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

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

Gentlemen:

Thank you for your letter dated January 14, 1982, informing us of the steps you have taken to correct violations 4 and 5 and the dates of corrective action for several other items identified in our Inspection Reports No. 50-329/81-12 and 50-330/81-12, forwarded by our letter dated July 10, 1981. We have no further questions regarding the responses provided in this most recent letter and your earlier letters dated August 7, 1981 and October 30, 1981.

Your cooperation with us is appreciated.

Sincerely,

"Original Signed By C.E. Norelius"

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

cc w/ltr dtd 1/14/82:
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
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CONSUMERS POWER COMPANY'S RESPONSE TO
US NUCLEAR REGULATORY COMMISSION, REGION III
LETTER DATED DECEMBER 3, 1981
DOCKET NUMBERS 50-329 AND 50-330

1. Paragraph 1 of the Region III letter of December 3, 1981, requests clarification of two issues.

a. Paragraph 1a of this letter states:

Field alteration of piping support and restraint installations subsequent to QC inspection and sign off has not been clearly addressed. Identification and correction of problems during final system walk-down prior to preoperational and/or startup tests should be the exception, not the rule. Your QA program should include measures to protect systems from damage and alterations after final acceptance by quality control

CONSUMERS POWER COMPANY'S RESPONSE

We regret that there was an editorial error which made it appear that we were not being fully responsive to your concern regarding field alteration of piping support and restraint installations subsequent to QC inspection and sign off. In the third paragraph on page two of the attachment to the October 30, 1981 letter, as a part of our response to Violation Item 4, we referenced "Item 6 in your Notice of Violation". We should have referenced Item 3. We apologize for the confusion this editorial error must have caused you.

Our response to Item 3, transmitted on August 7, 1981, stated:

Bechtel Construction has developed Administrative Guidelines addressing rework. The Administrative Guidelines provide reference to particular field procedures and outline the means of administratively processing rework information such that proper notifications and coordination are attained. Bechtel Quality Control has also developed Administrative Instructions to indicate the process followed for processing rework items.

It is noted that the above-referenced Administrative Guidelines and Instructions have been developed for Civil, Instrumentation, Mechanical and Electrical disciplines, and these actions in the Mechanical area are considered responsive to Unresolved Item 329/81-12-15 and 330/81-12-16 concerning procedural provisions to control design revisions on small bore piping and piping suspension systems. In the Mechanical area, the guidelines have been issued and revisions to the appropriate Mechanical procedures have been made and are expected to be issued for use by August 12, 1981.

The definition of rework as used in these guidelines and procedures includes both the removal of an accepted installation for the purpose of accomplishing a design change on it, and temporary removal of an accepted installation simply to accomodate construction congestion. These guidelines and procedures have now been released and are being implemented. This action should preclude unauthorized rework subsequent to QC inspection and sign off.

b. Paragraph 1b of the Region III letter states:

Your response states, "Project Engineering has been requested to evaluate the conditions represented by Items e, g and h." What consideration has been given to the possibility that field installation was carried out without a clear understanding of the design requirements and related interpretations?

CONSUMERS POWER COMPANY'S RESPONSE

With respect to Item e, Bechtel Project Engineering was asked to consider whether or not the pipe hanger and restraint installation tolerances given in Specification 7220-M-326(Q) are in conformance with the design requirements. In response to this question, Bechtel Project Engineering stated that there is only a minimum installation clearance requirement and that there is no maximum installation clearance requirement, unless specified on the drawing. There is a fabrication interfacing dimensional constraint, which when met, results in an acceptable maximum installation clearance. This dimensional constraint is verified at the time of fabrication. When the minimum installation clearance and the fabrication dimensional requirements are met, design stresses will not be exceeded.

Based on this Project Engineering response, we conclude that the tolerances are in conformance with the design requirements. Furthermore, we have verified that the Bechtel QC inspections and the MPQAD overinspections are being performed with the full understanding of the tolerances as set forth above. Finally, since it appears the circumstances concerning this item should have raised some question as to the proper interpretation of the pertinent design requirements, it has been reemphasized to all QA/QC personnel that, any time such a question or doubt arises, they are to promptly seek written direction from Project Engineering.

With respect to Items g and h, Bechtel Project Engineering was asked to consider whether or not the Technical Specification is an adequate and complete statement of the design requirements. In response to this question, Bechtel Project Engineering stated that the strength of grouted anchor bolts is controlled by the bond strength between the grout and the concrete interface. The strength of the concrete cone pull-out, calculated per ACE 349-81, Appendix B, is approximately three times the design strength of the grout-to-concrete interface. Therefore, small holes drilled within this concrete cone will not have a detrimental effect until the potential pull-out surface of that concrete cone is reduced by approximately two thirds. Based on this Project Engineering response, we conclude that the design requirements as currently stated in the Technical Specification are adequate. The occurrence of abandoned holes in the proximity

of a single grouted-in anchor bolt in such numbers that they would reduce the pull-out area of the concrete cone around the bolt by two-thirds seems highly improbable. Never-the-less, to preclude even the remotest possibility of such an occurrence, Project Engineering will revise the Technical Specification to incorporate their response to our question.

2. Paragraph 2 of the Region III letter states:

Our letter dated September 16, 1981, requested that you provide a date when full compliance was or will be achieved for each of the eight items of noncompliance. While your additional response for Items 4, 5 and 8 satisfied our request, you failed to provide a date for the other items.

CONSUMERS POWER COMPANY'S RESPONSE

The dates for which we were in full compliance are as follows:

- a. Item 1 - December 31, 1981
- b. Item 2 - December 31, 1981
- c. Item 3 - November 24, 1981
- d. Item 6 - August 5, 1981
- e. Item 7 - May 29, 1981



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

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

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

Gentlemen:

Thank you for your letter dated October 30, 1981, responding to our letter dated September 16, 1981, which addressed the need for you to provide additional information so we could complete our evaluation of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Report No. 50-329/81-12; 50-330/81-12 forwarded by our letter dated July 10, 1981.

We have reviewed your response and have the following comments:

1. Response to Items 4 and 5

Your response is generally acceptable; however, two issues warrant further clarification:

- a. Field alteration of piping support and restraint installations subsequent to QC inspection and signoff has not been clearly addressed. Identification and correction of problems during final system walkdown prior to preoperational and/or startup tests should be the exception, not the rule. Your QA program should include measures to protect systems from damage and alterations after final acceptance by quality control.
- b. Your response states, "Project Engineering has been requested to evaluate the conditions represented by items e., g., and h." What consideration has been given to the possibility that field installation was carried out without a clear understanding of the design requirements and related interpretations?

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CONSUMERS POWER COMPANY'S RESPONSE TO NOTICE OF
VIOLATIONS DESCRIBED IN NRC INSPECTION REPORT
DOCKET NO 50-329/81-12 AND 50-330/81-12

Item 4 from Appendix A (Item of Noncompliance 50-329/81-12 and 330/81-12-12 provides the following:

"10CFR50, Appendix B, Criterion V states, in part, 'Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings. . . and shall be accomplished in with these instructions, procedures, or drawings.'

The Consumers Power Company Quality Assurance Program Policy No. 5, Revision 9 states, in part, 'Instructions for controlling and performing activities affecting quality of equipment or operations during the design, construction . . . phases of nuclear power plants, such as . . . construction, installation . . . are documented in instructions . . . and other forms of documents, and the responsible CP departments shall 'also verify through audits that the required instructions . . . are implemented.' Contrary to the above, seven large bore pipe restraints, supports, and anchors were not installed in accordance with design drawing and specification requirements. (329/81-12-11; 330/81-12-12)

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

CONSUMERS POWER COMPANY'S RESPONSE

Violation Item 4

The pipe supports identified in the NRC report of the May 18-22, 1981 inspection which were used as supporting details for Item 4 in the Notice of Violation were all turned over to QC for inspection in 1980 (inspections completed between 5/80 and 12/80).

An evaluation was conducted by MPQAD of the quality indicators related to hangers for the time period of June 1980 to May 1981. This study found that half of the indicators were issued between 9/17/80 and 11/19/80 which coincides with the QC inspection dates for the hangers identified by Mr Yin. This study concluded that construction did not assure that hangers and related items were complete and in accordance with the most recent drawing revision prior to turnover to QC.

As a result of actions taken primarily in the Quality Control area, the number of quality indicators dropped from a peak of 134 in August/September 1980 to an average of 19.25 per month from March 1981 thru June 1981, and that general level has been maintained. Overinspections conducted by MPQAD have confirmed that the Bechtel QC inspection of hangers has improved and is providing increased assurance that pipe hangers which have been QC inspected and accepted do meet drawing and specification requirements.

Actions taken as a preventive measure include the following. In June 1981, field engineers were issued a hanger checklist which was prepared for their use to assist in the checking of hangers prior to turnover to QC. This checklist includes a review to confirm use of the most recent drawing revision, and by checking all items noted on the checklist, the field engineer can help assure that the hangers are complete and in accordance with the drawing and specification requirements prior to turnover to QC for their inspection. In addition, the reading list for Mechanical Field Engineers has been expanded to enhance their skills.

Based on this evaluation and the resulting recommendations and action taken by Bechtel Field Engineering, and the information in our response to Item 5 of the Notice of Violation, we are scheduling an overinspection by MPCAD of a sample of those pipe hangers and supports installed prior to January 1981 to assess the acceptability of the installations and adequacy of the original inspection performed by Bechtel QC. This overinspection program will be completed by December 31, 1981. Subsequent evaluation of the overinspection results will be used to determine if there is any need for additional corrective action.

In addition to the above, in response to your concern about rework subsequent to QC inspection (Item f), this concern is similar to Item 6 in your Notice of Violation resulting from the May 18-22, 1981 inspection. We request that you review our response to Item 6, as our response to the concern stated in your letter dated September 16, 1981. In that letter, you stated that you will examine this matter during a subsequent inspection, therefore apparently accepting the actions we have taken. Therefore, we feel that no additional action is necessary on this item. An audit is planned to be conducted in November 1981 to address the effectiveness of the rework controls which includes the additional procedures generated since the May inspection.

All of the specific hanger deficiencies are being addressed. Item a through d and f have been resolved. Project Engineering has been requested to evaluate the conditions represented by items e, g and h. Disposition and corrective action results from the disposition is anticipated to be completed by January 5, 1981. Pending the result of the overinspection to be accomplished by MPCAD of the hangers installed prior to January 1981, the plant will be in compliance in regards to this matter at that time.

Item 5 from Appendix A (Item of Noncompliance 329/81-12-12 and 330/81-12-13) provides the following:

"10CFR50, Appendix B, Criterion X states in part: 'A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.'

The Consumers Power Company Quality Assurance Program Policy No 10, Revision 8 states, in part, 'Inspections and surveillance are performed to assure that activities affecting quality comply with . . . design documents.'

Contrary to the above, licensee construction quality control inspectors inspected and accepted six of seven large bore pipe restraints, supports, and anchors that, in fact, had not been installed in accordance with design drawings and specifications as determined by the NRC inspector. (329/81-12-12; 330/81-12-13).

This is a Severity Level V violation (Supplement II,."

CONSUMERS POWER COMPANY'S RESPONSE

Violation Item 5

The pipe supports identified by the NRC in the report of their site inspection of May 18-22, 1981, which were used as supporting details for Item 5 in the Notice of Violation were all inspected in the time period of May 1980 to December 1980.

"An evaluation conducted by MPQAD of quality indicators related to hangers for the time period June 1980 to May 1981 found that half of the indicators were issued between 9/17/80 and 11/19/80, which coincides with the QC inspection dates for the hangers identified by Mr Yin.

The evaluation also found that during that time period, the number of crafts personnel significantly increased. Construction had not assured that hangers were complete and met the requirements of the most recent drawing revision prior to turnover to QC. The result was that QC received a large number of hangers to inspect and these hangers had a relatively large number of deficiencies."

In October and November of 1980, planned personnel changes included a new Lead Mechanical QCE, and pipe support group supervisor. These changes brought additional experience to the QC organization. Additionally, increased effort was directed to the inspection of pipe supports.

Subsequent to these actions, the number of quality indicators dropped from a peak of 134 in August/September 1980 to an average of 19.25 per month from March 1981 through June 1981, and that general level has been maintained. Overinspections conducted by MPQAD have confirmed that the Bechtel QC inspection of hangers has improved and is providing increased assurance that pipe hangers which have been QC inspected and accepted do meet drawing and specification requirements.

A question regarding the intent of Specification M-326 with regards to the location for the measurement for clearance determination (is a clearance that varies from 1/16" to 3/8" acceptable if the drawing requires a 1/16" clearance) has been referred to Bechtel Project Engineering.

All of the specific hanger deficiencies are being addressed. Item a through d and f have been resolved. Project Engineering has been requested to evaluate the conditions represented by items e, g and h. Disposition and corrective action results from the disposition is anticipated to be completed by January 5, 1981. Pending the result of the overinspection to be accomplished by MPQAD of the hanger installed prior to January 1981, the plant will be in compliance in regards to this matter at that time. It is felt that our present inspection program is in compliance with applicable requirements in regards to hanger inspections.



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

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

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

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Gentlemen:

Thank you for your letter dated August 7, 1981, informing us of the steps you have taken to correct the items of noncompliance which we brought to your attention in Inspection Report No. 50-329/81-12; 50-330/81-12 forwarded by our letter dated July 10, 1981.

Your letter has been reviewed, and particular attention was given to the information presented. We do not consider the actions delineated in your letter to be fully responsive as described below.

1. Response to Items 1, 2, and 3

We will examine these matters during a subsequent inspection.

2. Response to Items 4 and 5

These two noncompliance items involve installers who failed to follow work procedures and design instructions and also QC inspectors who failed to provide adequate installation verification. We contend that installation and inspection are two distinctly different functional areas. In addition, in our review of this matter we cannot support your statement that approximately half of the specific findings could be substantiated after further analysis.

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Item e (Rigid Frame Restraint 18-1HCB-2-H13). We do not concur with your statement that this item is not in fact nonconforming to its design requirements nor was there an inspection error. Our basis is: (1) the procedure did not call for the use of a level and angle finder for this specific application, (2) due to the small surfaces involved, use of the angle finder may not be considered applicable, (3) calculations proved that the reading from the angle finder was not conservative, and (4) as

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SEP 16 1981

it stands, portions of the gap clearance are in noncompliance with the restraint design. Furthermore, your response did not address our inspector's question as to whether or not the 2° criteria is permissible since the design drawings called for a full load bearing surface between the pipe lugs and box frame restraint shims.

Item f (Sliding Stanchion Assembly 2HBC-124-H7). Your statement, "It is believed that the hanger movement occurred after the QC inspection that accepted the installation" raises concerns that you are not aware that alteration of installation, subsequent to QC inspection without proper control could indicate a breakdown in your site QC inspection program.

Item g (Rigid Frame Assembly 12-2HBC-124-H5R) and Item h (Anchor 2 1/2" - ICCB-2-H7). During our inspection discussions with your staff, we did not understand that the anchor bolts installed were grouted-in type; however, we feel the issues identified are still valid. This is based on the engineering consideration that the load capacity for both types of anchor bolts is principally dependent on the condition of the affected shear cone area of the concrete. Small holes drilled within this concrete cone body will not only weaken the concrete, but they will also initiate cracking along the disturbed regions. If design and test data for grouted-in type anchor bolts installed in this manner is available, we will review it during a subsequent inspection.

Item i (Sway FSK-M-2HBC-137-3-H3(Q)). We could not concur with your statement that since this item had not as yet been released for QC inspection, it is considered "under construction" and as such, no inconsistency is noted. As we stated in our inspection report, we recognized that the hanger installation had not been QC inspected. We consider the problem warrants attention, even if your QC inspection could identify and correct the problem at a later date. We believe that the installer should implement design requirements independently of QC inspection.

In addition to the comments presented above your response did not address (1) the program inspection performed to insure that similar deficiencies do not exist in other systems, (2) when the specific problems and extended inspection program will be initiated and completed, and (3) the corrective action taken to prevent future recurrence.

3. Response to Item 6

We performed a followup inspection in this area prior to receipt of your response to this item. We will continue this inspection effort during future inspections.

2/7/81

Additionally, the field procedures were revised to more clearly address rework in some areas. Specifically, within the electrical area, Field Procedures FPE-3.000, "Installation of Electrical Tray and Conduit;" FIE-3.100, "Class IE Tray Support Installation;" and FIE-3.300, "Class IE Conduit Support," have been revised to address the rework of electrical raceway. These documents are in the approval cycle and are expected to be issued by August 12, 1981. In addition to these procedure revisions, an Administrative Guide E-1.00, "Processing Rework of Scheduled Raceway," was issued for use by Bechtel Construction.

Bechtel Quality Control has developed and issued QC Administrative Instruction No 617, "Instructions for Processing Rework Electrical Items." This instruction details how rework is processed by Quality Control.

The lack of prompt corrective action described in the Item of Noncompliance relative to the Bechtel and Consumers Power Company audit findings was due to considerable discussion between parties on the need, extent and detail necessary to adequately cover the rework activity procedurally. There was a lack of any identified nonconformances relative to items being reworked and as such, there were not and are not now, indications that the rework processes were out of control.

It is noted that the above-referenced administrative guidelines and instructions have been developed for Civil, Instrumentation, Mechanical and Electrical disciplines, and these actions in the Mechanical area are considered responsive to Unresolved Item 329/81-12-15 and 330/81-12-16 concerning procedural provisions to control design revisions on small bore piping and piping suspension systems. In the Mechanical area, the guidelines have been issued and revisions to the appropriate Mechanical procedures have been made and are expected to be issued for use by August 12, 1981.

Full compliance will be achieved upon issuance of the procedures.

Item 4 from Appendix A (Item of Noncompliance 50-329/81-12-11 and 330/81-12-12) provides the following:

"10CFR50, Appendix B, Criterion V states, in part, 'Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in with these instructions, procedures, or drawings.'

The Consumers Power Company Quality Assurance Program Policy No. 5, Revision 9 states, in part, 'Instructions for controlling and performing activities affecting quality of equipment or operations during the design, construction . . . phases of nuclear power plants, such as . . . construction, installation . . . are documented in instructions . . . and other forms of documents,' and the responsible CP departments shall 'also verify through audits that the required instructions . . . are implemented.' Contrary to the above, seven large bore pipe restraints,

supports, and anchors were not installed in accordance with design drawing and specification requirements. (329/81-12-11; 330/81-12-12)

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

Item 5 from Appendix A (Item of Noncompliance 329/81-12-12 and 330/81-12-13) provides the following:

"10CFR50, Appendix B, Criterion X states, in part: 'A program for inspection of activities affecting quality shall be established and executed by or for the organization performing the activity to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity.'

The Consumers Power Company Quality Assurance Program Policy No. 10, Revision 8 states, in part: 'Inspections and surveillance are performed to assure that activities affecting quality comply with . . . design documents.'

Contrary to the above, licensee construction quality control inspectors inspected and accepted six of seven large bore pipe restraints, supports, and anchors that, in fact, had not been installed in accordance with design drawings and specifications as determined by the NRC inspector. (329/81-12-12; 330/81-12-13)

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

Response to Item 4 and 5

These two items of noncompliance are appropriately addressed together. The item identification used in this response is identical to the identification of the seven specific examples of noncompliance found in Section V 2 of the body of the inspection report. Further analysis of the seven items substantiated approximately only half of the findings. Specifically the following was determined.

1. Items c and d were found upon reinspection to be in nonconformance with their requirements and erroneously accepted by Bechtel Quality Control. Nonconformance reports have been issued for these discrepancies. Compliance will be achieved upon closure of the nonconformance reports.
2. Item e (rigid frame restraint 18-1HCB-2-H13) is not in fact nonconforming to its design requirements nor was there an inspection error.

QC reinspection of this restraint utilizing standard inspection methods (level and angle finder) indicated that this item is within tolerance. The NRC calculations had indicated a 2.23° out of parallel condition between the upper shim plate and stanchion plate versus 2° allowable.

3. Item f (sliding stanchion assembly 2HBC-124-H7) at the time of the NRC inspection was nonconforming. Further QC inspection revealed that the paint line between the base plate and the wall was broken. Because of this, it is believed that the hanger movement occurred after the QC inspection that accepted the installation. An SCN (No. 26) to M-326 dated June 16, 1981 has been issued rendering the previously inconsistent condition acceptable. No further action on this item is required.
4. Item g (Rigid Frame Assembly 12-2HBC-124-H5R) is in compliance.

Consumers notes that the NRC Inspector referenced the wrong specification. Specification 7220 C-305(Q) relates to drilled-in anchor bolts. The applicable specification for this condition is Specification 7220-C-306(Q) for grouted-in anchor bolts. This Specification (C-306) references no requirements for proximity of abandoned holes (due to the different anchoring mechanism none is required). Therefore, no inconsistency existed nor was there an inspection error. No further action is required.
5. Item h (Anchor 2 1/2" - 1CCB-2-H7) in a similar manner to (g) above is in compliance. The applicable Spec. (M-306) contains no requirements for the proximity of abandoned bolts. (Note: further QC inspection revealed that the 1/4" diameter bolts were, in fact, abandoned). Therefore, no inconsistency existed nor was there an inspection error. No further action is required.
6. Item i (Sway Strut FSK-M-2HBC-137-3-H3(Q)) had not, as yet, been released for QC inspection, it is considered "under construction" and as such, no inconsistency is noted. No further action is required at this time other than assuring at the time of inspection the item is in conformance.

Item 6 of Appendix A (Item of Noncompliance No. 50-329/81-12-13 and 330/81-12-14) provides the following:

"10CFR50, Appendix B, Criterion III states, in part: 'The design control measures shall provide for verifying or checking the adequacy of design, such as by the performance of design reviews . . . Design control measures shall be applied to items such as . . . stress analysis . . .'

The Consumers Power Company Quality Assurance Program Policy No. 3, Revision 9 states, in part, 'The design organization identifies the applicable regulatory requirements, design bases, codes and standards; develop the design and specify the design interfaces; perform design verification and prepare design documents.'

Contrary to the above, several of the small bore pipe and piping suspension system designs performed at the site had not been prepared, reviewed and approved in accordance with established design control procedures. (329/81-12-13; 330/81-12-14)

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

Functional or Program Areas Inspected

1. Observation of Underpinning Instrumentation Installation Activities

- a. The inspector observed the partial installation of several underpinning instrumentation thermocouple cables. The inspector observed that the raceway internals were free of hazardous debris and sharp edges. The cables and raceway were undamaged and cable pull tensions were properly monitored.
- b. On July 1, 1982, the inspector observed the supports and the anchor bolt installations pertaining to extensometers 3 and 5. The inspector observed that unapproved installation/coordination forms were being used by construction personnel to document these installations. The use of installation/coordination forms was discussed with the licensee during the May 28 and June 17 exit meetings. This subject was also discussed during a conference call between the inspector and licensee representatives on June 18, 1982. During these discussions the licensee committed to the use of approved installation/coordination forms during the installation of affected underpinning instrumentation. Therefore, it has been determined that the licensee is in deviation from an NRC commitment as described in Appendix B of the report transmittal letter (50-329/82-11-01; 50-330/82-11-01).

During the observation of extensometer EX5, one anchor was found to not have the required embedment depth as specified in Specification C305. Construction and engineering had signed-off on the coordination form for that instrument indicating completion of this activity. This failure to properly install the anchor bolt is in noncompliance to 10 CFR Part 50, Appendix B, Criterion V, as described in Appendix A of the report transmittal letter (50-329/82-11-02; 50-330/82-11-02). Subsequently, the licensee initiated an NCR on this item.

2. Other Areas Inspected - Units 1 and 2

During a tour of the Auxiliary Building and the Cable Storage Yard the inspector observed the following:

- a. The inspector observed a 20 inch vertical separation between redundant Class 1E cables located in the Unit 1 cable chase at elevation 659. The 20 inch vertical separation was measured at the point at which Class 1E cables exit raceway sleeves 1DH058 (separation Group D) and 1BFF001 (separation Group B). The required vertical separation is 36 inches. If this separation cannot be attained then barriers must be installed. This matter is unresolved pending review

of previous licensee inspections of this area and the identified barrier requirements for raceways 1DH058 and 1BFF001. (50-329/82-11-03)

- b. The inspector observed the condition of Class 1E cables stored in the Cable Storage Yard. Two instances were observed in which the ends of Class 1E cables were not properly capped. The licensee stated that immediate corrective action would be taken.

3. Freeze-wall Monitoring Pits

The inspector reviewed the procedures and drawings for the four monitoring pits and determined that they were acceptable. The inspector also inspected the four pits for conformance with the design drawings and also determined they were acceptable. The inspector gave the licensee verbal concurrence that they could activate the freeze-wall on May 21, 1982. The only open hold point is that they cannot dig below the deep duct bank until they get NRR concurrence on the proposed method.

4. Pond Fill Line Repair

The inspector gave the licensee verbal concurrence that they could repair the 72 inch pond fill line if the following two conditions were met:

- a. An approved site excavation permit for that activity.
- b. Fines monitoring on the dewatering wells to be the same as previously approved by NRR for plant area dewatering wells.

5. Slope Layback at Auxiliary Building Access Shafts

The inspector gave the licensee verbal concurrence that the slope layback scheme proposed for the auxiliary building access shafts was acceptable. This scheme was shown on Drawings C1420 and C1421, Revision 3.

6. FIVP Temporary Supports

The inspector while reviewing drawing C-2020, which defines the FIVP support system, requested evidence that the as-built configuration of the supports is as shown on the drawing. The licensee could not produce any documented evidence that the support structures were built as illustrated on the drawing since it was installed non "Q" several years ago. The licensee agreed to do an inspection of the supports to determine their adequacy. Subsequently, the licensee determined that Unit 1 support steel has nine deficiencies from the drawing; while Unit 2 has ten deficiencies from the drawing. That is, the specific details of the installation drawing have not been

July 19, 1982

Docket Nos.: 50-329/330 OM, OL

APPLICANT: Consumers Power Company

FACILITY: Midland Plant, Units 1 and 2

SUBJECT: SUMMARY OF JUNE 25, 1982 MEETING ON SOILS RELATED
REQUESTS FOR INFORMATION

On June 25, 1982, a meeting was held in Bethesda, Maryland between Consumers Power Company (the applicant), the NRC, Bechtel and various consultants to discuss the applicant's responses to enclosure 8 of the NRC letter of May 25, 1982 which requests additional information on soils related remedial activities for the Midland Plant. At the outset of the meeting the staff presented memoranda containing specific structural and geotechnical questions which are attached as enclosures 1 and 2. During the meeting the response to the questions in enclosures 1 and 2 were prepared by the applicant and are attached as enclosure 3. Enclosure 3 also includes the applicant's responses to verbal questions on piping raised during the meeting (see Section III); a summary of an NRC caucus (see Section IV); and a review of the FIYP design (see Section V).

Meeting attendees are listed by enclosure 4.

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

Enclosures:
As stated

cc: See next page

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JUL 23 1982

OFFICE	DL:LB#4	DL:LB#4					
SURNAME	DHood:eb	EAdensam					
DATE	7/16/82	7/19/82					

MIDLAND

Mr. J. W. Cook
Vice President
Consumers Power Company
1945 West Parnall Road
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