



Encl. 2

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

July 23, 1982

MEMORANDUM FOR: R. F. Warnick, Director, Enforcement and Investigations Staff

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

SUBJECT: INDICATORS OF QUESTIONABLE LICENSEE PERFORMANCE - MIDLAND SITE

As per our conversation of July 21, 1982, the following is a list of those items that various inspectors consider to be indicative of questionable licensee performance:

1. One of the leading items is the over-inspection performed on electrical QC inspectors which was done in response to NRC concerns identified in the May 1981 team inspection. The licensee found weaknesses in the inspections performed by some electrical QC inspectors pertaining to not identifying the mis-routing of cables. This item culminated in an item of noncompliance. The licensee did not expand the overview activity to a degree necessary for an acceptable resolution to the identified weakness - even after a meeting in RIII. This item has not been resolved to the satisfaction of the NRC although our position has been clearly defined. ;

As a partial response to the team inspection concern, the licensee presented the NRC with an audit report which would demonstrate a response to our concern of questionable electrical QC inspections. However, the audit report stated that it (the audit report) did not address the NRC concerns.

2. During the dialogue for the underpinning and remedial soils work, a large amount of emphasis has been placed on the settling data for the structures involved. During a meeting in HQ on March 10, 1982, the need for QC requirements on remedial soils instrumentation were explicitly delineated. However, one week later, the NRC inspectors found soils work instrumentation installation was started the day after the March 10, 1982 meeting without a QC/QA umbrella; that the licensee's QA Auditor and QA Engineering personnel were not approached pertaining to the need for QA coverage for this soils settlement instrumentation; that there were strong indications that the licensee had mislead the NRC in relating that the work was essentially complete when indeed it was not; and presently, the licensee management informs our inspector that items are ready for his review when in actuality they are not. Our conversations with licensee personnel - other than management - confirm that the items are not ready for review.

3. Historically, one of the NRC questions has been, "Who is running the job - Bechtel or Consumers?" The following example would allow one to believe it is Bechtel: As a part of the resolution to our findings in the soils settlement instrumentation installation, the NRC insisted that the licensee generate a Coordination/Installation Form to cover interface between different evolutions of instrumentation installation. The licensee would call our inspector for his concurrence on the adequacy of the form - the inspector would approve Consumers Power Company's form, but then would find out that Bechtel did not want to work to Consumer's form - the form that was generated to resolve regulatory concerns. This event has occurred twice and was considered as a deviation during a more recent inspection. The opinion of the staff is that if Consumers generates a form that will aid them in not incurring regulatory difficulty, and which has had NRC input, the licensee should demand that the contractor comply with these policies instead of the contractor dictating the regulatory environment under which they will work.
4. Deficiencies in material storage conditions has continually been a concern to the NRC and has resulted in items of noncompliance. To the inspectors, the ability to maintain quality storage is indicative of how rigorous or slipshod the constructor's attitude is towards construction. The licensee has attempted to entice the constructor to do better in maintaining the material storage conditions, but still the licensee's auditors and the NRC have negative findings in material storage conditions and negative discussions with the contractor about the validity of the finding.
5. At periodic intervals, the support of cables, particularly in the control room area, which are awaiting further routing or termination, has met with the disapproval of the NRC inspectors. These discrepancies also include cables without covered ends being on the floor in walk areas that are in a partially installed status. This is also another indicator of slipshod workmanship which has been brought to the constructor's attention at various times, but was last noted during a recent inspection.
6. In the area of instrumentation impulse line installation and marking, the licensee has had separability violations which has required removal of all installed impulse lines. Also, the NRC, because of this and significant adverse operational conditions, insisted that the installed impulse lines be identified. Although the licensee plans to mark the impulse lines, there was an inordinate amount of resistance to marking the lines - even though there had been instances of mis-matched channels because of identification confusion.

7. An example of reluctance in placing the responsibility for quality workmanship at the foreman and/or worker level has recently been identified. The NRC inspectors noted that some drop-in anchors were improperly installed and obviously did not adhere to the installation procedures. The licensee's attitude indicated this was not a valid finding because QC had not inspected the item. The NRC inspectors treat this as indicative that slipshod workmanship is tolerated in the hopes that QC will find the mistakes.
8. Late in 1981, the licensee decided to move the QA Site Superintendent into another position and cover this site function by sharing the site time between the QA Director and the QA Manager. After a January 1982 meeting with the NRC at RIII, the licensee opted to fill the QA Superintendent spot with another person. In the spring of the year, the NRC inspectors were following up on welding allegations and approached the QA Superintendent. The QA Superintendent was familiar with the alleged poor welding and had established what the NRC inspectors determined to be a responsive plan to resolve the questionable QC welding inspections. At the Exit Interview, the QA Director did not appear to back the QA Site Superintendent's proposed plan which had tacit NRC approval. The NRC inspector classified in writing and with just cause that the Exit Interview was the most hostile exit interview he had ever encountered.
9. During a recent inspection, it was noted by the NRC inspector that fill dirt was piled and being covered with a mud mat at a nominal 1:14 horizontal to vertical slope when the specification called for a 14:1 horizontal to vertical slope. A constructor Field Engineer witnessed the wrong slope being installed and justified and defended the slope after being informed of the specification requirement. This is another example of the constructor having an attitude which precludes quality workmanship.
10. At different times, NRC inspectors have experienced difficulty in getting information which is controlled by the contractor, such as supporting calculations and qualifying information to justify a given installation. A recent example is: the NRC inspector informed the licensee and the contractor he wanted to see resumes of persons involved in the remedial soils work. There is an obligation to the NRC to supply a precise number of "qualified" persons on the soils work. The inspector was informed he could not get these records as they were personal. The inspector ultimately did get the information after bringing it to the attention of licensee upper management. However, this indicates an implied unwillingness of the constructor to share information with the NRC and sometimes with the licensee.

11. The licensee oftentimes does not demonstrate a "heads up" approach to their activities. The following are examples of the licensee operating in an environment using tunnel vision - "blindness".

- a) During a recent NRC inspection, the inspector challenged the ability to maintain the proper mix ratio on high pressure grout. This was done after the inspector noted that the operator could never maintain the proper mix ratio without continual manual control - which was not available when the grout is applied. The licensee's apathetic attitude did not allow them to stop the grout application until the next day when this became an issue at the exit interview.
- b) At one point in time, the company doing drilling on site for the remedial soils work cut into a safety related duct bank between the diesel generator building and the service water building. The Consumers Power Site Manager's Office (the production people) stopped work because - from a quality standpoint conditions were so deplorable. However, the Site Manager's Office did not have responsibility in this area - the Midland Project QA Department had this responsibility and did not invoke their authority to prevent the drilling work from getting out of control - or to bring it back into control.
- c) The NRC inspector recently witnessed the licensee setting up to drill a well hole in safety related dirt using a technique which was not authorized. If the inspector had not brought this to the licensee's attention, the licensee would have violated an Order addressing remedial soils work and also the Construction Permit. When the licensee was queried as to the availability of the QC/QA personnel who would prevent such activity from happening, the NRC inspector was informed that this was (another) misunderstanding.

The NRC inspectors have been informed by our contacts on site that there are memoes written to the effect that "peripheral vision" should be curtailed and communication with the NRC stifled. The NRC has not read these memoes yet - but plans to in the near future, provided they really exist and infer what we have been informed.

12. The licensee seems to possess the unique ability to search all factions of the NRC until they have found one that is sympathetic to their point of view - irregardless of the impact on plant integrity. Some examples of this are:

- a) The NRC soils inspector informs the licensee that soils stabilization grout comes under the Q program. The licensee is not particularly happy with this position. Unknown to the inspector, the licensee argues his point with NRR to have the grout non-Q - using only those arguments which support his (the licensee's) position. The licensee

has the advantage of the NRC inspector's technical and regulatory basis for supporting his (the inspector's) position, and therefore avoids mention of this during the discussions with NRR. However, the licensee's QA program, which has already been approved by NRR, states that all the remedial soils work is Q unless RIII approves a relaxation on a case by case basis. It appears the licensee does not wish to acknowledge the prior agreements with the NRC.

- b) Since the failure of auxiliary feedwater headers in B&W steam generators, discussions have transpired between the NRC inspectors and the site personnel. These discussions have indicated that the licensee was maintaining a conservative approach and were entertaining the concerns expressed by the NRC which were stimulated primarily by gross mistakes in attempting the modification at operating B&W plants. The licensee's corporate personnel were annoyed that the NRC inspectors would not give approval to start the modification until all the preparatory work had been accomplished as this would tend to impact the schedule and the modification to the steam generators could become a scheduling nuisance. The licensee corporate personnel contacted the NRC inspectors involved to "reason with them". However, the corporate personnel, (including a representative from B&W) were unable to answer the concerns of the NRC inspectors but did mention that the NRR Operational Project Manager indicated that it was alright to proceed with the modification. The licensee corporate personnel could not state what the position of the NRR Construction Project Manager was on this issue - only that they had found some form of approval from someone in the NRC.
- c) At times, when Immediate Action Letters or other forms of escalated enforcement become imminent, the licensee attempts to "appeal" their case with individuals in the regional management who are removed from the particulars of the tentative enforcement action. The licensee attempts to get these persons to agree to specific portions of the issue which would indicate that the licensee is "really not all that bad". However, the "real" issues, as identified by the NRC inspectors are being masked.
- d) During inspections of the remedial soils work, the NRC inspector has been informed by the licensee that certain findings and areas of inspection were not within the purview of his (the inspector's) inspection program because they were in essence considered non-Q and that by virtue of prior agreement with the Regional Administrator were excluded from enforcement action. However, the NRC inspectors would subsequently find that there was no such agreement between the Regional Administrator and the licensee - only a philosophical discussion as to what, in general terms, constituted an item of noncompliance.

The above indicators support the reputation the licensee has for being argumentative. Their apparent inability to accept an NRC position without diligently searching to find a "softened" position results in numerous hours of frustrated conversations between all parties involved to resubstantiate (usually the original position) a position based on technical and regulatory prudence.

13. The licensee has been classified publicly by the NRC as being argumentative. The licensee continues to exhibit this trend, as evidenced by the following examples:
  - a) Essentially every item of noncompliance receives an argumentative answer which addresses only the specificity of the item of noncompliance and selectively avoids any concept which would support the essence for the item of noncompliance. For example - in the instance of the improperly installed drop-in anchor mentioned above, it was the fact that QC had not inspected the installation of the bolt which was important to the licensee. However, the real enforcement issue was that components were being improperly installed.
  - b) The Cycle II SALP made critical evaluations of the licensee's performance in several areas. The licensee's response to this SALP report was argumentative over specific details and did not seem to acknowledge that the consensus of opinion of the NRC inspection staff was that there were areas where the licensee's performance was weak. The licensee's argumentative position is in the form of "we really are not all that bad" when the records, findings and observations of the NRC inspectors support just the opposite position.
  - c) The "Q-ness" of the remedial soils work has continually been an argumentative topic of discussion which ultimately resulted in a HQ meeting on March 10, 1982. At this meeting, the "Q-ness" of the remedial soils work was specified and later documented with the meeting minutes. However, the licensee did not wish to abide by this position and a subsequent meeting was held in RIII to further clarify the NRC position. Still, the topic of "Q-ness" is being argued by the licensee, even though the ASLB has issued an Order further defining the "Q-ness" of the soils work. It might be noted that a hearing is in process over this soils issue and the NRC's position on "Q-ness" has been expressed during these testimonies.
14. During a recent episode, the licensee wanted to continue excavation of soils in proximity to the Feedwater Isolation Valve Pit (FIVP). However, the licensee wanted to perform this evolution without determining that the temporary supports of the FIVP were adequate. Making this determination would have an impact on scheduling, as stated by the licensee. The FIVP supports were installed without a Q umbrella and subsequent inspections did reveal several discrepancies in the installation of the support structure.

15. During the limited remedial soils work which has transpired, the licensee has managed to penetrate Q-electrical duct banks, a condenser header drain line, an abandoned sewer line, a non-Q electrical duct bank and a 72-inch circulating water line. All of these occurrences have happened because of a lack of control and attention to details. Whenever approached by the NRC as to the adequacy of review prior to attempting to drill, the NRC receives responses which strongly suggest that the time was not taken to perform these reviews - perhaps taking this time would impact on the schedule.
16. By virtue of an earlier ALAB Order, the licensee is required to perform trend analyses for nonconforming conditions. These trend analyses have, in the past, masked the data such that obvious trends are not obvious and has resulted in negative findings by the NRC. This was addressed in one of the earlier SALP meetings. Recently, while performing a review of hanger welding data, the NRC inspector found that the statistical data had been diluted to the point that the number of unsatisfactory hangers could not be determined from the trend analyses or the type and degree of non-conforming conditions which were being identified pertinent to the hanger fabrication.
17. The licensee continually would use the NRC staff as consultants and classifies a regulatory and enforcement position as counter productive. This is reflected by the licensee not wishing to perform Q-work without obtaining NRC prior approval and then addressing only those areas where the NRC has voiced a regulatory concern - provided it is convenient to the licensee. This attitude has particularly prevailed in the remedial soils issue and to a lesser degree in the electrical installation areas. The preferred NRC inspector mode would be for the licensee to generate his program to establish quality and then the NRC would approve or disapprove. However, the licensee requires consultation with the NRC to establish his level of quality requirements.

The above is not intended to be a complete list of all discrepancies which indicate questionable licensee performance as this would require a more extensive review of the records and inspection personnel involved than time permits. Also, there has been no attempt to systematically document the enforcement and unresolved items list as these are contained in other information sources. However, the listing is rather comprehensive of the types of situations and attitudes which prevail at the Midland Site as observed by the NRC inspector staff.

When considering the above listing of questionable licensee performance attributes, the most damning concept is the fact that the NRC inspection effort at Midland has been purely reactive in nature for approximately the last year, and that these indicators are what have been observed in approximately the last six months. If

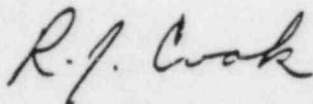
R. F. Warnick

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July 23, 1982

these are the types of items that have become an NRC nuisance under a reactive inspection program, one can only wonder at what would be disclosed under a rigorous routine inspection and audit program.

Sincerely,



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

cc: W. D. Shafer  
D. C. Boyd  
R. N. Gardner  
R. B. Landsman  
B. L. Burgess





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

August 18, 1982

MEMORANDUM FOR: Region III Files

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

SUBJECT: MEETING BETWEEN NRR AND REGION III RE CONSUMERS POWER COMPANY PERFORMANCE AT MIDLAND (DN 50-329; 50-330)

On July 26, 1982, R. F. Warnick and James G. Keppler met with E. G. Case, D. G. Eisenhut, R. H. Vollmer, R. O. Tedesco, T. H. Novak, W. D. Paton, and J. Rutberg to discuss the performance of Consumers Power Company at the Midland site.

During the meeting reference was made to information contained in two memos from the RIII staff. The first memo dated June 21, 1982 is from C. E. Norelius and R. L. Spessard and concerns suggested changes for the Midland Project. The second memo dated July 23, 1982 is from R. J. Cook and concerns the licensee's performance at Midland. Copies of the memos are attached.

The meeting resulted in the following recommendations:

- (1) Region III should obtain the results of the recent audit by KMC.
- (2) Schedule a public meeting between NRC and CPC management in Midland, Michigan, to obtain licensee commitment to accomplish (3) and (4) below.
- (3) The licensee should obtain an independent design review. (A vertical slice from design thru completion of construction.)
- (4) The licensee should obtain an independent third party to continuously monitor the site QA implementation and provide periodic reports to the NRC. Region III is to provide a suggested outline for the continuous monitoring function.

*Robert F. Warnick*

Robert F. Warnick, Acting Director  
 Office of Special Cases

Attachments: As stated

cc w/attachments: Meeting  
 participants

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"MIDLAND-ACTIONS RECOMMENDED BY THE MIDLAND SECTION, OFFICE OF SPECIAL CASES"

1. Establish an augmented inspection effort by the NRC.
  - a. Inspections should be concentrated in the following ten areas:
    - (1) Soils
    - (2) Electrical
    - (3) I&C
    - (4) High Pressure Piping
    - (5) Hangers and Supports
    - (6) Corrective Action System - including identification documentation, resolution, and prevention of future events.
    - (7) Receipt, Storage, and Handling
    - (8) Structural Steel
    - (9) Subcontractor Welder Qualification
    - (10) Management Overview System
  - b. The effort as initially conceived will last from 6 to 12 months but it could last longer.
  - c. It is proposed that the inspections be performed by the Midland Section and 5 contract inspectors assigned fulltime to the Midland Section and located onsite. The Midland Section would be as follows:
    - (1) W. D. Shafer, Chief, Midland Section
    - (2) R. N. Gardner, Project Manager
    - (3) R. B. Landsman, Inspector
    - (4) R. J. Cook, Senior Resident Inspector
    - (5) B. L. Burgess, Resident Inspector
    - (6) Welding & NDT-Contracted
    - (7) Mechanical-Contracted
    - (8) Electrical-Contracted
    - (9) I & C - Contracted
    - (10) Startup & Test-Contracted
    - (11) Secretary (Fulltime)
2. Require the licensee to have an independent third party look at a vertical slice of a safety-related system from design through completion of construction.
3. Require that all QC inspectors be independent of Bechtel, reporting only to CPCo.
4. Conduct NRC exits with Construction Manager.
5. NRC should get commitments in writing and should give release on hold points in writing.
6. It is proposed that Mr. Keppler and Mr. Denton meet with Consumers Power Company and Bechtel top management to ensure that steps are taken to correct the following:

- a. The Site QA Superintendent is not being given the latitude and senior management support needed to perform his job effectively.
- b. Senior management is not being made aware of or is not dealing with QA problems.
- c. We are convinced that Bechtel has cost and scheduling as their foremost consideration. Quality is taking a back-seat with management.



**Consumers  
Power  
Company**

Attachment *EW*  
(K-5)

James W Cook  
Vice President - Projects, Engineering  
and Construction

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

September 17, 1982

Harold R Denton, Director  
Office of Nuclear Reactor Regulation  
Division of Licensing  
US Nuclear Regulatory Commission  
Washington, DC 20555

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

PRINCIPAL STAFF			
<i>✓</i>	<i>Kepler</i>		
<i>✓</i>	<i>J. Ke...</i>	<i>FILE</i>	<i>✓</i>
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MIDLAND NUCLEAR COGENERATION PLANT  
MIDLAND DOCKET NOS 50-329, 50-330  
QUALITY ASSURANCE PROGRAM IMPLEMENTATION  
FILE: 0485.16 SERIAL: 18850

REFERENCE: CPCo Letter Serial 18845, 9/17/82, "Quality Assurance Program Implementation for Soils Remedial Work"

The referenced letter summarized Consumers Power Company's discussions with the NRC management regarding the implementation of the Quality Assurance Program for the Midland soils remedial work. In addition to the discussions specifically related to soils, the total Midland Quality Assurance Program implementation was reviewed and areas were identified where additional efforts should be directed to insure successful overall project implementation and the performance of the primary inspection function (QC) on site. In response to these concerns Consumers Power made two significant new commitments which are conceptually described in the following paragraphs. Additional documentation will be provided as the details of these commitments are worked out.

Quality Control Function

In order to improve the performance of the Quality Control function and to make it more responsive to direction from the Quality Assurance organization, the responsibility for directing the entire Quality Control function will be assumed by Consumers Power. The Quality Control group will functionally report to MPQAD. The programmatic aspects now in place will continue to be used and the combined inspection resources of both Bechtel and CPCo will be integrated. This reorganization will be fully implemented as soon as the appropriate procedural changes are finalized. The integration of the QC resources for soils into MPQAD has already been accomplished as a separate action.

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purpose of this evaluation was to review the Midland engineering activities to determine if design criteria have been implemented and if the design assumptions, design methods, and the design processes are satisfactory. Bechtel Corporate Management was asked to initiate this assessment in order to certify that the Midland project met all the standards expected of any Bechtel project. To carry out this assignment the assessment team was specifically chosen to be independent from the Bechtel Ann Arbor Power Division. The team consisted of senior experienced personnel with appropriate expertise having previously performed similar work on other projects. A Consumers Power representative was a direct participant on the assessment team. The final report will be sent to the NRC upon completion and whatever other documentation or discussion as may be requested will be provided.

Conclusion

Based on the discussion outlined above and in the reference letter, Consumers Power believes that steps have been taken to insure both the successful implementation of the remaining work to complete the plant and a verification program, including quality records, test program results, and third party assessments, that will certify the adequacy of the plant as constructed.

*James W. Cook*

JWC/JAM/bjw

CC Atomic Safety and Licensing Appeal Board  
CBechhoefer, ASLB  
MMCherry, Esq  
FPCowan, ASLB  
RJCook, Midland Resident Inspector  
RSDecker, ASLB  
SGadler  
JHarbour, ASLB  
GHarstead, Harstead Engineering  
DSHood, NRC (2)  
DFJudd, B&W  
JDKane, NRC  
FJKelley, Esq  
RBLandsman, NRC Region III  
WHMarshall  
JPMatra, Naval Surface Weapons Center  
WOtto, Army Corps of Engineers  
WDPatton, Esq  
SJPoulos, Geotechnical Engineers  
FRinaldi, NRC  
HSingh, Army Corps of Engineers  
BStamiris

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

Letter Serial 18850 Dated September 17, 1982

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits information regarding the implementation of the Consumers Power Company Quality Program for the Midland Plant.

CONSUMERS POWER COMPANY

By

*J W Cook*  
J W Cook, Vice President

Projects, Engineering and Construction

Sworn and subscribed before me this \_\_\_ day of \_\_\_.

\_\_\_\_\_  
Notary Public  
Bay County, Michigan

My Commission Expires 7-11-82



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

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DRRF

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Docket No. 50-329 } 82-05  
Docket No. 50-330 } (and 06)

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

Gentlemen:

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

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

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

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

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

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

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

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

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

Your cooperation with us is appreciated.

Sincerely,

*15 / for R. N. Gardner*

*for* R. F. Warnick, Director  
Office Special Cases

cc w/ltrs dtd 5/28 & 6/11/82:  
DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
The Honorable Charles Bechhoefer, ASLB  
The Honorable Jerry Harbour, ASLB  
The Honorable Frederick P. Cowan, ASLB  
The Honorable Ralph S. Decker, ASLB  
Michael Miller  
Ronald Callen, Michigan  
Public Service Commission  
Myron M. Cherry  
Barbara Stamiris  
Mary Sinclair  
Wendell Marshall  
Colonel Steve J. Gadler (P.E.)  
Consumers Power Company

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

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*RNS*  
Gardner

RIII  
*RNS*  
Shafer

RIII  
*RNS*  
Warnick



Consumers  
Power  
Company

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James W Cook  
Vice President - Projects, Engineering  
and Construction

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

October 15, 1982

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

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

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

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

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

~~8210290163~~

OCT - 0 1982

Consumers Power Company

By James W. Cook

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

Patricia A. Luffer  
Notary Public, Bay County, Mich

My commission expires 3-4-86

JWC/WRB/ljr

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

11a

Attachment <sup>F</sup>  
(K-6)



**Consumers  
Power  
Company**

James W Cook  
Vice President - Projects, Engineering  
and Construction

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 789-0453

September 17, 1982

Harold R Denton, Director  
Office of Nuclear Reactor Regulation  
Division of Licensing  
US Nuclear Regulatory Commission  
Washington, DC 20555

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

✓	lee
	✓
	lee

3/3

MIDLAND NUCLEAR COGENERATION PLANT  
MIDLAND DOCKET NOS 50-329, 50-330  
QUALITY ASSURANCE PROGRAM IMPLEMENTATION FOR SOILS REMEDIAL WORK  
FILE: 0485.16 SERIAL: 18845

This letter summarizes recent discussions with NRC management regarding implementation of soils remedial construction and presents the Company's documentation of those discussions.

BACKGROUND

The 1980/1981 SALP Report, presented to Consumers in late April of this year, indicated that activities in the soils area should receive more inspection effort on the part of both the NRC and CP Co. Follow-up discussions with the NRR staff and Region III Inspectors led to the conclusion that the Quality Assurance Program and its definition was adequate; however, there was concern that certain aspects were not being or might not be satisfactorily implemented.

Consumers Power has performed an in-depth review of the implementation plans for the Midland soils work activities. This review included the areas of design and construction requirements and plans, organization and personnel, project controls and management involvement. The results of this review and the proposed steps to assure the successful implementation of all aspects of the work were discussed with the NRC management in a meeting held in Chicago on September 2, 1982.

~~8406020155~~

SEP 2 1982

### STEPS TO IMPROVE IMPLEMENTATION

A number of new steps have or are being taken by Consumers Power Co to enhance the implementation of the quality program with regard to the soils remedial work. These measures touch upon all aspects of the work, from design to post-construction verification and include the following:

- (1) Retaining a third party to independently assess the implementation of the auxiliary building underpinning work;
- (2) Integrating the soils QA and QC functions under the direction of MPQAD;
- (3) Creating a "Soils" project organization with dedicated employees and single-point accountability to accomplish all work covered by the ASLB order;
- (4) Establishing new and upgraded training activities, including a special quality indoctrination program, specific training in underpinning activities, and the use of a mock-up test pit for underpinning construction training;
- (5) Developing a quality improvement program (QIP), specifically for soils remedial work;
- (6) Increasing senior management involvement in the soils remedial project through weekly, on-site management meetings wherein both work progress and quality activities are reviewed;
- (7) Improving systems for tracking of and accounting for design commitments.

What follows is a description of the soils implementation plan, as it will be carried out using the new approaches outlined above, together with other specific aspects which we believe will be critical to the successful performance of the job. The discussion is limited to the implementation features specific to soils, is divided into areas roughly describing the progression of the job from design to completion and ends with a description of organizations, management involvement and NRC overview.

### DESIGN ADEQUACY AND IMPLEMENTATION

The design for the required remedial activities is in an advanced state; design details and adequacy have been reviewed by numerous organizations. A special ACRS Subcommittee reviewed the soils activities and commented favorably on the thoroughness and conservatism of the review and remedial approaches. Numerous submittals to the NRC have been presented to clarify the design intent. It is our understanding that the Staff is completing its detailed review of all design aspects and is in the process of issuing an SSER. This advanced state of design has permitted the early development of a thorough planning effort and assisted in the organization and development of a detailed training effort. Following-up on design activities, the Project has assigned to the site a design team comprised of experienced structural and geotechnical engineers under the Resident Engineer. This team will monitor

and review the field implementation as specified in design documents, resolve on a timely basis routine construction questions requiring engineering response and administer the specific contingency plans immediately if any problem should arise during the underpinning work. Additional engineering resources for the soils work will continue to be located in Ann Arbor.

#### IMPLEMENTATION OF DESIGN FEATURES AND COMMITMENTS

All soils activities covered by the ASLB Order of April 30, 1982 are covered under soils-specific QA plans. These plans require that appropriate procedures are in place to accomplish the work in a quality manner and that detailed inspection plans be developed and utilized. Additionally, a Work Authorization Procedure and Work Permit System insure that the NRC and CP Co have specifically authorized and released the work. Under this system, the NRC reviews proposed work details, asks for additional information when necessary and authorizes construction activities in advance. CPCo then authorizes the work to proceed.

To further assure that commitments made to the NRC are properly accounted for in design documents, Consumers Power and Bechtel review the written records of commitments and insure that they are being incorporated into design documents. The Project is currently undertaking an additional review of past correspondence to create a computer listing of commitments. This computer list will be periodically reviewed to insure that commitments are incorporated in design or construction documents in a timely fashion.

#### PERFORMANCE OF PROJECT CONSTRUCTION, QUALITY ASSURANCE AND QUALITY CONTROL ACTIVITIES

To assure that project construction, quality assurance and quality control personnel correctly carry out their appointed tasks, a number of measures have been taken, including a reorganization of quality control, upgraded training programs, direct Company involvement in construction scheduling and control, and utilization of a contract format to minimize any cutting of corners by contractors. These elements of enhanced performance are described more specifically below.

First, the project has reorganized the Soils QA-QC effort, creating an integrated organization with single-point quality accountability under the MPQAD. This new organization is expected to improve QC performance, increase CPCo involvement in the management of the quality control function and improve QA-QC interfaces.

Second, extensive training programs for the soils underpinning work have been developed. This overall training program, which includes the major Construction and Quality organizations involved in soils work, covers both general training in quality and specific training relative to the construction procedures.

The majority of the personnel associated with Remedial Soils work have attended a special Quality Assurance Indoctrination Session. The QA indoctrination has been provided to Bechtel Remedial Soils Group, CPCo

Construction, QC, QA, Mergentime and Spencer, White and Prentis (SW&P) personnel down to the craft foreman level. This training consists of one three-hour session covering Federal Nuclear Regulations, the NRC, Quality Programs in general and the Remedial Soils Quality Plan in detail.

With regard to the work procedures, a requirement on both Mergentime and SW&P is that specific training on the procedures be provided prior to initiating any quality related construction activity. The identification of individuals to receive this training is spelled out in each procedure pertaining to a specific construction activity. Completion of the specific training requirements is a QA hold point which must be satisfied before work can proceed.

In further recognition of the importance of training to the underpinning work, the Company is utilizing a mock-up test pit as part of its training program for underpinning construction. The purpose of this test pit is to provide specific training in the construction of a pier, bell and grillage assembly from initial issuance of design drawings through completion of construction. This allows supervisory and craft personnel to perform work under the conditions, requirements and restraints which will be encountered when the actual underpinning starts. It also allows the various quality organizations to inspect the work and insure that their concerns and requirements are properly reflected in the procedures.

Third, to further enhance the performance of key project organizations, Consumers Power will maintain control over scheduling, both through the construction authorization process and by frequent meetings with the involved contractors and subcontractors. Each week, underpinning subcontractors will present proposed construction work to the Company. In addition, to assure the best quality work, the major subcontracts were entered into on a time-material basis. This should improve subcontractor attention to detail and acceptance of owner direction in the performance of specific construction activities.

Last, the Company is establishing a separate Quality Improvement Program (QIP) for the soils project. Although not part of the formal Quality Assurance program, the QIP is a management system that should be helpful in communicating and reinforcing project policies and expectations to all project participants. To launch this effort, an indoctrination program will be presented to all individuals, stressing the absolutes of Quality and the concept of "Doing it right the first time." Measurements specific to soils will be developed for those critical areas which are indicative of a "quality product". Tracking these activities will provide an indication of the effectiveness of the program. The QIP will provide mechanisms for individual "feedback" from all individuals involved, including the craft personnel.

INDEPENDENT ASSESSMENT

A third party will be retained to independently appraise the initial phases of the construction of the auxiliary building underpinning. This consultant will be mobilized as soon as possible and, after familiarizing itself with the design, will evaluate the auxiliary building underpinning construction work at

the site. If significant problems or adverse trends are observed, the third party assessment program will be extended in both scope and duration until a satisfactory conclusion can be drawn. The initial evaluation will be carried out over a three-month period.

The independent assessment will be conducted by a team of nuclear plant construction and quality assurance experts. This team will be supplemented by the addition of an underpinning consultant who will review the soils design documents, construction plans and construction itself to assure not only that the design intent is being implemented but also that the construction is consistent with industry standards. The assessment will further assure that the QA Program is being implemented satisfactorily and that the construction is being implemented in accordance with the construction documents. Arrangements are being made with Stone and Webster Engineering Corp to assume the lead role in this appraisal. They will be assisted by Parsons, Brinkerhoff, Quade and Douglas, Inc who will provide underpinning expertise. The NRC will be apprised of all findings of this independent assessment in a timely manner.

#### ORGANIZATION, MANAGEMENT INVOLVEMENT AND NRC OVERVIEW

The project organization formed for the performance of the soils remedial work incorporates single-point accountability, dedicated personnel to the extent practical, minimum interfaces-particularly at the working level, and a quality organization integrating QA and QC. The soils project organization is tailored to the task at hand. The entire organization, including quality assurance and quality control are staffed with well qualified, experienced personnel, augmented by design consultants and construction subcontractors nationally recognized in the underpinning field.

The soils remedial effort will also include a high level of senior management involvement. Project senior management will conduct weekly in-depth reviews on site of all aspects of the work including quality and implementation of commitments. In addition, the reporting chains to the senior project personnel have been shortened. The Company's CEO is briefed on a regular basis and schedules bi-monthly briefings on all aspects of the project including soils. During the bi-monthly briefings, the CEO normally tours the Midland site.

Complementing the CPCo management role, NRC Region Management overview of the construction process will be enhanced by monthly meetings, agreed upon by the Region, to overview the results of the quality program and the progress of the soils project. These meetings will cover any or all aspects of the project of general or special interest to the NRC management.

#### CONCLUSION

Based on the discussion outlined above, CP Co believes that the soils program has been thoroughly and critically evaluated and that all prerequisites for successful implementation have been or are being accomplished. The Company's program, with the initial overview from the independent implementation assessment, and the continuing overview by the NRC staff and management should



provide adequate assurance that the remedial soils activities will be successfully completed.

*James W. Cook*

JWC/JAM/bjw

CC Atomic Safety and Licensing Appeal Board

CBechhoefer, ASLB

MMCherry, Esq

FPCowan, ASLB

RJCook, Midland Resident Inspector

RSDecker, ASLB

SGadler

JHarbour, ASLB

GHarstead, Harstead Engineering

DSHood, NRC (2)

DFJudd, B&W

JDKane, NRC

FJKelley, Esq

RBLandman, NRC Region III

WHMarshall

JPMatra, Naval Surface Weapons Center

WOtto, Army Corps of Engineers

WDPatton, Esq

SJPoulos, Geotechnical Engineers

FRinaldi, NRC

HSingh, Army Corps of Engineers

BStamiris

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

Letter Serial 18845 Dated September 17, 1982

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits information regarding the implementation of the Consumers Power Company Quality Program for the Midland Plant soils remedial work.

CONSUMERS POWER COMPANY

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

Sworn and subscribed before me this 17<sup>th</sup> day of Sept 1982.

Francis B. Puffer  
Notary Public  
Bay County, Michigan

My Commission Expires 3-4-86

## Midland - Misrouted electrical cables

- ① \* Urbany - 6.3% of total cables inspected are misroute
  - ② Knot - 11.9% of total cables inspected are misroute
  - ③ Dake - 3.7% of total cables inspected are misroute
  - ④ Hines - 1% of total cables inspected are misroute
- \* only 500 of 1147 total inspections have been overinspected.

- ① education and experience meets ANSI N45.2.6 requirements
- ② " " " " " " " " " " " "
- ③ education meets ANSI N45.2.6 requirements while experience does not.
- ④ same as ③



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

*Shirley*  
*766 forms*  
*attached*

NOV 08 1982

(15)

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

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

Gentlemen:

This refers to the routine safety inspection conducted by Messrs. W. Shafer, R. Cook, R. Gardner, R. Landsman, and B. Burgess of this office on September 20 to October 12, 1982, of activities at Midland Nuclear Power Plant, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-81 and No. CPPR-82 and to the discussion of our findings with Mr. J. A. Mooney at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in non-compliance with NRC requirements, as specified in the enclosed Appendix. A written response is required.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and (b) submit within twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), any such application must be accompanied by

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NOV 08 1982

an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons which are the bases for the claim that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

*10/10 R.F. Warnick*

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

Enclosures:

- 1. Appendix, Notice of Violation
- 2. Inspection Reports
  - No. 50-329/82-21
  - No. 50-330/82-21

cc w/encls:

DMB/Document Control Desk (RIDS)  
 Resident Inspector, RIII  
 The Honorable Charles Bechhoefer, ASLB  
 The Honorable Jerry Harbour, ASLB  
 The Honorable Frederick P. Cowan, ASLB  
 The Honorable Ralph S. Decker, ASLB  
 Michael Miller  
 Ronald Callen, Michigan  
 Public Service Commission  
 Myron M. Cherry  
 Barbara Stamiris  
 Mary Sinclair  
 Wendell Marshall  
 Colonel Steve J. Gadler (P. E.)

OFFICE	RIII	RIII	RIII	RIII	RIII	RIII
SURNAME	R. Warnick	W. Shafer	R. Gardner	R. Gardner	R. Landman	B. Burgess
DATE			11/4/82	11/4/82	11/4/82	

Appendix

NOTICE OF VIOLATION

Consumers Power Company

Docket No. 50-329

Docket No. 50-330

As a result of the inspections conducted on September 20 to October 12, 1982, and in accordance with the NRC Enforcement Policy, 47FR9987 (March 9, 1982), the following violations were identified:

10 CFR 50, Appendix B, Criterion VI, states in part that, "Measures shall be established to control the issuance of documents . . ."

Consumers Power Company Quality Assurance Program Policy No. 6, Revision 12, dated April 2, 1982, states in part, that, "Documents which prescribe activities affecting quality . . . are . . . controlled . . . and distributed according to a controlled distribution . . . The assigned holders of the document are responsible for maintaining the latest revisions of the documents."

Contrary to the above, the inspectors determined the following two examples of noncompliance:

1. The QA department was using a controlled copy of PQCI UP-C-1.013 to make up QC recertification exam questions. This copy of the PQCI was different from a controlled copy obtained from the QC records vault. Both documents were marked revision 0 and dated 8/20/82. There were two pages that were different dealing with the same interface document UP-C-1.008. Furthermore, during the inspection, the licensee could not produce the controlled distribution list for the referenced PQCI.
2. Two controlled copies, Manual numbers 1456 and 1369A, of the Bechtel "Quality Control Notices Manual", Procedure G-6.1, which controls PQCIs, were not of the latest revision.

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

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

NOV 0 1982

Dated \_\_\_\_\_

~~82-111902-78~~

R. F. Warnick

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

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-329/82-21(OSC); 50-330/82-21(OSC)

Docket Nos. 50-329; 50-330

Licenses No. CPPR-81; CPPR-82

Licensee: Consumers Power Company  
1945 West Parnall Road  
Jackson, MI 49201

Facility Name: Midland Nuclear Power Plant, Units 1 and 2

Inspection At: Midland Site, Midland, MI

Inspection Conducted: September 20 through October 12, 1982

Inspectors:	<sup>FCL</sup> B. L. Burgess	<i>R. B. Landsman</i>	<u>11/8/82</u>
	R. J. Cook	<i>R. J. Cook</i>	<u>11/9/82</u>
	R. N. Gardner	<i>R. N. Gardner</i>	<u>11/4/82</u>
	R. B. Landsman	<i>R. B. Landsman</i>	<u>11/4/82</u>
Approved By:	W. D. Shafer, Chief Midland Section	<i>R. F. Wernick for</i>	<u>11/2/82</u>

Inspection Summary

Inspection on September 20 through October 12, 1982 (Reports No. 50-329/82-21(OSC); 50-330/82-21(OSC))

Areas Inspected: Review of Remedial Soils QC recertification program; examination of site conditions; conditions for limited site fire main capability and repairs; management meetings and examination of the Zimmer site. The inspection involved 180 inspector-hours on site by four NRC inspectors.

Results: Of the areas inspected, one item of noncompliance was identified with two examples: Severity Level IV failure to maintain the latest revision of documents.

~~8211190283~~

## DETAILS

### Persons Contacted

#### Consumers Power Company

J. A. Mooney, Executive Manager  
D. B. Miller, Site Manager  
M. L. Curland, Site Project QA Superintendent  
D. E. Horn, MPQAD, Civil  
J. K. Meisenheimer, MPQAD, Soils  
B. H. Peck, Construction Superintendent  
J. Schaub, Midland Project Office  
R. M. Wheeler, Technical Section Supervisor

#### Bechtel Power Corporation

M. A. Dietrich, Project QA Engineer  
J. Fisher, Manager, Remedial Soils  
M. M. Blendy, QC, Civil  
J. W. Darbey, Resident Engineer  
S. D. Kirker, QC, Civil

Other licensee and contractor personnel were routinely contacted during the course of these inspections.

### Functional or Program Areas Inspected

#### 1. Review of Remedial Soils QC Recertification Program

Consumer Power Company letter to the NRC, dated September 17, 1982, "Quality Assurance Program Implementation for Soils Remedial Work", identified the licensee's actions in regards to integrating the Soils QA and QC functions under the direction of MPQAD. In response to this letter, the licensee was required to initiate a recertification program for all Bechtel QC inspectors integrated into the Soils QA/QC organization. The licensee subsequently informed the NRC that the recertification of Bechtel QC inspectors would be accomplished through oral examinations. A schedule of these examinations was submitted by the licensee at the request of the NRC.

On September 23-24, 1982, the Region III inspectors conducted an inspection of the Bechtel QC recertification activities being accomplished by MPQAD. During this inspection, the inspectors determined the following:

- a. The inspectors observed that in administering the oral examinations, MPQAD would excessively repeat the questions, allowing the examinee several attempts to correct previously incorrect examination responses.



- b. The inspectors observed that in administering the oral examination, MPQAD would mark questions, which the examinee failed to correctly answer, as NA, when the question was relevant to the pertinent PQCI.
- c. The inspectors observed that the technical portion of the oral examination lacked the technical content necessary to establish the examinee's level of comprehension of the activity addressed by the subject PQCI.
- d. The inspectors observed that the QA examiner used a controlled copy of PQCI UP-C-1.013 to make up the exam questions. This copy was different from another controlled copy obtained from the QC records vault. Both documents were marked revision 0 and dated 8/20/82. There were two pages that were different dealing with the same interface document, UP-C-1.008. This failure to control documents is in noncompliance with 10 CFR Part 50, Appendix B, Criterion VI, as described in the Appendix of the report transmittal letter (50-329/82-21-1A; 50-330/82-21-1A). Furthermore, during the inspection, the licensee could not produce the controlled distribution list for the referenced PQCI.

The inspectors, while attempting to ascertain why the PQCIs were different, reviewed ten copies of the Bechtel "Quality Control Notices Manual", Procedure G-6.1, which controls PQCIs. During the review, one controlled copy of G-6.1 had pages missing from the procedure. Two other copies, Manual numbers 1456 and 1369A, of G-6.1 were not of the latest revision. This is another example of noncompliance to 10 CFR 50, Appendix B, Criterion VI, as described in the Appendix of the report transmittal letter (50-329/82-21-01B; 50-330/82-21-01B).

During the exit meeting, the licensee committed to review the complete PQCI control process.

Subsequently, Region III issued a Confirmatory Action Letter (CAL) on September 24, 1982, regarding the licensee's commitments in regard to the problems identified in the remedial soils QC requalification program. The licensee commitments identified by the CAL included: (1) the issuance of a Stop Work for all work on remedial soils with the exception of those continuous activities such as maintaining the freeze wall; (2) the suspension of all examinations relating to remedial soils QC requalifications; (3) the decertification of all remedial soils QC personnel previously certified; (4) the establishment of a retraining program for all QC personnel who fail the recertification examinations; and (5) the development of a written examination for all remedial soils QC recertifications.

## 2. Site Tours

At periodic intervals during the report period, tours of selected site areas were performed. These tours were intended to assess the cleanliness of the site; storage conditions of equipment and piping being used in site construction; the potential for fire or other hazards which might have a deleterious effect on personnel and equipment; and to witness construction activities in progress. A system walk down was performed of portions of the decay heat removal and component cooling water systems prior to the witnessing of initial performance testing.

## 3. Limited Site Fire Main Capability

As a result of inspection effort into the qualification of QC Inspectors for the remedial soils work, a Stop Work was invoked on September 24, 1982. However, at the time of the Stop Work, the licensee was in the process of making a tie-in between the temporary construction fire main and the permanent site fire main. This tie-in was being made to facilitate remedial soils work at the Service Water Building. Although no excavation was involved, the work was being controlled by use of an excavation permit (WP-106). The Stop Work negated the excavation permit and subsequently any work being performed under the excavation permit.

The licensee became fully aware of the limited fire main capacity on September 25, 1982, and completed working on the fire main tie-in to restore fire main capacity. The licensee notified the NRC that technically the work may have violated the Stop Work, but when considering the limited fire main capacity, it was more prudent to take emergency measures to restore the system to normal capacity. The Resident Inspector was informed of these actions and examined the system tie-in. No excavation work was in process as the excavation for access to the fire main had been performed at an earlier time. The NRC concurred with the licensee emergency action to restore the fire main capacity. (Reference ltr. Warnick to Cook dtd. October 5, 1982).

## 4. Management Meetings

On September 29, 1982, a meeting was conducted at the Ramada Inn Central in Midland, Michigan. The purpose of the meeting was to discuss the integration of Quality Control (QC) activities into the Midland Project Quality Assurance Department (MPQAD).

On September 28, 1982, the Midland Inspection Site Team met with members of Stone & Webster and Consumers Power Company. The meeting was conducted to introduce the Third Party Independent Assessment Team members for remedial soils work and to explain their function onsite.

On September 22, 1982, the Midland Inspection Site Team met in the regional office to discuss with Consumers Power Company the management of Quality Control personnel onsite. One of the issues discussed was how Consumers Power Company could manage and supervise Bechtel QC inspectors without jeopardizing the Bechtel owned "N" stamp.

5. Resident Inspector Visit to Zimmer Nuclear Power Station

On October 7 and 8, 1982, the Senior Resident Inspector (SRI) toured the Zimmer Nuclear Power Station. This tour was performed to compare the uniqueness of regulatory difficulties between the Zimmer and Midland Sites - both plants have been assigned special attention through Inspection Teams assigned to the Office of Special Cases, RIII.

It appeared to the SRI that inadequate structural steel, welding material traceability and the extensiveness of rework (excluding soils work) were more profound at the Zimmer Station than at Midland. It was apparent that there was little similarity between the exact nature of nonconforming conditions at the Zimmer and Midland Plants.

6. Exit Interview

The inspectors met with licensee representatives at the conclusion of the inspection on September 24, 1982. The inspectors summarized the scope and findings of the inspection. The licensee acknowledged the information.

**INSPECTOR'S REPORT**  
Office of Inspection and Enforcement

COOK, RONALD J  
REVIEWER  
W. SHAFER

INSPECTORS  
B. BURGESS  
R. LANISHAN, R. GARDNER

LICENSEE/VENDOR	TRANSACTION TYPE	DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)	REPORT		NEXT INSP. DATE	
			NO.	SEQ.	MO.	YR.
MILANS UNIT 1 AND 2	X I - INSERT	05000329	8221	A		
	M - MODIFY	05000330	8221	B		
	D - DELETE			C		
	R - REPLACE			D		
			14	15	18	

PERIOD OF INVESTIGATION/INSPECTION

FROM			TO		
MO.	DAY	YR.	MO.	DAY	YR.
09	20	82	10	12	82
20	25	26	31		

INSPECTION PERFORMED BY

1 - REGIONAL OFFICE STAFF	4 OTHER
2 - RESIDENT INSPECTOR	
3 - PERFORMANCE APPRAISAL TEAM	

ORGANIZATION CODE (OF REGION, HQ CONDUCTING ACTIVITY (See IEM: 0530 Manpower Reporting - Weekly Manpower Reporting - In code))

REGION	DIVISION	BRANCH
3	C	0
33	34	35

REGIONAL ACTION (Check one box only)

<input checked="" type="checkbox"/> 1 - NRC FORM 591	<input checked="" type="checkbox"/> 02 - SAFETY	<input type="checkbox"/> 06 - MGMT. VISIT	<input type="checkbox"/> 10 - PLANT SEC.	<input type="checkbox"/> 14 - INQUIRY
<input checked="" type="checkbox"/> 2 - REGIONAL OFFICE LETTER	<input type="checkbox"/> 03 - INCIDENT	<input type="checkbox"/> 07 - SPECIAL	<input type="checkbox"/> 11 - INVENT. VER.	<input type="checkbox"/> 15 - INVESTIGATION
	<input type="checkbox"/> 04 - ENFORCEMENT	<input type="checkbox"/> 08 - VENDOR	<input type="checkbox"/> 12 - SHIPMENT/EXPORT	
	<input type="checkbox"/> 05 - MGMT. AUDIT	<input type="checkbox"/> 09 - MAT. ACCT.	<input type="checkbox"/> 13 - IMPORT	

INSPECTION/INVESTIGATION FINDINGS (Check one box only)

A	B	C	D
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
1 - CLEAR			
2 - VIOLATION			
3 - DEVIATION			
4 - VIOLATION & DEVIATION			

TOTAL NUMBER OF VIOLATIONS AND DEVIATIONS

A	B	C	D
0	1	0	1

ENFORCEMENT CONFERENCE HELD

A	B	C	D

REPORT CONTAIN 2790 INFORMATION

A	B	C	D

LETTER OF REPORT TRANSMITTAL DATE

MO.	DAY	YR.
11	18	82

REPORT SENT TO HQ FOR ACTION

MO.	DAY	YR.
19	50	55

MODULE INFORMATION														MODULE INFORMATION																	
REC. DRD	MODULE NUMBER INSP					PRIORITY	DIRECT INSP. EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	PHASE	MANUAL	CHAPTER	PROCEDURE NUMBER	LEVEL	REC. DRD	MODULE NUMBER INSP					PRIORITY	DIRECT INSP. EFFORT IN STAFF HOURS EXPENDED THIS INSPECTION	PERCENTAGE COMPLETED	TO DATE	STATUS	PHASE	MANUAL	CHAPTER	PROCEDURE NUMBER	LEVEL
TYPE	NUMBER	PHASE	MANUAL	CHAPTER	PROCEDURE NUMBER	LEVEL	SED								TYPE	NUMBER	PHASE	MANUAL	CHAPTER	PROCEDURE NUMBER	LEVEL	SED									
B	245051B					20	20								B	242051C						A		8							
						20	20															B		8							
																						C									
																						D									
B	292706B					20	20								B	230703C						A		14							
						20	20															B		14							
																						C									
																						D									
B	290703B					10	10								B							A									
						10	10															B									
																						C									
																						D									
B	292706C					18	18								B							A									
						18	18															B									
																						C									
																						D									

\* CIRCLE SEQUENCE IF VIOLATION OR DEVIATION

INSPECTOR'S REPORT  
(Continuation)  
Office of Inspection and Enforcement

DOCKET NO. (8 digits) OR LICENSE NO. (BY PRODUCT) (13 digits)		REPORT		MODULE NUMBER	SITE
05000329		NO	SEQ	2141516117	
05000330		8221	B	II	
				VIOLATION SEVERITY OR DEVIATION	
				1	2
				C	X
				D	27

VIOLATION OR DEVIATION (Enter up to 2400 characters for each item. If the text exceeds this number, it will be necessary to paraphrase. Limit lines to 50 characters each.)

1	
2	See Appendix
3	
4	
5	
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11	
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48	

# K3 Tracking System

New Entry  
 Modify

Input: Type code

- 50.55(e) → E
- Unresolved Items → U
- AEO's → A
- Orders to Licensee → R
- IAL's → I
- Significant Safety Findings → S
- Open items → O
- Allegations → G
- 10 CFR 20 → F
- Part 2: → P
- LER's → L
- Deviations → D
- Violations-Severity levels → 1, 2, 3, 4, 5, 6

Item No. Type code

DKT	YY	XX	XX	X
1st 829	82	21	01	4
2nd 330	82	21	01	4

LER Event date LER Report date

1/84	1/88
------	------

Module No Response due date

1/84	1/88
------	------

Person who identified item

C	O	O	K																
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LER Report Type LER Revision

1/84	1/88
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Person Assigned

C	O	O	K																
---	---	---	---	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Followup due date (optional)

1st					
2nd					

1/84 Y M H D D

Licensee Dsg. #

1/84																			
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Closeout Report No

1st					
2nd					

1/84

## Brief Description

A. FAILURE TO CONTROL PRCI'S REVISIONS

2/31

Interim Report No

1st					
2nd					

Inspector

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2/86

B. FAILURE TO CONTROL QUALITY CONTROL NOTICES MANUAL

3-4/31

Interim Report No

1st					
2nd					

Inspector

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3/86

5-6/31

Interim Report No

1st					
2nd					

Inspector

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4/86

2 0

*Handwritten:* Gardner

14

OCT 28 1982

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:

Based on our review of your QC training program and the written examinations developed for all QC requalification examinations in the area of remedial soils, you are hereby authorized to commence remedial soils QC requalification activities.

All work on remedial soils will remain stopped until such time as previously decertified QC personnel are requalified in accordance with your prescribed QC requalification program. At that time, authorized remedial soils work activities may proceed commensurate with the availability of requalified QC inspectors to inspect those activities.

Sincerely,

Original signed by  
A. Bert Davis

James G. Keppler  
Regional Administrator

cc: DMB/Document Control Desk (RIDS)  
Resident Inspector, RIII  
The Honorable Charles Bechhoefer, ASLB  
The Honorable Jerry Harbour, ASLB  
The Honorable Frederick P. Cowan, ASLB  
The Honorable Ralph S. Decker, ASLB  
William Paton, ELD  
Michael Miller  
Ronald Callen, Michigan  
Public Service Commission  
Myron M. Cherry  
Barbara Stamiris  
Mary Sinclair  
Wendell Marshall  
Colonel Steve J. Cadler (P.X.)

8211020053

OFFICE	RIII					
SURNAME	Gardner/ls	Shafer	Warnick	Davis	Keppler	
DATE	10/27/82			10/27	10/27	

Midland FSAR

section 8.3.1.4.2;

"Administrative Responsibilities and Controls for Assuring Separation Criteria During Initial Installation"

states, in part,

"all cables... are installed in accordance with design drawings and schedules."

"...The routing is also confirmed by quality control personnel during installation to be consistent with the design document."

section 8.3.3.1; "Cable Routing and Cable Tray Fill"

states, in part,

"Cable tray fill is monitored during the cable routing process. Should the specified fill criteria be exceeded, a careful review is made for each case to ensure the adequacy of the design for both physical fill and derating."



Midland PSAR

Appendix 8A

"Separation Criteria and Administrative Procedure for Installation of Class 1E Equipment and Circuits"

section 4.0

"Administrative Responsibilities and Controls"

"All cables ... are installed in accordance with the design drawings and schedules."

E-37 "Electrical Circuit Schedule"

1976 INSPECTION HISTORY

JANUARY						13-16 Yin (76-01)
	X	X	X	X		

JULY				X	June 30 & July 1, 76 Yin
	X	X	X		
	X	X	X		

July 14-16, 76 Yin, Erb (76-06)

FEBRUARY						2/4/76 DMH DWH Mtg. w/ CP
	X					

AUGUST				X	76-07 8/9-9/9/76 Yin Jordan 76-08
	X	X	X	X	
	X	X	X	X	
	X	X			

MARCH						3/16-18/76 & 3/24-26/76 (76-02) YIN
	X	X	X			
	X	X	X			
	X	X	X			

SEPTEMBER				X	
	X	X	X	X	

76-04

APRIL						4/19-21/76 YIN JABLONSKI HAYES
	X	X	X			

OCTOBER					Oct. 20, 1976 mtg. w/ AR, Parnell F. S. Echels & B. Jorgensen
				X	

May 19, 76 Bil. Jorgensen 76-03

MAY						5/3/76 YIN 5/6-7/76 YIN Wms Phillip Hayes 5/13-14/76 YIN Phillip Hoyes (14 only)
	X	X	X			
	X	X	X			
	X	X				

NOVEMBER					Nov. 16-19, 76 YIN & Erb Nov. 30, 76 ASLB Head Yin, Jordan, & Jorgensen 5/20/76 Keppler, Humatt, Noveline, Hoyes, LeDoux, & Yin
	X	X	X	X	
	X				

JUNE						June 7-8/76 Keppler (6/2/76) Humatt Hoyes LeDoux June 24-25/76 Yin, Snowblower
	X	X				
	X					

DECEMBER					

ENFORCE      ACTION

80-01

FACILITY:

Midland Unit 2

PROJECT INSPECTOR:

T.E. Hurdell

50-330

Noncompliance				Resolution			
Report No. and Date	Item No.	Summary Background	Severity and Description	Report No. and Date	Item No.	Summary Background	Remarks
80-01	03	Lee	No procedure to handle design changes 80-01-03				
	01	Lee	Walker (10/24) welded beyond his qual. 80-01-01	80-00	01	Lee	✓ Closed
	02	Lee	Inspection record for pipe cleanliness not dated or signed. 80-01-02	80-70	02	Lee	✓ Closed
80-21	01	Lee	Failure to Specify Codes in Purc. Order	11/7/80 REPLY J.W. COOK, U.P. 12/26/80 MEMO - G. FIGRELLI			Closed.
80-22	01	SUTPHIN KNOP	FAILURE OF BACKLOG, BEHTEL, & PCCC. TO AUDIT PHOTO TESTING - FOR WELDER TNG. & CERT. SERVICES.				
80-29	01	LEW LEE	(ANI) AUTHORIZED NUCLEAR INSPECTOR HOLDING NOT HONORABLE. BYPASSED WELDER HOLDING ACCEPTED BY C.	80-29	01	LEE	9/25/80 ACTION: Closed.
80-32	01	COCK	FAILURE TO EXPEDITE AN EVALUATION OF 100% ISOTOPIC PARTS FOR REPEATABILITY, DELAVAL LINK ROD ASSY.				
80-33	01	GALLAGHER LANDSHAN	ORIGINATOR OF DESIGN DOCUMENT FAILED TO PROVIDE ADEQUATE DESIGN INTERFACE CONTROL				
80-33	02	GALLAGHER LANDSHAN	CIVIL PROJECT ENGINEERING GROUP FAILED TO MAINTAIN DESIGN INTERFACE AND COORDINATION CONTROL				
80-33	03	GALLAGHER LANDSHAN	NO REVIEW & APPROVAL OF SPECIFICATION REVISIONS BY GEOTECHNICAL GROUP. NO DESIGN INTERFACE CONTROL				
80-33	06	GALLAGHER LANDSHAN	FAILURE TO PROVIDE ADEQUATE CORRECTIVE ACTION FOR AUDIT RESULTS RE. DESIGN REVIEW DOCUMENTS LISTING IN BLOCK				
81-01	01	GALLAGHER LANDSHAN	ADEQUATE LABORATORY HAD FIELD TEST PROCEDURES IF NOT BEEN ESTABLISHED FOR CONTROL OF SOIL TESTING.				
81-01	02	GALLAGHER LANDSHAN	MEASUREMENTS HAVE NOT BEEN ESTABLISHED TO CONTROL U.S. TESTING FORMS USED FOR SOILS QUALITY ACTIVITY				
81-01	03	GALLAGHER LANDSHAN	SOIL TEST REPORTS WERE NOT INITIALED OR DATED & NO ESTABLISHED PROCEDURE TO CONTROL SIGNATURE STAMP.				

FACILITY:

Midland Unit 2

PROJECT INSPECTOR:

T.E. Vanden

Noncompliance			Resolution				
Report No. and Date	Item No.	Summary	Severity and Description	Report No. and Date	Item No.	Resolution	Remarks
79-10	01	Gallagher	FSAR failed to include design criteria based on specifications regarding chemical limits.	79-19	01	Gallagher	Closed
79-12	01	Maxwell	Inadequate Drawing control	81-01	01	Maxwell	CLOSED
	03	Naidu	Control of purchased material was inadequate.	80-16	03	Naidu	CLOSED
	09	Naidu	Inadequate review of WPS for Lack Refinement	79-22	09	Naidu	Closed
79-14	01	Creed	Failure to follow welding procedures regarding use of a welding dam	Oct 10-12, 79	01	Creed	CLOSED
79-18	02	Maxwell	Additional Insulation to be supplied	80-16	02	Maxwell	CLOSED
79-19	01	Gallagher	Inadequate personnel for tandem inspections	80-09	01	Gallagher	Closed
	02	Gallagher	Unacceptable Qualifications of QC Inspected personnel for tandem inspections	80-04	02	Gallagher	Closed
79-20	01	Naidu	Lack of quality control over materials used in safety related work (Stabilized Packets)	80-16	01	Naidu	CLOSED
79-22	02	Lee	Inadequate Control of Welding Activities	80-01	02	Lee	Closed
79-24	01	Lee	Weld rod control inadequate (FERRITIC BEANS)	80-01	01	Lee	Closed?
79-13	01	COOK	Blanking of unused weld rod needs to be clarified. TEST OF UNIT 2 IN CORE INSTRUMENT INDIC 21-87, FAILURE TO INSPECT ALL JOINTS & CONNECTIONS	80-38	01	COOK	CLOSED



78-03

OPEN IS LIST  
Non Compliance

DOCKET NO. 330

FACILITY Midland #2

PROJECT INSPECTOR Hanson/Vandel

OPEN ITEM		RESOLUTION			
ITEM NO./RESPONSE DUE	INSPECTOR/MODULE NO.	BRIEF DESCRIPTION	INTERIM INSPECTIONS	INSPECTOR	REPORT NO.
78-15-01	Naiden	1116 dequate corrective action - Nelson Studs	Received final action letter 2-1-79		79-23 Closed Naiden
78-15-02	Naiden	Weld Sizes Non Conforming	Received final action letter 2-1-79		79-25 Closed Vandel
78-16-01	Lee	Pipe Spool Analysis Report - Charpy U Notch Test Specimens failed to meet Specs	79-03	Lee	79-24 Lee Closed
78-17-01	Vandel	Repair weld - Cracked air lock stiffener plate	79-15 79-22 79-25 80-16	Vandel Vandel Vandel/SLC Vandel/Croft	
<del>78-20-01</del>	<del>Phillips/Kelley</del>	<del>Failure of tubular component</del>			
78-20	Phillips/Kelley	78-20-01 & Design basis not included in Spool design. FSAR			
<del>78-20-02</del>	<del>Phillips/Kelley</del>	<del>Failure to follow procedures (composition)</del>			
<del>78-20-03</del>	<del>Phillips/Kelley</del>	<del>Failure to assure that conditions adverse to quality are properly identified and corrected.</del>			
<del>78-20-04</del>	<del>Phillips/Kelley</del>	<del>Failure to assure that conditions adverse to quality are properly identified and corrected.</del>			
<del>78-20-05</del>	<del>Phillips/Kelley</del>	<del>Failure to assure that conditions adverse to quality are properly identified and corrected.</del>			
78-20-05	Phillips/Kelley	78-20-05, regulatory comment, sets			

OPEN 'S LIST

Non Compliance

78-02

FACILITY Midland #2

DOCKET NO. 330

PROJECT INSPECTOR Hansen/Vandel

OPEN ITEM

RESOLUTION

ITEM NO./ RESPONSE DUE	INSPECTOR/ MODULE NO.	BRIEF DESCRIPTION	INTERIM INSPECTIONS	INSPECTOR	REPORT NO.
78-03-02	Naidu	Weld procedure did not specify Voltage log-	Head Quat 78-18 79-15 79-22	Action <del>Naidu</del> Vandel Naidu	79-25 Closed
78-03-01	Naidu	incomplete records on Safety related Steel (e-scanned from unscanned)		Naidu	78-15 Closed
78-05-05	Erb	Lock of weld Rod Control			79-22 Closed Vandel
78-07-03	Maxwell	Drawings in use by each were two revisions old.	79-18	Maxwell	Closed 79-25 Maxwell
78-07-03A	Maxwell	Procedure Control inadequate		Maxwell	Closed 79-25
78-09-02	Lee	Failure to follow Procedure No PB-AI-Ag regarding locking gas flow		Lee	78-16
<del>78-12-11</del>	<del>Naidu</del>	<del>Weld joints of unequal dimension</del>			
78-12	Cook	Weld Joints of unequal dimension did not meet reqmts	To be controlled by Cook		
78-13	Cook	Breakers un protected			





ENFORCEMENT ACTION

FACILITY: Midland Unit 2

PROJECT INSPECTOR: T. E. Vandell

77-01

Noncompliance

Resolution

Report No. and Date	Inspector	Brief Description	Report No. and Date	Inspector	Remarks
50-330/77-02 Feb. 28 - Mar. 1, 1977	I. T. Yin	Failure to report 50.55(b) item regarding lower plate bulges within the reporting time limits.	50-330/77-14	TEU	Closed
50-330/77-08 May 24-27, 77	Jack Durr	Separation of concrete wall and pipe support bearing plate in excess of specifications. Contingency to Criteria II.	50-330/77-01 Jan. 24-25, 78	TEU	Closed
16	Jack Durr	Pipe Support Drawings with hand written design changes were being used for installation. Contingency to Criteria II.	Also see 50-330/77-14	T. E. V.	Closed
17	H. S. Phillips	Audit reports had not been completed or issued even though the audit had been performed. See monthly calendar.	50-330/77-11 Aug. 15-18, 77	TEU	Closed
18	H. S. Phillips	No trend analysis had been performed per the procedure.		TEU	Closed
19	H. S. Phillips	Defective scale had not been tagged per procedure.		TEU	Closed
20 Aug. 30 - Sep. 2, 13-15, 1977	K. R. Naidu	Contrary to Criterion II U.S. Testing failed to follow procedure. USA - Audit - 1	50-330/77-01 Jan. 24-25, 78	TEU	Closed
21	K. R. Naidu	Contrary to Criterion IX Nelson stud welding procedure. P1 - Stud welding. Not Qualified. Form to use.	30-330/77-05 May 17, 1978	KRN	Closed
22	K. R. Naidu	Contrary to criterion X Accept/Reject criteria not established for weld size and length.	"	KRN	"
23	<del>██████████</del>		"		
24 5/21-23 78-03	K. R. Naidu	Criterion IX cable spreading holds inadequately inspected. (78-01-03)	77-25	TEU	Closed
25	K. R. Naidu	Criterion IX weld procedure did not specify voltage.	78-15	TEU	Closed
26 5/17-19 78-05	K. R. Naidu	Criterion VIII incomplete records on safety related steel erected from unsecured beam (78-01-01)			
27	Erb	Welds not locked. Control for procedure.			
28	Corb	No response item piping jacketing.	78-05	TEU	Closed

FACILITY:

Midland Unit 2

PROJECT INSPECTOR:

*lylin*

Noncompliance				Resolution			
Report No. and Date	Item No.	Summary Paragraph	Severity and Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
76-09 11/16-19/76	13	A.	Handling of Noncompliance Returns	77-01	13	B.Y.A.	ok
77-02 2/28-3/1/77	14		Containment Lin. & Plate Budge - Failed to report per 50.55(e) within 24 hr.	77-H			ok
77-12			Failure to follow Abdot procedures by U.S. Steel Section II Part III 800.805 Excess of welds inspection criteria				

*All Clear*

Midland Unit 2

FACILITY:

PROJECT INSPECTOR:

*C. Yim*

Noncompliance			Resolution			
Report No. and Date	Item No.	Severity and Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
76-04 <i>(cont.)</i>	8	B.3 Infr.: Inadequate Rebar & DC Inspection	78-05	8		<i>ok</i>
	9	B.4 Infr.: Inadequate NCR review for 50,55(c) reparability		9	B.1.6	<i>Identified as (per record) ok</i>
	10	B.5 Infr.: Lack of DC interim inspection monitoring		10	B.1.c	<i>ok</i>
76-08 8/9-9/9/ 1976	11	B.1 Infr.: FE Instructions & Procedures not written & approved per procedure	77-01	11	B.3.a	<i>ok</i>
	12	B.2 Infr.: QCE failed to follow Inspection Procedure		12	B.3.b	<i>ok</i>
	13	B.3 Infr.: Inadequate Provision for Tendon Sheath on site storage & surveillance.		13	B.3.c	<i>ok</i>
						<i>All closed T&amp;S</i>

FACILITY:

Midland Unit 2

PROJECT INSPECTOR:

L. Yin

Noncompliance		Resolution					
Report No. and Date	Item No.	Summary Paragraph	Severity and Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
76-01 1/15/16/76	1	B.1	Infr.: Drying Oven w/o temp. verification	76-02 3/16-18 <del>24-26</del> 24-26/76	1	B.1	Closed
	2	B.2	Infr.: Measurements have not been established to identify nonconforming aggregate		2	B.2	"
	3	B.3	Infr.: nonconforming agr. were not disposed of as required.		3	B.3	"
76-02 3/16-18 24-26/76	4	B.1	Infr.: U.S. Testing VP did not audit rept. issue to Bechtel per QA manual	76-08 8/9-9/9/78	4	A	U.S. Testing Revised their QA Manual - checked ok
	5	B.2	Infr.: U.S. Testing didn't perform some corrective actions required by audit finding		5	B	
	6	B.1	Infr.: No drilling Procedure	77-01	6	B.1.a	OK
76-04 April 9 May, 76	7	B.2	Infr.: Inadequate Review of NCR for corrections	78-05	7		Checked (Identified as <del>found</del> ) NCR-12

← 700 closed







CITY:

Midland Unit 2

PROJECT INSPECTOR:

T.E. Vauhl

Problems to be Resolved				Resolution			
Report No. and Date	Item No.	Summary Paragraph	Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
77-24	01	Lee	Hauling of unused well material classification	80-01	01	Lee	Closed
77-25	01	Barrett Munnell	Separation and Bedded resolution				
80-01	04	Naidu	No verification of separation criteria				
	05	Naidu	Cable flexibility formula does not include displacement	80-16	05	NAIDU	CLOSED ✓
	06	Naidu	Lack of separation criteria and approval of design	80-06	06	Naidu	Closed ✓
	07	Naidu	Additional tube needed for Elec. Spec. Design criteria				
	08	Gallagher	Topic form change to be made for circulation in 15.	80-26	08	GALLACHER	CLOSED ✓
80-04	01	Gallagher	Inspector to review prestressing work & records	80-26	01	GALLACHER	CLOSED ✓
80-12	01	Yin	Further review req'd. of Pipe Whip restraint Design				
	02	Yin	Bolts for pipe whip restraints needed for the review				
	03	Yin	Washers & Spacers missing on Mk 36 CB II 11lb restraint	81-01	03	SUTPHIN	CLOSED WITH YIN'S CONCURRENCE.
80-09	01	Gallagher	Tenders H-21-234 re Hold & being reviewed	80-26	01	GALLACHER	CLOSED ✓
80-16	01	Naidu	Audit No. M-01-55-0 to be followed up				
	02	Erb	Steam Gen Belts Hardware above Allowed				
	03	Erb	Checking of all Bolts, Nuts, & Washers				
80-26	02	Lee	Questionable Weld quality in Bored H/C stringer plates	← See		NEW LISTING NEXT PAGE.	
80-18	01	WARD	Follow up on LICENSE REVIEWS TO COLLECTOR 80-05	80-28	01	DETAILS PAGE 3	K.P. WARD CLOSED





CILITY: Midland Unit 2

PROJECT INSPECTOR: T.E. Vandek

79-05

79-21

Report No. and Date	Item No.	Summary Inspector	Description	Report No. and Date	Item No.	Resolution	Remarks
79-05	03	Yin	Hanger system design methodology and deflection criteria was not available @ 5% to provide more detailed design sketches on up to date hanger installation details	79-27	01	Cook	Escalated to Engineer
79-09	01	Cook	QC Held corrections by licensee to be evaluated in the field	79-22	02	Galleger	Closed
79-10	02	Galleger	Test results were not available regarding prestressing system (4765) Sept. 10-12-79				
79-12	02	Barrott	Logic of Qualification for Field Engng authorizing design change activities				
	04	Naidu	No documentation available regarding environmental qualification of valve posing valve				
	05	Naidu	Valve testing inadequately done				
	06	Naidu	Inadequate temp. requirement for valve ambient temp.	80-31	06	Naidu	Closed
	07	Naidu	Environmental seismic qualifications not included in Document packages for valves	79-20	07	Naidu	Closed
	08	Naidu	Lack of requirements for environmental conditions of HVAC gaskets, sealants, Flex	80-16	10	Naidu	Closed
	10	Naidu	Bechtel Audit findings regarding Bechtel will be reviewed when completed	6/20/80			
79-17	01	Lee	Temp range exceeded spec. for Contact system welds with 4-7% with 4-1	79-22	01	Lee	Closed
79-18	02	Lee	welder qualification for stamp P416 was unavailable	80-01	02	Lee	Closed
	01	Maxwell/Naidu	Additional Information to be submitted regarding SWIG records	79-20	01	Naidu	Upgraded to Non Comp.
	03	Maxwell/Naidu	Color coding of I.F. Cable, Procedure to be changed by Bechtel	79-25	03	Maxwell	Closed
79-22	01	Lee	Procedure Control of DGN revisions in the field	80-01	01	Lee	Upgraded to 1 Am. Not Resolved
79-21	01	WON	NAME for 1977 edition was corrected	80-02	01	WON	Placed

79-01

OP: EMS LIST  
UNRESOLVED  
11/21/75  
PROJECT INSPECTOR  
Hansen/Maxwell

DOCKET NO. 330

FACILITY W11 Stand #2

OPEN ITEM		RESOLUTION			
ITEM NO. / RESPONSE DUE	INSPECTOR / MODULE NO.	BRIEF DESCRIPTION	INTERIM INSPECTIONS	INSPECTOR	REPORT NO.
79-01-03	Y/111	Primary Plant Buttur Whip Polaroids - ACK Identification - etc	79-12	Hansen Yes	80-12 Closed
79-01-04	Y/111	WHS - Change		Yes	80-17 Closed
79-01-05	Y/111	World West Bar install Cooking		Yes	80-17 Closed
79-01-06	Y/111	Effects of welding acceptability of welds		Yes	80-13 Closed
79-02-01	Bassett / 111	Experiments 1746 THRU 1749 Qualification Testing (Nbt: Stand of Robot Safety Related equipment a 50.55c item also)		N/A/D/S	CLOSED 80-16
79-02-02	Bassett / 111	Cable Jacket Manufacturer Confirmation of Working			79-18 Maxwell
<del>79-03</del>	<del>tee</del>	<del>Docton SEL procedures unavailable for review for work done in '74 &amp; '75</del>		Yes	80-13 Closed
79-05-01	Y/111	ITT-G Hangar calculations to be reviewed at a later date.			
79-05-02	Y/111				
<del>79-05-03</del>					

FACILITY Michael's PROJECT INSPECTOR Thomas / M. del

DOCKET NO. 330

OPEN ITEM		RESOLUTION			
ITEM NO./ RESPONSE DUE	INSPECTOR/ MODULE NO.	BRIEF DESCRIPTION	INTERIM INSPECTIONS	INSPECTOR	REPORT NO.
78-19-02	YIN	ETT Gaining documentation Supervise the approval of FCR-11-116	79-01 80-12	YIN YIN	
78-19-04	YIN	Qualification requirement for personnel in the plant in order to work			
78-19-05	YIN	Pass Tests in lot performed and recommended by 78-20-11	79-01 80-08	YIN Cook (OPEN)	
78-19-06	YIN	Insufficient information at Plant to clear issues in corrective action			
78-20-02	Gallegos/Phillip	Ground water permitted to saturate plant fill material undetermined.			
78-20-02	Cook	licensee inspection of stores Terminal Blocks will be reviewed later.		Cook	78-23
79-01-01	YIN	Working on... can't... ...			
79-01-02	YIN	Abg... ...			

OF EMS LIST

Unresolved

FACILITY Midland #2

DOCKET NO. 330

PROJECT INSPECTOR Hansen/Verde!

OPEN ITEM			RESOLUTION		
ITEM NO. / RESPONSE DUE	INSPECTOR/ MODULE NO.	BRIEF DESCRIPTION	INTERIM INSPECTIONS	INSPECTOR	REPORT NO.
<del>78-10-11, 12</del>	<del>_____</del>	<del>_____</del>			
78-13-14	Cook	SG & RPV hold down bolts. Diesel Gen. Bldg. Settlement	78-14	}	Ron Cook to Control
78-15-03	Naiden	Licensee assure integrity of existing welds about seal weld	79-08; 79-09; 79-13; 79-15		Naiden
78-15-01	Barrett	type of cable ties Cable Supports	79-02	Barrett	79-18 Reopen Maxwell
78-15-05	Barrett	temperature/time parameters for cables (Electrical)	79-02	Barrett	79-02 (Barrett)
78-16-02	Lee	3 pool piece UT thickness Cable ties			79-22 closed Lee
<del>78-17, 18</del>	<del>_____</del>	<del>_____</del>			
78-17-01	Yin	Duration of Restraint allowed in spec 111-326		Yin	80-12 Closed
78-17-02	Yin	111-326 installation insulation of cable connections	80-12	Yin	

OPEN 5 LIST

UNRESOLVED

W. L. #2

DOCKET NO. 330

PROJECT INSPECTOR

W. L. #2

OPEN ITEM

RESOLUTION

ITEM NO. / RESPONSE DUE

INSPECTOR / MODULE NO.

BRIEF DESCRIPTION

INTERIM INSPECTIONS

INSPECTOR

REPORT NO.

78-05-01

Naidu

welding of only one  
angle leg - sk's 1-657-1-214

~~78-05-01~~  
1-659-6-1

~~Naidu~~

79-22  
closed  
Naidu

Mc [unclear]  
York

~~W. L. #2~~

≡ No open items ≡

'78-02

OP' EMS LIST

Unresolved  
Farris Hansen/Vandil

FACILITY Midland # 2

DOCKET NO. 330

PROJECT INSPECTOR

OPEN ITEM

RESOLUTION

ITEM NO. / RESPONSE DUE	INSPECTOR / MODULE NO.	BRIEF DESCRIPTION	INTERIM INSPECTIONS	INSPECTOR	REPORT NO.
78-04-01	NAIDU	P listing Raceway, supports & grounding	78-15 79-18 79-20	Maxwell Maxwell Naidu	78-02-16 Naidu
78-04-02	Johns	Failure to identify Class I E components	78-15 79-18	Maxwell Maxwell	79-22 Naidu
78-05-01	closed by Naidu	In accordance with PFI			
78-05-02	Naidu	'O' Rings to not used Environmental Req	78-15	Naidu	79-22 Closed Naidu
78-05-04	Naidu	Fuel Pool Minor PUS Non Q	78-15	Naidu	79-22 Closed Naidu
78-06-02	Johns	Wall - Corbel 11111 1207	78-15 79-18 79-20	Naidu Maxwell Naidu	79-22 Closed Naidu
78-06-01	Johns	Bechler Form 321-D Construction	78-15 79-18 79-22	Maxwell Naidu	79-25 Closed Naidu
78-07-01	Fib	Measure Start Dis not indicate receipt of report	79-15	Vandil	Closed 79-15
79-02-01	Lee	Listing in report by Vandil		Lee	79-03

- All i.L. closed =

OUTSTANDING ITEMS FILE

7.7. 6/16/78  
Cpm 8/17/78  
Gm 11/4/78

NRC:1 Form #6 Dec 76

DOCKET #

050330

Midland 2

T. E. VANDEL

Facility Name

Project Inspector

PI's Initials

Date Acknowledged

ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
78-06-01	IFI	S1055B	SME	E/P		78-15-0

DESCRIPTIVE TITLE

DETERMINE	IF	BECHTEL	G-321-D	FORM	HAS	BEEN	EVALUATED	DURING	AN
AUDIT	OF	ELEC	ENG	ANN	ARBOR	BY	CONSUMERS	POWER	TO
SIN	45	2	13-10	AND	APP	B	CRIT	VII	REQMTS

*to mm*  
*Wandel*

ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
78-06-02	IFI	S1055B	SME	E/P		78-15-0

DESCRIPTIVE TITLE

FOLLOW	UP	ON	BECHTEL	NCR	NO	1207			
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*Open*  
*Transferred to page 98.02*

ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
78-07-07	IFD	92706B	SME	E/P		78-15-C

DESCRIPTIVE TITLE

Could	not	Determine	if	Calibration	of	tools	is	being	done

*closed*

ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
		B		/		

DESCRIPTIVE TITLE

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Information entered by WPC on   /  /   by             
Date Initials

*(No open items)*



OUTSTANDING ITEMS FILE

7.2. 5/3/78  
 8/17/78  
 8/11/78 NRC:1 Form #6 Dec 76

DOCKET #  
 50-3-

Midland #2  
 Facility Name

T.E. VANDEL  
 Project Inspector

PI's Initials  
 Date Acknowledged

ITEM NUMBER TYPE MODULE # AREA RESP. ACTION DUE DATE CLOSEOUT ACTION  
 78-04-01 UNR 51051B SME E/C - - - 78-15-0

Closed:  
 80-16

DESCRIPTIVE TITLE

RACEWAY SUPPORTS RACEWAY AND GROUNDING NOT ON Q-LLST NO QA-Q  
 C ACTIVITIES

ITEM NUMBER TYPE MODULE # AREA RESP. ACTION DUE DATE CLOSEOUT ACTION  
 78-04-02 UNR 51051B SME E/C - - - 78-15-0

DESCRIPTIVE TITLE

FAILED TO IDENTIFY CLASSIFIED COMPONENTS IN ACCORDANCE WITH IEEE 279  
 PARA 4.2.2

ITEM NUMBER TYPE MODULE # AREA RESP. ACTION DUE DATE CLOSEOUT ACTION  
 78-04-03 I/FI 51061B SME E/C - - - 78-07-03

"updated" to  
 infraction

DESCRIPTIVE TITLE

FOLLOW UP ON POTENTIAL DOCUMENT CONTROL PROBLEMS EXTRAORDINARY  
 NUMBER OF DRAWINGS INCLUDING UNCONTROLLED DISTRIBUTION

ITEM NUMBER TYPE MODULE # AREA RESP. ACTION DUE DATE CLOSEOUT ACTION  
 78-04-04 UNR 51061B SME E/C - - - 78-15-0

closed

DESCRIPTIVE TITLE

MECH / ELEC INTERFACE SEPARATION CRITERIA - NO MINIMUM DIMENSI  
 ONS ESTABLISHED

Information entered by WPC on 1/1 by           
 Date Initials

(All completed)

OUTSTANDING ITEMS FILE

78 5/3/78  
 8/17/78  
 11/4/78 NRC:1 Form 16 Dec 76

DOCKET #

50-330

MIDLAND #2

T.E. VANDEL

Facility Name

Project Inspector

PI's Initials

Date Acknowledged

1 1

ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
78-04-05	IFI	51061B	SME	E/C	-    -	78-07-C closed

DESCRIPTIVE TITLE

QUALITY CONTROL INST	E-2.0 CABLE TRAY	DOES NOT REFERENCE DWS
7220 E 47 WHICH ESTABLISHES	SEP CRIT	

ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
78-04-06	IFI	42051B	SME	E/C	-    -	78-07-C closed

DESCRIPTIVE TITLE

MIN FIRE BRIGADE TRAINING REQUIREMENTS	NOT ESTABLISHED
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ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
-    -					-    -	-    -

DESCRIPTIVE TITLE

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ITEM NUMBER	TYPE	MODULE #	AREA	RESP.	ACTION DUE DATE	CLOSEOUT ACTION
-    -					-    -	-    -

DESCRIPTIVE TITLE

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Information entered by WPC on   /  /   by       
 Date Initials

(All closed)

UNRESOLVED MATTERS

PAGE 78-01

FACILITY: Midland Unit 2

PROJECT INSPECTOR: JE Vandek

Problems to be Resolved				Resolution		
Report No. and Date	Inspector	Module Being Worked On	Brief Description	Report No. and Date	Inspector	Remarks
78-03 5/19-19/	R Naida	48055	lack of documents for stiffening plates (78-01-04)	30-33078-05 May 1978, 78-17	KRN	Closed
78-05	R Naida	92706	timely inspection of cable tray hanger welding (78-01-05)	78-07 18	TEU	Closed
5/19-19/	<del>Naida</del>	<del>92706</del>	<del>Sketch of 59 tanks vs tubs</del>	<del>79-32 19</del>	<del>Naida</del>	<del>Closed</del>
	Naida	53053	O-rings meet environment (33078-05-02)	Transferred to page 78-02		
	Naida	92706	Staggering of Cadwells (33078-05-03)	78-07	TEU	Closed
	Naida	48053	Safety status Fuel Pool liners (33078-05-04)	Transferred to page 78-02		

Handwritten notes: "No open items" circled in the table.

Large circled handwritten note: "No open items"

FACILITY: Midland Unit 2

PROJECT INSPECTOR: T. E. Vaudel

Problems to be Resolved

Report No. and Date	Inspector	Module Being Worked On	Brief Description	Report No. and Date	Inspector	Remarks
70-330/77-08 May 24-27, 77	H.S. Phillips	92706 B	Changes to the OPEO. QA Manual were incomplete	50-330/98-03 March 21-23, 78	Vaudel	Resolved
71	H.S. Phillips	92706 B	QA Program Audit by NATCO not available for review.	50-330/78-04 April 20-May 2, 78	Vaudel	Resolved
72	H.S. Phillips	92706 B	Timely resolution of NCR's implementation not available during inspection	50-330/77-12 Aug 10-Sep 2, 77	C.M. Erb	closed
74	Jack Durr	92705 B	Illegible pipe support drawings	50-330/77-11 Aug 1-5 98-9, 77	TEV	closed
75	Shewmaker	92705 B	Field Instructions and Field Procedures by Project Engineering	76	TEV	closed
76	G.M. Erb	53053 B	Tendon Gallies need attention	50-330/78-01 Jan. 25-27, 78	RJC	closed
77	TEVaudel	92706 B	Records of Qualification of Auditors not available during inspection	50-330/78-04 4/15-21/78	TEV	closed
78	Naidu	48055 B	NCR 0044 still open	50-330/78-03 March 21-23, 78	Naidu Vaudel	Resolved
79	Naidu	92706 B	NCR 0083 still open	50-330/78-05 May 17-19, 78	Naidu	Resolved
80	Naidu	48065 B	Inadequate Documentation for embedded welds	50-330/78-03 March 21-23, 78	Naidu	Resolved upgraded to a Nonconformance item
81	Naidu	48065 B	Rechtel G 121 D Form inadequate	78-07	Naidu	Resolved
82	Naidu	92706 B	Penetrations not protected	78-15 (over)	TEV	closed
83	Jablonski	51051/51061	MECHANICAL SUPPORTS, REINFORCEMENT AND BRACING FOR ON-O-LIST, NO QA-QC (78-04-01)	78-15 (over)	TEV	Moved to new forms
84	Jablonski	51051/51061	FINISHED TO 10 CLASS IE CONCRETE WITH ACCORD WITH IEEE 279-4.22 (78-04-02)	78-15	TEV	Moved to new forms
85	Jablonski	51051/51061	Mech/Elec. INTERFACE SEPARATION CRITERIA (78-04-04)	78-15	TEV	Moved to new forms
86	Jablonski	51051/51061		78-15	TEV	Moved to new forms
87	Jablonski	51051/51061		78-15	TEV	Moved to new forms
88	Jablonski	51051/51061		78-15	TEV	Moved to new forms
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200	Jablonski	51051/51061		78-15	TEV	Moved to new forms

All closed

\* SEE MEMOS - SPESSARD - REINMUTH 4/28/78  
 #2 - JADLOWSKI - SPESSARD 5/2/78



UNRESOLVED MATTERS

FACILITY: Midland Unit 2

PROJECT INSPECTOR: Hyin

Problems to be Resolved				Resolution			
Report No. and Date	Item No.	Summary Paragraph	Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
<u>76-04</u> cont.	20	E.1	(Deviation) Audits not meeting schedules	<u>76-08</u> 8/9-9/9/76	20	F.1	closed
	21	E.2	(Deviation) Bechtel design engineer QA training	<u>78-05</u>	21	E.	76-09 open <sup>100%</sup> <del>50%</del> closed
<u>76-06</u> 7/14-16/1976	22	A.1	S.S. & Carbon Steel; Q-listed & non & pipe storage	<u>76-09</u> 11/16-19/76	22	3.a	ok
	23	A.2	Crane platform storage support needs improvement		23	3.b	ok
	24	A.3	The lifting & placing of Liner dome & NSSUs equipment are considered safety related items.	<u>77-01</u>	24	3.C	76-09 open
					24	E.1	77-01 closed
				( <u>all closed</u> )			

UNRESOLVED MATTERS

FACILITY: Midland Unit 2 PROJECT INSPECTOR: lyin

Problems to be Resolved				Resolution			
Report No. and Date	Item No.	Summary Paragraph	Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
76-04	14	A.4	Ineffective DCN control log.	76-08 8/9-9/9/76	14	G.2.b	ok
Cont.	15	B.1	CP's control of FCR's		15	G.2.c.	ok
	16	B.2	Bahitel use of Dept. stds to supplement or replace PSAR & Dept. Procedure	78-07	16	2.b. IFV, Closed	76-09 open
	17	B.3	Use of NCR to document design changes	76-08	17	G.2.d	ok
	18	B.4	QC Inspection plan submittals & approvals	76-09 11/19/89	18	2.c	procedures revised closed
	19	B.5.	NCRs without sufficient detail description	All Closed	19	2.d	ok

UNRESOLVED MATTERS

FACILITY: Midland Unit 2

PROJECT INSPECTOR: L. Yin

Problems to be Resolved				Resolution			
Report No. and Date	Item No.	Summary Paragraph	Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
76-02 Cont.	8.	B.1	RAM review comments - U.S. Testing	76-08 8/9/76 -9/9/76	8	G.1.c	Both QA manual went thru complete overhaul
	9.	B.2	RAM review comments - Champion, Inc.	76-09 11/11/76	10	F.1	procedures implemented
	10	B.3	U.S. Testing Training procedure	76-05 6/24-25, 6/27-30, 7/1/76	11	F.1	Reviewed by R.E. Shewman et. H.A. to be OK.
76-04 April + May, 76	11	A.1	Accumulative effects of rebar omission	76-08	12	G.2.a	Ok, closed
	12	A.2	Discrepancies identified in RF-95, 96, and 100	76-09	13	2.a	Ok
	13	A.3	Lack of Bakhtel Trend Analysis	(All closed)			



FACILITY: Midland Unit 2PROJECT INSPECTOR: P. Yin

Problems to be Resolved				Resolution			
Report No. and Date	Item No.	Summary Paragraph	Description	Report No. and Date	Item No.	Summary Paragraph	Remarks
76-01 1/13-16/76	1	A.1	Painter qualification and identification	76-02	1	F.1	RQ 1.54 ANSE 101.4
	2	A.2	CP NCR QF-48 inaccurate statement	3/16-18 24-26/76	2	F.2	Closed
	3	E.	(Deviation) IEI report 75-05 App. A, Item No 1 commitment - QA manual index register	?	3		know it is completed
	4	A.1	Deteriorated rebar tags didn't meet purchase spec. regit.	76-06 7/14-16/76	4	F.1	meet the spec. intent
76-02 3/16-18 and 3/24- 26/76	5	A.3	Bechtel QC Insp. regit omission	76-08 8/9-9/9/76	5	G.1.a	ok
	6	A.4	QF-56 insufficient corrective actions.	76-06	6	F.3	Closed
	7	A.5	Deteriorated pipe and other covers	76-08	7	G.1.b.	Fordon Sheath protection - an infraction This item is closed.
				(All closed)			





## OTHER ITEMS TO BE INSPECTED

PAGE SD-01FACILITY: Midland Unit 2PROJECT INSPECTOR: T.E. Vandel

Item No.	Date Enter	Item Description	Inspector	Item Reference	Inspection Action and Reference	Inspector	Date Closed
20	3/3/80	Ruskin Mtg. time Dumper problem	Cook	AIT number Hcb 000551			
21	3/3/80	NSSS equipment at site notes & record	Lib				
22	3/3/80	NSSS equipment setting completion review	Vandel				
23	3/3/80	Milliamp circuit defects	Cook	AIT number Hcb 160526			

NOTE: This form is a supplement for documenting origination and resolution of: (1) open items stated in inspection Report Details, (2) followup on IE Bulletins, (3) significant events reported by the licensee, (4) IE managerial and Engineering Support Section requests, (5) inspector-identified problems for followup during future inspections, (6) repeated problems areas and (7) HQ requests.

OTHER ITEMS TO BE INSPECTED

FACILITY Midland Unit 2

PROJECT INSPECTOR L. J. [Signature]

ITEM NO.	DATE ENTER	ITEM DESCRIPTION	ITEM REFERENCE	INSPECTION ACTION AND REFERENCE	DATE CLOSED
11	10/6/76	Abuse of FIM and licensee proposal of deleting this FIM	76-08 Detail 2.5		
12	10/6/76	Sample of site drawing to compare w/ latest Rev. No. in AA.	Jordan memo. 10/6/76	Ok, 76-09, Para. A.1	12/20/76
13	6/27/77	Review PIP-tray minimum 77 installation separation requirements	77-09 para 3c	CHANGED TO UNRESOLVED ITEM SECTION II, PARA 1j. (78/04-04)	5/2/78
14	6/27/77	Review color coding of name plates on SW Gear, components, etc.	77-09 para 3d	CHANGED TO UNRESOLVED ITEM SECTION II, PARA 1h, (78/04-02)	5/2/78
15	5/2/78	Follow up on document CONTROL (78-04-03)	78-04 SECTION II PARA 1i	updated to Inspection (78-07-03) CLOSED 78-07	5/17/78
16	5/2/78	QCIE-2.0 "CABLE TRAY" DEFS NOT REF. DWG 720 E-47 (SEE CAT) (78-04-05)	78-04 SECTION II PARA 1R	closed 78-07	5/17/78
17	5/2/78	FIRE BRIGADE TRAINING REQUIREMENTS (78-04-06)	78-04 SECTION II PARA 20(u)	closed 78-07 Mainwell 78-07 see sheets in unresolvd elect list	5/17/78
18	6-16-78	Follow-up on BECATEL <del>NCR</del> 6-321-D FORM IN ELECTRICAL AREA. <del>1207</del> 78-06-01	78-06 PARA 1d(7)	closed 77-75 GM	11/1/78
19	6-16-78	Follow-up on BECATEL NCR 1207 78-06-02	78-06 PARA 1e	closed 77-72 NADW	11/1/78

NOTE: This form is a supplement to Form CB-9 for documenting origination and resolution of: (1) open items stated in inspection Report Details, (2) followup on IE Bulletins, (3) significant events reported by the licensee, (4) IE managerial and Engineering Support Section requests, (5) inspector-identified problems for followup during future inspections, and (6) repeated problem areas.

## OTHER ITEMS TO BE INSPECTED

PAGE 1

FACILITY

Midland Unit 2

PROJECT INSPECTOR

L. J. Jir

ITEM NO.	DATE ENTER	ITEM DESCRIPTION	ITEM REFERENCE	INSPECTION ACTION AND REFERENCE	DATE CLOSED
1	1/23/76	Coolant pipe elbow Charpy Test req't.	76-01 Detail 9		
2	"	10 CFR 50.55 a CP position statement evaluation "			
3	"	Additional NCR review of the months June - Oct. 75	76-01 Detail 2	76-04 Extensive NCR review, particularly rebar omissions, was performed	10/5/76
4	"	Safety component on site receiving & storage check	76-01 Detail 3		
5	"	Review of Champion QA Manual	76-01 Detail 7	76-02 Appendix B Review Comments	Comments resolved 3/76
6	"	Review of U.S. Testing QA Manual	76-01	76-02 Appendix A Review Comments	in 76-08 3/76
7	"	75-05 Item 5. open item check - personnel g.	76-01 Detail 8	Q. 5	
8	7/7/76	Low strength concrete test cylinders.	Licensee Rpt'd	76-06 Rpt. Details, Section I, Item 4	7/16/76
9	10/6/76	Commitment #2 Drawing Clarity and Completeness	76-08 Detail 2b.		
10	"	Training & record need continue attention.	76-08 Detail 2.e	76-09 A.1, F.1 <u>OK</u>	1/5/76

NOTE: This form is a supplement to Form CB-9 for documenting origination and resolution of: (1) open items stated in inspection Report Details, (2) followup on IE Bulletins, (3) significant events reported by the licensee, (4) IE managerial and Engineering Support Section requests, (5) inspector-identified problems for followup in future inspections, and (6) repeated problem areas.



(C)

ASSISTANCE REQUEST FORM

PART 1

TO J. Allan DATE 3/4/75 NO. MNP-1

FROM D.W. Hayes

FACILITY INVOLVED Midland 1 & 2 DOCKET NO. 50-329 50-330 CPPR 81 ~~OLTP~~ NO. 82 CAT. A2

PART 2

ITEMS TO BE INSPECTED OR REVIEWED

REFERENCE

<u>Yearly Inspection</u>	
<u>Environmental Protection</u>	<u>TI-3400 SECTION II</u>
<u>Construction Phase</u>	
<u>(CP issued 12/14/72)</u>	

DATE REQUESTED March or April, 1975

PROJECT INSPECTOR T.E. Vandell SENIOR INSPECTOR D.W. Hayes

PART 3

ASSIGNED TO \_\_\_\_\_ DATE \_\_\_\_\_

SCHEDULED FOR \_\_\_\_\_

PART 4

ITEM INSPECTED OR REVIEWED

CLOSURE DATE

REFERENCE


OIL ITEMS/REFERENCES (see back side) \_\_\_\_\_

SUPPORT INSPECTOR \_\_\_\_\_ DATE \_\_\_\_\_ PROJECT INSPECTOR \_\_\_\_\_ DATE \_\_\_\_\_



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

DWH  
JL  
~~JS~~  
FY 14  
DMH

November 26, 1975

J. M. Allan, Chief, Fuel Facility and Materials Safety Branch

DEFERMENT OF INSPECTIONS

The attached memorandum provides the basis for deferring the environmental inspection at Midland and the confirmatory measurements inspection at Davis-Besse. In addition to the reasons presented for the Midland inspections postponement, the construction permit environmental monitoring requirements are minimal and nospecific. These inspections will be rescheduled appropriately in 1976.

The Assistance Request Form for Midland is being returned to construction; we did not receive one for Davis-Besse.

*J. A. Pagliaro*

J. A. Pagliaro, Section Leader  
Environmental and Special  
Projects Section

Attachment:  
As stated

cc: G. Fiorelli  
D. W. Hayes  
R. C. Knop  
D. M. Hunnicutt ✓

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

November 14, 1975

J. A. Pagliaro, Section Leader, Environmental Protection and  
Special Projects Section

DEFERMENT OF INSPECTIONS

The environmental inspection for Midland and the confirmatory measurements inspection for Davis-Besse will have to be deferred until after the beginning of calendar year 1976. The deferments are based on the following information:

Midland

A meeting between CP and the NRC to discuss changes in the environmental program due to plant design changes is to be held this month. A revised program resulting from this meeting would probably not be implemented until well into 1976. Also, construction which is currently at a minimum due to monetary considerations, will probably escalate in 1976.

Davis-Besse

*not true! 1. for 12/2/75*

The initial confirmatory measurements inspection which involves capability determinations using standards supplied by HSL cannot be scheduled until the licensee receives his instrumentation. The licensee was contacted in October to schedule this inspection. The licensee representative in charge of this operation indicated that their equipment had been ordered, but is not scheduled for receipt until February 1976.

*A. G. Januska*

A. G. Januska  
Radiation Specialist



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

April 3, 1984

Docket Nos: 50-329 OM, OL  
 and 50-330 OM, OL

PRINCIPAL STAFF	
RA	DEP
D/RA	DE
A/RA	DRMS
RC	DRRA
PAO	SCS
SA	ML
	FILE

MEMORANDUM FOR: Chairman Palladino  
 Commissioner Gilinsky  
 Commissioner Roberts  
 Commissioner Asselstine  
 Commissioner Bernthal

FROM: Darrell G. Eisenhut, Director  
 Division of Licensing, MPR

SUBJECT: BOARD NOTIFICATION ON ALLEGATION REGARDING  
 CONVERSATION OVERHEARD DURING MIDLAND HEARING  
 (BN 84-058)

PRINCIPAL STAFF	
RA	DEP
D/RA	DE
A/RA	DRMS
RC	DRRA
PAO	SCS
SA	ML
	FILE

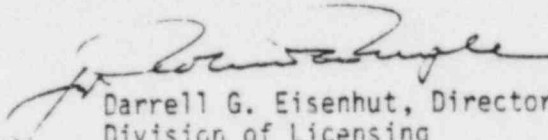
In accordance with the NRC procedures for Board Notifications, the following information is being provided directly to the Commission for information. This information is applicable only to the Midland Plant, Units 1 and 2. The appropriate Boards and parties are being informed by copy of this memorandum.

An affidavit regarding a conversation overheard during the Midland OM-OL hearing has been received and reviewed by the NRC. This matter relates to the conduct of the proceeding and could be material and relevant to quality assurance/quality control issues before the Board. Consistent with the procedures of the Commission's Policy Statement of August 5, 1983, regarding Investigations and Adjudicatory Proceedings (48 FR 36358, August 10, 1983), the staff has determined that Enclosures 1 through 4 should be provided only to the Commission for their in camera consideration. We are providing for the use of the Commissioners one complete copy, showing no deletions, of Enclosures 1 through 4. We are also providing an additional copy of these enclosures for the Commissioners, and copies for the presiding Atomic Safety & Licensing Board and the parties, from which the name of the alleged and associated identifying information have been removed in accordance with the alleged's request for confidentiality.

Enclosure 1 is one of six affidavits on the Midland Plant provided MPR June 29, 1982, under coverletter (Enclosure 2) by Ms. Billie P. Garde of the Government Accountability Project. It presents fragments of a conversation overheard between two attorneys for Consumers Power Company, an NRC attorney and a staff witness outside the hearing room prior to the witness's testimony on October 15, 1981. The witness's testimony addressed an item of noncompliance in Region III's Inspection Report 50-329/80-32; 50-330/80-33 regarding a log (known as "Patty's log") of interfacing design documents reflecting FSAR requirements and a section (Block 8) of the quality control form used in the applicant's re-review of the FSAR.

Enclosure 1 was reviewed by the NRC's Office of Inspector and Auditor (Enclosures 3 and 4). The review found no evidence of misconduct nor of an ethical transgression on the part of the NRC attorney. The review also found no evidence of an overt act necessary to establish a conspiracy to hide information from the Licensing Board or other hearing parties. Therefore, the matter is closed.

This Board Notification supplements the discussion of this allegation as provided to the Board and parties by RIII Inspection Report 50-329/84-03(OSC); 50-330/84-03(OSC) under R. F. Warnick's coverletter dated February 15, 1984.



Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosures:

- (1) Affidavit
- (2) B. Garde coverletter, 6/29/82
- (3) R. Smith memorandum, 4/19/83
- (4) G. Messenger memorandum,  
1/30/84

cc: OPE  
OGC  
EDO  
SECY (2)  
Parties to the Proceeding  
C. Bechhoefer, ASLB  
F. P. Cowan, ASLB  
J. Harbour, ASLB  
C. Kohl, ASLAB  
J. Buck, ASLAB  
T. Moore, ASLAB

DISTRIBUTION LIST FOR BOARD NOTIFICATION

Midland Units 1&2,  
Docket Nos. 50-329/330

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James E. Brunner, Esq.  
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Gerald Charnoff, Esq.  
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Ms. Mary Sinclair  
Ms. Barbara Stamiris  
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Atomic Safety and Licensing  
Board Panel  
Atomic Safety and Licensing  
Appeal Panel  
Docketing and Service Section  
Document Management Branch

ACRS Members

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Mr. Myer Bender  
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Mr. William M. Mathis  
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Dr. Milton S. Plesset  
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MIDLAND (For BNs)

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Resident Inspector's Office  
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c/o Mr. Max Clausen  
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U.S. Nuclear Regulatory Commission,  
Region III  
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Glen Ellyn, Illinois 60137

Mr. Ron Callen  
Michigan Public Service Commission  
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Lansing, Michigan 48909

Geotechnical Engineers, Inc.  
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1017 Main Street  
Winchester, Massachusetts 01890

Billie Pirner Garde  
Director, Citizens Clinic  
for Accountable Government  
Government Accountability Project  
Institute for Policy Studies  
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Mr. Neil Gehring  
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NCEED - T  
7th Floor  
477 Michigan Avenue  
Detroit, Michigan 48226

Mr. J. W. Cook

- 2 -

cc: Mr. I. Charak, Manager  
NRC Assistance Project  
Argonne National Laboratory  
9700 South Cass Avenue  
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ATTN: Clyde Herrick  
Franklin Research Center  
20th & Race Streets  
Philadelphia, Pennsylvania 19103

Mr. Patrick Bassett  
Energy Division  
Norwest Bank Minneapolis, N.A.  
8th and Marquette  
Minneapolis, Minnesota 55479

Enrollment  
AFFIDAVIT

On October 15, 1981, outside the Atomic Safety and Licensing Board Soils Hearing ( DM 50-329 and on 50-530) in the lobby of the Midland County Courthouse, I overheard a discussion between Mr. Miller and Ms. Bloom (Consumers Power Attorneys), Mr. William Paton ( NRC Attorney) and Mr. Lansmann (NRC witness). This was immediately prior to Mr. Lansmann's testimony. Other people were also present, however, I did not recognize them. I was seated with my back to the group about ten feet away. Although I was unable to hear the entire conversation, I was able to take notes unnoticed.

The statement "we're not going to mention that" caught my attention and I began to take notes as follows:

"....log lacking "....not happy with the log as recently as October 5, 6, and 7th... don't mention that some were not happy....don't mention....back-logging the log.... 8032 document....December, 1980 they were happy with the log... non-compliance..."

Lansmann, Bloom and Miller began listing "four items of non-compliance"... "there were the two violations, one was answered between January and February, one was closed in the May inspection.....Bloom and Miller said "Say very little when you get up there"....Other five...Lansmann said "I don't know--could be big"...."design defects".... Lansman then said, "confidence level-assessment tool...Blockade 2" ( I later discovered that they had actually said " Block B



too")... "Audit discovered..." Mr. Lansmann said "Ambiguous procedures"... Ms. Bloom (CPco attorney) interrupted and said, "Don't use 'ambiguous' -- use 'unclear or already complicated'.... May item of non-compliance".

y impression was that the group was very concerned or worried that the information about the other design defects not be brought out or offered by Mr. Lansmann during his testimony. Mr. Miller and Ms. Bloom cautioned Mr. Lansmann to say very little while <sup>testifying</sup>. Mr. Paton was present throughout the entire conversation.

I have read the above 2 page affidavit and it is true, accurate and complete to the best of my knowledge and belief.

JUN 16 1992

\*  
\*

100  
22 JUN 16 1992 11:00 AM

I am sharing my affidavit on problems at the  
Midland Nuclear Plant with the LONE TREE COUNCIL on the  
express condition that they will not use any parts  
thereof for any purpose without my prior consent.  
use"

Dated: June 16, 1982

Attest 6/16/82

\* NAME AND IDENTIFYING INFORMATION DELETED

Enclosure 2

11th  
Div. 7  
G. J. Fortina  
779845

June 29, 1982

Mr. Kepples,

Enclosed are six affidavits on the Midland nuclear power plant. All of the affidavits have been notarized and will be made available to you in the digital form. They

have agreed to make whatever corrections and changes need to be made and send them directly to you. They have reviewed the draft and finals "point-by-point" and I do not anticipate any changes.

Two of these affidavits are <sup>who,</sup> Tom and I believe, as with your investigator's time to talk to in depth. Their stat statements as to give you an introduction to their knowledge.

I look forward to talking to you again about setting up the Midland investigation.

Thank you,  
Billie Pinner Gault



Enclosure 3

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

April 19, 1983

MEMORANDUM FOR: James J. Cummings, Director  
Office of Inspector and Auditor

THRU: Hollis Bowers, A/D for Investigations

FROM: Ronald M. Smith, Investigator  
Office of Inspector and Auditor

SUBJECT: REVIEW OF \* ALLEGATION

After reading the \* affidavit provided to this office by Mr. Fitzgerald, I concluded that if there were wrongdoing associated with the bits of conversation recorded by \* and included in \* affidavit, it would have to be in the form of a "conspiracy" to hide information from the ASLB and/or from other interested parties, i.e., intervenors. (I think it appropriate to note here that \* affidavit was executed June 16, 1982, but concerned events which allegedly occurred some eight months previous. There is no indication as to why \* delayed \* reporting of this allegation.)

I also reviewed the pertinent portions of the transcript for the referenced October 15, 1981, hearing in an effort to try and identify any discourse(s) which appeared to coincide with the "bits" of information provided by \*. I could find no such discourse(s) - particularly involving Mr. Paton (ELD attorney on the case). Thus I could find no evidence of an "overt act" as would be required to establish the "conspiracy" referenced above.

With the failure to find evidence of misconduct on the part of Mr. Paton, I was left with the possibility of an ethical transgression on the part of Mr. Paton, at least to the extent of an "appearance of evil" if he was in fact privy to a conversation which could be construed as an effort to "coach" the testimony of a Government witness (Dr. Landsman). In pursuit of this issue, I spoke to Mr. Paton on April 6, 1983. In sum he acknowledged that he was the NRC attorney assigned to the case. He noted that it is his normal practice to permit licensees and intervenors to talk to his witnesses in the interest of getting all of the relevant information out into the open. However, it is also his practice, as a general proposition, to be present - as the NRC's attorney - during such conversations.

Mr. Paton further stated that he has read the \* affidavit but does not recall the alleged conversation as having taken place. He did know that had such a conversation (involving the coaching of a witness) been attempted, he would not have permitted the conversation to continue. Mr. Paton stated as his primary reason for this position the fact that no case was worth taking the risk of losing his license to practice law (he is admitted before the

8404100458

File 83-41

Maryland and D.C. bars and before the United States Supreme Court). Without his license he could no longer work and support his family.

Finally, I would note that the allegation was rather nonspecific in nature. To be sure bits of language, out of context, and a setting were provided where suspicions could be raised. However, because no further details were provided, e.g., how this alleged conversation resulted in bad conduct, it really is of no practical use. That fact coupled with the fact that I can find no objective proof of conduct and my belief that Mr. Paton was truthful in his responses to me leads me to the conclusion that there is no substantive matter to pursue. It is unfortunate that Ms. Garde (GAP) in forwarding \* affidavit to Mr. Keppler did not provide anything clarifying and/or expanding on the inferred allegation contained in \* affidavit, particularly in light of her assertion that each affidavit had been reviewed "point-by-point." I therefore conclude there is nothing else to provide.

Based on the above, at this time there appear to be no viable leads to pursue and accordingly I recommend that this matter be closed without further action.

\* NAME AND IDENTIFYING INFORMATION DELETED.

*Encl. #*



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

January 30, 1984

MEMORANDUM FOR: John Harrison, Chief, Midland Project  
Office of Special Cases, Region III

FROM: *George H. Messenger*  
George H. Messenger, Acting Director  
Office of Inspector and Auditor

SUBJECT: AFFIDAVIT OF \*

In response to your phone call inquiry of January 19, 1984, concerning the status of the subject matter, the following information is provided:

The Office of Inspector and Auditor (OIA) received one (by \* ) of six affidavits which had been submitted to the U.S. Nuclear Regulatory Commission (NRC) by Billie Pirner Garde, presently Director, Citizens Clinic, Government Accountability Project (GAP). The \* affidavit was believed to fall within the purview of investigations conducted by OIA.

OIA reviewed the affidavit of \* which was executed June 16, 1982, but concerned events which allegedly occurred some eight months previous, and also reviewed portions of the transcript of the Atomic Safety and Licensing Board Soils Hearing and was unable to find any evidence of misconduct.

Based on the OIA review, there appeared to be no viable leads to pursue and, therefore, the subject matter was closed by memorandum to the file, dated April 19, 1983.

\* NAME DELETED

~~8404100474~~

CONTACT: Hollis Bowers  
OIA - 27170