2PFA 2AP-FSS.12	LP EVAP D FOLEP RUN UP	4FES10E
2PFA 2AP-FSS.14	"M" EVAP BOILOUT	4FES10E
2PFA 2AP-FSS.14	"M" EVAP BOILOUT	4FES10E
2PFA 2AP-FSS.12	LP EVAP L POWER RUN UP	4FES10E
2PFA 2AP-FSS.26	LP EVAP D REL VLVE TEST	4FES10E
2PFA 2SP-SVT.02	INIT FUR A/C/E E PUMPS	4FES10E
2PFA 2FP-ED.02	FLGW VERIF & FLUSH	4FES10E
2PFA 2FP-CE.01	IPR & PNEOF FLUSH	4FES10E

MAR

1984 (CONT.)

		<p style="text-align: center;">UNIT 2/COMMON</p> <p>           1CKA 2TP-ENC.12 ENC ELECTRICAL PRE-OP      1EMC2TR            1ACA 2TP-TGS.12 INIT TUPH ROLL            1ETES2TR            1MMA 2TP-EEP.12 480 VAC MCC PRE-OP      1EER1CJ            1SCA 2TP-ICS.11 ICS INFRT VERIF          1IES1CJ            1PAU 2AP-MCS.03 MN &amp; STA XFMPS ACCEPT   1PES2TR            1MAA 2AP-MGS.01 MN GENEP/EXCIT          1MES2TR            1YEB 2AP-MGT.12 ISG-PHATE HUS COOL RECEPTEYES2TR         </p>
JAN	FEB	MAR

1984 (CONT.)<sup>2</sup>

JHEA JFP-HE.31 OTHER EYE FLSH TO RUCH (EFS)2J  
 JHEF JFP-HE.36 GRAVITY FLUSH EVAP (EFS)2J  
 JHEE JFP-HE.05 IPR FLSH TO DGBR DENIMS (EFS)2J  
 JHGA JFP-HE.31 LVS CRN SYS DNSTM PMS TO (E6D)2J  
 JHGR JFP-HE.01 LVS DN TK INPUT LINE TO F (E6D)2J  
 JHGA JFP-HE.31 GRAY FLSH EP TK PMP SUCT (E6C)2J  
 JHCA JFP-HE.31 HYDRA PRECP FLOW VERIF (EFS)2J  
 JHLC JFP-HE.31 GUARDHOUSE FLUSH (E6S)2J  
 JHEI JFP-HE.32 FLUSH (E6S)2J  
 JHCA JFP-HE.31 FLSH ACID & CAUSTIC VST (E6S)2J  
 JHEA-2 JFP-HE.31 FLSH DRPS TO AH COLL HOP (E6S)2J  
 JHEF JFP-HE.36 AIR FLOW TUBE SIDE OF EVAP (EFS)2J  
 JHNE JFP-HE.31 OXYTURB LAB) AB/FUNCT (E6C)2J  
 JHNE JFP-RH.12 OXYLAUX 616) AB/FUNCT (E6C)2J  
 JHND JFP-RH.03 PROPURE LAB) AB/FUNCT (E6C)2J  
 JHNF JFP-PH.17 ACETLAUX 632) AB/FUNCT (E6C)2J  
 JHNF JFP-PH.05 ACETLAUX LAB) AB/FUNCT (E6C)2J  
 JHND JFP-RH.15 P-10 LAUX 632) AB/FUNCT (E6C)2J  
 JHND JFP-RH.14 HEL LAUX 616) AB/FUNCT (E6C)2J  
 JHNE JFP-RH.11 PHOFLAUX 616) AB/FUNCT (E6C)2J  
 JHND JFP-RH.16 PROFLAUX 632) AB/FUNCT (E6C)2J  
 JHNF JFP-RH.15 ACETLAUX 616) AB/FUNCT (E6C)2J

UNIT 2/COMMON

UNIT 1

JHNA JFP-CF.01 PH CF CR VLV OPER TEST (E6C)1J  
 JHFA JFP-CF.31 PH LPI ESFAS TEST (E6C)1J  
 JHCA JFP-CNS.01 COMP. REPAIR MODE PERHC (E6R)1J  
 JHCA JFP-CNF.31 BACKUP SF COOLING DEMO (E6R)1J  
 JHCA JFP-CNF.31 RULOUT ELFC ADD DEMO (E6R)1J  
 JHCA JFP-CNF.03 DHH ESAF TEST (E6R)1J  
 JHEJ JFP-CFO.31 FIL DGFC T-XC/O LVL INST (E6C)1J  
 JHCR JFP-CFS.02 GEN AIR DRCP TEST (E6S)1K  
 JHCA JFP-HE.31 FLUSH LINES TO SF POOL (E6R)1J  
 JHFN JFP-CJ.31 FILL FW EMP L/O SYS (E6S)1J  
 JHFA JFP-GS.31 IPR & FROF FLUSH (E6W)1J  
 JHJA JFP-CJ.32 SAFGRD CHILL WTR TRAIN 1B (E6H)1J  
 JHJA JFP-GJ.31 SAFGRD CHILL WTR TRAIN 1A (E6H)1J  
 JHJA JFP-JE.31 DRAIN & CLEAN DAY TANKS (E6D)1J  
 JHEJ JFP-JC.31 IPR & FLUSH (E6D)1J  
 JHEF JFP-HE.31 PRELIN FLUSH & DAL (E6S)2J  
 JHNE JFP-HE.02 DOMESTIC WATER FLUSH (E6S)2J  
 JHNE JFP-PH.01 AIR BLOW PIPTAG (E6C)1K  
 JHCA JFP-SL.31 AIR FLOW SAMPLE LINES (E6W)1K

APR

JHNA JFP-APP.01 LX FLMT PRESS (INST AIR) (E6P)1K  
 JHNC JFP-APP.01 LX CHASE SYS LX TEST (E6P)1K  
 JHGD JFP-RTE.03 (F) 1217/61/25/65/66 (E6P)1K  
 JHGA JFP-RTE.31 (F) 1246-MU (E6P)1K  
 JHND JFP-RTE.03 (F) 1213 (E6S)1K  
 JHLA JFP-RTE.03 (F) 1241 (E6W)1K  
 JHGA JFP-RTE.03 12-19AUC20AR/25/45C-PZR (E6S)1K  
 JHGC JFP-RTE.03 (F) 12-33 (E6V)1K  
 JHGD JFP-RTE.03 (F) 12-63/PE (E6C)1K  
 JHGC JFP-RTE.31 (F) 12-15PC/16PC (E6C)1K  
 JHHA JFP-RTE.31 (F) 1244AP/45AD (E6S)1K  
 JHKA JFP-RTE.31 (F) 1229/30/53/56 (E6S)1K  
 JHTE JFP-RTE.31 (F) 12-34 (E6V)1K  
 JHDA JFP-RTE.31 12-49A/E/52A/E/15A/14A (E6V)1K  
 JHGA JFP-RTE.31 (F) 123/7/5/10/6B (E6C)1K  
 JHGE JFP-RTE.31 (F) 121/47/60/67 (E6C)1K  
 JHHA JFP-RTE.31 (F) 12-22 (E6S)1K  
 JHCB JFP-RTE.31 (F) 12-72/7B (E6C)1K  
 JHGS JFP-RTE.31 (F) 12-46/21 (E6V)1K  
 JHNA JFP-ENC.01 MN TURB ENC ACCEPT (E6C)1K  
 JHCA JFP-GGS.01 GENERATOR GAS SYS ACCEPT (E6S)1K  
 JHAF JFP-PES.02 15C-PHASE BUS COOL ACCEPT (E6S)1K  
 JHAA JFP-PES.31 PH GENCM & EXCITER (E6S)1K  
 JHCH JFP-ART.31 FWP TURB NO LOAD TEST (E6V)1K  
 JHFC JFP-FLC.31 FWT LUPE OIL ACCEPT (E6S)1J  
 JHGC JFP-CMS.01 FUNCTIONAL TEST (E6V)1K  
 JHFD JFP-PES.01 C/O AIR START SYS (E6S)1J  
 JHEA JFP-PES.31 C/O AIR START SYS (E6S)1J  
 JHCA JFP-FC.31 FLUSH SAMPLE LINES (E6S)1J  
 JHFD JFP-CJ.31 FLUSH FWT L/O SYSTEM (E6S)1J  
 JHEA JFP-PE.03 FLUSH J/W SYS (E6S)1J  
 JHEB JFP-PE.31 FLUSH F/O SYS (E6S)1J  
 JHEC JFP-EL.31 FLUSH J/W COOL SYS (E6S)1J  
 JHEA JFP-PE.31 FLUSH F/O SYS (E6S)1J  
 JHEA JFP-PE.32 FLUSH S/W SYS (E6S)1J  
 JHEB JFP-PE.32 FLUSH S/W SYS (E6S)1J  
 JHTE JFP-RT.31 FLSH WTR LINES TO ISO VLV (E6P)1K  
 JHEA JFP-HE.01 FINAL FLUSH (E6S)1K  
 JHEA JFP-HE.01 INIT FLSH RUCH WITH PMS (E6S)1K  
 JHEA JFP-HE.01 OTHER SYS FLSH TO RUCH (E6S)1K  
 JHCA JFP-CA.31 STEAM BLOW SEL LINES (E6S)1K  
 JHGB JFP-FD.31 STP BLOW AIR EJECT PPG (E6R)1K  
 JHGA JFP-PF.31 STP BLOW AIR HOCGER PIPING (E6R)1K  
 JHTA JFP-RT.31 BLOWDOWN PENET AIR LINES (E6P)1K  
 JHTC JFP-ST.31 BLOW LINES TO PENETRATIONS (E6P)1K  
 JHTE JFP-RUN COMPRESSORS & AIR BLOW (E6P)1K

MAY

JHFA JFP-CFE.03 CFM FUNCTIONAL TEST (E6D)1J  
 JHNA JFP-CEB.32 APC VAC MCC FRE-OP (E6D)1J  
 JHJA JFP-SCF.01 SAFGRD LG CHILL WTR (E6C)1J  
 JHTR JFP-APP.31 VERIFY/FILL WTR TMS (E6P)1K  
 JHTR JFP-APP.31 VERIFY/FILL W2 SUPPLY (E6P)1K  
 JHJA JFP-APP.01 RX PENET PRESSE (W2) (E6P)1K  
 JHCA JFP-RTE.31 (F) 12-R.11 (E6S)1J  
 JHAG JFP-RTE.03 (F) 12-42/43 (E6V)1K  
 JHGA JFP-RTE.31 & RTE.32 PH RB SIT/ILRT (E6S)1K  
 JHCA JFP-RTE.31 (F) 12-68 (E6C)1K  
 JHCA JFP-RTE.31 (F) 1271 (E6S)1K  
 JHFA JFP-RTE.31 (F) 1251P (E6P)1K  
 JHCA JFP-RTE.31 (F) 12-6.4 (E6S)1K  
 JHJR JFP-RTE.31 (F) 12-44 (E6S)1K  
 JHKA JFP-RTE.31 (F) 12-76 (E6S)1K  
 JHKA JFP-RTE.31 (F) 12-95 (E6S)1K  
 JHAC JFP-RTE.31 (F) 12-51A (E6S)1K  
 JHCA JFP-CAF.31 SM CHDOP EVAC ACCEPT (E6S)1J  
 JHNA JFP-CDE.01 CONDENSATE DENIM ACCEPT (E6C)1J  
 JHGA JFP-CNH.31 TURB PLOG CHILL WTR TEST (E6V)1J  
 JHAF JFP-CSS.31 CHD XFER ACCEPT (E6S)1J  
 JHAA JFP-CWS.31 CIRC WATER SYS ACCEPT (E6S)1J  
 JHCA JFP-FWS.31 CROSTAT/FW RECIRC ACCEPT (E6S)1J  
 JHCA JFP-GSP.31 HYDROGEN SEAL OIL ACCEPT (E6C)1J  
 JHCA JFP-SCS.31 STATOR COOLING ACCEPT (E6S)1J  
 JHCA JFP-SFC.31 STP FLMT SHELING TEST (E6S)1J  
 JHCF JFP-HE.31 DUAL PULSE SHAPER CALIB (E6V)1J  
 JHCF JFP-HE.32 PCC KMA-1X SIG COND CALIB (E6V)1J  
 JHCF JFP-HE.32 15-4 TAFE RECORDER C/O (E6V)1J  
 JHCF JFP-HE.32 NEUTRON NOISE LOG CALIB (E6V)1J  
 JHEA JFP-FES.32 INITIAL RUN DIESEL ONLY (E6V)1J  
 JHEA JFP-FES.32 1C-11 SIG FLIC C/O (E6V)1J  
 JHEB JFP-PES.32 INITIAL RUN DIESEL ONLY (E6V)1J  
 JHEB JFP-PES.32 1C-12 SIG ELEC C/O (E6V)1J  
 JHGA JFP-AIS.31 INIT RPS ENERG/POD CALIB (E6S)1K  
 JHAA JFP-AP.32 GRAVITY FL TURB AFWP SUCT (E6S)1J  
 JHEA JFP-PE.05 FLUSH INTAKE DUCTS (E6S)1J  
 JHFD JFP-PE.05 FLUSH INTAKE DUCTS (E6S)1J  
 JHEA JFP-PE.04 FLUSH L/O SYS (E6S)1J

JUN

1984





UNIT 2 / COMMON

2PFA 21P-EPC.71 CLASS 1E DC SYS PRE-OP (END) 30J  
 2PMA 21P-EPC.72 CLASS 1E MIN VOLTAGE PRE-OP 30J  
 2GDE 21P-EPL.70 STATION EKER DC CIT (EPL) 30J  
 2APA 21P-MES.71 IMS X-COR VALVE (MES) 30J  
 2EFG 21P-PEP.31 MUEPURIF CHEM ADD PRE-OP (PEP) 30J  
 2SCF 21P-PLT.71 LSE PRYS MONIT SYS PART (PLT) 30J  
 2PFA 21P-PLC.32 PX HLOG SPRAY PREOP (RES) 30J  
 2SJB 21P-PEP.31 POST ACC SAMPLE (PEP) 30J  
 2GJA 21P-PEP.71 TAFGRD ED CHILL WTR (PEP) 30J  
 2CG 2AP-CAP.31 DELAYD ENDSR EVAC ACCEPT (CAP) 30J  
 2PFA 2AP-CEE.71 CONDENSATE DEMIN ACCEPT (CEE) 30J  
 2ADP 2AP-CEE.31 CONDENSATE SYS ACCEPT (CEE) 30J  
 2CLA 2AP-CPL.71 TUPD BLDG CHILL WTR TEST (CPL) 30J  
 2CAR 2AP-CLS.71 CIRC WATER SYS ACCEPT (CLS) 30J  
 2PAC 2AP-FLC.71 FW CHEM ADD ACCEPT TEST (FLC) 30J  
 2ACC 2AP-FLC.31 FW CHEM ADD ACCEPT TEST (FLC) 30J  
 2AL 2AP-FAS.71 CONDENSATE/FW RECIPIC ACCEPT (FAS) 30J  
 2AFB 2AP-FVE.32 LF HTR TRANS/VNTR/VLVL CTL (FVE) 30J  
 2CCA 2AP-FVT.01 TUPD BLD HVAC TEST (FVT) 30J  
 2CEA 2AP-SCA.71 STATOR COOLING ACCEPT (SCA) 30J  
 2SCA 2AP-SPL.71 ST PLANT SHPLG TEST (SPL) 30J  
 2AC 2SP-ACC.12 ACCELE 1ST TRIN CALIB (AC) 30J  
 2BA 2SP-FAD.14 LOAD SENSING TRIN CALIB (FAD) 30J  
 2DAS 2SP-DES.71 DATA ACQ SETUP F/UNIT 2 HFT (DES) 30J  
 2DAS 2SP-DES.71 INSTALL LAFYARD RECUEFC UNIT (DES) 30J  
 2DAS 2SP-DAS.71 INSTALL ACCELR IN UNIT 2 (DAS) 30J  
 2EAS 2SP-FAS.71 INSTALL LOAD CELLS IN UNITS (FAS) 30J  
 2EFC 2SP-FEP.71 PCF START VOLT EOC TEST (FEP) 30J  
 2GAK 2SP-ECF.01 2A11 FAST FUS YER (ECF) 30J  
 2SCC 2SP-MA1.72 P22 PHA-1X SIG COND CALD (MA1) 30J  
 2SCC 2SP-MA1.74 PASTER DUAL AUDIO C/D (MA1) 30J  
 2SCF 2SP-PL1.11 DUAL PULSE SHAFER CALIB (PL1) 30J  
 2SCC 2SP-MA1.74 NEUTRON PGISE EOC CALIB (MA1) 30J  
 2SCC 2SP-PL1.74 T-4 TAPE RECORDER C/D (PL1) 30J  
 2FC7 2SP-PL1.12 DIGIT LPM LOC C/D (PL1) 30J  
 2PFS 2SP-FPS.72 INITIAL RUN DIESEL (PFS) 30J  
 2PCL 2SP-FPS.72 INITIAL RUN DIESEL ONLY (PFS) 30J  
 2PFA 2SP-FPS.75 20-11 EGG ELEC C/D (FPS) 30J  
 2PFA 2SP-FPS.74 20-10 EGG ELEC C/D (FPS) 30J  
 2PFA 2SP-FPS.72 DIESEL GEN INIT RUN (FPS) 30J  
 2PFA 2SP-FPS.72 DIESEL GEN INIT RUN (FPS) 30J  
 2APF 2FP-AP.70 GRAY FLSH TURB AFWP SUCT (AP) 30J  
 2EFG 2FP-FC.31 FLUSH INLET & OUTLET FPG (FC) 30J  
 2EAF 2FP-FA.71 PRELIM FLUSH & BAL (FA) 30J  
 2HDC 2FP-KE.73 DOMESTIC WATER FLUSH (KE) 30J  
 2LCA 2FP-LE.71 ACID & CAUSTIC WASTE (LE) 30J

APR

MAY

JUN

1984 (CONT.)



UNIT2/COMMON

214	21P-214.71	21-104 4PH EPDR PM	41840J
215	21P-215.71	CPM FUNCTIONAL TEST	40-090J
216	21P-216.72	CPE 5/1 INTEGRATED TEST	40P010J
217	21P-217.71	HE MOD VOLT 46.5KV	40040J
218	21P-218.71	NON 1-E 100 VOLTEN.4KV	40040J
219	21P-219.71	403 VAC LCC PRE-OP	40040J
220	21P-220.71	1-E LOW VOLT 46.5KV	40040J
221	21P-221.71	1-E LOW VLT 46.5KV	40040J
222	21P-222.71	120V AC 403-E	40040J
223	21P-223.71	120VAC-1PPE PREF FWR	40040J
224	21P-224.71	120VAC 1-E PFD FWR	40040J
225	21P-225.71	NON 1-E 100 VOLTEN.4KV	40040J

APR

MAY

JUN

1984 (CONT.) 1





UNIT2/ COMMON

257E 2TP-RFF.01 VERIFY/FILL I:2 SUPPLY (EFP)2K  
 257A 2TP-RFF.01 FR PENT PRESS (H2) (EFP)2K  
 257B 2TP-RFF.01 VERIFY/FILL WTR TKS (EFP)2K  
 257C 2TP-RFF.02 (F) 22-42/43 (E7H)2K  
 257D 2TP-RFF.03 (F) 22-P.11 (EWS)2K  
 257E 2TP-RFF.03 (F) 22-51A (IAS)2K  
 257F 2TP-RFF.03 (F) 22:7C (KLG)2K  
 257G 2TP-RFF.03 (F) 22-A.6 (EWS)2K  
 257H 2TP-RFF.03 (F) 22-13 (EWS)2K  
 257I 2TP-RFF.01 4 RFF.02 PH RD SET/ILRT (EFS)2K  
 257J 2TP-RFF.01 (F) 22-2P (E7R)2K  
 257K 2TP-RFF.01 (F) 22-25 (E7S)2K  
 257L 2TP-RFF.01 (F) 22:1C (EFP)2K  
 257M 2TP-RFF.03 (F) 22-44 (E7Y)2K  
 257N 2TP-RIS.05 HI PRE-OP CALIF TEST (EFS)2K  
 257O 2TP-RPS.02 NPS PRE-OP CALD (EFS)2K  
 257P 2TP-RIS.01 ICH ELLET TEST (E7D)2K  
 257Q 2TP-RFP.05 LIQUID FAD MONT PRE-OP (E7A)2K  
 257R 2TP-RFC.01 DRAIN EFFCT FUEL POOL (EFC)2K  
 257S 2TP-RPL.01 PRIM WTR STOP/TRANSF (E7K)2K  
 257T 2TP-RAP.02 1-E AREA RAD MONT PRE-OP (E7A)2K  
 257U 2TP-RAP.01 AREA RAD MONT (MER) (E7A)2K  
 257V 2TP-RPS.03 FILL ASPHALT TANK (E7S)2K  
 257W 2TP-RPS.03 RAD LST SOLIDIFICATION (E7S)2K  
 257X 2TP-RPS.05 FILL STEAM DOME POILOUT (E7S)2K  
 257Y 2TP-RPS.07 "M" EVAP QUALITY CHECK (E7S)2K  
 257Z 2TP-RPS.05 "J" EVAP QUALITY CHECK (E7S)2K  
 2580 2TP-RPS.11 HP TERT STM HGR SET HPT (E7S)2K  
 2581 2TP-RPS.12 THERMAL PERFORM BASELAC (E7S)2K  
 2582 2TP-RPS.07 RECIRC SYS LP COOLDOWN (E7S)2K  
 2583 2TP-RPS.01 PSS INTERLOCK & CTRL CHK (E7S)2K  
 2584 2TP-RPS.07 "H" EVAP QUALITY CHECK (E7S)2K  
 2585 2TP-RPS.09 "A" EVAP QUALITY CHECK (E7S)2K  
 2586 2TP-RPS.19 HP THX STM QUAL'D EVAP\* (E7S)2K  
 2587 2TP-RPS.09 LP DEPR/REC'DV PHASE 2 (E7S)2K  
 2588 2TP-RPS.11 HAIRER CHECK COLD (E7S)2K

JUL

UNIT2/ COMMON

2589 2TP-RWS.01 OPERATED WATER STOP PREOP (E7S)2K  
 258A 2TP-RSA.04 ESFAS RESPONSE TIME TEST (E7A)2K  
 258B 2TP-RSA.07 TOT SFAS RESPONSE TIME (E7A)2K  
 258C 2TP-RSA.05 INTERGATED ESFAS LP (E7S)2K  
 258D 2TP-RSA.05 ECCAS LCP SEC PREOP (E7A)2K  
 258E 2TP-RAP.02 1-E AREA RAD MONT PRE-OP (E7A)2K  
 258F 2TP-RAP.04 1-E AIR RAD MONT (E7A)2K  
 258G 2TP-RCV.01 RE AIR FUR/CLNDUP/VCTT (E7V)2K  
 258H 2TP-RGE.03 H2 MONITORING PRE-OP (E7C)2K  
 258I 2TP-RRC.02 H2 VENT SUPPLY/EXH PRE-OP (E7C)2K  
 258J 2TP-RCC.01 H2 RECHGR PRE-OP (E7C)2K  
 258K 2TP-RPS.01 RPS TIME RESPONSE (E7S)2K  
 258L 2TP-RHV.01 DG BLDG HVAC PRE-OP (E7V)2K  
 258M 2TP-RAP.01 AREA RAD MONT (E7S)2K  
 258N 2TP-RHV.03 CMT HEAT REMOVAL PREOP (E7V)2K  
 258O 2SP-RAP.08 CMPLT C/O (E7V)2K  
 258P 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258Q 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258R 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258S 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258T 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258U 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258V 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258W 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258X 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258Y 2SP-RAP.07 CMPLT C/O (E7V)2K  
 258Z 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2590 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2591 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2592 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2593 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2594 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2595 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2596 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2597 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2598 2SP-RAP.07 CMPLT C/O (E7V)2K  
 2599 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259A 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259B 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259C 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259D 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259E 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259F 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259G 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259H 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259I 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259J 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259K 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259L 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259M 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259N 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259O 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259P 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259Q 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259R 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259S 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259T 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259U 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259V 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259W 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259X 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259Y 2SP-RAP.07 CMPLT C/O (E7V)2K  
 259Z 2SP-RAP.07 CMPLT C/O (E7V)2K

AUG

1984 (CONT.)

UNIT2/ COMMON

259A 2TP-CHP.04 POLAR CRANE EFF-OP (E7E)2K  
 259B 2TP-RPS.02 HALON FIRE PROTECTION PRE-OP (E7S)2K  
 259C 2TP-RUF.01 HU SYS PRE-OP (E7S)2K  
 259D 2TP-RIS.04 HI DETECTOR PRE-OP (E7S)2K  
 259E 2TP-RIS.06 SF/IR INITIAL SETTINGS (E7S)2K  
 259F 2TP-RIS.02 ICH SYSTEM PRE-OP (E7S)2K  
 259G 2TP-RIS.03 HI DETECTOR CAULING TEST (E7S)2K  
 259H 2TP-RAP.03 CMT HI RANGE RAD MON (E7A)2K  
 259I 2TP-RAP.03 STACK HI RANGE RAD MON (E7A)2K  
 259J 2TP-RPS.01 RO SPRAY MER AIR TEST (E7S)2K  
 259K 2TP-RCS.04 PST HFT I/ICK INSPIRVIC (E7S)2K  
 259L 2TP-RPS.03 AKIS SYG PREOP (E7S)2K  
 259M 2AP-RHV.01 TARDON GALLERY HVAC (E7V)2K  
 259N 2SP-RIP.02 CMPLT C/O (E7V)2K  
 259O 2SP-RIP.02 CMPLT C/O (E7V)2K  
 259P 2SP-RIP.02 CMPLT C/O (E7V)2K

SEP

		<p style="text-align: center;">UNIT 1</p> <p>15EA 1TP-RIS.01 ICP ELECT TEST      07.1511P  15EP 1TP-RIS.0A MI DETECTOR PRE-OP      07.1511P</p>
OCT	NOV	DEC

486T

0045 JSP-015.01 DATA ALL SETUP F/M/11 1 FEB 1985

UNIT 2/COMMON

UNIT 1

0001 JSP-01.01 DEFIB LINE TO DOW POND (PES)10  
 0002 JSP-01.02 COND LINE FLUSH TO POND (PES)10  
 1001 JSP-01.01 POLAR CHAPE FPE-CP (CIE)11  
 1002 JSP-01.02 DG BLEG HVAC PRE-CP (CIV)11  
 1003 JSP-01.03 FIRE ECT & ALARM PRE-CP (FFA)11  
 1004 JSP-01.04 CO2 FIRE PROT PRE-CP (FFS)11  
 1005 JSP-01.05 HALON FIRE PROTECTION FPE-CP 11P  
 1006 JSP-01.06 HI DETECTOR CALLING TEST (IIS)11  
 1007 JSP-01.07 IOP SYS PRE-CP (NIS)11  
 1008 JSP-01.08 SK/IR INITIAL SETTINGS (FFS)11  
 1009 JSP-01.09 RH SPRAY FOR AIR TEST (FIS)11  
 1010 JSP-01.10 CTY HEAT REMOVAL PRED (FIV)11  
 1011 JSP-01.11 KM FLOW COR/S/INT/INSP (FCS)11  
 1012 JSP-01.12 TLD GALLERY HVAC (FHV)11  
 1013 JSP-01.13 CATHODIC PROTECTION (CIS)11  
 1014 JSP-01.14 CHELT C/O 11P  
 1015 JSP-01.15 FILL EGS BY COMPLETELY (EPS)11  
 1016 JSP-01.16 FLUSH OUT OUT PIPE (EES)11  
 1017 JSP-01.17 BACK FLUSH FM/100 (FFS)11

2001 JSP-045.14 LOAD SENSING TRAIN CALIB 12F  
 2002 JSP-045.15 ACCELA TRAIN CALIB 12F  
 2003 JSP-045.16 INSTALL LANYARD REDUCERS 12F  
 2004 JSP-045.15 LANYARD REDUCER CALIB 12F

UNIT 2/COMMON

JAN

FEB

MAR

1985

UNIT 1  
SAFE-1/2 04P-PSS.14 INIT HIUP EXT LINE TO TURBID

ATE 4TP-PSS.14 MODE 1 INTEG. CPS 9 FOX (FSS)  
ATE TE-9020.14 HP DOW LINE STEAM FLOW (FSS)  
ATE TL-9020.14 LP DOW WEST STEAM FLOW (FSS)  
ATE TE-9021.14 LP DOW EAST STEAM FLOW (FSS)  
ATE TE-9021.14 LP DOW TUR LIE STR FLOW (FSS)

UNIT 2/COMMON

APR

MAY

JUN

1985

UNIT 1

ICAS DSP-DAS.04 DATA ACQ SETUP F/UNIT 1 FEE 31P  
ICAS DSP-DAS.14 LOAD CELL CALIB 31P  
ICAS DSP-DAS.06 INSTALL ACCEL IN UNIT 1 31P  
ICAS DSP-DAS.12 ACCEL TRAIN CALIB 31P  
ICAS DSP-DAS.08 INSTALL LANYARD REDUCERS IN UNIT 1 31P  
ICAS DSP-DAS.16 LANYARD REDUCER CALIB 31P

JUL

AUG

SEP

1985

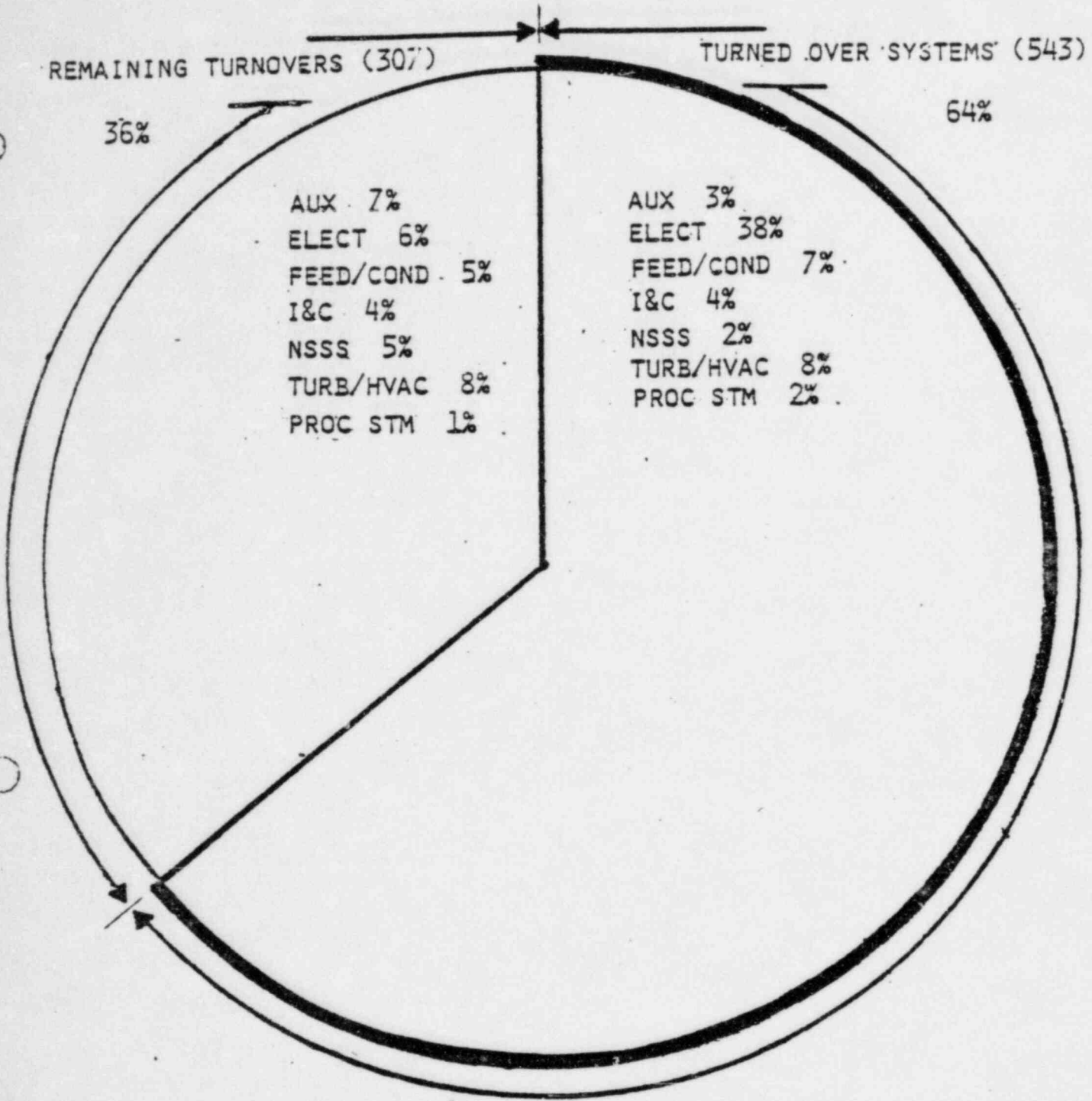




SYSTEM

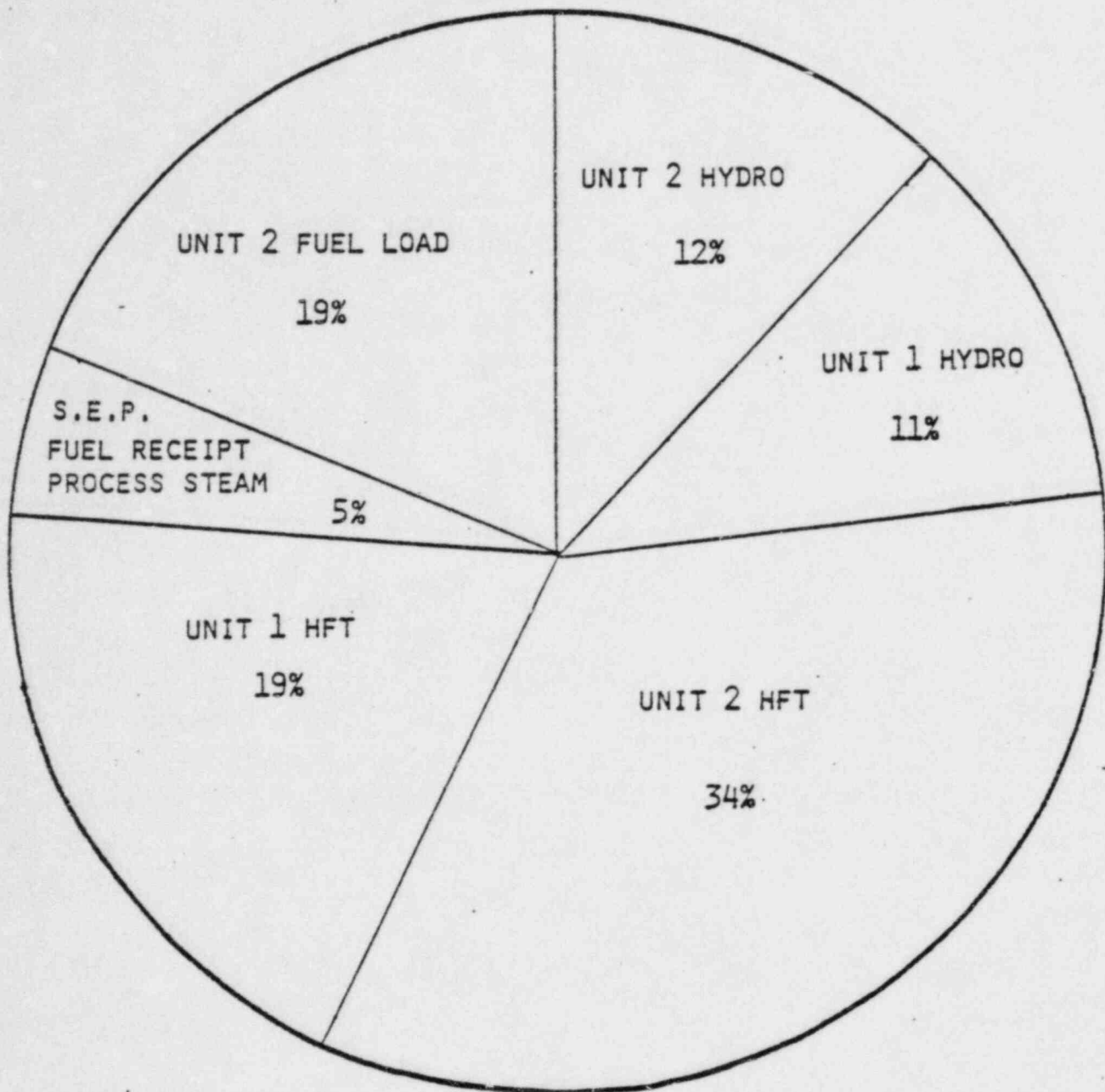
TURNOVER

STATUS



TOTAL SYSTEMS = 850  
 TURNED OVER = 543  
 REMAINING = 307  
 % COMPLETE = 64

SYSTEM TURNOVERS BY DISCIPLINE - (3-31-83)

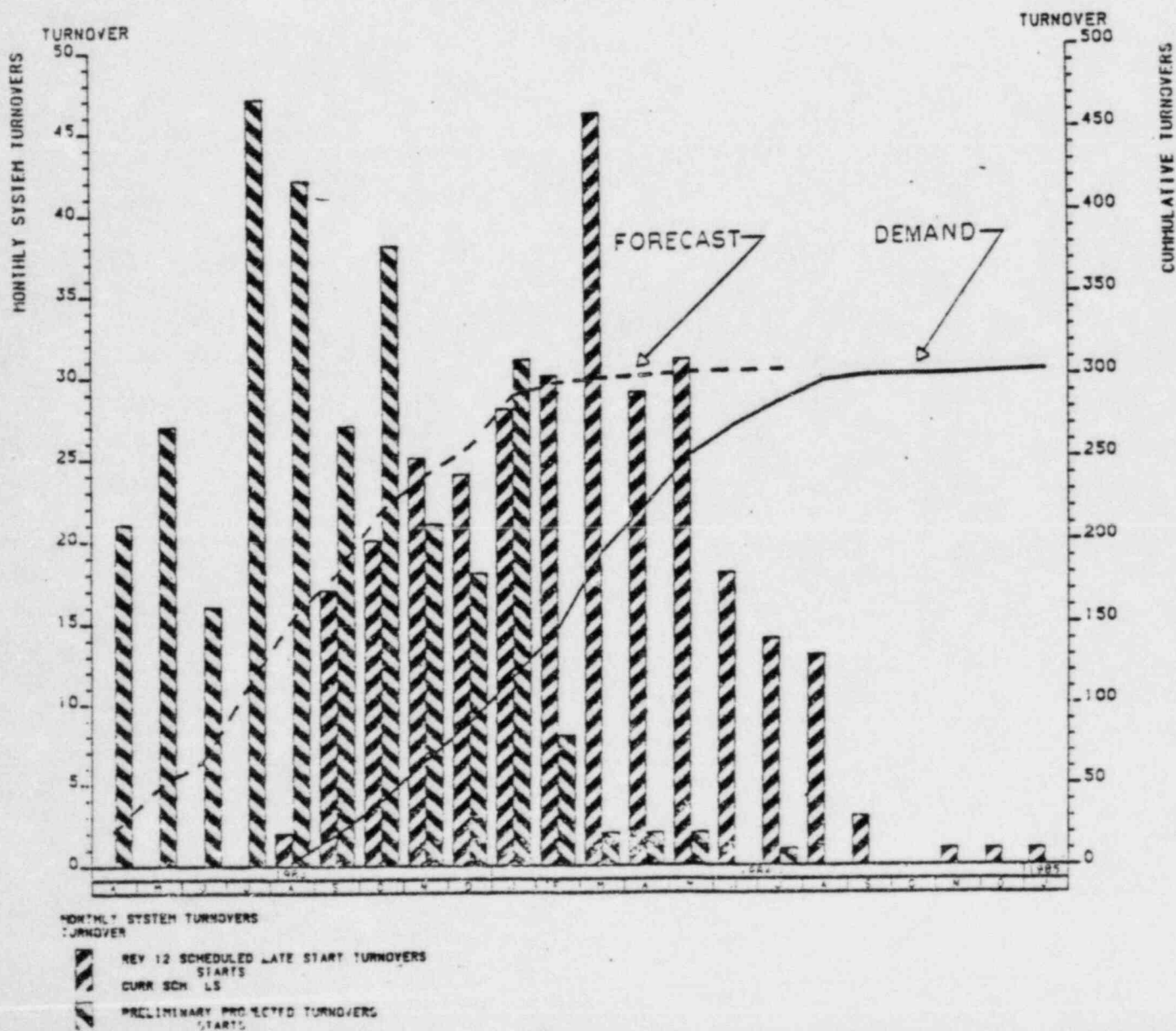


REMAINING SYSTEMS = 307

REMAINING SYSTEMS BY MILESTONES - (3-31-83)

\*\*\* REVISION 12 \*\*\*

SYSTEMS ACCEPTED= 544 OF 850 TOTAL



MONTHLY SYSTEM TURNOVERS  
TURNOVER

REV 12 SCHEDULED LATE START TURNOVERS  
STARTS  
CURR SCH LS  
PRELIMINARY PROJECTED TURNOVERS  
STARTS

TURNOVER  
500

CUMULATIVE TURNOVERS

TEST STATUS

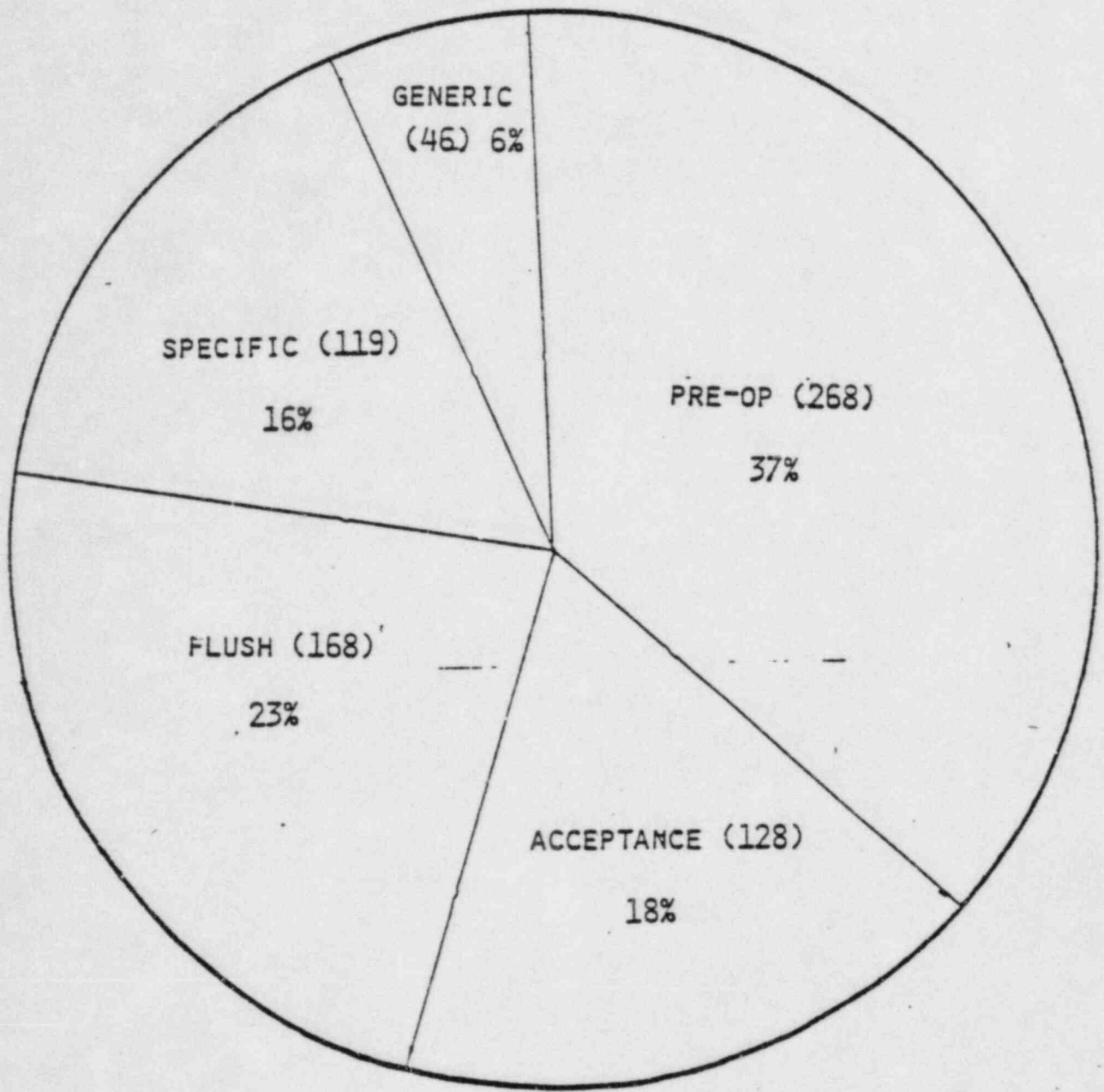
(REFER TO HANDOUT MATERIAL)

	<u>PAGE</u>
ELECTRICAL	2
I&C	3
NSSS	6
AUXILIARY	8
FEEDWATER/CONDENSATE	10
TURBINE/HVAC	15
PROCESS STEAM	19
PROGRAMMATIC	21

PROCEDURE DEVELOPMENT

AND

PERFORMANCE STATUS

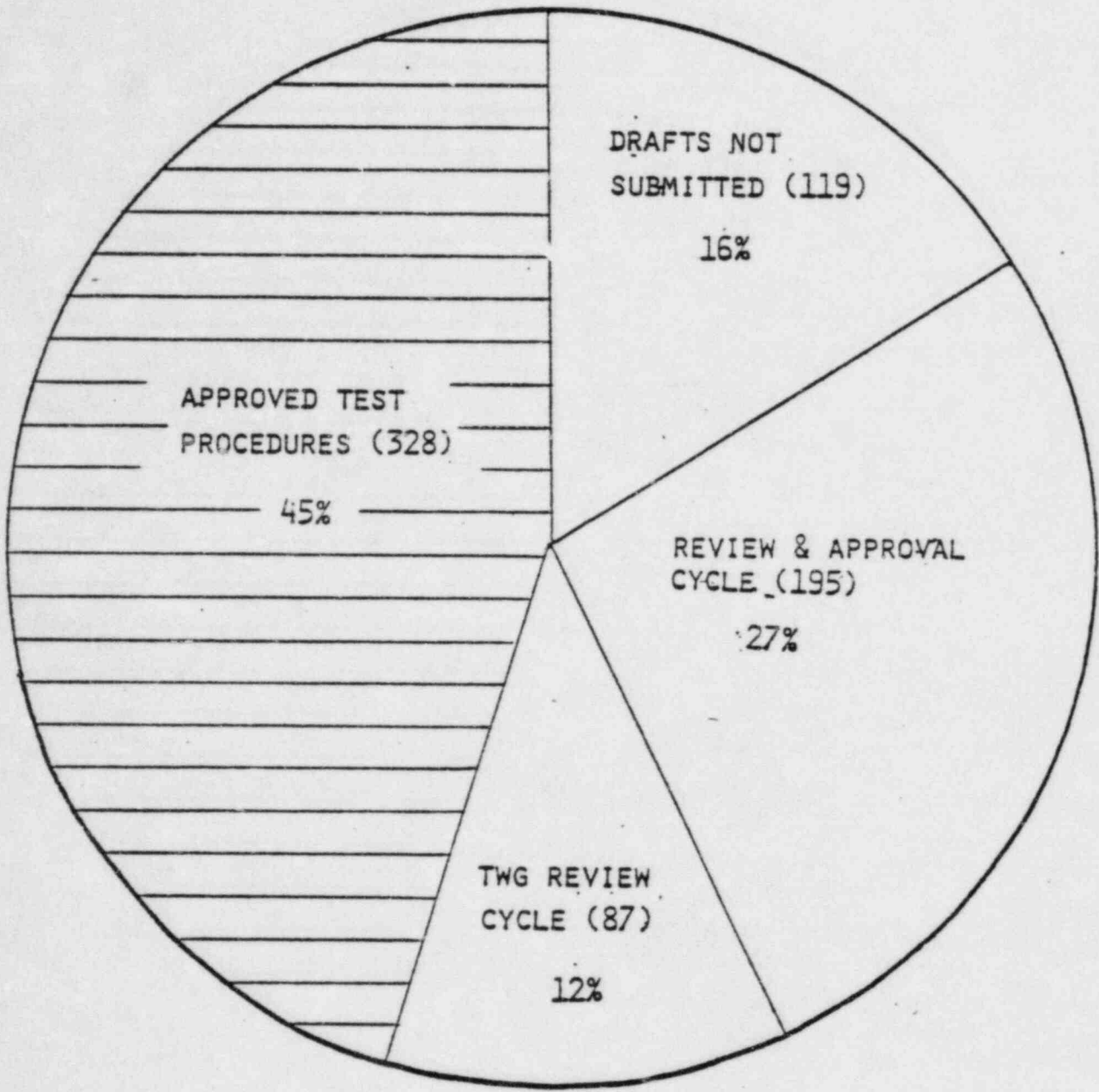


TEST PROCEDURES - PROCEDURE TYPES

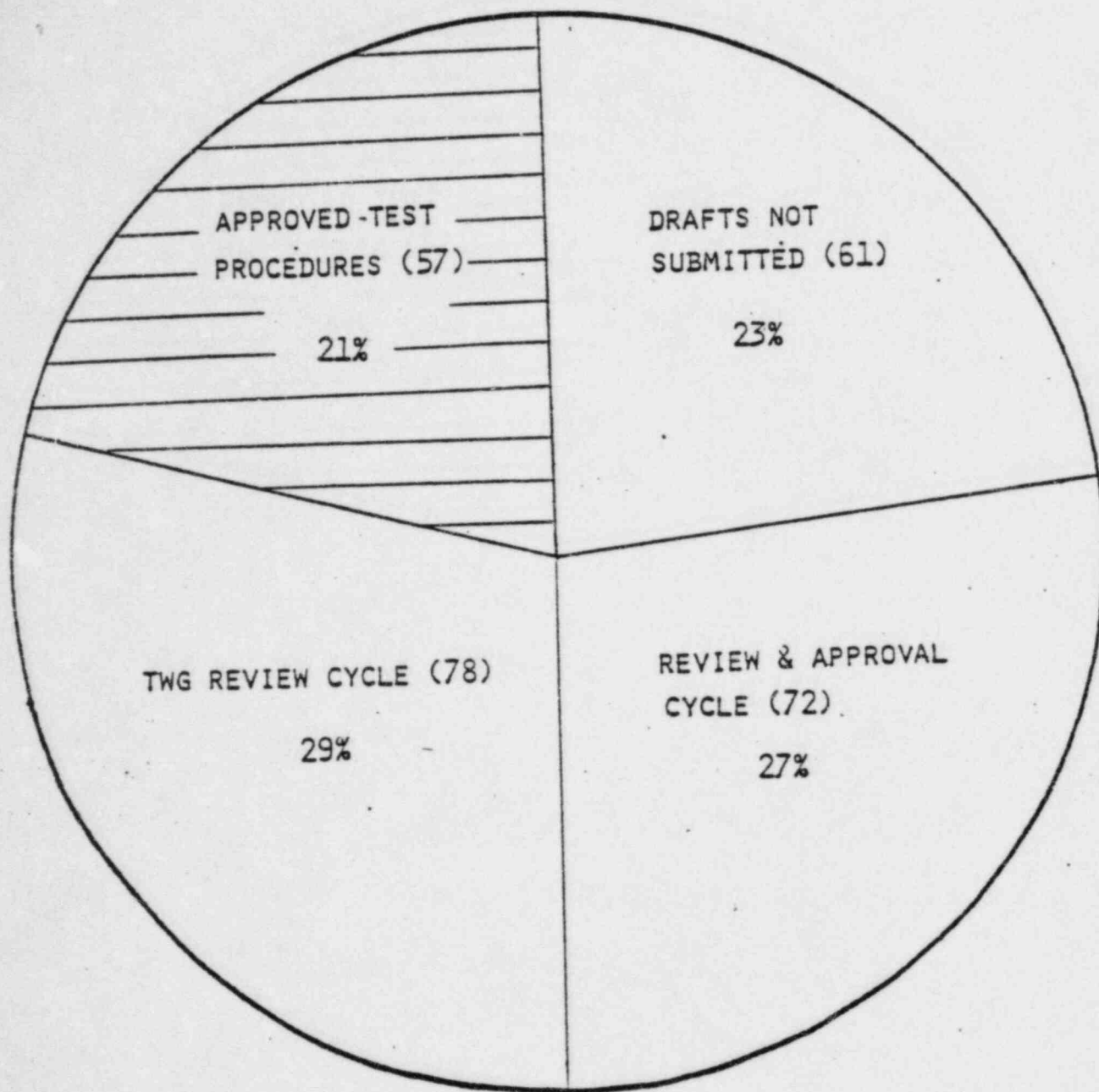
(729)

(5)

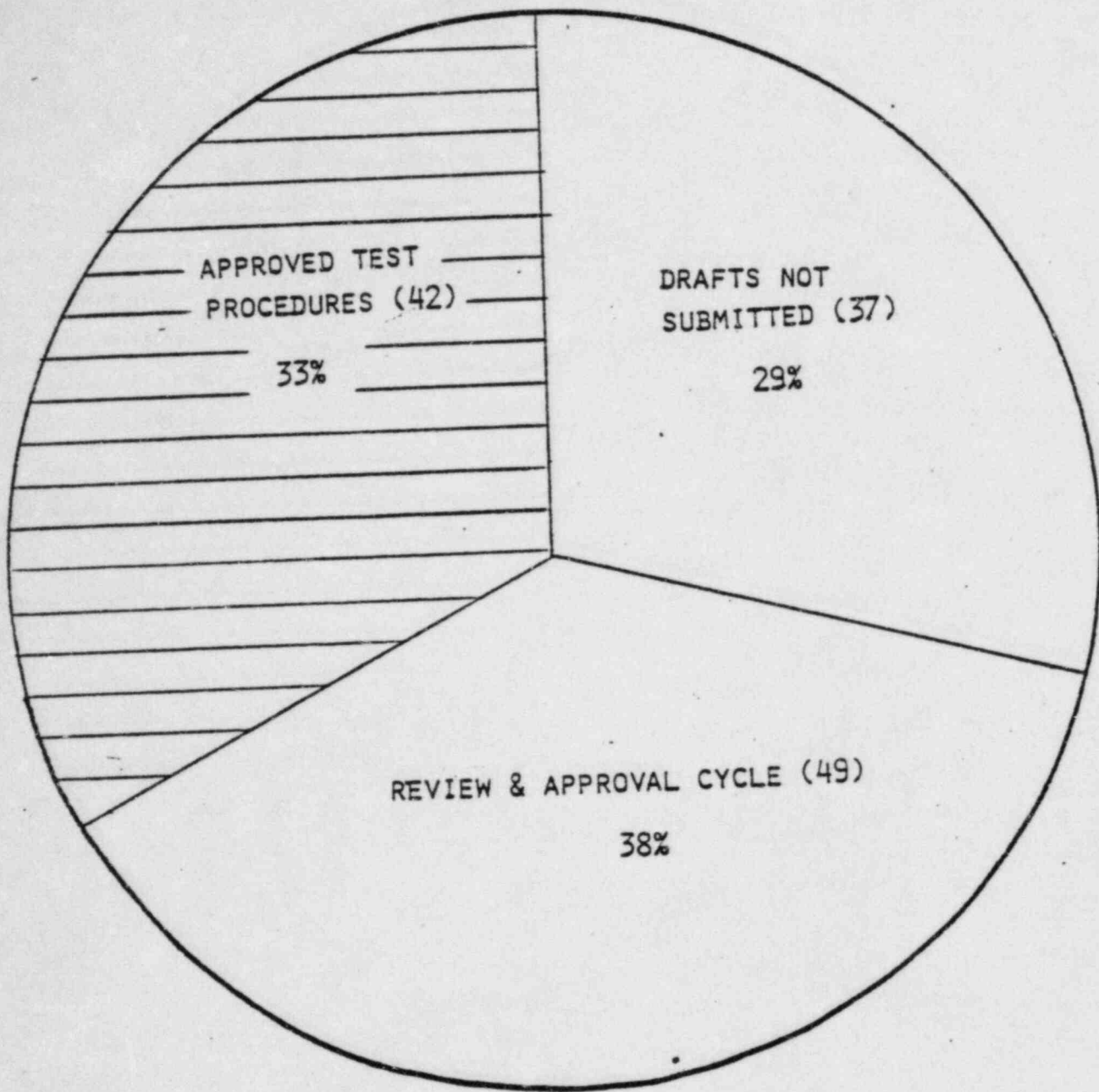




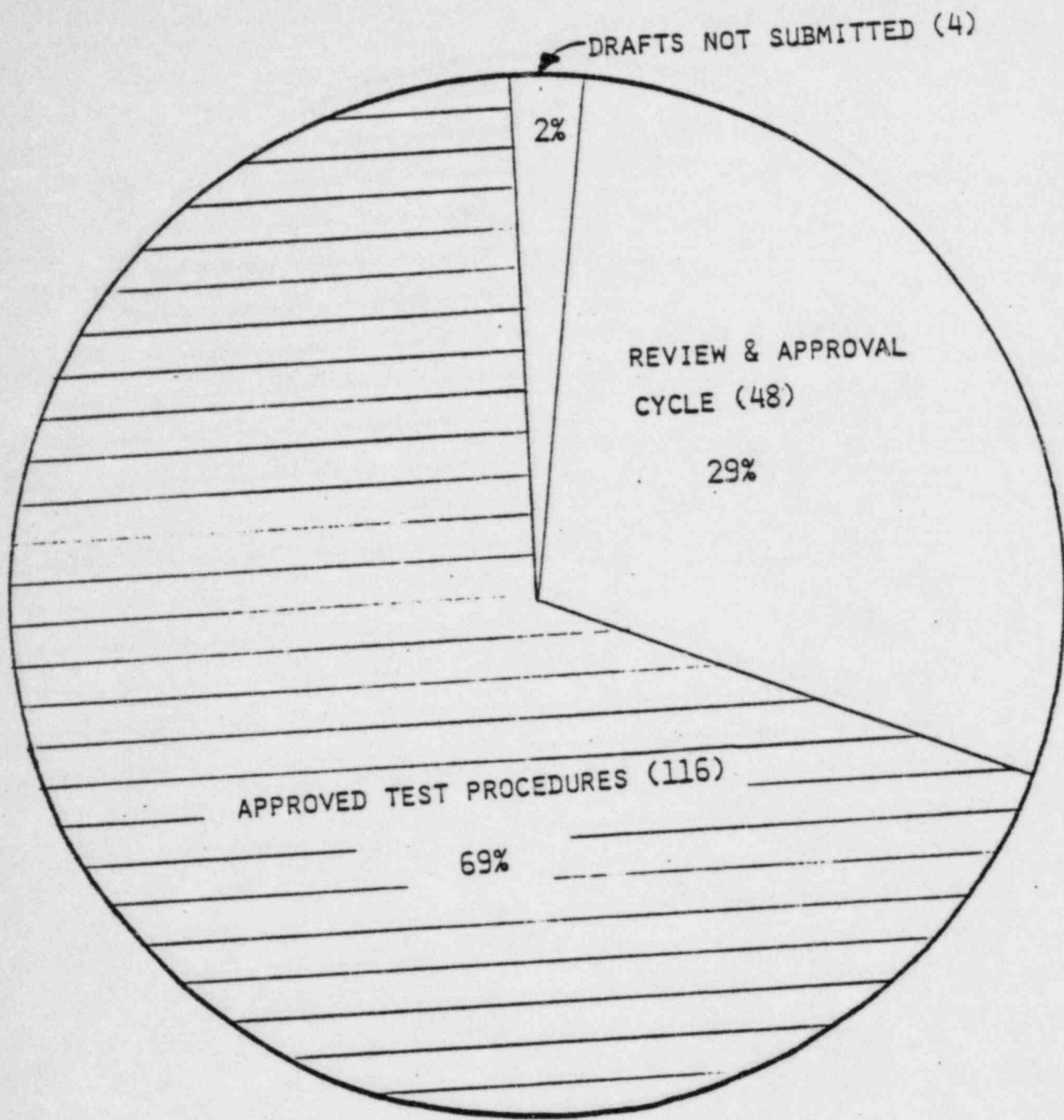
TEST PROCEDURE - STATUS 3-31-83 (729)



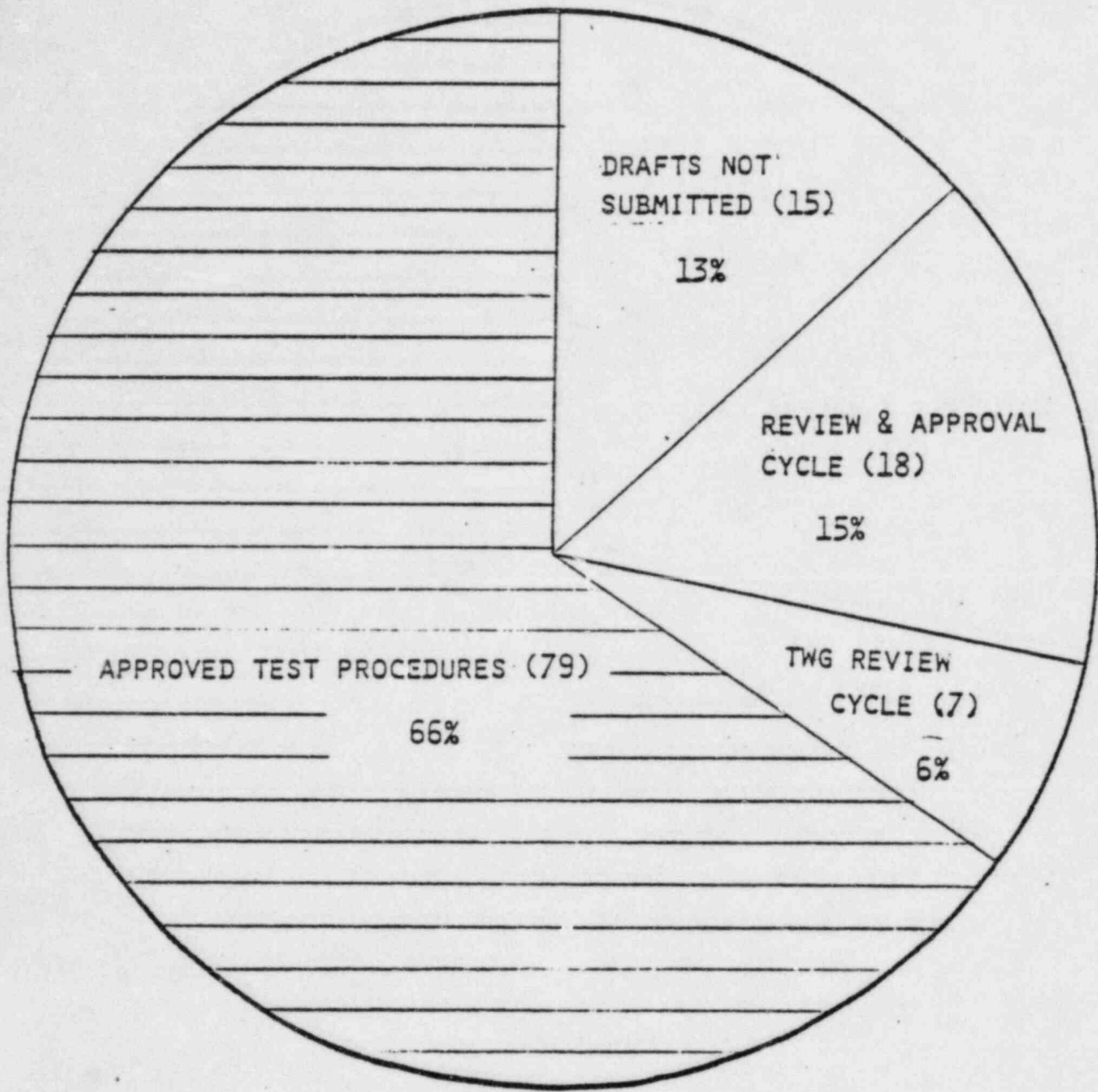
PREOPERATIONAL TEST PROCEDURES (268)



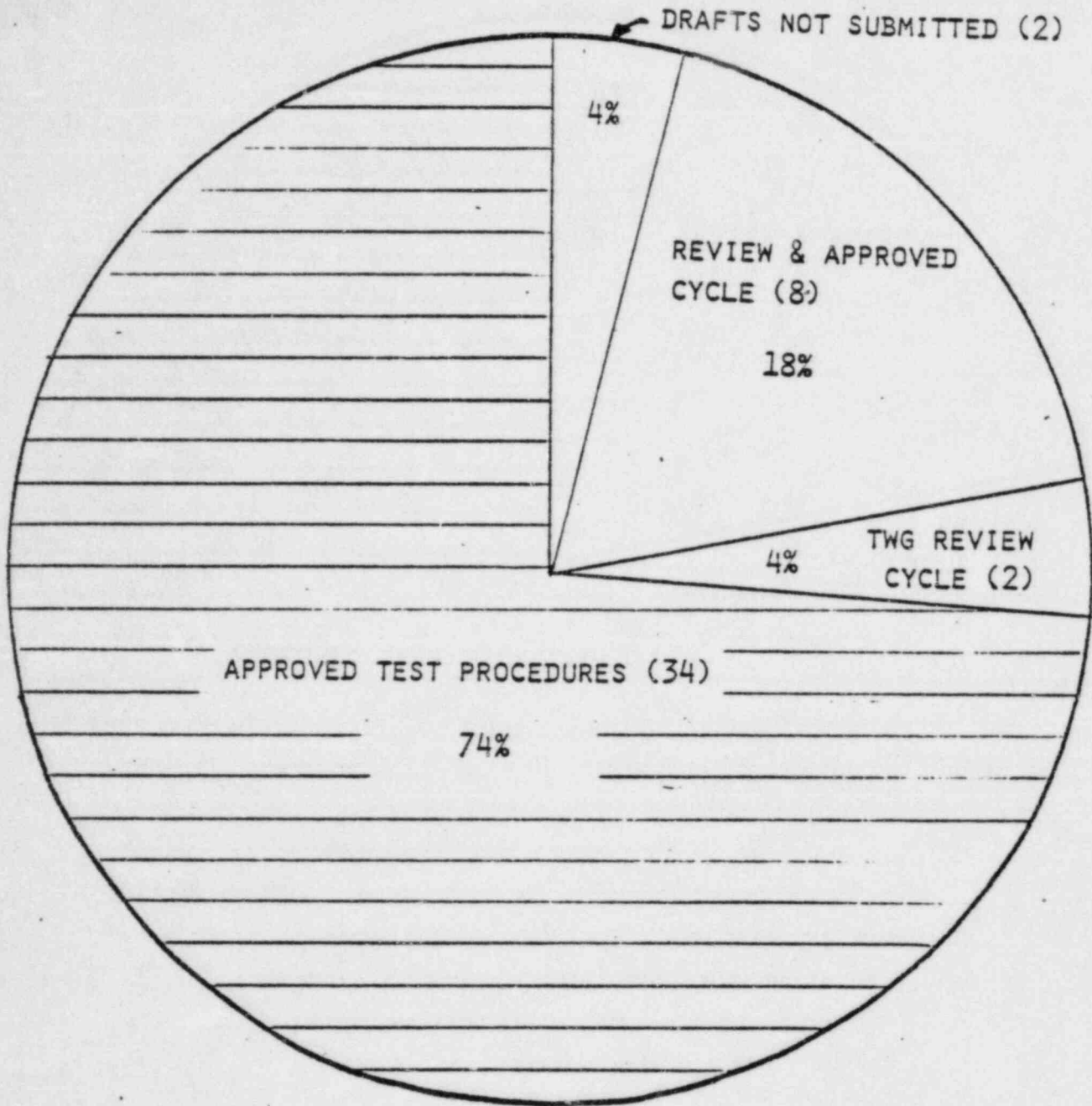
ACCEPTANCE PROCEDURES (128)



FLUSHING PROCEDURES (168)



SPECIFIC PROCEDURES (119)



GENERIC PROCEDURES (46)

	<u>COMPLETED</u>	<u>STARTED/NOT COMPLETE</u>
PRE-OPERATIONAL TESTS	0	2
ACCEPTANCE TESTS	1	0
SYSTEM FLUSHES	16	17
SPECIFIC TESTS	9	23
	<hr/>	<hr/>
TOTAL	26	42

TOTAL TESTS REQUIRED

(EXCLUDING GENERIC TESTS) 683

% TEST COMPLETE = 4

TESTS COMPLETED - (3-31-83)

DISCIPLINE

GENERIC CHECKOUT  
PERCENT COMPLETE

ELECTRICAL

83

I & C

37

TURBINE/HVAC

24

FEEDWATER/CONDENSATE

25

NSSS

4

AUXILIARY SYSTEM

8

PROCESS STEAM

15

TOTAL SYSTEM CHECKOUT COMPLETE

---

45%

SYSTEM CHECKOUT STATUS - (3-31-83)



TEST SCHEDULE REV 12

(REFER TO BIG CHART - PLAN FOR  
TWO UNIT STARTUP OR FIGURE 4  
OF HANDOUT)

POST TURNOVER EXCEPTION WORK  
CONSTRUCTION GENERAL SERVICES ORGANIZATION MANPOWER

NON-MANUAL 55

MANUAL

PIPEFITTERS & WELDERS - 55

ELECTRICIANS - 35

LABORERS - 10

100

MANPOWER CURVES

REFER TO HANDOUT MATERIAL, FIGURE 5



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

SEP 2 1981

R.J. COOK

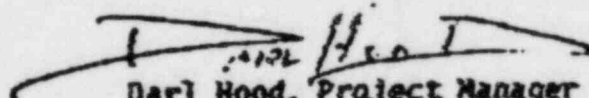
MEMORANDUM FOR: Darrell G. Eisenhut, Director  
Division of Licensing, NRR

THRU: Robert L. Tedesco, Assistant Director  
for Licensing, DL

FROM: Darl Hood, Project Manager  
Licensing Branch #4, DL

SUBJECT: NRR PERFORMANCE EVALUATION FOR SALP CYCLE 2 FOR  
MIDLAND PLANT, UNITS 1 AND 2

The enclosure provides NRR's performance evaluation as part of the Systematic Assessment of Licensee Performance, Cycle 2, for Midland Plant, Units 1 and 2. The evaluation was prepared by the Project Manager and covers the period July 1, 1980 to June 30, 1981. Since most of the interaction with Consumers Power Company during this assessment period regarded the soils settlement and seismic input for the site, concurrences from the Division of Engineering were obtained during the preparation of this assessment.

  
Darl Hood, Project Manager  
Licensing Branch #4  
Division of Licensing

Enclosure:  
As stated

Dupe  
~~8109150641XA~~

## NRR PERFORMANCE EVALUATION

Facility: Midland Plant, Units 1 and 2 Project Manager: Darl Hood

Appraisal Period: July 1, 1980 - June 30, 1981

### 1. Performance Elements

#### a. Quality of Responses and Submittals

Responses and submittals during this review period have principally regarded the soils settlement issue, including seismic input, and responses to Post-TMI requirements (NUREG-0737). These matters involve significant design changes, extensive additional calculations, soils exploration and laboratory analyses. During the earlier part of this review period, replies to staff's request were not substantive and tended to argue the staff's need for that information; once the management appeal decision or staff position was taken, the replies tended to become responsive. Hence, the quality of the response tends to be acceptable once the need is firmly established. Following a long appeal to NRR management, recent responses providing soil borings and laboratory tests comply with the staff request and are of acceptable quality. Recent responses establishing new seismic design criteria for the site have been of high quality once the staff position letter (R. Tedesco, October 1, 1980) established the need. Like many other plants, the responses to post-TMI requirements at this point in time largely reflect plans and commitments with details left for a later stage. In summary, while early responses during the report period were below average in responsiveness, the more recent responses tend to be substantive and of acceptable quality. This recognizes, of course, that in several areas, design progress does not yet provide for substantive replies.

#### b. Efforts Required to Obtain an Acceptable Response or Submittal

##### (1) Timeliness

It generally takes more than the average time and effort to obtain acceptable and substantive responses from this applicant. The propensity of this applicant to utilize the hearing process and NRC management appeal process to resolve disagreements requires that additional time and effort be expended by the staff in satisfying the applicant that the staff's request or views are adequately based. Examples during this report period are discussed above for the staff request for soil borings and the need for seismic criteria resolution. Such factors make it difficult to maintain schedules for this application.

##### (2) Effort

Refer to item 1b (1) above.

##### (3) Responsiveness to staff requests

Refer to item 1a

(4) Anticipate or reacts to ~~unc~~ ~~needs~~

This is an average utility in this area. The utility's effort to anticipate post-TMI changes were quite favorable. However the utility's early reluctance to provide information needed by the staff with respect to soils issues denotes a lack of appreciation of or reaction to staff ~~needs~~ needs. An improvement in this item has occurred during the latter phase of this review period as the potential of licensing delays impacting construction completion is realized by this utility.

c. Working Knowledge of Regulations, Guides, Standards and Generic Issues

This Utility has a good and current working knowledge of licensing matters. I would rate it above average in this respect.

d. Technical Competence

This is an experienced Utility with two operating nuclear plants (Palisades and Big Rock Point). The Utility is considered to be average to above average overall in technical competence. However, in the soils and foundation engineering areas, the Utility has relied heavily upon Bechtel, and Bechtel in turn, upon consultants. The effectiveness derived from employing expert consultants has, in the past, been diminished by the practice of Bechtel to utilize consultants' information as recommendations only and thus to modify or ignore their advice. Thus, the technical competence of the Midland project with respect to soils has depended upon the competence of Bechtel to recognize the significance of its decisions with respect to expert consultants' advice. Some improvements have been noted during this report period in a revised QA organization intended to provide more control to Consumer's over the project. Consumer's has also tended recently to contract directly with recent consultants, rather than to contract through Bechtel.

e. Conduct of Meetings with NRR

A significant improvement in the conduct and followup of meetings with NRR has occurred since the utility reorganization which began in March 1980 and was completed in October 1980. The utility is now considered average in this area.

f. Long-standing Open Items

While there are many long-standing open items on this plant, it is recognized that the early plant design and interrupted staff review following the TMI-2 accident have also contributed. Timely close-out of these items under the circumstances are judged reasonable. An exception to this is the applicant's delay in providing soil borings, which has delayed the soils hearing completion and results in overlaps with the Staff's OL SER preparation effort. This area will be quite significant during the next report period.

g. Organization and Management Capabilities

As noted in paragraphs 1d and 1e above, the recent Utility reorganization reflects significant improvements and a tendency toward increased self-sufficiency on the part of the Utility. The new organization is judged to be average in effectiveness.

h. Results of Operator Licensing Examinations

Not applicable to this appraisal period.

i. Performance on Specific Issues

Consultants utilized by this Utility for advice on soils remediation, soils borings and laboratory evaluation, and for resolution of seismic issues are among the best available. This is a positive factor contributing to the Utility's performance on very complex and sweeping issues.

2. Observed Trends in Performance

As noted in several items above, several improving trends in licensing performance have been observed.

3. Notable Strengths and Weaknesses

Strengths

This is an experienced Utility with a good knowledge of NRC licensing requirements.

Weaknesses

Needs to be satisfied as to the reality of NRC staff information needs before responsive and substantive replies are offered. It is thus difficult to maintain licensing review schedules on this plant. The Project Manager also believes that a more assertive role by the Utility in screening input from others for responsiveness to staff information requests could significantly increase licensing completion.

4. Overall Summary

Overall, this is considered to be an average Utility. This Utility has the ability to be responsive to staff requests and licensing needs, if properly motivated. Absent this motivation, Applicant tends to be unresponsive. This trend, however, is improving as schedular pressures accruing from untimely staff review become more obvious. Compared to other Utilities, this Applicant tends to make more frequent use of staff management appeals and use of licensing boards to obtain resolution of issues, often at the expense to licensing review schedules. More recently, a significant trend toward increased cooperation and communication with the technical staff at the reviewer levels has been noticed, a trend which this Project Manager feels will prove to be in the Applicant's best interest.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
Resident Inspector Office  
Rt 7  
Midland, Michigan  
48640

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

These two pages, Overall  
licensee Performance Evaluation,  
are "flavoring" for the letter  
to the licensee from the SALP  
Board Chairman.



## Overall Licensee Performance Evaluation

During the evaluation period, the licensee's performance is assessed to be Category 3 in the technical areas of resolving the soils settlement issues; installation of piping and pipe suspension systems - particularly small bore piping; and electrical installations.

In the past three years there has been an abundant amount of activity associated with soils settlement issues. In spite of this, the enforcement history in this area shows the licensee has demonstrated a lack of attention to detail. Therefore, the licensee is considered to be in performance Category 3 in this area. Continued enforcement in the soils area may cast dispersions on the licensee's ability to successfully perform proposed resolution to the soils settlement issues and invoke further escalated enforcement action in this area.

In the area of control of piping and pipe support systems, the licensee had received (during the evaluation period) escalated enforcement action. While in the process of attempting to correct these deficiencies, the licensee received additional items of noncompliance and escalated enforcement as a result of the NRC review into their resolution of the original items. This happened immediately after the end of the evaluation period. Since then, the licensee's performance appears to be improved. However, the test of time will ensure that the licensee has actually improved their performance in control of piping and pipe supports systems or whether their improvement was only as a result of responding to escalated enforcement action.

In the electrical area, the licensee had embarked on an ambitious "pulling schedule" commencing half way through the evaluation period. Prior to this, the NRC had verbally advised the licensee to have adequate number and quality of QC and QA personnel available when escalated electrical installation activities commenced. The enforcement history identified during the evaluation period indicates a lack of rigorous QC coverage. Since this enforcement, the licensee has increased the rigor and frequency of overview inspections, performed a detailed audit pertaining to material storage and brought upper management's attention to the findings, and is presently inquiring (at the insistence of the NRC) into the adequacy of electrical QC coverage. Similarly, to the installation of piping and pipe support systems, time will establish the sincerity of corrective actions.

In the less technical, but more managerial, areas of corrective action and reporting and design control, the licensee has demonstrated during the evaluation period that the Category 3 performance classification is warranted by not having a strong resolution to perpetually avoid the indicators discussed in the body of this report. The licensee's argumentative attitude toward responses to NRC enforcement issues has invoked management meetings with the licensee subsequent to the SALP evaluation period where the NRC has delineated what information constitutes an adequate response. Should the licensee offer strong responsible management conviction to resolving the reporting and design control issues, a turn-around in these areas could be expedited.

It is intuitively obvious from the above and the body of the report that the licensee's overall performance is considered to be Category 3.

DRAFT

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE

CONSUMERS POWER COMPANY

MIDLAND NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NUMBERS 50-329 AND 50-330

FEBRUARY 1982

ASSESSMENT PERIOD

JULY 1, 1980 to JUNE 30, 1981

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2. Letter to Licensee from SALP Board Chairman
3. Licensee Comments

I. Introduction

II. Criteria

III. Summary of Results

IV. Performance Analyses

V. Supporting Data and Summaries

1. Noncompliance Data
2. Licensee Report Data
3. Licensee Activities
4. Inspection Activities
5. Investigations and Allegations
6. Escalated Enforcement Action
7. Management Conferences

## I. INTRODUCTION

The NRC has established a program for Systematic Assessment of Licensee Performance (SALP). The SALP is an integrated NRC Staff effort to collect available observations and data on a periodic basis and evaluate licensee performance based upon these observations. SALP is supplemental to normal regulatory processes used to insure compliance to the rules and regulations. SALP is intended from a historical point to be sufficiently diagnostic to provide a rational basis: (1) for allocating future NRC regulatory resources, and (2) to provide meaningful guidance to licensee management to promote quality and safety of plant construction and operation.

A NRC SALP Board composed of managers and inspectors who are knowledgeable of the licensee activities, met on October 23, 1981 to review the collection of performance observations and data to assess the licensee performance in selected functional areas.

This SALP report is the Board's assessment of the licensee safety performance at the Consumer Power Company Midland Nuclear Power Plant for the period July 1, 1980 to June 30, 1981.

The results of the SALP Board assessments in the selected functional areas were presented to the licensee at a meeting held \_\_\_\_\_.

## II. CRITERIA

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

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

1. Management involvement in assuring quality
2. Approach to resolution of technical issues from safety standpoint
3. Responsiveness to NRC initiatives
4. Enforcement history
5. Reporting and analysis of reportable events
6. Staffing (including management)
7. Training effectiveness and qualification

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

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

Category 1. A combination of attributes which demonstrates achievement of superior safety performance; i.e., licensee management attention and involvement are aggressive and oriented toward nuclear safety; licensee resources are ample and effectively used such that a high level of performance with respect to operational safety or construction is being achieved. Reduced NRC attention may be appropriate.

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

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

III. SUMMARY OF RESULTS

<u>Functional Areas</u>	<u>Performance Category</u>		
	<u>1</u>	<u>2</u>	<u>3</u>
1. Soils and Foundations			X
2. Containment and other Safety-Related Structures		X	
3. Piping Systems and Supports			X
4. Safety-Related Components		X	
5. Heating, Ventilating, and Air Conditioning Systems	X		
6. Electrical Power Supply and Distribution			X
7. Instrumentation and Control Systems	NA	NA	NA
8. Licensing Activities		X	
9. Quality Assurance		X	
10. Fire Protection	X		
11. Preservice Inspection		X	
12. Design and Design Changes			X
13. Reporting Requirements and Corrective Action			X

#### IV. PERFORMANCE ANALYSES

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##### 1. Soils and Foundations

###### a. Analysis

During the evaluation period, inspections have been performed to examine the licensee's implementation of corrective actions regarding the 10 CFR 50.54(f) request for additional information pertaining to soils settlement; observation of soils work activities and to witness taking of soil borings requested by NRC reviewers and consultants.

Since 1978, the soils settlement issues have been paramount in the amount of attention given by the NRC to this licensee. This activity has resulted in an order issued in December 1979 which is the basis for a hearing on soils settlement issues. A multitude of effort has gone into soils testing and major re-review of the FSAR and design control. In spite of this attention, every inspection involving Regional based inspectors and addressing soils settlement issues has resulted in at least one significant item of noncompliance, and the following enforcement history for the soils settlement area has existed during the SALP evaluation period:

Two level IV violations were identified in NRC Inspection Report No. 50-329/80-32; 50-330/80-33.

- 1) Failure to initiate preventive action to preclude repetition of not identifying design documents as references to which the FSAR was to be reviewed against.
- 2) Three examples of failure to translate applicable regulatory requirements and design criteria into design documents.
  - a) Failure to maintain a coordination log of specification change notices (SCN).



- 01/27/77
- b) Failure to correctly translate Specification Change Notice No. SCN-9004 as a requirement into Rev. 20 of specification C-208.
  
  - c) Failure of Engineering Department Project Instruction No. EDPI 4.25.1, Rev. 8 to establish adequate measures for design interface requirements.

One level V violation and a deviation were identified in NRC Inspection Report No. 50-329/81-01; 50-330/81-01.

- 1) Failure to establish test procedures for soils work activities.
  
- 2) Failure to supply an onsite geotechnical engineer.

One level V violation was identified in NRC Inspection Report No. 50-329/81-09; 50-330/81-09 which is discussed under the Quality Assurance Section. However, the finding of lack of QA was a result of attempting to review the QA associated with procuring soil boring samples.

Failure to evaluate the technical capabilities of Woodward-Clyde (principal supplier of services for soil boring activities) prior to procurement of a drilling contractor.

b. Conclusion

Because of the above enforcement history, the licensee is considered to be in a performance Category 3 in the area of soils and foundations.

c. Board Recommendation

The Board recommended an NRC escalated inspection activity for each major evolution in the resolution of soils settlement issues. The Board also noted that there was an increased inspection frequency recommended in the SALP 1.

2. Containment and Other Safety Related Structures

a. Analysis

During the evaluation period, containment prestressing system procedures were reviewed; selected work activities associated with tendon insertion and buttonheading for Unit 1 were observed and prestressing system material records for Unit 1 and quality records for Units 1 and 2 were reviewed.

Also during the evaluation period, the Senior Resident Inspector witnessed portions of the atmospheric hydrostatic test placed on the borated water storage tanks (BWST). The Senior Resident Inspector observed Quality Control and the Authorized Nuclear Inspector examine the tanks. The hydrostatic test was done in an acceptable manner. Although the hydrostatic test was completed without complications, loading of the BWST with water resulted in cracks developing in the valve pit area associated with these tanks. This cracking in the valve pit support walls is subsequently related to soils issues.

b. Conclusions

During the previous reporting period the licensee experienced difficulty in installation of prestressing tendons. However, these difficulties did not exist during this evaluation period. Therefore, the licensee is considered to be in a performance Category 2 for containment and safety related structures.

c. Board Recommendations

None

3. Piping Systems and Supports

a. Analysis

During the evaluation period, installation of large and small bore piping and pipe hanger systems (including storage of piping components) was examined and noted in seven different inspection reports of regularly scheduled inspection activities. Three of these inspections resulted in seven items of noncompliance and an isolated instance of inadequate dunnage in a temporary storage area. The following items of noncompliance indicate weakness in the implementation of the QA program.

- 1) Bechtel Purchase Order did not specify applicable codes for purchase of 60,000 pounds of E7018 electrode.
- 2) Bypass of an inspection hold point for pressurizer surge piping. (Unit 2 only).
- 3) Failure to install large bore pipe restraints, supports, and anchors in accordance with design drawings and specifications.
- 4) Failure of QC inspector to reject large bore restraints, supports and anchors that were not installed in accordance with design drawings and specifications.
- 5) Failure to prepare, review and approve small bore pipe and piping suspension system designs performed onsite in accordance with design control procedures.
- 6) Failure to adequately control documents used in site small bore piping design activities.
- 7) Failure of audits to include a detailed review of system stress analysis and to follow up on previously identified hanger calculation inconsistencies.

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Also during the evaluation period, an Immediate Action Letter (IAL) was issued on May 22, 1981, pertaining to the design control and issuance of drawings for the installation of small bore piping and support systems. The NRC inspection of July 16-17 and 23-24, 1981 (NRC Inspection Report No. 50-329/81-14; 50-330/81-14) determined that the licensee had "satisfactorily addressed" the provisions of the May 22, 1981 IAL. Also, subsequent to the evaluation period, on July 27, 1981, a Confirmatory Action Letter was submitted by the licensee stating the actions to be taken to control modification to small bore piping drawings which do not have Committed Preliminary Design Calculations (CPDC).

b. Conclusion

Considering the above escalated enforcement action plus the enforcement history, the licensee is considered to be in performance Category 3.

c. Board Recommendation

An escalated and intensified inspection effort is recommended for implementation in early 1982.

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4. Safety Related Components

a. Analysis

During the evaluation period, NRC Inspectors observed alignment of reactor coolant pumps; installation of lower core support assembly guide blocks; installation of core support assembly vent valves and associated portions of quality documentation. The enforcement history consisted of two items of noncompliance and a Confirmatory Action Letter. All were issued as a result of NRC findings during the installation of the core support assembly vent valves.

The following is a summary of the items of noncompliance which culminated in a Confirmatory Action Letter issued by the licensee on January 22, 1981.

- 1) Failure to have an appropriate procedure for installation of vent valves.
- 2) Failure to follow access control procedures and account for items used in the assembly of the U/2 core support assembly vent valves on the equipment entry log.

The Confirmatory Action Letter stated that the Stop Work on assembly of core support assembly vent valves would remain in effect until procedures, personnel training and QA overview inspection plans are upgraded.

b. Conclusion

Because the above enforcement was aimed at an isolated instance and may have been directly related to changes in NSSS QC personnel changes and because the licensee had in the past and since this episode continues to maintain QA control for assembly of NSSS equipment (particularly reactor internals), the licensee is considered to be in performance Category 2 for this area.

c. Board Recommendation

None

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5. Heating, Ventilating, and Air Conditioning Systems

a. Analysis

On January 7, 1981, a \$38,000 Civil Penalty was levied against the licensee for QA deficiencies in the installation of heating, ventilating, and air conditioning (HVAC) systems which were noted during an investigation during the period of March 6, 1980 to July 31, 1980. Seventeen items of noncompliance were identified during this period and one additional item was identified in a later report (NRC Inspection Report No. 50-329/80-21; 50-330/80-22). The later item was not considered in the Civil Penalty.

Considering the above enforcement history would ordinarily force a Category 3 performance classification in this area. However, because of the overlap into the previous SALP (evaluation period of July 1, 1979 to June 30, 1980) for the investigation and subsequent escalated enforcement action and previous discussions in this area, this present SALP overall evaluation shall not be influenced by the enforcement history for installation of HVAC systems.

Since the investigation, Consumers Power Company has accepted complete responsibility for HVAC System QA/QC functions. This aggressive action of removing QA/QC responsibility from the subcontractor installing HVAC systems has resulted in marked improvement being noted in the control of HVAC system installation.

b. Conclusion

Because of the aggressiveness of Consumers Power Company to accept QA/QC responsibility for HVAC system installation and to staff this organization with an adequate number of skilled personnel, the licensee is considered to be in performance Category 1.

c. Board Recommendation

The Board recommends escalated inspection effort to cover all areas of HVAC system installation and the resolution of previous enforcement items.

6. Electrical Power Supply and Distribution

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a. Analysis

During the evaluation period, two routine inspections and one team inspection were performed with a substantial portion of the inspection effort dedicated to the electrical area. Five other inspection periods addressed specific electrical items with one of these inspections addressing the in place storage condition of electrical equipments. As a result of the inspection effort dedicated to the electrical area, six items of noncompliance were identified. The inspection effort into the equipment storage conditions resulted in a single item of noncompliance with three examples - two of these examples were for electrical equipment.

It must be emphasized that there was essentially no electrical work being performed for more than six months into the evaluation period because of the need to perform re-engineering to permit routing of the cables without thermal and/or physical overload of the raceways. When electrical work resumed, it was done on a very ambitious schedule. However, it appears that not enough qualified QC personnel, rigorous QA audits and established procedural controls were invoked to avoid the following list of enforcement items.

- 1) Failure to establish procedures for temporary support of cable, cable coils --- and for routing cables.
- 2) Electrical contractors failed to verify conformance to paragraph 3.1 of Project Quality Control Instruction E-5.0, failure to perform adequate inspection.
- 3) Failure to identify and control nonconforming components.
- 4) Failure to translate design criteria into drawings and specifications.

- 5) Failure to identify during inspection that a nonconforming condition with regard to minimum installed cable bend radius existed.
- 6) Failure to take proper corrective action with regard to the lack of approved procedures for the rework of electrical raceways.
- 7) Failure to provide adequate storage conditions for
- a) Control Rod Drive Primary AC Breakers
  - b) New and spent fuel storage racks
  - c) Emergency battery chargers

b. Conclusion

Based on the above enforcement history, the licensee is considered to be in performance Category 3.

c. Board Recommendation

Comprehensive inspections at approximately two-month intervals are recommended for the electrical area. These inspections should place particular emphasis on those areas of heaviest activity for the month preceding the inspection with particular emphasis on QC personnel.



7. Instrumentation and Control Systems

a. Analysis

The licensee is not rated in this area because a minimal amount of instrumentation installation and subsequent inspection effort has occurred during this evaluation period.

b. Conclusions

None

c. Board Recommendations

The Board recommends comprehensive inspections at two-month intervals commencing when the instrumentation installation activities start to dramatically increase, with particular emphasis on design control and QC coverage. These inspections could be coincident with the electrical inspections.

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8. Licensing Activities

a. Analysis

Responses and submittals during this review period have principally regarded the soils settlement issue, including seismic input, and responses to Post-TMI requirements (NUREG-0737). During the earlier part of this review period, replies to staff's request were not substantive and tended to argue the staff's need for that information; once the management appeal decision or staff position was taken, the replies tended to become responsive. Hence, the quality of the response tends to be acceptable once the need is firmly established. Because of the time expended in establishing a need, more than the normal amount of time and effort are required to obtain acceptable and substantive responses. Recent responses establishing new seismic design criteria for the site have been of high quality once the staff's position letter established the need.

The licensee is considered to be technically competent and is an experienced utility with two operating nuclear plants. Timely close out of long-standing open items is reasonable when considering the many open items on this plant, the early plant design and interrupted staff review following the TMI-2 accident.

b. Conclusion

Early responses during the reporting period were lacking in responsiveness. However, the more recent responses tend to be substantive and of acceptable quality. Therefore, the licensee is considered to be in performance Category 2 for licensing activities.

c. Board Recommendation

None

9. Quality Assurance

a. Analysis

Effective August 15, 1980, Consumers Power Company reorganized the site QA functions by creating the Midland Plant Quality Assurance Department (MPQAD) which was composed of both Consumers Power Company and Bechtel Power Corporation personnel. This reorganization was instituted in the interest of more comprehensive coverage of QA and more timely resolution of noted discrepancies. Consumers Power Company retains the lead responsibility for QA.

Also during the reporting period, Consumers Power Company assumed responsibility for all on-site QA and QC functions for installation of HVAC systems. These functions and controls were previously handled by The Zack Company. The changes in responsibility were implemented to "establish more effective QA/QC interface; provide increased technical support; and provide a mechanism to improve inspection performance".

Because of changes in QA organization and changes in the Site QA Superintendent, the NRC regularly evaluated the impact of these changes on the overall QA aspects of the site and performed a Team Inspection in May 1981. A portion of this Team Inspection consisted of making a determination of the adequacy of QA and the influence of production considerations on the independence of QA/QC. This inspection revealed that the number and qualifications of personnel in the Consumers Power Company QA organization were above average. The QA programs and overview inspection and audit functions were also above average. However, a severity level IV item of noncompliance was written against management's failure to take prompt comprehensive corrective action in response to the identification of adverse quality trends (Inspection Report No. 50-329/81-12; 50-330/81-12). This item of noncompliance is indicative of Consumers Power Company QA Management exhibiting a hesitancy to determine the "root cause" of increases in deficiencies. This same weakness was identified during the previous SALP period.

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A second item of noncompliance was identified which is indicative of questionable managerial QA control. This item pertained to the licensee's failure to evaluate the technical capability of the principal supplier of services for soil boring activities (Inspection Report No. 50-329/81-09; 50-330/81-09). During the inspections prior to taking soil borings, 15 items requiring QA resolution were identified by the NRC prior to any drilling activities but during the period when "setting up" for the drilling operations was being anticipated.

b. Conclusion

When considering an overall performance category for the licensee's Quality Assurance capability, a Category 2 performance is realized with two major infractions being identified in two confined areas.

c. Board Recommendation

None

10. Fire Protection

a. Analysis

During the evaluation period, the Senior Resident Inspector toured selected areas of the site each month to assess the cleanliness of the site and determine the potential for fire or other hazards which might have a deleterious effect on personnel and equipment. The site has maintained an adequate safety record during this SALP period. A substantial portion of the site safety program is devoted to fire protection. The licensee conducts weekly training and drills for the on site fire brigade. The fire brigade has consistently passed the quarterly fire drills imposed by the licensee's insurance agency. Volatile chemicals are controlled and issued in small quantities in metal containers. Volatile chemicals, oils, combustibles and trash are not tolerated in an unclean and uncontrolled state. Fire hazards were minimized during the evaluation period and the licensee has accrued a multi-million-hour safety record.

b. Conclusion

Because of the above mentioned attentiveness to fire protection, the licensee is considered to be in a performance Category 1 in this area.

c. Board Recommendation

None

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11. Preservice Inspection

a. Analysis

During the evaluation period, three routine inspections were performed to evaluate the ultrasonic testing (UT) of the reactor pressure vessels by South West Research Institute (SWRI) and the preservice inspection being performed by Babcock & Wilcox (B&W). The inspection effort revealed that adequate management controls existed for the inservice inspection program, procedures, and material and equipment. The licensee responses to I&E Bulletins was determined to be complete in this area. The data reports demonstrated that QA/QC audits and requirements are met. The qualifications and training of SWRI and B&W personnel was in accordance with SNT-TC-1A, 1975.

b. Conclusion

Considering the above performance and the overall effectiveness and the cooperative attitude of the licensee and nondestructive evaluation personnel, the licensee is considered to be in performance Category 2 in the area of preservice inspection.

c. Board Recommendation

None

12. Design and Design Changes

a. Analysis

During the evaluation period, three items of noncompliance were identified against 10 CFR 50 Appendix B, Criterion III, Design Control and one item against Criteria XVI, Corrective Action which was closely related to deficiencies in design control. These items of noncompliance have been addressed in other sections of this SALP report. However, the common bond between these items of noncompliance is that each addresses inadequate design control.

The following is a reference list of these items of noncompliance:

1) Section 1, Soils and Foundations

- (a) Failure to initiate preventive action to preclude repetition of not identifying design documents.
- (b) Three examples of failure to translate applicable regulatory requirements and design criteria into design documents.

2) Section 3, Piping Systems and Supports

Failure to prepare, review and approve small bore pipe and piping suspension system designs performed onsite in accordance with design control procedures.

3) Section 6, Electrical Power Supply and Distribution

Failure to translate design criteria into drawings and specifications.

In addition to the enforcement items listed above, an Immediate Action Letter was issued by the NRC pertaining to design control and issuance of drawings for the installation of small bore piping. This item was previously iterated in Section 5, Piping and Hangers.

Also, the following five 10 CFR 50.55(e) summaries, which were among the twelve Construction Deficiency Reports submitted demonstrates there was lack of QA in design control and these instances should have been licensee controllable.

- 1) High Energy Line Break Analysis (HELBA), steady state thrust forces rather than transient peak thrust forces were used in the energy balance techniques for the design of HELBA pipe whip restraints.
- 2) Component Cooling Water (CCW) Design, CCW system susceptibility to Loss of Coolant Accident (LOCA) induced failures.
- 3) Seismic model of Auxiliary Building has incorrect assumption that control tower and main portion of Auxiliary Building are an integral unit between elevation 614 and 659.
- 4) Borated Water Storage Tank Foundation stress cracks.
- 5) Shear reinforcement at major containment penetrations.

The fact that the licensee is able to often times identify design deficiencies through their audit programs and take appropriate action is commendable. However, these design deficiencies would not occur if there were more stringent control at the source of these design errors and deficiencies.

b. Conclusion

Considering the above indicators which suggest questionable design control and the amount of re-engineering which has transpired in electrical, civil, and piping areas, the licensee's performance is considered to be Category 3.

c. Board Recommendation

None



13. Reporting Requirements and Corrective Action

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a. Analysis

During the evaluation period, the licensee submitted twelve Construction Deviation Reports to the NRC with most of the information contained being a fair (but not necessarily an elaborate) description of the circumstances resulting in the 10 CFR 50.55(e) report. The following is an abbreviated summary of each 10 CFR 50.55(e) submitted to the NRC during the evaluation period.

- 1) High Energy Line Break Analysis (HELBA), steady state thrust forces rather than transient peak thrust forces were used in the energy balance techniques for the design of HELBA pipe whip restraints.
- 2) Sway Strut Rod Ends Deficiency, ITT Grinnell supplied sway struts, snubbers and shock suppressors have loose or totally disengaged rod end bushings.
- 3) Component Cooling Water (CCW) Design, CCW system susceptibility to Loss of Coolant Accident (LOCA) induced failures.
- 4) Nuclear Steam Supply System (NSSS) analysis, anomalies identified in the NSSS seismic and Loss of Coolant (LOCA) analysis of the primary system.
- 5) Emergency Core Cooling Actuation System (ECCAS) vendor wiring in the ECCAS cabinets 1C45 and 2C45 was inconsistent with redundant subsystem modules in the cabinets.
- 6) Low alloy quenched and tempered bolting  $1\frac{1}{2}$  inches and greater in support of safety-related systems.
- 7) Underrated Terminal Strips on Limitorque Operators.

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- 8) Seismic model of Auxiliary Building has incorrect assumption that control tower and main portion of Auxiliary Building are an integral unit between elevation 614 and 659.
  - 9) Borated Water Storage Tank Foundation stress cracks.
  - 10) ITE Gould Class 1E equipment, unqualified cable used to wire equipment and/or controls.
  - 11) Shear reinforcement at major containment penetrations.
  - 12) Operation of reactor cavity cooling system.

During the evaluation period, the licensee failed to make a timely determination for the need to submit a 10 CFR 50.55(e) report to the NRC based on a 10 CFR Part 21 report from Transamerica Delaval, Inc. pertaining to diesel engine link rod clearances and this was identified by the NRC as an item of noncompliance. The licensee has taken positive actions to ensure that any safety related information received pertinent to the Midland Site is evaluated with respect to the impact on overall safety.

With regard to responses to items of noncompliance, the licensee has contested 9 of the 22 items of noncompliance written against areas other than HVAC system installation. Of the nine items contested by the licensee, the NRC agreed in two instances and removed the items of noncompliance. Of the twenty total items of noncompliances against the installation of HVAC systems (19 items in NRC Inspection Report No. 50-329/80-10; 50-330/80-11 and one item in NRC Inspection Report No. 50-329/80-21; 50-330/80-22) the licensee contested five items and the NRC agreed in two instances and removed the items of noncompliance.

It is realized that the licensee does have appeal rights on items of noncompliance, but when the licensee appeals over 40% (excluding HVAC system citations) and realizes a less than 10% success rate, it becomes apparent that the licensee's rebuttal lacks substance a high percentage of the time. The licensee's inadequate responses delays an expedient

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resolution to the items of noncompliance and conveys an uncooperative attitude and ultimately affects the efficient operation of both the licensee and NRC and becomes a detriment to construction of a quality plant. Subsequent to the evaluation period licensee management were invited to a meeting in the Regional Office so the NRC could explain their position on what constitutes an adequate response to noncompliances and subsequent corrective action.

b. Conclusion

Based on the questionable quality of the licensee's response to enforcement items, the licensee is considered to be in performance Category 3 for this area.

c. Board Recommendation

None

V. SUPPORTING DATA AND SUMMARIES

1. Noncompliance Data

Facility Name: Midland Nuclear Power Plant UNIT: 1 DOCKET NO: 50-329

Inspections No. 50-329/80-17 through No. 50-329/80-37

No. 50-329/81-04 through No. 50-329/81-12

Functional Areas	Noncompliances and Deviations <sup>1</sup>									
	Severity Levels						Categories			
	I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.
1. Soils & Foundations				(2)	(1)					(1)
2. Containment & Other Safety Related Structures										
3. Piping System & Supports				(1)	(4)			(1)		
4. Safety Related Components										
5. HVAC Systems					(1)			(15)	(3)	
6. Electrical Power Supply/Dist					5					
7. Instrumentation & Control Sys.										
8. Licensing Activities										
9. Quality Assurance				(1)	(1)					
10. Fire Protection										
11. Preservice Inspection										
12. Design and Design Changes										
13. Reporting Requirements								(1)		
14.										
15.										
16.										
17.										
18.										
19.										
20.										
21.										
TOTALS				4	12			17	3	1

<sup>1/</sup> Numbers in parenthesis indicate noncompliances common to both units.

V. SUPPORTING DATA AND SUMMARIES

1. Noncompliance Data

Facility Name: Midland Nuclear Power Plant UNIT: 2 DOCKET NO: 50-330

Inspections No. 50-330/80-18 through No. 50-330/80-38

No. 50-330/81-04 through No. 50-330/81-12

Noncompliances and Deviations<sup>1</sup>

Functional Areas	Severity Levels						Categories			
	I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.
1. Soils & Foundations				(2)	(1)					(1)
2. Containment & Other Safety Related Structures										
3. Piping System & Supports				(1)	(4)			2		
4. Safety Related Components					2					
5. HVAC Systems					(1)			(15)	(3)	
6. Electrical Power Supply/Dist					(4)	1				
7. Instrumentation & Control Sys.										
8. Licensing Activities										
9. Quality Assurance				(1)	(1)					
10. Fire Protection										
11. Preservice Inspection										
12. Design and Design Changes										
13. Reporting Requirements								(1)		
14.										
15.										
16.										
17.										
18.										
19.										
20.										
21.										
TOTALS				4	13	1		18	3	1

<sup>1/</sup> Numbers in parenthesis indicate noncompliances common to both units.

2. Licensee Report Data

a. Construction Deficiency Reports (CDR's)

Twelve (12) Construction Deficiency Reports (CDR's) reported pursuant to 10 CFR 50.55(e), were received by the regional office during the period of July 1, 1980 and June 30, 1981. The following list is a summary of each reportable item.

- \*1. High Energy Line Break Analysis (HELBA), steady state thrust forces rather than transient peak thrust forces were used in the energy balance techniques for the design of HELBA pipe whip restraints.
2. Sway Strut Rod Ends Deficiency, ITT Grinnell supplied sway struts, snubbers and shock suppressors have loose or totally disengaged rod end bushings.
- \*3. Component Cooling Water (CCW) Design, CCW system susceptibility to Loss of Coolant Accident (LOCA) induced failures.
4. Nuclear Steam Supply System (NSSS) analysis, anomalies identified in the NSSS seismic and Loss of Coolant (LOCA) analysis of the primary system.
5. Emergency Core Cooling Actuation System (ECCAS) vendor wiring in the ECCAS cabinets 1C45 and 2C45 was inconsistent with redundant subsystem modules in the cabinets.
6. Low alloy quenched and tempered bolting  $1\frac{1}{2}$  inches and greater in support of safety related systems.
7. Underrated Terminal Strips on Limitorque Operators.
- \*8. Seismic model of Auxiliary Building has incorrect assumption that control tower and main portion of Auxiliary Building are an integral unit between elevation 614 and 659.

Number and Nature of Deficiency Reports (cont)

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- \*9. Borated Water Storage Tank Foundation stress cracks.
- 10. ITE Gould Class 1E equipment, unqualified cable used to wire equipment and/or controls.
- \*11. Shear reinforcement at major containment penetrations.
- 12. Operation of reactor cavity cooling system.

\*Indicates may have been licensee controllable and are indicative of lack of QA in design control.

b. Part 21 Reports:

No Part 21 reports were initiated by the licensee during the reporting period.

3. Licensee Activities

The licensee continued to construct both units at the same rate and achieved approximately 70% completion during the reporting period. Safety related electrical installation was recommenced with vigor after a period of reduced activity while additional engineering was performed. Assembly of vessel internals, closure head and reactor coolant pumps aggressively continued during the period. As a portion of the resolution for soils settlement issues, extensive soil samples and borings were taken and work commenced on dewatering wells.

4. Inspection Activities

A major "team" inspection was accomplished on May 18-22, 1981, which resulted in an issue of an Immediate Action Letter pertaining to installation of small bore piping.

Heavy inspection effort was expended to follow the resolution of soils settlement issues and taking of soil samples. Inspections in the electrical area have increased to be commensurate with the increase in licensee efforts in this area.

5. Investigations and Allegations

None were pursued during the evaluation period.

6. Escalated Enforcement Actions

a. Civil Penalty

On January 7, 1981, a \$38,000 civil penalty was issued by the NRC as a result of an investigation pertaining to the installation of heating, ventilating and air conditioning equipment and systems. Nineteen items of noncompliance were identified in 10 of the 18 Appendix B criteria (10 CFR 50 Appendix B). The investigation was completed in July 1980.

b. Orders

None



c. Immediate Action Letters

On May 22, 1981, an Immediate Action Letter was issued by the Region III Office of Inspection and Enforcement concerning the issuance of fabrication and construction drawings for the installation of the safety related small bore piping and piping suspension systems.

d. Confirmatory Action Letter

1. On January 22, 1981, Consumers Power Company issued a letter to the Director of Region III stating that their Stop Work Order of January 16, 1981 to B&W for installation of Core Support Assembly Vent Valves would remain in effect until the procedures were revised, training of personnel was completed, and the overview inspection plan was revised. This action was taken in lieu of Region III, Office of Inspection and Enforcement issuing an Immediate Action Letter.
2. On July 27, 1981, Consumers Power Company issued a letter to the Director, Region III delineating those actions to be taken to control modification to drawings which do not have the required Committed Preliminary Design Calculations (CPDC) and that the methodology for modifications to be fully documented and submitted to the Regional Office for review. This action was taken in lieu of Region III Office of Inspection and Enforcement issuing an Immediate Action Letter.

7. Management Conferences

Three meetings were held with Consumers Power Corporate Management during the appraisal period.

- a. The first meeting was held on November 24, 1980 and continued on December 2nd and 17th, 1980. The purpose of the meeting was to discuss the Systematic Assessment of Licensee Performance (SALP) and to be present for the licensee's presentation of the recently reorganized QA organization. (Inspection Report No. 50-329/80-36 and 50-330/80-37)

- JLW
- b. The second meeting was held March 13, 1981 to discuss the Midland Project Organization, Midland QA Program evaluation and the new external quality consultation. (Inspection Reports No. 50-329/81-05 and 50-330/81-05)
  
  - c. The third meeting was held on May 22, 1981 to discuss the results of the team inspection of 5/18 to 5/22/81. (Inspection Report No. 50-329/81-12 and 50-330/81-12)

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III. SUMMARY OF RESULTS

Category 1

Category 2

Category 3

Functional Areas

	<u>Category 1</u>	<u>Category 2</u>	<u>Category 3</u>
1. Soils and Foundations			X
2. Containment and other Safety-Related Structures		X	
3. Piping systems and supports			X
4. Safety-Related Components		X	
5. Support Systems <del>HVAC</del>	X		
6. Electrical power supply and distribution			X
7. Instrumentation and Control Systems <del>Instrumentation and Control Systems</del>	NA	NA	NA
8. Licensing Activities			
9. Others (list any other areas or delete. If in preop phase use appropriate areas from list under operating reactors.)			
9 Quality Assurance		X	
10 Fire Protection	X		
11 Pre-service Inspection		X	
<del>HVAC</del>	<del>NA</del>		
12 Design + Design <del>Control</del> Changes			X

204

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11. NUMBER AND NATURE OF ENFORCEMENT ITEMS

Midland Unit 2

Functional Area	Noncompliances and Deviations										
	Severity Level						Classification				
	I	II	III	IV	V	VI	Vio	Inf	Def	Dev	
9 1. Quality Assurance				(1)	(1)						
2. Site Preparation and Foundations				(2)	(1)					(1)	
3. Containment Structures											
4. Safety-Related Structures											
5. Piping & Hangers				(1)	(4)			2			
6. Safety-related Components					2						
7. Electrical					(4)	1					
8. Instrumentation											
9. Licensing Activities											
10. Fire Protection											
11. Preservice Inspection											
12. Reporting Requirements, Corrective Actions and Reporting								(1)			
12. Procurement											
13. Design and Design Changes											
14. Training											
15. HVAC Modules Not Included In Any Functional Area					(1)			(15)	(3)		
TOTALS				4	13	1		18	3	1	

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APPENDIX B

REGION III

Licensee Performance Evaluation (Construction)

Facility: Midland Units 1 and 2

Licensee: Consumers Power Company

Unit Identification:

<u>Docket No.</u>	<u>CP No./Date of Issuance</u>	<u>Unit No.</u>
50-329	CPPR-81, December 15, 1972	1
50-330	CPPR-82, December 15, 1972	2

Reactor Information:	<u>Unit 1</u>	<u>Unit 2</u>
NSSS	B&W	B&W
MWt	2452	2452

Appraisal Period: July 1, 1979 to June 30, 1980

Appraisal Completion Date: July 15, 1980

Review Board Members:

Draft

A. Number and Nature of Noncompliance Items

<u>Noncompliance Category</u>	<u>Unit 1</u>	<u>Unit 2</u>
Violations	-	-
Infractions	7	8
Deficiencies	2	2

<u>Areas of Noncompliance</u>	<u>Unit 1 (Points)</u>	<u>Unit 2 (Points)</u>
Criterion XIII	10	10
Criterion II	10	10
Criterion III	10	10
Criterion IX (2)	20	20
Criterion V (2/3)	20	30
Criterion XVII	2	2
Criterion V	2	2

B. Number and Nature of Deficiency Reports

Twelve Construction Deficiency Reports (CDR's) were received by the regional office during the period of July 1, 1979 through June 30, 1980. The nature of these reports covers a broad range of material and construction problems as listed below:

1. Containment coolers, water supply problem
2. Small break/RC Pump operation interaction
3. States sliding links, defective clip (Electrical)
4. Tendon wire length problem
5. Station batteries inadequate
- \* 6. Hilti drop-in anchors
- \* 7. RPV anchor bolt failures
8. Boration system inadequacies
9. Gould startes
- \*10. Epoxy coating o primary shielding walls
11. Letdown coolers supports over-stressed
- \*12. NSSS components wiring problem

\*Indicates may have been licensee controllable

C. Escalated Enforcement Actions

Civil Penalties

None

Orders

December 6, 1979, an order modifying construction permits No. CPPR-81 and CPPR-82 was issued by the NRC prohibiting certain construction activities relating to soils problems.

Draft

Immediate Action Letters

March 21, 1980 an immediate action letter was issued by the Region III office of Inspection and Enforcement concerning stop work by the Zack Corporation of all safety related heating and ventilating equipment installations.

D. Management Conferences Held During Past Twelve Months

E. Justification of Evaluations of Functional Areas Categorized as Requiring an Increase in Inspection Frequency/Scope (See evaluation sheet)

Draft

FUNCTIONAL AREA	Inspection Frequency and/or Scope		
	Increase	No. Change	Decrease
1. Quality Assurance, Management & Training	X (Interim for new organization)		
2. Substructure & Foundations		X	
3. Concrete			X (Suggest Cease)
4. Liner (Containment & Others)			X (Ditto)
5. Safety-Related Structures		X (push for completion)	
6. Piping & Hangers (Reactor Coolant & Others)		X	
7. Safety-Related Components (Vessel, Internals & HVAC)	X (HVAC)	X (Push for completion)	
8. Electrical Equipment		X	
9. Electrical (Tray & Wire)		X	
10. Instrumentation		X	
11. Fire Protection		X	
12. Preservice Inspection		X	
13. Reporting			
(It is unknown as to what the author had in mind here)			

Several inspections should have effort applied to review of the organization changes in the QA/QC function on site. At this time it appears that additional inspection coverage will be necessary for the HVAC activity until the function stabilizes.

(Designated Regional Manager)

Date \_\_\_\_\_



FUNCTIONAL AREA	Inspection Frequency and/or Scope		
	Increase	No. Change	Decrease
1. Quality Assurance, Management & Training	✓		
2. Substructure & Foundations	✓		
3. Concrete		✓	
4. Liner (Containment & Others)		✓	
5. Safety-Related Structures		✓	
6. Piping & Hangers (Reactor Coolant & Others)		✓	
7. Safety-Related Components (Vessel, Internals & HVAC)	✓		
8. Electrical Equipment		✓	
9. Electrical (Tray & Wire)		✓	
10. Instrumentation		✓	
11. Fire Protection		✓	
12. Preservice Inspection		✓	
13. Reporting	✓		

(Designated Regional Manager)

Date

## Management

- 1) QA, Management & Training - Management Central  
There has been several management changes and an influx of new employees plus an integration of CPCo and Bechtel QA personnel within the past 4-8 weeks. There are also plans to add additional QA Personnel including personnel in the management ranks. CPCo Site QA management has not completely settled out, i.e., J. Corley has gone to CPCo Corporate and a permanent replacement has not been announced. Therefore increased inspection effort would be warranted to
  - 1) Insure the qualifications of the "rank and file" QA personnel (including Bechtel QA personnel) is adequate.
  - 2) Insure, when all the management slots are filled, that strong QA control can be maintained
  - 3) To insure that the CPCo - Bechtel QA Dept. integration does not hamper free flow of QA information in the interest of protecting commerciality aspects which exist between CPCo and Bechtel. (Refer Attachment A)

attachment A

(2)

## Reporting - Communications

a recent episode occurred when there was a hesitancy of Bechtel to supply CPCs QA personnel with a Part 21 letter from Debaral without the Bechtel QA person getting authorization to release the letter. This temporary hesitancy of Bechtel to release the Part 21 letter resulted in some strained dialogue between CPCs and Bechtel QA with strong undertones of protecting Bechtel commerciality. Although this is only one "explicit" indicator, it may be symptomatic that congeniality might not exist between CPCs and Bechtel QA departments as applied to the integration of the two factions.

Bechtel got Debaral ltr on Sept 26, 1980

Oct 24, 1980 - I probed Part 21 Debaral - conversation above was that day

Adequacy of Management Controls

(2,3&5) Substructures and Foundations and Safety Related Structures and Concrete

Because of the soils settlement issues and subsequent heaving activities, an increased inspection activity is recommended to allow I+E to be responsive to quality related questions pertinent to these issues.

Essentially all the concrete is poured. However, related to the above, in response to NRR requirements pertaining to concrete placement and the fact that the Batch Plant has been dismantled I+E should perform limited scope inspections of concrete placement to insure the above referenced requirements are met.

Because of Soils Heaving and NRR Requirement involvement, the above inspections should be completed from the Regional Office.

#### 4) Liner (Containment and Others)

The only activity which should require I+E involvement is in the area of penetrations. Some work is presently transpiring in the termination of piping at fluidheads / penetrations. An area which appears to have received limited I+E attention is the penetration leak detection system and associated instrumentation.

(5)

7) Safety-Related Components (Vessel, Internals and HVAC)

Because of the investigation and preponderance of negative results pertaining to The Zack Co installation of HVAC Systems - increased inspection effort is warranted in this area. Particular emphasis should be placed on CFC's and Bechtel QC ability to monitor and assess the QC programs invoked by Zack prior to starting work.

There has been increased activity pertaining to assembly of the vessel internals, closure head and reactor coolant pumps and has required much hand fitting. Although there has been no apparent major QC deficiencies at the site - this is attributed to the perseverance of a single CFC - QA individual and the attention of the NRC.

### 13) Reporting

The entire aspect of reporting Part 50.55(e) needs more attention in that there is a reluctance of CLC to not report a 50.55(e) until a 50.55(e) exists beyond a shadow of doubt. The mechanism by which reporting requirements are triggered also requires more scrutiny. These points have been brought about by the Part 21-Debaral letter and the failure of the "system" to pick up this information and trigger a review for 50.55(e) aspects. Also, there was a hesitancy to report the Rock HVAC situation as a 50.55(e) until it could be demonstrated that the inferior welds would fail and cause safety concerns.

Whether the trend of hesitancy to report 50.55(e) is due to Corporate QA management changes is not completely known - but Corporate QA management changes were made at about the time this trend was "sensed" by the NRC.

General Organization

There are changes occurring in the site QA organization - these changes are not complete. However, the Site QA Superintendent was removed from his position and placed in a removed capacity (from QA) at the Corporate office and no replacement has been picked. Therefore, until a new Site QA Superintendent has been picked and indoctrinated - it might be appropriate for the Corporate QA Manager to fill this vacancy.





# DRAFT

V. SUPPORTING DATA AND SUMMARIES

1. Noncompliance Data

Facility Name: Midland Nuclear Power Plant UNIT: 1 DOCKET NO: 50-329

Inspections No. 50-329/80-17 through No. 50-329/80-37

No. 50-329/81-04 through No. 50-329/81-12

Functional Areas	Noncompliances and Deviations <sup>1</sup>									
	Severity Levels						Categories			
	I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.
1. Soils & Foundations				(2)	(1)					(1)
2. Containment & Other Safety Related Structures										
3. Piping System & Supports				(1)	(4)			(1)		
4. Safety Related Components										
5. HVAC Systems					(1)			(15)	(3)	
6. Electrical Power Supply/Dist.					5					
7. Instrumentation & Control Sys.										
8. Licensing Activities										
9. Quality Assurance				(1)	(1)					
10. Fire Protection										
11. Preservice Inspection										
12. Design and Design Changes										
13. Reporting Requirements								(1)		
14.										
15.										
16.										
17.										
18.										
19.										
20.										
21.										
<b>TOTALS</b>				4	12			17	3	1

<sup>1</sup>/ Numbers in parenthesis indicate noncompliances common to both units.

*Note: One (I) really for material storage*

OK

01111

SUMMARY OF ITEMS OF NONCOMPLIANCE

-329 50-330 Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	
10-10 80-11	Criterion V	Activities affecting quality were not accomplished in accordance with documented instructions and procedures for fabrication. <span style="float: right;">1050</span>	10	10	Infraction
	Criterion V	Welders identification was not recorded on travelers.	2	2	Deficiency
	Criterion V	Unapproved marking material, Eberhard Faber Marquette was used to mark sheet steel stock and fabricated items installed in seismic Class 1 duct work without a change approved by the contractor.	2	2	Deficiency
	Criterion XII	Documentary evidence did not exist that material and equipment conform to procurement requirements prior to installation or use.	10	10	Infraction
	Criterion VIII	Failure to assure the identification of safety related HVAC components throughout fabrication, erection and installation.	10	10	Infraction
	Criterion IX	Established welding procedures were not used as specified or in the manner used to qualify the procedure.	10	10	Infraction
	Criterion IX	Procedures to control weld filler metal at the Midland construction site were not followed	10	10	Infraction

OK

9/27/15  
151  
10/27/79

SUMMARY OF ITEMS OF NONCOMPLIANCE

-329 50-330 Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Type
(cont) (cont) 80-10 80-11	Criterion IX	Welding was not performed in accordance with prequalified welding procedures.	10	10	Infraction
	Criterion IX	Individual welds were not identified by welder ID numbers.	10	10	Infraction
	Criterion IX	Two welders were assigned the same welder's ID stamp	10	10	Infraction
	Criterion X	Instructions and procedures for inspections were not prescribed for activities affecting quality.	10	10	Infraction
	Criterion X	The program for inspection was not adequate to assure compliance with applicable specifications.	2	2	Deficiency
	Criterion XV	Measures which would prevent the inadvertent use or installation of nonconforming materials had not been established.	10	10	Infraction
	Criterion XV	Nonconformance tags had been applied to fire dampers without explicitly identifying the item.	10	10	Infraction
	Criterion XVI	None of the seven nonconformance reports generated by CPCo during 5/23 - 10/2/79 had been promptly corrected.	10	10	Infraction

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SUMMARY OF ITEMS OF NONCOMPLIANCE

-329 50-330 Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Type
cont) (cont) 0-10 80-11	Criterion XVI	Measures were not adequate to assure that conditions adverse to quality were promptly identified.	10	10	Infraction
	Criterion XVII	Sufficient records to furnish evidence of activities affecting quality were not maintained.	10	10	Infraction



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SUMMARY OF ITEMS OF NONCOMPLIANCE

Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Severity Level
10-32 80-33	Criterion III	<p>Three examples of failure to translate applicable regulatory requirements and design criteria into design documents</p> <ul style="list-style-type: none"> <li>a) Failure to maintain a coordination log of specification change notices.</li> <li>b) Failure to correctly translate SCM-9004 as a requirement into Rev. 2C of specification C-208.</li> <li>c) Failure of EDPI 4.25.1, Rev. 8 to establish adequate measures to waive design interface requirements.</li> </ul>	10	10	IV

SUMMARY OF ITEMS OF NONCOMPLIANCE

LEVEL

0-329 50-330 E Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Severity Level
81-01 81-01	Criterion V	Failure to establish test procedures for soils work activities.	10	10	V
	Criterion VI	Failure to control test results forms for soils work activities.	10	10	V
	Criterion XVII	Failure to initial and date test report sheets or to control the use of signature stamps.	10	10	V
81-04 81-04	Criterion V	Failure to have an appropriate procedure for installation of vent valves.	10	10	V
	Criterion V	Failure to follow access control and severity levels items used in the assembly of the U2 core ie., U2 core support assembly vent valves without being supported assembly valves on the equipment accounted for on equipment log entry log.	10	10	V
81-08 81-08	Criterion XIII	Failure to provide adequate storage conditions for  1) Control Rod Drive Primary AC Breakers  2) New and spent fuel storage racks  3) Emergency battery chargers	10	10	V

Under E list  
Leak  
7

OK

So. 54 f  
Quest 23 response

Failure to supply an onsite geotechnical engineer

Procedures  
in account for

Failure to follow access control and severity levels items used in the assembly of the U2 core ie., U2 core support assembly vent valves without being supported assembly valves on the equipment accounted for on equipment log entry log.

Deviated



SUMMARY OF ITEMS OF NONCOMPLIANCE

50-329 IE Report No.	50-330 Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Severity Categories
81-09	Criterion V <i>15051 6005</i>	Failure to evaluate the technical capabilities of Woodward <sup>Clyde</sup> prior to commencement of drilling operations.	10	10	V
81-11	Criterion V <i>51051 6005</i>	Failure to establish procedures for temporary support of cable, cable coils --- and for routing cables.	10	<del>10</del> 10	V
Question whether really against only Unit 1	Criterion X <i>7 51051 6005</i>	Electrical contractors failed to verify conformance to paragraph 3.1, failure to perform adequate inspection.	10	<del>10</del>	V
	Criterion XV <i>7 51051 6005</i>	Failure to identify and control nonconforming components.	10	10	V
Electrical Engineering	Criterion III <i>1 51051 6005</i>	Failure to translate design criteria into drawings and specifications.	10	<del>10</del> 10	V

SUMMARY OF ITEMS OF NONCOMPLIANCE

50-329 50-330 IE Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Severity Categorie
81-12 81-12 <i>Q1-1</i>	Criterion XVI <i>2706 WEB</i>	Routine analysis of report revealed that appropriate site managers have not routinely established comprehensive corrective actions in response to the identification of adverse quality trends.	10	10	IV
<i>Question whether Unit 2 on Comm.</i>	Criterion X <i>1 2706</i>	Failure to identify during inspection that a nonconforming condition with regard to minimum installed cable bend radius existed.	<i>Adm</i>	<i>2</i>	VI
	Criterion XVI <i>2706 WEB</i>	Failure to take proper corrective action with regard to the lack of approved procedures for the rework <i>of electrical race ways</i> .	10	10	V
	Criterion V <i>2706 WEB</i>	Failure to install large bore pipe restraints, supports, and anchors in accordance with design drawings and specifications.	10	10	V

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UNCLASSIFIED

SUMMARY OF ITEMS OF NONCOMPLIANCE

50-329 50-330	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Severity Categories
IE Report No. (cont) 81-12	50-330 5KAS	Failure of QC inspector to reject large bore restraints, supports and anchors that were not installed in accordance with design drawings and specifications.	10	10	V
(cont) 81-12	50-330 5KAS	Failure to prepare, review and approve small bore pipe and piping suspension system designs performed onsite in accordance with design control procedures.	10	10	IV
	50-330 5KAS	Failure to adequately control documents used in site small bore piping design activities.	10	10	V
	50-330 5KAS	Failure of audits to include a detailed review of system stress analysis and to follow up on previously identified hanger calculation problems.	10	10	V

NUMBER AND NATURE OF ENFORCEMENT ITEMS - Plants under Construction

Facility Name MIDLAND Docket No. 329 Unit 1

Functional Areas	Investigation & Inspection Manhours	Noncompliances and Deviations										
		Severity Levels						Categories				
		I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.	
1. Quality Assurance	73					4						
2. Site Preparation and Foundations	18											
3. Containment Structures	26											
4. Safety-Related Structures	2											
5. Piping and Hangers	33				1	4			1			
6. Safety-Related Components	14											
7. Electrical	107						3					
8. Instrumentation												
9. Fire Protection	25											
10. Preservice Inspection	32											
11. Corrective Action and Reporting	1											
12. Procurement	0											
13. Design and Design Changes	2											
14. Training	0											
15. Plant Operations Preparation	0											
16. Fuel Loading Preparation	0											
17. Maintenance	0											
18. Security & Safeguards	NONE											
19. Surveillance and Pre-OPERATIONAL TESTING	0											
20. Emergency Planning	0											
21. Audits, Reviews, and Committee activities	0											
22. Modules Not included in Any Functional Area	927				1	1			20	3		
TOTALS	1260				2	12			21	3		

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NUMBER AND NATURE OF ENFORCEMENT ITEMS - Plants under Construction

Facility Name MIDLAND Docket No. 330 Unit 2

Functional Areas	Investigation & Inspection Manhours	Noncompliances and Deviations											
		Severity Levels						Categories					
		I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev		
1. Quality Assurance	71					4							
2. Site Preparation and Foundations	17												
3. Containment Structures	5												
4. Safety-Related Structures	2												
5. Piping and Hangers	40				1	4				2			
6. Safety-Related Components	17					2							
7. Electrical	104					2	1						
8. Instrumentation	0												
9. Fire Protection	26												
10. Preservice Inspection	34												
11. Corrective Action and Reporting	1												
12. Procurement	0												
13. Design and Design Changes	2												
14. Training	0												
15. Plant Operations Preparation	0												
16. Fuel Loading Preparation	0												
17. Maintenance	0												
18. Security & Safeguards	0												
19. Surveillance and Pre OPERATIONAL TESTING	0												
20. Emergency Planning	0												
21. Audits, Reviews, and Committee activities	0												
22. Modules Not included in Any Functional Area	921				1	1				20	3		
TOTALS	1240				2	<del>1</del>				20	5		

15

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Number and Nature of Noncompliance Items

Noncompliance Category

Unit 1 Points Unit 2 Points

Violations

-

-

Infractions

21

21

Deficiencies

3

3

Severity Levels

I

0

0

II

0

0

III

0

0

IV

2

2

V

12

13

VI

0

1

II. NUMBER AND NATURE OF ENFORCEMENT ITEMS

UKAF 1

Midland Unit 1

Docket No. 50-329

Functional Area	Investigation & Inspection Manhours	Noncompliances and Deviations								
		Severity Level						Classification* Dev.		
		I	II	III	IV	V	VI	Vio.	Infr.	Def.
1. Quality Assurance	73					4				
2. Site Preparation & Foundations	18									
3. Containment Structures	26									
4. Safety-Related Structures	2									
5. Piping & Hangers	33				1	4			1	
6. Safety-related Components	14									
7. Electrical	107					3				
8. Instrumentation										
9. Fire Protection	25									
10. Preservice Inspection	32									
11. Corrective Actions & Reporting	1									
12. Procurement	0									
13. Design and Design Changes	2									
14. Training	0									
15. Modules Not Included In Any Functional Area	927				1	1			20	3
TOTALS	1260				2	12			21	3

# DRAFT

## II. NUMBER AND NATURE OF ENFORCEMENT ITEMS

Midland Unit 2

Docket No. 50-330

Functional Area	Investigation & Inspection Manhours	Noncompliances and Deviations								
		Severity Level						Classification* Dev.		
		I	II	III	IV	V	VI	Vio.	Infr.	Def.
1. Quality Assurance	71					4				
2. Site Preparation & Foundations	17									
3. Containment Structures	5									
4. Safety-Related Structures	2									
5. Piping & Hangers	40				1	4			2	
6. Safety-Related Compo- nents	17					2				
7. Electrical	104					2	1			
8. Instrumentation	0									
9. Fire Protection	26									
10. Preservice Inspection	34									
11. Corrective Actions & Reporting	1									
12. Procurement	0									
13. Design and Design Changes	2									
14. Training	0									
15. Modules Not Included In Any Functional Area	921				1	1		20	3	
TOTALS	1240				2	13	1	20	5	



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Number and Nature of Noncompliance Items

Noncompliance Category

Unit 1 Points Unit 2 Points

Violations

-

-

Infractions

21

21

Deficiencies

3

3

Severity Levels

I

0

0

II

0

0

III

0

0

IV

2

2

V

12

13

VI

0

1

II. NUMBER AND NATURE OF ENFORCEMENT ITEMS

Midland Unit 1

Functional Area	Noncompliances and Deviations									
	Severity Level						Classification			
	I	II	III	IV	V	VI	Vio	Inf	Def	Dev
1. Quality Assurance				1	1					
2. Site Preparation and Foundations				2	2	1				1
3. Containment Structures										
4. Safety-Related Structures										
5. Piping & Hangers				1	4			1		
6. Safety-related Components										
7. Electrical					5					
8. Instrumentation										
9. Fire Protection										
10. Preservice Inspection										
11. Corrective Actions and Reporting								1		
12. Procurement										
13. Design and Design Changes										
14. Training										
15. Modules Not Included In Any Functional Area	278				1			15 -14	3	
TOTALS	517			4	13	1		16	3	1

II. NUMBER AND NATURE OF ENFORCEMENT ITEMS

Midland Unit 2

Functional Area	Noncompliances and Deviations									
	Severity Level						Classification			
	I	II	III	IV	V	VI	Vio	Inf	Def	Dev
1. Quality Assurance				1	1					
2. Site Preparation and Foundations				2	2	1				1
3. Containment Structures										
4. Safety-Related Structures										
5. Piping & Hangers				1	4			2		
6. Safety-related Components					2					
7. Electrical					5	1				
8. Instrumentation										
9. Fire Protection										
10. Preservice Inspection										
11. Corrective Actions and Reporting								1		
12. Procurement										
13. Design and Design Changes										
14. Training										
15. Modules Not Included In Any Functional Area	277				1			15	3	
TOTALS	492			4	15	2		18	3	1

SUMMARY OF ITEMS OF NONCOMPLIANCE

0-329 50-330 E Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	
80-10 80-11	Criterion V	Activities affecting quality were not accomplished in accordance with documented instructions and procedures for fabrication.	10	10	Infraction
	Criterion V	Welders identification was not recorded on travelers.	2	2	Deficiency
	Criterion V	Unapproved marking material, Eberhard Faber Marquette was used to mark sheet steel stock and fabricated items installed in seismic Class 1 duct work without a change approved by the contractor.	2	2	Deficiency
	Criterion VII	Documentary evidence did not exist that material and equipment conform to procurement requirements prior to installation or use.	10	10	Infraction
	Criterion VIII	Failure to assure the identification of safety related HVAC components throughout fabrication, erection and installation.	10	10	Infraction
	Criterion IX	Established welding procedures were not used as specified or in the manner used to qualify the procedure.	10	10	Infraction
	Criterion IX	Procedures to control weld filler metal at the Midland			

## SUMMARY OF ITEMS OF NONCOMPLIANCE

0-329 50-330 E Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Type
(cont)(cont) 80-10 80-11	Criterion IX	Welding was not performed in accordance with prequalified welding procedures.	10	10	Infraction
9	Criterion IX	Individual welds were not identified by welder ID numbers.	10	10	Infraction
10	Criterion IX	Two welders were assigned the same welder's ID stamp	10	10	Infraction
11	Criterion X	Instructions and procedures for inspections were not prescribed for activities affecting quality.	10	10	Infraction
12	Criterion X	The program for inspection was not adequate to assure compliance with applicable specifications.	2	2	Deficiency
13	Criterion XV	Measures which would prevent the inadvertent use or installation of nonconforming materials had not been established.	10	10	Infraction
14	Criterion XV	Nonconformance tags had been applied to fire dampers without explicitly identifying the item.	10	10	Infraction
15	Criterion XVI	None of the seven nonconformance reports generated by CPCo during 5/23 - 10/2/79 had been promptly corrected.	10	10	Infraction

SUMMARY OF ITEMS OF NONCOMPLIANCE

0-329 50-330 E Report No.	Area of Noncompliance	Subject of Noncompliance	Unit 1 Points	Unit 2 Points	Type
(cont) (cont) 80-10 80-11	Criterion XVI	Measures were not adequate to assure that conditions adverse to quality were promptly identified.	10	10	Infraction
	Criterion XVII	Sufficient records to furnish evidence of activities affecting quality were not maintained.	10	10	Infraction

U-1

1. NUMBER AND NATURE OF ENFORCEMENT ITEMS - Plants under Construction

Facility Name MIDLAND Docket No. 329 Unit 1

Functional Areas	Investigation & Inspection Manhours	Noncompliances and Deviations											
		Severity Levels						Categories					
		I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.		
1. Quality Assurance	6 73					4							
2. Site Preparation and Foundations	X 18												
3. Containment Structures	0 26												
4. Safety-Related Structures	0 2												
5. Piping and Hangers	X- 33				1	4				1			
6. Safety-Related Components	0 14												
7. Electrical	X- 107					3							
8. Instrumentation	MC												
9. Fire Protection	+ 25												
10. Preservice Inspection	0 32												
11. Corrective Action and Reporting	X 1												
12. Procurement	0												
13. Design and Design Changes	X 2												
14. Training	X 0												
15. Plant Operations Preparation	0												
16. Fuel Loading Preparation	0												
17. Maintenance	0												
18. Security & Safeguards	NONE												
19. Surveillance and Pre-OPERATIONAL TESTING	0												
20. Emergency Planning	0												
21. Audits, Reviews, and Committee activities	0 at												
22. Modules Not included Any Functional Area	X 927				1	1				20	3		
TOTALS	1260				2	12				21	3		

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1. NUMBER AND NATURE OF ENFORCEMENT ITEMS - Plants under Construction

Facility Name MIDLAND

Docket No. 330

Unit 3

Functional Areas	Investigation & Inspection Manhours	Noncompliances and Deviations												
		Severity Levels						Categories						
		I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.			
1. Quality Assurance	71					4								
2. Site Preparation and Foundations	17													
3. Containment Structures	5													
4. Safety-Related Structures	2													
5. Piping and Hangers	40				1	4					2			
6. Safety-Related Components	17					2								
7. Electrical	104					2	1							
8. Instrumentation	0													
9. Fire Protection	24													
10. Preservice Inspection	34													
11. Corrective Action and Reporting	1													
12. Procurement	0													
13. Design and Design Changes	2													
14. Training	0													
15. Plant Operations Preparation	0													
16. Fuel Loading Preparation	0													
17. Maintenance	0													
18. Security & Safeguards	0													
19. Surveillance and Pre OPERATIONAL TESTING	0													
20. Emergency Planning	0													
21. Audits, Reviews, and Committee activities	0													
22. Modules Not included in Any Functional Area	921					1	1				20	3		
TOTALS	1240					2	<del>1</del>				20	5		

13 1



*J* U-1

1. NUMBER AND NATURE OF ENFORCEMENT ITEMS - Plants under Construction

Facility Name MIDLAND Docket No. 329 Unit 1

Functional Areas	Investigation & Inspection Manhours	Noncompliances and Deviations												
		Severity Levels						Categories						
		I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev.			
1. Quality Assurance	53 <del>73</del>					4								
2. Site Preparation and Foundations	<del>18</del> 77				2		1							1
3. Containment Structures	26													
4. Safety-Related Structures	2													
5. Piping and Hangers	<del>33</del> 17				1	4					1			
6. Safety-Related Components	14													
7. Electrical	107						3							
8. Instrumentation														
9. Fire Protection	25													
10. Preservice Inspection	32													
11. Corrective Action and Reporting	1													
12. Procurement	0													
13. Design and Design Changes	2													
14. Training	0													
15. Plant Operations Preparation	0													
16. Fuel Loading Preparation	0													
17. Maintenance	0													
18. Security & Safeguards	NONE													
19. Surveillance and Pre-OPERATIONAL TESTING	0													
20. Emergency Planning	0													
21. Audits, Reviews, and Committee activities	0													
22. Modules Not included in Any Functional Area	<del>927</del> 278				1	1					20	3		
TOTALS	1260 <del>577</del>				2	12	1				21	3		1

13 16

checks comp. print out

1. NUMBER AND NATURE OF ENFORCEMENT ITEMS - Plants under Construction

Facility Name MIDLAND

Docket No. 330

Unit 3

Functional Areas	Investigation & Inspection Manhours	Noncompliances and Deviations												
		Severity Levels						Categories						
		I	II	III	IV	V	VI	Viol.	Infr.	Def.	Dev			
1. Quality Assurance	71					4								
2. Site Preparation and Foundations	<del>17</del> 34				2	2	1							1
3. Containment Structures	5													
4. Safety-Related Structures	2													
5. Piping and Hangers	<del>40</del> 19				1	4					2			
6. Safety-Related Components	17					2								
7. Electrical	104					2	1							
8. Instrumentation	0													
9. Fire Protection	24													
10. Preservice Inspection	34													
11. Corrective Action and Reporting	1												1	
12. Procurement	0													
13. Design and Design Changes	2													
14. Training	0													
15. Plant Operations Preparation	0													
16. Fuel Loading Preparation	0													
17. Maintenance	0													
18. Security & Safeguards	0													
19. Surveillance and Pre OPERATIONAL TESTING	0													
20. Emergency Planning	0													
21. Audits, Reviews, and Committee activities	0													
22. Modules Not included in Any Functional Area	<del>92</del> 277					0	1				20	3	3	
TOTALS	1240 492					24	2			2	20	5	3	1

13 1  
15

WESTERN ELECTRIC COMPANY  
NRC LIC. # 24-06015-06  
777 NORTH BLUE PARKWAY  
LEES SUMMIT MI 48063

WESTERN ELECTRIC COMPANY INC  
NRC LIC. # 24-06015-01  
KANSAS CITY WORKS  
777 NORTH BLUE PARKWAY  
LEES SUMMIT MI 48063

WHITING CORPORATION  
NRC LIC. # 12-04921-01  
QUALITY CONTROL DEPARTMENT  
157th STREET AND LAKEVIEW AVENUE  
MAYVET IL 60426

WILLIAM BEAUMONT HOSPITAL  
NRC LIC. # 21-01333-01  
3601 WEST 13 MILE ROAD  
ROYAL OAK MI 48072

WILLIAM BEAUMONT HOSPITAL  
NRC LIC. # 21-01333-03ND  
ROYAL OAK MI 48072

WILLIAM MUIR-ELL COMPANY (THE)  
NRC LIC. # 34-02963-01  
2503-31 SPRING GROVE AVENUE  
CINCINNATI OH 45214

WISCONSIN CENTRIFUGAL INCORPORATED  
NRC LIC. # 48-11641-01  
905 EAST ST. PAUL AVENUE  
WAUKESHA WI 53186

WISCONSIN DEPARTMENT OF NATURAL RESOURCES  
NRC LIC. # 48-14887-01  
SOUTHERN DISTRICT HEADQUARTERS  
3411 FIST WACKTENV ROAD  
MADISON WI 53711

WISCONSIN INDUSTRIAL TESTING INC.  
NRC LIC. # 48-17480-01  
5600 WEST WENLOCK STREET  
MILWAUKEE WI 53223

WISCONSIN UNIVERSITY OF  
NRC LIC. # 48-09843-18  
SAFETY DEPARTMENT  
317 N. RANDALL AVENUE  
MADISON WI 53706

WYANDOTTE GENERAL HOSPITAL  
NRC LIC. # 21-12930-02ND  
2333 BIDDLE AVENUE  
WYANDOTTE MI 48192

X-MAY INDUSTRIES INCORPORATED  
NRC LIC. # 21-05472-01  
16711 JOHN W. STREET  
DETROIT MI 48203

205

Not able to stand gaff when NRC  
attempt to close 50-55e when  
you say they are ready  
Rpt 8/1-12 penetrations - looked at 2 of  
the 23 & found not good.

CPC - had change in site management  
Insp Rpt 80-31/32 dtd 10/1-31/80

Citation - Part 21 on diesels  
Insp Rpt 80-31/32 - CPC/Bechtel twice  
has had a poor system for getting Part 21  
info into 50-55e evaluation system.

QA Avg / above average  $\equiv$  Programs OK  
Staff OK Qual/No-  
If went for adequacy of staff in trenches - would  
have a high probability of failure - biggest cap  
is in management corrective action - Soils look-  
QA.

**DRAFT** 205

REGION: III

LICENSEE PERFORMANCE EVALUATION (CONSTRUCTION)

Facility: Midland Units 1 and 2

Licensee: Consumers Power Company

Unit Identification:

<u>Docket No.</u>	<u>CP No./Date of Issuance</u>	<u>Unit No.</u>
50-329	CPFR-81, December 15, 1972	1
50-330	CPFR-82, December 15, 1972	2

<u>Reactor Information:</u>	<u>Unit 1</u>	<u>Unit 2</u>
NSSS	B&W	B&W
MWt	2452	2452

Appraisal Period: July 1, 1980 to June 30, 1981

Appraisal Completion Date:

Review Board Members:

C. Escalated Enforcement Actions

**DRAFT**

Civil Penalty

On January 7, 1981, a \$38,000 civil penalty was issued by the NRC as a result of an investigation pertaining to the installation of heating, ventilating and air conditioning equipment and systems. Nineteen items of noncompliance were identified in 10 of the 18 Appendix B criteria (10 CFR 50 Appendix B). The investigation was completed in July 1980.

Orders

None

Immediate Action Letters

On May 22, 1981, an Immediate Action Letter was issued by the Region III Office of Inspection and Enforcement concerning the issuance of fabrication and construction drawings for the installation of the safety related small bore piping and piping suspension systems.

Letters of Understanding

1. On January 22, 1981, Consumers Power Company issued a letter to the Director of Region III stating that their Stop Work Order of January 16, 1981 to B&W for installation of Core Support Assembly Vent Valves would remain in effect

DRAFT

2. Site Preparation and Foundation

The licensee is rated below average. <sup>Q</sup> During the evaluation period, inspections have been performed to examine the licensee's implementation of corrective actions regarding the 10 CFR 50.54(f) request for additional information pertaining to soils settlement; observation of soils work activities and to witness taking of soil borings requested by <sup>NRC</sup> NRC Reviewers and Consultants.

Q Since 1978, the licensee

inspectors and addressing

Since 1978, the soils settlement issues have been paramount in the amount of attention given by the NRC <sup>to this</sup> and the licensee. This activity ~~is~~ has resulted in an order issued in December 1979 which is the basis for a hearing on soils settlement issues. A multitude of effort ~~which~~ has gone into soils testing and major re-review of the FSAR and design control. In spite of this attention, <sup>and the</sup> following enforcement history for the soils settlement area <sup>has</sup> existed during the SACLP evaluation period:

inspector has notified  
of non-compliance

One level V violation and a deviation were identified in NRC Inspection Report No. 50-329/81-01; 50-330/81-01.

- 1) Failure to establish test procedures for soils work activities.
- 2) Failure to supply an onsite geotechnical engineer.

One level V violation was identified in NRC Inspection Report No. 50-329/81-09; 50-330/81-09 which was previously discussed under the Quality Assurance Section. However, the finding of lack of QA was as a result of attempting to review the QA associated with procuring soil boring samples.

Failure to evaluate the technical capabilities of Woodward-Clyde (principal supplier of services for soil boring activities) prior to ~~commencement of drilling operations~~ <sup>procurement of a drilling contractor</sup>.

Considering the above enforcement history and the fact that an order was issued in December 1979 which ~~has culminated in a~~ <sup>is the basis for the</sup> hearing on soils settlement issues and the multitude of effort which has gone into soils testing, major re-review of the FSAR and design control; the rating is below average.

Add more history of this soils order - High activity  
Repetitive and timely because of enforcement history

Therefore from the above ~~history~~ <sup>enforcement history</sup> ~~history~~, the rating is considered below average.



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4. Safety Related Structures

The licensee is rated average.

During the evaluation period, the Senior Resident Inspector witnessed portions of the atmospheric hydrostatic test placed on the borated water storage tanks (BWST). The Senior Resident Inspector observed Quality

Control and the Authorized Nuclear Inspector examine the tanks. The hydrostatic test was ~~acceptable and without complications.~~ <sup>done in an acceptable manner.</sup> Although ~~the hydrostatic test was completed without complications.~~ <sup>the hydrostatic test was completed without complications.</sup> The rating in this area is considered average.

Complications, loading of the BWST with ~~loaded with water~~ resulted in cracks developing in the valve pit area associated with these tanks. <sup>The cracking in the</sup> ~~valve pit wall is subsequently~~ <sup>absolutely</sup> related to such issues.

5. Piping and Hangers

The licensee is rated below average.

During the evaluation period, installation of large and small bore piping and pipe hanger systems (including storage of piping components) was examined and noted in seven different inspection reports of regularly scheduled inspection activities. Three of these inspections resulted in seven items of noncompliance and an isolated instance of inadequate dunnage in a temporary storage area. The following items of noncompliance indicate weakness in the implementation of the QA program.

- 1) Bechtel Purchase Order did not specify applicable codes for purchase of 60,000 pounds of E7018 electrode.
- 2) Bypass of an inspection hold point for pressurizer surge piping. (Unit 2 only).
- 3) Failure to install large bore pipe restraints, supports, and anchors in accordance with design drawings and specifications.
- 4) Failure of QC inspector to reject large bore restraints, supports and anchors that were not installed in accordance with design drawings and specifications.
- 5) Failure to prepare, review and approve small bore pipe and piping suspension system designs performed onsite in accordance with design control procedures.
- 6) Failure to adequately control documents used in site small bore piping design activities.
- 7) Failure of audits to include a detailed review of system stress analysis and to follow up on previously identified hanger calculation problems.

Seals

U R I A L  
IAAL

Also during the evaluation period, an Immediate Action Letter <sup>was</sup> issued on May 22, 1981, pertaining to the design control and issuance of drawings for the installation of small bore piping and support systems. <sup>also</sup> Subsequent to the evaluation period, on July 27, 1981, a <sup>letter ab</sup> ~~Reverse~~ Understanding Immediate Action Letter was submitted by the licensee stating the actions to be taken to control modification to small bore piping drawings which do not have Committed Preliminary Design Calculations (CPDC).

Considering the above escalated enforcement action plus the enforcement history; the rating is below average.

The NRC Inspection of July 16-17 <sup>and</sup> 23-24, 1981  
 (NRC Insp Rpt No. 50-47/81-14; 50-320/81-14)  
 determined that the licensee had "satisfactorily addressed" the provisions of the May 22, 1981 IAL

6. Safety Related Components

The licensee is rated average.

During the evaluation period, NRC Inspectors observed alignment of reactor coolant pumps; installation of lower core support assembly guide blocks; installation of core support assembly vent valves and associated portions of quality documentation. The enforcement history consisted of two items of noncompliance and a Reverse Immediate Action Letter. All were issued as a result of NRC findings during the installation of the core support assembly vent valves.

The following is a summary of the items of noncompliance which culminated in the ~~Reverse Immediate Action Letter~~ <sup>a letter of understanding</sup> issued by the licensee on January 22, 1981. The ~~Reverse Immediate Action Letter~~ <sup>letter of understanding</sup> stated that the Stop Work on assembly of core support assembly vent valves would remain in effect until procedures, personnel training and QA overview inspection plans are upgraded.

- 1) Failure to have an appropriate procedure for installation of vent valves.
- 2) Failure to follow access control procedures and account for items used in the assembly of the U/2 core support assembly vent valves on the equipment entry log.

Because the above enforcement ~~appeared to be~~ <sup>was</sup> aimed at an isolated instance and may have been directly related to changes in NSSS QC personnel changes <sup>had in the past and the licensee</sup> and because the licensee ~~had~~ <sup>had (and has)</sup> maintained QA control for assembly of NSSS equipment (particularly reactor internals), the overall rating in this area is considered to be average.

*more elaborate than in past performance*



DRAFT

7. Electrical

The licensee is rated below average.

During the evaluation period, two routine inspections and one team inspection were performed with a substantial portion of the inspection effort dedicated to the electrical area. Five other inspection periods addressed specific electrical items with one of these inspections addressing the in place storage condition of electrical equipments. As a result of the inspection effort dedicated to the electrical area, six items of noncompliance were identified. The inspection effort into the equipment storage conditions resulted in a single item of noncompliance with three examples --- two of these examples were electrical equipment.

It must be emphasized that there was essentially no electrical work being performed for more than six months into the evaluation period because of the need to perform ~~more re-engineering~~. When electrical work resumed, it was done on a very ambitious schedule. However, it appears that not enough qualified QC personnel, rigorous QA audits and established procedural controls were invoked to avoid the following list of enforcement items.

- 1) Failure to establish procedures for temporary support of cable, cable coils --- and for routing cables.
- 2) Electrical contractors failed to verify conformance to paragraph 3.1, failure to perform adequate inspection.
- 3) Failure to identify and control nonconforming components.
- 4) Failure to translate design criteria into drawings and specifications.

see engineering permit number of the cable without thermal and/or physical monitoring of the cable

8. Instrumentation

The licensee is not rated in this area. *because*

Minimal amount of instrumentation installation and subsequent inspection effort has occurred during this <sup>construction</sup> reporting period. ~~Those findings which have pertained to instrumentation are included in the electrical~~ section (Section 7). The NRC's most substantial finding pertained to the licensee's failure to translate design criteria into drawing and specifications by not identifying impulse instrument lines per IEEE-279-1971, Section 4.22.

To evaluate the licensee's performance in this area based on this one finding and considering the lack of effort in this explicit area would tend to unduly bias the overall evaluation of the licensee's performance. Therefore, no rating of the licensee is attempted in this area.

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9. Fire Protection

The licensee is rated above average.

During the evaluation period, the Senior Resident Inspector toured selected areas of the site each month to assess the cleanliness of the site and determine the potential for fire or other hazards which

might have a deleterious effect on personnel and equipment. The site has maintained an ~~excellent~~ <sup>adequate</sup> safety record of which fire protection is

a ~~substantial~~ <sup>substantial</sup> portion of their overall program. Their multi-million man-hour safety records ~~have been recognized by the safety departments of Bechtel and Consumers Power Company.~~ <sup>because</sup>

Words to indicate no fires and has been attentive

The site has maintained an adequate safety record during this SRA-P period. A substantial portion of the site safety program is devoted to fire protection. The licensee ~~maintains~~ <sup>conducts</sup> weekly training and drills for the on-site fire brigade and the fire brigade has consistently passed the <sup>quarterly</sup> fire drills imposed by the licensee's insurance agency. Volatile chemicals are controlled and issued in small quantities in metal containers. ~~Other~~ <sup>Volatile</sup> chemicals, oils, combustibles and trash are not tolerated in an unclear and uncontrolled state. Fire hazards ~~to~~ <sup>are</sup> were minimized during the evaluation period and the licensee has developed ~~with~~ <sup>and</sup> achieved a ~~substantial~~ <sup>substantial</sup> million ~~hour~~ <sup>hour</sup> safety record.

10. Preservice Inspection

The licensee is rated average.

During the evaluation period, three routine inspections were performed to evaluate the ultrasonic testing (UT) of the reactor pressure vessels by South West Research Institute (SWRI) and the preservice inspection being performed by Babcock & Wilcox (B&W). The inspection effort revealed that adequate management controls existed for the inservice inspection program, procedures, and material and equipment. The licensee responses to I&E Bulletins was determined to be complete in this area. The data reports demonstrated that QA/QC audits and requirements are met. The qualifications and training of SWRI and B&W personnel was in accordance with SNT-TC-1A, 1975.

Considering the above performance and the overall effectiveness and the cooperative attitude of the licensee and NDE personnel, the licensee is considered average in the preservice inspection area.

*radiation protection*



Section

DRAFT

- 7) Underrated Terminal Strips on Limitorque Operators.
- 8) Seismic model of Auxiliary Building has incorrect assumption that control tower and main portion of Auxiliary Building are an integral unit between elevation 614 and 659.
- 9) Borated Water Storage Tank Foundation stress cracks.
- 10) ITE Gould Class 1E equipment, unqualified cable used to wire equipment and/or controls.
- 11) Shear reinforcement at major containment penetrations.
- 12) Reactor Cavity cooling system.

During the evaluation period, the licensee failed to make a timely determination for the need to submit a 10 CFR 50.55(e) report to the NRC based on a 10 CFR Part 21 report from Transamerica Delaval, Inc. pertaining to diesel engine link rod clearances and this was identified by the NRC as an item of noncompliance. The licensee has taken positive actions to ensure that any safety related information received pertinent to the Midland Site is evaluated with respect to the impact on overall safety.

With regard to responses to items of noncompliance, the licensee has contested 9 of the 22 items of noncompliance written against areas other than HVAC system installation. Of the nine items contested by the licensee, the NRC agreed in two instances and removed the items of noncompliance. Of the twenty total items of noncompliances against the installation of HVAC systems (19 items in NRC Inspection Report No. 50-329/80-10; 50-330/80-11 and one item in NRC Inspection Report No. 50-329/80-21; 50-330/80-22) the licensee contested five items and the NRC agreed in two instances and removed the items of noncompliance.

11  
It is realized that the licensee does have appeal rights on items of non-compliance, but when the licensee appeals over 40% (excluding HVAC system citations) and realizes a less than 10% success rate, it becomes apparent that the licensee's rebuttal lacks substance on a high percentage of the time. The licensee's inadequate responses delays an expedient resolution to the items of noncompliance and conveys a <sup>uncooperative</sup> vindictive attitude and ultimately affects the efficient operation of both the licensee and NRC and becomes a detriment to construction of a quality plant. Subsequent to the evaluation period, licensee management were invited to a meeting in the Regional Office <sup>so</sup> ~~for~~ the NRC <sup>could</sup> ~~to~~ explain their position on what constitutes an adequate response to noncompliances and subsequent corrective action.

Based on the questionable quality of the licensee's response to enforcement items, this area of corrective action and reporting is considered below average.

Make change

The following is a reference list of these items of non-compliance:

Section 2, Site Preparation and Foundations

a)

DRAFT

12. Design and Design Changes

The licensee is rated below average.

During the evaluation period, three items of noncompliance were identified against 10 CFR 50 Appendix B, Criterion III, Design Control and one item against Criteria XVI, Corrective Action which was closely related to deficiencies in design control. However, these items of

noncompliance have been addressed in other sections of this SALP Report. However, the common bond between these items of noncompliance is that each addresses inadequate design control. The following is a summary of this enforcement action.

Part of the...  
The following is a summary of this enforcement action.

1) ~~Discussed~~ in Section 2, Site Preparation and Foundations

(a) Failure to initiate preventive action to preclude repetition of not identifying design documents. Reviewers were not reviewing the FSAR against references.

(b) Three examples of failure to translate applicable regulatory requirements and design criteria into design documents.

- 1. ~~Failure to maintain a coordination log of specification change notices.~~
- 2. ~~Failure to correctly translate SCM-9004 as a requirement into Rev. 20 of specification G-208.~~
- 3. ~~Failure of EDPI 4.25.1, Rev. 8 to establish adequate measures to waive design interface requirements.~~

2) ~~Discussed~~ in Section 5, Piping and Hangers

Failure to prepare, review and approve small bore pipe and piping suspension system designs performed onsite in accordance with design control procedures.

3) Discussed-in Section 7, Electrical

Failure to translate design criteria into drawings and specifications.

In addition to the enforcement items <sup>listed</sup> ~~discussed~~ above, an Immediate Action Letter was issued by the NRC pertaining to design control and issuance of drawings for the installation of small bore piping. This item was previously iterated in Section 5, Piping and Hangers.

Although the above items have been discussed in three other functional areas of this SALP report, the common bond between them is that each address inadequate design control.

Also, the following five 10 CFR 50.55(e) summaries, which were among the twelve Construction Deficiency Reports submitted, <sup>demonstrates</sup> ~~strongly suggest that~~ <sup>there was</sup> ~~there may be a blatant~~ lack of QA in design control and these instances <sup>should</sup> ~~may~~ have been licensee controllable.

- 1) High Energy Line Break Analysis (HELBA), steady state thrust forces rather than transient peak thrust forces were used in the energy balance techniques for the design of HELBA pipe whip restraints.
- 2) Component Cooling Water (CCW) Design, CCW system susceptibility to Loss of Coolant Accident (LOCA) induced failures.
- 3) Seismic model of Auxiliary Building has incorrect assumption that control tower and main portion of Auxiliary Building are an integral unit between elevation 614 and 659.
- 4) Borated Water Storage Tank Foundation stress cracks.
- 5) Shear reinforcement at major containment penetrations.

DRAFT

Considering the above indicators which suggest questionable design control and the amount of re-engineering which has transpired in electrical, civil, and piping areas, the licensee's performance is rated as below average.

The fact that the licensee is able to often times identify design deficiencies through their audit programs and take appropriate action is commendable. However, these design deficiencies would not occur if there were more stringent control at the source of these design errors and deficiencies. ~~Therefore, the licensee is rated as below average in this area.~~

*Therefore the below average rating may be attributed to ~~not~~ <sup>allowing</sup> identifying design deficiencies ~~at the~~ to source ~~being the~~ ~~error~~ to leave the source of design.*



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

October 18, 1979

MEMORANDUM FOR: R. C. Knop  
D. W. Hayes  
D. H. Danielson  
K. Naidu  
G. Maxwell  
W. Hansen  
P. Barrett  
R. Cook  
T. Vandell  
F. Jablonski  
E. Lee  
G. Gallagher  
K. Ward  
I. Yin

FROM: G. Fiorelli, Chief, Reactor Construction and  
Engineering Support Branch

SUBJECT: MIDLAND CONSTRUCTION STATUS REPORT AS OF  
OCTOBER 1, 1979

The attached report was finalized based on your feedback requested in my memo of October 5, 1979. If you still feel adjustments are necessary please contact me. If you consider the report characterizes your current assessment of the Midland project, please concur and pass it along promptly.

G. Fiorelli, Chief  
Reactor Construction and  
Engineering Support Branch

Enclosure: As stated

cc: J. G. Keppler

Dupe

~~8405230075~~

16pp.

MIDLAND SUMMARY REPORT UPDATE

Facility Data

Docket Number	- 50-329 and 50-330
Construction Permits	- CPPR-81 and CPPR-82
Permits Issued	- December 14, 1972
Type Reactor	- PWR; Unit 1, 492 MWe*; Unit 2, 818 MWe
NSSS	- Babcock and Wilcox
Design/Constructor	- Bechtel Power Corporation
Fuel Load Dates	- Unit 1, 4/82; Unit 2, 11/81
Status of Construction	- Unit 1, 54%; Unit 2, 61%; Engineering 82%

\*Approximately one-half the steam production for Unit 1 is dedicated, by contract, to be supplied to Dow Chemical Corporation, through appropriate isolation heat exchangers.

Chronological Listing of Major Events

July 1970	Start of construction under exemption
9/29-30 & 10/1/70	Site inspection, four items of noncompliance identified, extensive review during CP hearings
1971 - 1972	Plant in mothballs pending CP
12/14/72	CP issued
9/73	Inspection at Bechtel Ann Arbor offices, five items of noncompliance identified
11/73	Inspection at site, four items of noncompliance identified (cadweld problem) precipitated the Show Cause Order
12/29/73	Licensee answers Show Cause Order commits to improvements on QA program and QA/QC staff
12/3/73	Show Cause Order issued suspending cadwelding operation
12/6-7/73	Special inspection conducted by RIII and HQ personnel
12/17/73	Show Cause Order modified to allow cadwelding based on inspection findings of 12/6-7/73



12/5/75 CP. reported that rebar spacing out of specification 50 locations in Unit 2 containment

3/5 & 10/75 CP reported that 63 #6 rebar were either missing or misplaced in Auxiliary Building

3/12/75 RIII held management meeting with CP

8/21/75 CP reported that 42 sets of #6 tie bars were missing in Auxiliary Building

3/22/76 CP reported that 32 #8 rebar were omitted in Auxiliary Building. A stop-work order was issued by CP

3/26/76 RIII inspector requested CP to inform RIII when stop-work order to be lifted and to investigate the cause and the extent of the problem. Additional rebar problems identified during site inspection by NRC

3/31/76 CP lifted the stop-work order

4/19 thru 5/14/76 RIII performed in-depth QA inspection at Midland

5/14/76 RIII management discussed inspection findings with site personnel

5/20/76 RIII management meeting with CP President, Vice President, and others.

6/7 & 8/76 RIII follow up meeting with CP management and discussed the CP 21 correction commitments

6/1-7/1/76 Overall rebar omission reviewed by R. E. Shewmaker

7/28/76 CP stops concrete placement work when further rebar placement errors found by their overview program. PN-III-76-52 issued by RIII

8/2/76 RIII recommends HQ notice of violation be issued

8/9 - 9/9/76 Five week full-time RIII inspection conducted

8/13/76 Notice issued

10/29/76 CP responded to HQ Notice of Violations

12/10/76 CP revised Midland QA program accepted by NRR

2/28/77 Unit 2 bulge of containment liner discovered by licensee

4/19/77 Tendon sheath omissions of Unit 1 reported

4/29/77 IAL issued relative to tendon sheath placement errors

5/5/77 Management meeting at CP Corporate Office relative to IAL regarding tendon sheath problem

5/24/77 Special inspection by RIII, RI and HQ personnel to determine adequacy of QA program implementation at Midland site.

6/75 - 7/77 Series of meetings and letters between CP and NRR on applicability of Regulatory Guides to Midland. Commitments by CP to the guides was responsive.

7/24/78 Construction resident inspection assigned.

8/21/78 Measurements by Bechtel indicate excessive settlement of Diesel Generator Building. Officially reported to RIII on September 7, 1978.

12/78 - 1/79 Special investigation/inspection conducted at Midland sites, Bechtel Ann Arbor Engineering offices and at CP corporate offices relative to Midland plant fill and Diesel Generator building settlement problem.

2/7/79 Corporate meeting between RIII and CPC to discuss project status and future inspection activities. CPC informed construction performance on track with exception of diesel/fill problem.

2/23/79 Meeting held in RIII with Consumers Power to discuss diesel generator building and plant area fill problems.

3/5/79 Meeting held with CPC to discuss diesel generator building and plant area fill problems.

3/21/79 10 CFR 50.54 request for information regarding plant fill sent to CPC by NRR.

5/5/79 Congressman Albosta and aides visited Midland site to discuss TMI effect on Midland.

5/8-11/79 Mid-QA inspection conducted.

## Significant Major Events

### Past Problems

#### 1. Cadweld Splicing Problem and Show Cause Order

A routine inspection, conducted on November 6-8, 1973, as a result of intervenor information, identified eleven examples of four noncompliance items relative to rebar Cadwelding operations. These items were summarized as: (1) untrained Cadweld inspectors; (2) rejectable Cadwelds accepted by QC inspectors; (3) records inadequate to establish cadwelds met requirements; and (4) inadequate procedures.

As a result, the licensee stopped work on cadweld operations on November 9, 1973 which in turn stopped rebar installation and concrete placement work. The licensee agreed not to resume work until the NRC reviewed and accepted their corrective action. However, Show Cause Order was issued on December 3, 1973, suspending Cadwelding operations. On December 6-7, 1973, RIII and HQ personnel conducted a special inspection and determined that construction activity could be resumed in a manner consistent with quality criteria. The Show Cause Order was modified on December 17, 1973, allowing resumption of Cadwelding operations based on the inspection results.

The licensee answered the Show Cause Order on December 29, 1973, committing to revise and improve the QA manuals and procedures and make QA/QC personnel changes.

Prehearing conferences were held on March 28 and May 30, 1974, and the hearing began on July 16, 1974. On September 25, 1974, the Hearing Board found that the licensee was implementing its QA program in compliance with regulations and that construction should not be stopped.

#### 2. Rebar Omission/Placements Errors Leading to IAL

Initial identification and report of rebar nonconformances occurred during an NRC inspection conducted on December 11-13, 1974. The licensee informed the inspector that an audit, had identified rebar spacing problems at elevations 642' - 7" to 652' - 9" of Unit 2 containment. This item was subsequently reported per 10 CFR 50.55(e) and was identified as a item of noncompliance in reports Nos. 50-329/74-11 and 50-330/74-11.

Additional rebar deviations and omissions were identified in March and August 1975 and in April, May and June 1976. Inspection report Nos. 50-329/76-04 and 50-330/76-04 identified five noncompliance items regarding reinforcement steel deficiencies.

Licensee response dated June 18, 1976, listed 21 separate items (commitments) for corrective action. A June 24, 1976 letter provided a plan of action schedule for implementing the 21 items. The licensee suspended concrete placement work until the items addressed in licensee's June 24 letter were resolved or implemented. This commitment was documented in a RIII letter to the licensee dated June 25, 1976. Although not stamped as an IAL, in-house memos referred to it as such.

Rebar installation and concrete placement activities were satisfactorily resumed in early July 1976, following completion of the items and verification by RIII.

Additional action taken is as follows:

a. By the NRC

- (1) Assignment of an inspector full-time onsite for five weeks to observe civil work in progress.
- (2) IE management meetings with the licensee at their corporate offices
- (3) Inspection and evaluation by Headquarters personnel

b. By the Licensee

- (1) June 18, 1976 letter committing to 21 items of corrective action.
- (2) Establishment of an overview inspection program to provide 100% reinspection of embedments by the licensee following acceptance by the contractor QC personnel.

c. By the Contractor

- (1) Personnel changes and retraining of personnel.
- (2) Prepared technical evaluation for acceptability of each identified construction deficiency.
- (3) Improvement in their QA/QC program coverage of civil work (this was imposed by the licensee).

3. Tendon Sheath Placement Errors and Resulting Immediate Action Letter (IAL)

On April 19, 1977, the licensee reported, as a Part 50, Section 50.55(e) item, the inadvertent omission of two hoop tendon sheaths

from a Unit 1 containment concrete placement at elevation 703' - 7" due to having already poured concrete in an area where the tendons were to be directed under a steam line. The tendons were subsequently rerouted in the next higher concrete lift.

An IAL was issued to the licensee on April 29, 1977, which spelled out six licensee commitments for correction which included: (1) repairs and cause corrective action; (2) expansion of the licensee's QC overview program; (3) revisions to procedures and training of construction and inspection personnel.

A special QA program inspection was conducted in early May 1977. The inspection team was made up of personnel from RI, RIII and HQ. Although five items of noncompliance were identified, it was the consensus of the inspectors that the licensee's program was an acceptable program.

The licensee issued it's final report on August 12, 1977. Final review onsite was conducted and documented in report No. 50-329/77-08.

#### Current Problems

1. The licensee informed the RIII office on September 8, 1978, per requirements of 10 CFR 50.55(e) that settlement of the diesel generator foundations and structures were greater than expected.

Fill material in this area was placed between 1975 and 1977, with construction starting on the diesel generator building in mid-1977. Review of the results of the RIII investigation/inspection into the plant fill/Diesel Generator Building settlement problem indicate many events occurred between late 1973 and early 1978 which should have alerted Bechtel and the licensee to the pending problem. These events included nonconformance reports, audit findings, field memos to engineering and problems with the administration building fill which caused modification and replacement of the already poured footing and replacement of the fill material with lean concrete.

Causes of the excessive settlement include: (1) inadequate placement method - unqualified compaction equipment and excessive lift thickness; (2) inadequate testing of the soil material; (3) inadequate QC inspection procedures; (4) unqualified quality control inspectors and field engineers; (5) over reliance on inadequate test results.

The proposed remedial work and corrective action are as follows:

- (1) Diesel Generator Building - apply surcharge load in and around building to preconsolidate the foundation material. Continue to monitor soil response to predict long-term settlement.
- (2) Service Water Pump Structure - Install piles to hard glacial till to support that portion of the structure founded on plant fill material.
- (3) Tank Farm - Fill has been determined to be suitable for the support of Borated Water Storage Tanks. Tanks are to be constructed and hydro tested while monitoring soil response to confirm support of structures.
- (4) Diesel Oil Tanks - No remedial measure; backfill is considered adequate.
- (5) Underground Facilities - No remedial work is anticipated with regards to buried piping.
- (6) Auxiliary Building and F. W. Isolation Valve Pits - Installed a number of caissons to glacial till material and replace soil material with concrete material under valve pits.
- (7) Dewatering System - Installed site dewatering system to provide assurance against soil liquidification during a seismic event.

The above remedial measures were proposed to the NRC staff on July 18, 1979. No endorsement of the proposed actions have been issued to the licensee to date. The licensee is proceeding with the above plans.

The NRC activities, to date, include:

- a. Lead technical responsibility and program review was transferred to NRR from IE by memo dated November 17, 1978.
- b. Site meeting on December 3-4, 1978, between NRR, IE, Consumers Power and Bechtel to discuss the plant fill problem and proposed corrective action related to the Diesel Generator Building settlement.
- c. RIII conducted an investigation/inspection relative to the plant fill and Diesel Generator Building settlement. Findings are contained in Report 50-329/78-20; 330/78-20 dated March 1979.
- d. NRC/Consumers Power Company/Bechtel meetings held in RIII office to discuss findings of investigation/inspection of site settlement (February 23, 1979 and March 5, 1979).

- e. NRC issue of 10 CFR 50.54(f) regarding plant fill dated March 21, 1979.
- f. Several inspections of Midland site settlement have been performed.

The Constructor/Designer activities include:

- a. Issued NCR-1482 (August 21, 1978)
  - b. Issued Management Corrective Action Report (MCAR) No. 24 (September 7, 1978)
  - c. Prepared a proposed corrective action option regarding placement of sand overburden surcharge to accelerate and achieve proper compaction of diesel generator building sub-soils.
  - d. Issued 10 CFR 50.55(e) interim report number 1 dated September 29, 1978.
  - e. Issued interim report No. 2 dated November 7, 1978.
  - f. Issued interim report No. 3 dated June 5, 1979.
  - g. Issued interim report No. 4 dated February 23, 1979
  - h. Issued interim report No. 5 dated April 30, 1979
  - i. Responded to NRC 10 CFR 50.54(f) request for information onsite settlement dated April 24, 1979. Subsequent revision 1 dated May 31, 1979, revision 2 dated July 9, 1979 and revision 3 dated September 13, 1979.
  - j. Meeting with NRC to discuss site settlement causes and proposed resolution and corrective action taken dated July 18, 1979. Information discussed at this meeting is documented in letter from CPCo to NRC dated August 10, 1979.
  - k. Issued interim report No. 6 dated August 10, 1979
  - l. Issued interim report No. 7 dated September 5, 1979
2. Review of Quality Documentation to Establish Acceptability of Equipment

The adequacy of engineering evaluation of quality documentation (test reports, etc.) to determine if the documentation establishes that the equipment meets specification and environmental requirements is of concern. The licensee, on November 13, 1978, issued a construction deficiency report (10 CFR 50.55(e)) relative to this matter. An interim report dated November 18, 1978 was received



and stated Consumers Power was pursuing this matter not only for Bechtel procured equipment but also for NSS supplied equipment.

### 3. Source Inspection to Confirm Conformance to Specifications

The adequacy of equipment acceptance inspection by Bechtel shop inspectors has been the subject of several noncompliance/nonconformance reports. Consumers Power has put heavy reliance on the creditability of the Bechtel vendor inspection program to insure that only quality equipment has been sent to the site. However, the referenced nonconformance reports raise questions that the Bechtel vendor inspection program may not be effectively working in all disciplines for supplied equipment. Some significant examples are as follows:

- (1) Decay heat removal pump being received with inadequate radiography. The pumps were returned to the vendor for re-radiography and repair. The pumps were returned to the site with one pump assembled backwards. This pump was again shipped to the vendor for reassembly. CPCo witnessed a portion of this reassembly and noted in their audit that some questionable techniques for establishing reference geometry were employed by the vendor. The pumps had been shop inspected by Bechtel.
- (2) Containment personnel air lock hatches were received and installed with vendor supplied structural weld geometry which does not agree with manufacturing drawings. The personnel air lock doors had been vendor inspected.
- (3) Containment electrical penetrations were received and installed with approximately 25% of the vendor installed terminations showing blatant signs of inadequate crimping. These penetrations were shop inspected by 3 or 4 Bechtel supplier quality representatives (vendor inspectors).
- (4) 350 MCM, 3 phase power cable was received and installed in some safety related circuits with water being emitted from one phase.
- (5) A primary coolant pump casing was received and installed without all the threads in one casing stud hole being intact. The casings were vendor inspected by both Bechtel and B&W.

Additional IE inspections will be conducted to determine if CP has thoroughly completed an overview of the Bechtel shop inspector's function and that equipment already purchased has been reviewed to confirm it meets requirements.

### 4. "Q" List Equipment

- (1) There have been instances wherein safety related construction components and their installation activities have not been identified on the "Q" list.

This shortcoming could have affected the quality of work performed during fabrication due to the absence of quality controls identified with "Q" list items. Examples of non-"Q" list activities identified which should be "Q" listed include:

#### Cable Trays

#### Components of Heating and Ventilation System

The licensee will be advised to review past as well as future construction activities to confirm that they were properly defined as "Q" list work or components.

### 5. Management Controls

- a. Throughout the construction period CPCo has identified some of the problems that have occurred and reported them under the requirements of 10 CFR 50.55(e). Management has demonstrated an openness by promptly identifying these problems. However, CPCo has on repeated occasions not reviewed problems to the depth required for full and timely resolution. Examples are:

Rebar omissions (1974)

Tendon sheath location error (1977)

Diesel generator building settlement (1978)

Containment personnel access hatches (1978)

In each of the cases listed above the NRC in its investigation has determined that the problem was of greater significance than first reported or the problem was more generic than identified by CPCo.

This incomplete wringing out of problems identified has been discussed with CPCo on numerous occasions in connection with CPCo's management of the Midland project.

- b. There have been many cases wherein nonconformances have been identified, reviewed and accepted "as is." The extent of review given by the licensee prior to resolving problems is currently in progress. In one case dealing with the repair of airlock hatches, a determination was made that an incomplete engineering review was given the matter.

### Inspection History

The construction inspection program for Midland Units 1 and 2 is approximately 60% complete. This is consistent with status of construction of the two units. (Unit 1 - 54%; Unit 2 - 61%). The licensee's QA program has repeatedly been subject to in-depth review by IE inspectors. The following highlight these inspections.

1. July 23-26, and August 8-10, 1973, inspection report Nos. 50-329/73-06 and 50-330/73-06: A detailed review was conducted relative to the implementation of the Consumers Power Company's QA manual and Bechtel Corporation's QA program for design activities at the Bechtel Ann Arbor office. The identified concerns were reported as discrepancies relative to the Part 50, Appendix B, criteria requirements.

2. September 10-11, 1973 report Nos. 50-329/73-08 and 50-330/73-08: A detailed review of the Bechtel Power Corporation QA program for Midland was performed. Noncompliances involving three separate Appendix B criteria with five different examples, were identified.
3. February 6-7, 1974, report Nos. 50-329/74-03 and 50-330/74-03: A followup inspection at the licensee's corporate office, relative to the items identified during the September 1973 inspection (above) along with other followup.
4. June 16-17, 1975, report Nos. 50-329/75-05 and 50-330/75-05: Special inspection conducted at the licensee's corporate office to review the new corporate QA program manual.
5. August 9 through September 9, 1976, report Nos. 50-329/76-08 and 50-330/76-08: Special five-week inspection regarding QA program implementation onsite primarily for rebar installation and other civil engineering work.
6. May 24-27, 1977, report Nos. 50-329/77-05 and 50-330/77-08: Special inspection conducted at the site by RIII, IE AND RI personnel to examine the QA program implementation onsite by Consumers Power Company and by Bechtel Corporation. Although five examples of noncompliance to Appendix B, Criterion V, were identified, the consensus of the inspectors involved was that the program and its implementation for Midland was considered to be adequate.
7. May 8-11, 1979, a mid-construction QA inspection covering purchase control and inspection of received materials design control and site auditing and surveillance activities was conducted by a team of inspectors. While some items will require resolution, it was concluded the program was adequate.

The licensee's Quality Assurance program has undergone a number of revisions to strengthen it's provisions. The company has expanded it's QA/QC auditing and surveillance coverage to provide extensive overview inspection coverage. This was done in 1975 with a commitment early in their experience with rebar installation problems and was further committed by the licensee in his letter of June 18, 1976, responding to report Nos. 50-329/76-04 and 50-330/76-04. This overview inspection activity by the licensee has been a positive supplement to the constructor's own program, however, currently our inspectors perceive the overview activities cover a small percentage of the work in some disciplines. This has been brought to the licensee's attention who has responded with a revised overview plan. RIII inspectors are reviewing the plan as well as determining it's effectiveness through observation of construction work. A specific area brought to the attention of the licensee was the lack of overview in the instrumentation installation area. The licensee has responded to this matter with increased staff and this item is under review by RIII inspectors.

The RIII office of inspection and enforcement instituted an augmented onsite inspection coverage program during 1974, this program has continued in effect until the installation of the resident inspector in July 1978.

#### Enforcement History

##### a. Noncompliance Statistics

Year	Number of Noncompliances	Number of Inspections	Inspector Hours Onsite
1976	14	9	646
1977	5	12	648
1978	18	23	1180
*1979 to date	7	18	429

A resident inspector was assigned to the Midland site in July 1978. The onsite inspection hours shown above does not include his inspection time.

\*Through August 1979

- b. An investigation of the current soils placement/diesel generator building settlement problem has revealed the existence of a material false statement. Issuance of a Civil Penalty is currently being contemplated.

#### Summary and Conclusions

Since the start of construction Midland has experienced some significant problems resulting in enforcement action. These actions are related (1) to improper placement, sampling and testing of concrete and failure of QA/QC to act on identified deficiencies in September 1970; (2) to drawing control and lack of or inadequate procedures for control of design and procurement activities at the Bechtel Engineering offices in September 1973; (3) to inadequate training, procedures and inspection of cadweld activities in November 1973; (4) to a series of RIII in-depth QA inspections and meetings which identified underlying causes of weakness in the Midland QA program implementation relative to embedments in April, May and June 1976. (The noncompliance items identified involved inadequate quality inspection, corrective action, procedures and documentation, all primarily concerned with installation of reinforcement steel); (5) to tendon sheath omissions in April 1977; and (6) to plant soil foundations and excessive settlement of the Diesel Generator Building relative to inadequate compacted soil and inspection activities in August 1978 through 1979.

Following each of these problem periods, the licensee has taken action to correct the problems and to upgrade his QA program and QA/QC staff. The most prominent action has been an overview program which has been steadily expanded to cover safety related activities.

The evaluation both by the licensee and IE of the structures and equipment affected by these problems (again except the last) has established that they fully meet design requirements.

Looking at the underlying causes of these problems two common threads emerge: (1) utilities historically have tended to over rely on A-E's (in this case, Bechtel) and (2) insensitivity on the part of both Bechtel and Consumers Power to recognize the significance of isolated events or failure to adequately evaluate possible generic application of these events either of which would have led to early identification and avoidance of the problem.

Admittedly construction deficiencies have occurred which should have been identified earlier but the licensee's QA program has ultimately identified and subsequently, corrected or in process of correcting these deficiencies.

The RIII inspectors believe that continuation of (1) resident site coverage, (2) the licensee overview program, (3) the licensee's attention and resolution of identified problems in this report, (4) ceasing to permit work to continue when quality related problems are identified with construction activities and (5) a continuing inspection program by regional inspectors will provide adequate assurance that construction will be performed in accordance with requirements and that any significant errors and deficiencies will be identified and corrected.

Concurrence: 

Knop <i>AK</i>	Hayes <i>DSH</i>	Danielson <i>DSH</i>	<i>Maxwell</i>	Maxwell <i>em</i>
Hansen <i>PH</i>	Barrett <i>PD</i>	Cook <i>PH</i>	Vandel <i>PH</i>	Jablonski <i>J</i>
Lee #2 <i>JW</i>	Ward <i>JW</i>	Yin <i>JW</i>	Gallagher <i>AS</i>	Fiorelli <i>F</i>

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MIDLAND REPORT

The Midland Units 1 and 2 Status report for: (1) the manual chapter inspection program and enforcement history; (2) open items both unresolved and noncompliance items; (3) reportable deficiencies; and (4) significant events and problems; are included herein.

Manual Chapter Inspection Program

The module inspection program for the B program is considered to be approximately 50% complete for both units. The summary status is as follows:

<u>Unit</u>	<u>Modules Complete</u>	<u>Modules Open</u>	<u>Modules to be Opened</u>
1	24	33	36
2	27	30	36

The routine inspection modules program has not produced any significant number of enforcement items. In fact, comparison to other facilities, in a comparable construction and inspection status, indicates that most other facilities have experienced more noncompliance items (1976 thru 1978). The total number of noncompliances by years since the beginning of the project is tabulated as follows:

<u>Year</u>	<u>No. Reports</u>	<u>Noncompliance Items</u>		
		<u>Both Units</u>	<u>Unit 1</u>	<u>Unit 2</u>
1970	6	4		
1971 <sup>2/</sup>	2	0		
1972 <sup>1/</sup>	1	0		
1973 <sup>4/</sup>	11	9		

- <sup>1/</sup> CP issued 12/14/72  
<sup>2/</sup> Mothball or stretchout status  
<sup>4/</sup> Show cause order December 1973

<u>Year</u>	<u>No. Reports</u>	<u>Items</u> <u>Noncompliance Items</u>		
		<u>Both Units</u>	<u>Unit 1</u>	<u>Unit 2</u>
1974	11	3		
1975 <sup>2/</sup>	7	0		
1976 <sup>6/</sup>	9	14	<del>14</del>	<del>14</del>
1977 <sup>5/</sup>	12 - 15	4	<del>4</del>	<del>5</del> 1
1978 <sup>3/</sup>	16	10	<del>5</del>	<del>7</del>

Status of Open Items

A deliberate effort has been undertaken, during 1978, to identify and complete the close out of all previously identified unresolved and noncompliance items. This was considered necessary because a number of old unresolved items were hidden within the text of old reports and even in one instance in the letter to the licensee, (primarily during a period 1972 - 1975) that had never been closed. It is noted that this was also a concern of the licensee. Presently the open status of unresolved and noncompliance items is as follows:

<u>Unit</u>	<u>Unresolved</u>	<u>Noncompliance</u>
1	2	5
2	3	6

Reportable Deficiencies

A listing of the more recent 50.55(e) reportable items and its current status appears below.

1. Decay heat removal pumps castings (radiography) Licensee followup regarding inadequate radiography was good, these pumps are now being reinstalled at the site. NRC considers this item closed.

<sup>3/</sup> As of mid November

<sup>5/</sup> Immediate Action Letter April 1977 regarding Tendon Sheaths

<sup>6/</sup> Immediate Action Letter Re: Report 76-04

2. Reactor vessel surveillance capsule holder tube. This item is a generic item regarding B&W designed specimen holders located inside of the RPV. This item is considered closed with the understanding that the licensee will stay informed of the experiences of Davis-Besse (who also had the same change) for possible future problems.
3. Containment building personnel airlocks weld cracking. A final report had been received by RIII regarding the repairs to the cracked welds. Followup by RIII disclosed that the welding performed failed to follow the prescribed instructions of the controlling NRC. This was identified as a noncompliance item in a recent inspection report. The licensee indicated that a supplemental report will probably be issued in addition to the letter of response for the noncompliance item.
4. Unit 2 containment liner bulge. The design report, intended to be the final report, was issued at a meeting held in Ann Arbor the last of June 1977 attended by R. F. Heishman and R. E. Shewmaker. This report is still under review by Mr. Shewmaker. No response has ever been sent to the licensee acknowledging the final report. The repair work was completed about the end of May 1978, however no review has been done by RIII pending response from Mr. Shewmaker.
5. Seismic cable tray supports welding. A final report has been received. Final review by RIII is yet to be done.
6. Undersized fillet welds on ITT-Grinnell safety related pipe hangers. Some of the final report has been done by the assigned Hangers and Snubbers Engineering inspectors, however, more review is planned.
7. Other reportable deficiencies in various stages of corrective action status by the licensee are as follows:



- a. Reactor coolant pump motor flanges *B&W and GE*
- b. Reactor building spray piping supports *ITT Guinness & Co.*
- c. Design deficiency of the NI/RPS grounding *B&W*
- d. Piping small break analysis not conservative *B&W*
- e. Class 1E station battery racks *Exide*
- f. Settlement of diesel generator building *Bechtel*
- g. Components lack of qualification *Bechtel*

NRC Created Problems

Unanswered inquiries addressed to IE:HQ regarding components and material relative to a safety/nonsafety status as follows:

- a. Failure to identify certain class 1E system components to be covered by Consumers Power's QA manual letter Spessard to Reinmuth April 28, 1978. *Bechtel*  
*Investigating work*  
*Two letters to NRC.*
- b. Classification of spent fuel pool liner plate presently classed as nonsafety related by Bechtel. Letter Danielson to Reinmuth June 1, 1978. *He stating Non-Q coming from Reinmuth.*
- c. Apparent noncompliance with 50.55 a (h) regarding identification of components (color coding of electrical equipment and cables). Letter Spessard to Reinmuth dated May 3, 1978. *Unresolved item*

2. In ability to deal effectively with licensee regarding 50.55(e) items due to lack of support from IE:HQ. Examples:
  - a. Unit 2 containment liner bulge design report and completion of repair. Headquarters personnel have been reviewing the report for 18 months now with no response.
  - b. AWS D1.1 question regarding voltage/current requirements for welding. IE:HQ provided a position which appears questionable, then remains adamant without interest in resolving the problem.

Midland Facility Items

1. Significant Events
  - a. Installation of the <sup>Major</sup> NSSS components for both units was completed.
  - b. The cooling pond was filled from spring run off water from the <sup>Tittabawassee</sup> Tidibewassee river
  - c. Both units passed the 50% completion mark during the year, as reported in the yellow book. This figure is considered to be conservative and the fuel load dates are considered to be obtainable.
  - d. Consumers has added substantially to their QA/QC staff for the Midland project. This as allowed them appreciably to expand their own areas of coverage and details of review.
  - e. RIII inspection coverage was expended by the assignment of a resident inspector.

2. Significant Problems

2. Significant Problems

- A. Acceptability of equipment qualification tests and/or discrepancies in qualification test data review touches different kinds of equipment (mechanical & electrical) supplied by different vendors. This has been addressed by Electrical Support Inspectors and the licensee's recent 50.55(e) reportable item. The electrical inspectors believe it should rightfully cover all specification requirements. The involvement of the licensee expanding on this issue may have a limiting effect on the effectiveness of the mid QA inspection scheduled for January, 1979. This is considered the most urgent problem at Midland to date.
- B. There is (and has been) a continued reliance on the credibility of information on a Bechtel G321-D form which states that equipment has been shipped from the vendor in an acceptable manner. This reduces the depth of receipt inspection at the site. However, there are questions which pertain to the adequacy of the inspections performed at the vendor shops which result in materials being received at the site which do not necessarily meet all the requirements. This item may be tied ~~to~~ <sup>to</sup> item 1 above.
- C. Warehousing: Items are periodically being released from the warehouse without trackability and are stored in place without the preventative maintenance and equipment protection programs being triggered. There may be other problems in the warehousing and dissemination of material. An adequate mid-QA inspection is needed to identify weaknesses in the licensee warehousing programs and/or implementation of these programs.
- D. CPCo management review of licensee QA inspector findings may not be as in depth as desired. Particularly on those items which may have a sedatory or long lead time affect on the plant integrity.

*Clear Pump*

*Scram b. l. n. a. m. p. t. p. r. o. g. r. a. m.*

*Yield in c. b. l. t. r. a. n. s. p. o. r. t.*  
*Receipt*  
*Delay*

- E. Settlement of the diesel generator building and all the ramifications associated with procuring and analyzing information which will ensure an adequate structure. *Disturbed  
Shoreland*
- F. Bechtel's repeated failure to inspect adequately, without tunnel vision, in a timely manner results in failure to promptly identify (if at all) unacceptable areas.
- G. Build then design syndrome Occassionally structures cannot be fitted to existing structures. The structure being placed is then altered from the original blue print with a change to the blue print made later. Rather than, the necessary engineering analyses being performed, the blue prints changed and then the structure being installed. Without assurance of a timely engineering review, proper placement (from a loading stand point) of structures and/or shubbers cannot be guaranteed.

Rou Cook

MIDLAND REPORT

The Midland Units 1 and 2 Status report for: (1) the manual chapter inspection program and enforcement history; (2) open items both unresolved and noncompliance items; (3) reportable deficiencies; and (4) significant events and problems, are included herein.

Manual Chapter Inspection Program

The module inspection program for the B program is considered to be approximately 50% complete for both units. The summary completing status is as follows:

<u>Unit</u>	<u>Modules Complete</u>	<u>Modules Open</u>	<u>Modules to be Opened</u>
1	28	28	36
2	25	32	35

The routine inspection module program has not produced any significant number of enforcement items. In fact, comparison to other facilities, in a comparable construction and inspection status, indicates that most other facilities have experienced more noncompliance items. The total number of noncompliances by years since the beginning of the project is tabulated as follows:

<u>Year</u>	<u>No. Reports</u>	<u>Both Units</u>	<u>Unit 1</u>	<u>Unit 2</u>
1970	6	4		
1971 <sup>2/</sup>	2	0		
1972 <sup>1/</sup>	1	0		
1973 <sup>4/</sup>	11	9		
1974	11	3		
1975 <sup>2/</sup>	7	0		

- 1/ CP issued 12/14/72.
- 2/ Mothball status or stretchout status
- 4/ Show cause order December 1973

<u>Year</u>	<u>No. Reports</u>	<u>Both Units</u>	<u>Unit 1</u>	<u>Unit 2</u>
1975 <sup>2/</sup>	7	0		
1976 <sup>6/</sup>	9		14	14
1977 <sup>5/</sup>	12 - 15		<del>18</del> 4	<del>19</del> 5
1978 <sup>3/</sup>	16		<del>25</del> 15	<del>28</del> 7

### Status of Open Items

A deliberate effort has been undertaken during 1978 to identify and complete close out of all previously identified unresolved and noncompliance items. This was considered necessary because a lot of old unresolved items were hidden within the text of old reporting, and even in one instance in the letter to the licensee, (primarily 1972 - 1975) that had neither been treated as unresolved nor followed up. It is noted that this was also a concern of the licensee. Presently the open status of unresolved and noncompliance items is as follows:

<u>Unit</u>	<u>Unresolved</u>	<u>Noncompliance</u>
1	2	6
2	3	7

### Reportable Deficiencies

A listing of the more recent 50.55(e) reportable items and its current status appears below.

- Decay heat removal pumps castings (radiography) Licensee followup regarding inadequate radiography was good, these pumps are now being reinstalled at the site. NRC considers this item closed.

3/ As of Mid November

5/ Immediate Action Letter April 1977 regarding Tendon Sheaths

6/ Immediate Action Letter RE: report 76-04

7/ Two recent noncompliances identified by the C program.

2. Reactor vessel surveillance capsule holder tube. This item is a generic item regarding B&W designed specimen holders located inside of the RPV. This item is considered closed with the understanding that the licensee will stay informed of the experiences of Davis-Besse (who also has the same change) for possible future problems.
3. Containment building personnel airlocks weld cracking. A final report had been received by RIII regarding the repairs to the cracked welds. Followup by RIII disclosed that the welding performed failed to follow the prescribed instructions of the controlling NRC. This was identified as a noncompliance item in a recent inspection report. The licensee has indicated that a supplemental report will probably be issued in addition to the letter of response of the noncompliance item.
4. Unit 2 containment liner bulge. The design report intended to be the final report, was issued at a meeting held in Ann Arbor the last of June 1977 attended by R. F. Heishman and R. E. Shewmaker. This report is still under review by Mr. Shewmaker. No response has ever been sent to the licensee acknowledging the final report. The repair work was completed about the end of May 1978, however no review has been done by RIII pending response from Mr. Shewmaker.
5. Seismic cable tray supports welding. A final report is pending which will provide the analysis and acceptance of welds by the designer.
6. Undersized fillet welds on ITT-Grinnell safety related pipe hangers. Some review of the final report has been done by the assigned Hangers and Snubbers assigned Engineering inspector, however more review is planned.



7. Other reportable deficiencies in various stages of corrective action status are as follows:
  - a. Reactor coolant pump motor flanges
  - b. Reactor building spray piping supports
  - c. Design deficiency of the NI/RPS grounding
  - d. Piping small break analysis not conservative
  - e. Class 1E station battery racks
  - f. Settlement of diesel generator building
  - g. Components lack of qualification

Significant Events and Problems — *Message*

1. Electrical components qualification question raised by the Engineering Support Inspectors as expanded by the licensee's reportable deficiency to include mechanical and electrical components. The problem as envisioned by the licensee covers the seismic and environmental qualification. The electrical inspectors believe it should rightfully cover all specification requirements. This broad area of concern would be a limitation to the effectiveness of the mid-QA inspection presently scheduled for mid January '79. *May 1979*
  
2. Unanswered inquiries addressed to IE:HQ regarding components and material relative to a safety/nonsafety status as follows:
  - a. Failure to identify certain class IE system components to be covered by Consumers Power's QAnnual letter Spessard to Reinmuth April 28, 1978.
  - b. Classification of spent fuel pool liner plate presently classed as nonsafety related by Bechtel. Letter Danielson to Reinmuth June 1, 1978.

- c. Apparent noncompliance with 50.55 a (h) <sup>regarding</sup> identification of <sup>(Color Coding of electrical Equipment & Cables)</sup> components. Letter Spessard to Reinmuth dated May 3, '78.
3. In ability to deal effectively with licensee regarding 50.55(e) items due to lack of support from IE:HQ. Examples:
- a. Unit 2 containment liner bulge design report and completion of repair. Headquarters personnel have been reviewing the report for 18 months now with no response.
  - b. AWS D1.1 question regarding voltage/current requirements. IE:HQ provided a position which appears questionable, then remains adamant without interest in resolving the problem.
4. Significant events for the past year include.
- a. Installation of the NSSS components for both units was completed.
  - b. The cooling pond was filled from spring run off water
  - c. Both units % completion figures passed the 50% mark during the year
  - d. Consumers has added substantially to their QA/QC staff for the Midland project. This has allowed them appreciably to expand their own areas of coverage and details of review.
  - e. RIII coverage expended by the assigned resident inspector
5. The current problem areas include:
- a. settlement of diesel generator building area

b. Components qualification

c. Bechtel repeatedly failing to inspect adequately and/or failing to identify unacceptable areas

50. SSE = Status of

laundry list of problem areas:

Electrical - wire ways need painting  
Also after wire audit.

Qualification on B+W pumps - decay pt.  
~~others~~

B+W random machine of RCS.

B+W fit of Rx interface

B+W never did a job this big.

E-21 D form: Decay pumps.

Qualification on electrical cables  
and equipment - Fox Bourton

Ware housing: aux fd motor drivers

Building as burlts for structures

Reference lines for elevation off.

Procedures for handling equipment

Testing of equipment.

Welding of structures around.

2007

Meeting at Midland to explain to  
CPCo / Bechtel QA the results of 1979-1980  
SALP review by NRC

Bird, Cook, Keeley, Selby

12/22/80

- SALP -

CPCo - average - middle of group. without Zack

Significant events: Soils, bolts, coating, Zack

NRC sensitive to Bechtel taking to much lead.

To much time arguing if the problems identified is  
a problem

lack of timely stop work when bad things identified

Investigation of root cause of problems - Bolts } indicate  
Soils } improve

NRC claims CPCo has not done enough doc. to convince NRC  
of things done.

lack of timely response.

CPCo unhappy  
some SALP meeting  
comments got into local  
news.

Supply NRC with info con - in timely manner.

CPCo being evaluated by how personnel interface with  
NRC personnel.

// Cook stress do it right the first time.

When find problem either Fix or stop

Going to bring SALP evaluation up next time.

LaSalle  
Braidwood  
Dyran  
Zimmer

Comparative construction &  
inspection sites.

Qual test decay pump

Assembly decay pump

Radiograph decay ht pump

Info for technical manual  
cables

Fox box

In City  
can belie.  
admit prob.

Selby: CFCo committed to build a quality plant

CFCo is responsible party

Midland is different type plant - one of kind - process  
Stm.

// CFCo Cook & Selby presented the results of the WRC - SALP to QA personnel in a matter-of-fact positive manner -  
Mr. Cook indicated to RJC after meeting that CFCo may not fully agree with all the WRC findings. However, CFCo disagreements with WRC findings did not come out during the Cook/Selby presentation to the QA personnel.

CP Co - Midland  
QA Overview Program

The QA-PE&C overview activities started in June 1976 for rebar and in April 1977 for embeds. For all other civil, mechanical, welding, NDE, electrical, and instrumentation and controls, the overview program started at the end of June 1978 and was fully implemented by the end of March 1979 for activities then in progress. The overview program implemented between June 1978 and March 1979 was improved over that which was utilized in 1976 and 1977. The improvement consisted of review of Bechtel drawings, specifications, field procedures and quality control instructions for specificity, and of QA-PE&C's utilization of specific overinspection plans.

With regard to mechanical activities, from November 1978 to date, Bechtel closed 936 Quality Control Inspection Records (QCIRs), whereas in the same time period QA-PE&C performed 40 overinspections. Work in the mechanical area was well underway when the QA-PE&C overview program was started. Mechanical QCIRs had remained open for a long time and QA-PE&C had expressed concern about this because in some cases there were only minor inspections yet to be accomplished and in other cases the scopes of the QCIRs were too large. In response, during late 1978 and early 1979, Bechtel closed a large number of QCIRs for which almost all of the inspection was accomplished much earlier and for which there was little opportunity for a corresponding QA-PE&C overinspection. Thus, there is not a direct correlation between the 936 QCIRs closed from November 1978 to date and the 40 QA-PE&C overinspections performed during the same period. Furthermore, the most significant aspects of the mechanical work are the hydrostatic and pneumatic tests. Since October 1977,



all of the hydrostatic and pneumatic tests have been witnessed by QA-PE&C. The majority of this effort is not reflected in the QA-PE&C overinspection figure of 40 because hydrostatic and pneumatic tests are accomplished as a witness point in the Bechtel procedures.

With regard to welding, from November 1978 to date, Bechtel closed 2,690 QCIRs, whereas in the same period QA-PE&C performed 50 overinspections. The discussion about Bechtel QCIR closures, or lack thereof, in the preceding paragraph equally applies to the welding area. Furthermore, for all of Class 1 and Class 2 component and piping welds, radiographic examination is required with minor exceptions and the QA-PE&C review of the radiographs has been extensive as indicated below.

From June 1978 to the present, Bechtel originated 4,119 field radiographs and QA-PE&C has reviewed 704. For the same period, B&W originated slightly over 700 field radiographs and QA-PE&C has reviewed 700. B&W radiographs for primary systems are reviewed 100%, although not always in the same time frame as they originated. For other than the primary system, the QA-PE&C review is on a sampling basis. All 1,560 vendor radiographs received since December 1978 have been reviewed by QA-PE&C.

The electrical area can be further categorized as indicated in the following paragraphs.

For cable tray supports, Bechtel has closed approximately 200 QCIRs, whereas QA-PE&C has performed 13 overinspections.

For cable tray installations, Bechtel has closed 201 QCIRs, whereas QA-PF&C has performed 26 overinspections.

For conduit, junction boxes and their supports, Bechtel has closed approximately 500 QCIRs, whereas QA-PE&C has performed 26 overinspections.

For electrical penetration assemblies, Bechtel has closed 5 QCIRs, whereas QA-PE&C has performed 1 overinspection.

For the pulling of power cables, control cables and instrumentation cables, Bechtel has closed 331 QCIRs, whereas QA-PE&C has performed 75 corresponding overinspections (including 20 overinspections which were accomplished as part of audits). Of the 75 QA-PE&C cable pulling overinspections, 14 were for instrumentation cables.

For cable terminations, Bechtel has closed 853 QCIRs, whereas QA-PE&C has performed 63 corresponding overinspections.

The higher QA-PE&C emphasis on cable pulling in comparison to cable termination is attributable to the recognition that the cables essentially become inaccessible after the pulling, whereas the cable terminations are accessible and any defects are more detectable during checkout and preoperational testing.

For equipment installations, Bechtel has closed 10 QCIRs, whereas QA-PE&C has performed 15 overinspections. The reason for the excess of QA-PE&C overinspections is that we have performed some in-process overinspections.

*QA-PE&C rate of QCIR closure is not done.*

4

Neither Bechtel QC nor QA-PE&C cover the instrumentation and controls activities utilizing a separate group-level organization. Both mechanical and electrical disciplines are necessary for adequate coverage. Furthermore, Bechtel's responsibility is to install the instrumentation, to run cable and tubing to the instrumentation, to terminate the cable, and to hook up the tubing. Consumers' personnel will perform calibration, loop checks, component tests, and system tests as part of our formal checkout and preoperational test program. These organizational arrangements are different from those previously experienced by Mr Ron Cook which included an I&C group within the inspection organization and the architect-engineer performed all of the precalibration through system testing activities.

Work is just beginning on I&C. For the electrical aspects of I&C, Bechtel has not closed any QCIRs. Nevertheless, QA-PE&C has performed 14 overinspections--the same 14 cable pulling overinspections mentioned above. For the mechanical aspects of I&C, none of the Bechtel QCIRs are closed. Nevertheless, QA-PE&C has completed 1 overinspection since the scope of this QA-PE&C overinspection plan is different from the scope of the Bechtel QCIR.

## Overview:

1. What ~~reviews~~ are done  
percentage of closed QCR's
2. What predicted parameters are  
going to be looked at
3. What is the advanced planning  
for overview
4. Is the ~~per~~ percentage of confidence  
predicted
5. Is the percent overview - acceptable  
what is statistical confidence  
Do you even know  
More problems more overview

Areas: Mechanical Piping - address  
surveillance points and numbers

T+C.