

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

September 17, 1982

MEMORANDUM FOR: James E. Foster, Acting Director, Chicago Field Office

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

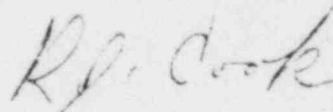
SUBJECT: REQUEST OF E. STAMIRIS

On September 15, 1982, Ms. E. Stamiris requested, via telecommunication with the Midland Site Resident Office, that the Office of Investigation be made aware of Attachment A to "Stamiris Motion for Partial Initial Decision on QA Adequacy in Soils Remedial Work Prior to Commencement of Remedial Underpinning Excavations", dated September 4, 1982.

This was discussed with Mr. C. Weil of your office during a site visit on September 15, 1982, who indicated he was aware of Ms. Stamiris' September 4, 1982 motion.

As discussed with you on September 17, 1982 by telecommunication, I am enclosing a copy of Ms. Stamiris' Attachment A to her September 4, 1982 motion before the board.

Ms. Stamiris felt that those individuals involved in investigating the issue of Consumers Power Company violating the April 30 Board Order should be made aware of her compilation of events associated with the remedial soils work.



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

cc w/Attachments:  
W. D. Shafer

8502090587 840517  
PDR FOIA  
RICE84-96 PDR

Read  
P. 12

Go to  
Gardner  
Kawalsman  
Return to WDS

PRINCIPAL STAFF	
QA	✓
QA/QC	② ✓
QA/RP	✓
DEPOS	ISLO ✓
DEBTP	
OL	FILE ! PKE

U. S. Nuclear Regulatory Commission

In the Matter of  
DPO, Midland Plant  
Units 1 & 2

Docket Nos.  
50-329 OL  
50-330 OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

STAMIRIS MOTION FOR PARTIAL INITIAL DECISION ON QA ADEQUACY  
IN SOILS REMEDIAL WORK PRIOR TO COMMENCEMENT  
OF REMEDIAL UNDERPINNING EXCAVATIONS

9/4/82

Due to the reported violations of established QA/QC procedures for soils remedial work, the failure to institute proper QA/QC procedures for that work, the reported violations of NRC/CPC agreements and of the Board's April 30, 1982 Order regarding soils remedial work; the question of Consumer's QA adequacy with respect to soils must be resolved by this Board prior to the commencement of excavations for remedial underpinnings if public health and safety is to be protected.

ISSUES BEFORE THE BOARD

All parties in the OM-OL proceeding have addressed QA beyond soils due to the terms of the 6/5/81 QA Stipulation. Since the NRC based their reasonable assurance of QA adequacy (Stipulation part 3) upon evaluation of the period from December 6, 1979 to June 1, 1981 during which little soils work was occurring. Yet the more narrow question of QA adequacy with respect to soils is the urgent question presently before this Board. This question, originally raised in the December 6, 1979 Order Modifying Construction Permits, must now be resolved as soon as possible in order to determine "the degree to which and the manner in which soils related construction activities (particularly remedial actions) will be permitted to continue"<sup>1</sup>

<sup>1</sup>ASLE 4/30/82 Order, p. 9.

~~826713684~~

SEP 9 1982

of these Board considerations are to remain viable.

The Board states in its April 30, 1982 Order (p. 7) that they have not yet completed their review of the second hearing issue "ie whether and, if so, to what extent the Modification Order should be sustained." This key issue is described by Consumer's as "whether the safety issues (giving rise to the facts set forth in part II of the Modification Order) have been resolved so that the QA program with respect to soils is now being properly implemented and there is reasonable assurance such implementation will continue through the construction process."<sup>2</sup>

The December 6, 1979 Modification Order sought prohibition of soils activities until the question of QA adequacy with respect to soils and the related safety questions were resolved. These QA adequacy/safety questions remain unresolved in late 1982, yet the complex and difficult soils remedial work which the Order sought to prohibit has been permitted to begin in the interim due to the wording of the Order.

The unresolved safety questions associated with the issue of soils QA adequacy, of renewed concern due to the course of recent events<sup>3</sup>, must be considered before the presently projected December 1982 QA hearing dates or they will, by that time, become moot questions as the soils remedial work in question will be irrevocably underway.<sup>4</sup> For the imminent underpinning excavation work will certainly commit the applicant to this course of remedial actions once it is begun, in a manner unlike the other prerequisite remedial steps previously approved by the Board.

As most recently and simply defined, the "QA" question before us is whether the soils remedial work will be properly implemented (as opposed to the "technical" question of whether that work is theoretically feasible).<sup>5</sup> A hearing conducted

<sup>2</sup>CPC findings, p. 36.

<sup>3</sup>see attachment A.

<sup>4</sup>During the 8-14-82 site tour we were informed that the excavation work was expected to begin within a week as the baseline data measurements had been completed. On 9-1-82 Mr. Ross Landsman informed me the excavations had not yet begun.

<sup>5</sup>Judge Bechhoefer's description in 9-1-82 conference call.

to determine whether the soils remedial work is likely to be properly implemented can only be meaningful if conducted before that work takes place.

To await a December QA hearing and an overall (QA adequacy-technical adequacy) decision in 1983 as presently projected, would leave us with the untenable situation of putting the answer (ie, continuation of soils remedial work) before the question (whether it is likely to be performed safely). In so doing, the Applicant's scheduling needs would be placed ahead of public health and safety needs.

Although soils remedial work has been approved prior to resolution of the related safety questions before in this proceeding, it has up till now been of a relatively minor nature and has been approved in this fashion because it did not constitute an irreversible commitment to the soils remedial work to follow.<sup>6</sup> However the very nature of the excavation work and the proportions of this underpinning job certainly qualify it as the major task of the soils remedial work at issue, from which there is no going back. Therefore, to allow the underpinning excavation work to go forward prior to the resolution of the related QA/safety questions by this Board, would be tantamount to prejudging the entire proceeding.

The scheduling needs of Consumer's Power Co, no matter how pressing, cannot be placed ahead of the unresolved questions affecting public health and safety. In a case involving the Midland plant, an Appeal Board affirmed "under the Atomic Energy Act, the Commission responsibility is to protect the public health and safety, not the pocket-books of owners or customers of electric utility investors."<sup>7</sup>

This Board has listened to CPC and NRC witnesses discuss the technical feasibility and theoretical adequacy of the underpinning remedial work, but that has no bearing upon the practical implementation of that work. The Board, in fact, found the QA aspects of the proposed underpinning work to be conspicuously lacking<sup>8</sup>

---

<sup>6</sup>7/7/81 tr. 1133-1137

<sup>7</sup>ALAB 458, 2/14/78, 7 NRC 4 p. 476, CPC Units 1 and 2, Midland.

<sup>8</sup>ASLB 2/5/82 Memo, tr. 7122-7128.

and their underpinning QA questions remain unresolved today. To have assurance that any plans will be carried out safely, this Board must first establish that there is an effective QA program to accomplish those plans.

VARIOUS PROPOSED HEARING PLANS

Unlike the after-the-fact December QA hearings currently envisioned, the pre-excavation QA hearings I propose would allow fair consideration of ultimate hearing outcomes and options to all parties. I would have the Board consider the now urgent QA question of the December 6 Order, as formulated by Consumer's, "whether the safety issues . . . have been resolved so that the QA program with respect to soils is now being properly implemented and there is reasonable assurance such implementation will continue through the construction process," (particularly the soils remedial work at hand). An expedited partial initial decision in the Applicant's favor on the soils remedial aspect of QA adequacy could allow the soils remedial work to go forward with only slight delay and with the added assurance that the public safety questions associated with the soils remedial work had first been resolved. Consumer's themselves sought this assurance for the public in their 9/2/81 Motion for an Initial Partial QA Decision.

The urgency of the QA question which I assert is reflected in the public statements of Mr. Keppler at the recent SALP meetings. Regarding the soils remedial work he said, "clearly something is wrong, its not proceeding as it should proceed." At this point, he said, "I have to wonder--can Consumer's do the job?" He added that NRC was "not comfortable about where we stand as an agency" and that he personally felt "very uneasy" about his 1981 testimony before the ASLE.<sup>9</sup>

As a result of the negative SALP rating, and the continuation of soils remedial work problems up to that day (6/21/82), Mr. Keppler announced the formation of a special inspection team to oversee Midland's work. Shortly thereafter he called

---

<sup>9</sup>6/21/82 SALP meeting, statements as reported in 6/22/82 Midland Daily News.



for a reopening of the OM-OL hearings to reconsider his QA reasonable assurance testimony. Mr. Keppler's testimony was expected by late August and "Mr. Paton advised that there were substantial differences of opinion between the Applicant and the Staff regarding certain factual material."<sup>10</sup> These reopened QA hearings, as first entertained, would have properly brought the facts and evidence regarding the NRC-Consumer's differences before the Board for their judgement and resolution.

But by July 12, 1982 a dramatic change in the form and scope of the reopened QA hearings was announced by NRC counsel, Mr. Paton, in a conference call on the subject. "The Staff now advised that Mr. Keppler wished to confer with certain high-level NRC officials, formulate suggestions with respect to Consumer's QA/QC program, and present those suggestions to high-level Consumer's officials (Selby and Cook). According to the Staff, if Consumer's accepted the NRC suggestions (to which CPC counsel indicated there would likely be "a very quick turn-around") then the factual questions now in dispute between Consumer's and the Staff would become of lesser importance. The Staff and Consumer's could then file testimony (perhaps simultaneously) concerning the proposed QA/QC solutions."<sup>11</sup>

In the hopes of avoiding lengthy contested hearings, and perhaps as the only way to allow construction to proceed at the plant, the NRC, Consumer's, and the Board, are willing to accept hearings based once again on subjective judgements and conclusory statements about future QA adequacy and "proposed QA/QC solutions."

In 1981, the hearings held to resolve the QA/safety questions of part III of the December 6, 1979 Order regarding "the adequacy of the remedial action to correct the deficiencies in the soil construction under and around safety related structures,"<sup>12</sup> were necessarily conducted in the abstract future form, since that

---

<sup>10</sup>ASLB 7/7/82 memo, p. 3.

<sup>11</sup>ASLB 7/13/82 memo, p. 2.

<sup>12</sup>12/6/79 Order, p. 4.

work has not begun. But the question of QA adequacy with respect to soils remedial actions, which is before the Board in 1982, is in the very real present tense.

Soils work has resumed and so have the related QA problems. Once again we have before us evidence of the state of QA with respect to soils. This evidence is available in the form of CFF Appendix B violations, inspection reports, nonconformance reports, audit reports and findings, stop work reports, and their manner of resolution. We have no need in 1982 to look to the future to answer the question of soils QA adequacy--and whether the soils remedial work is likely to proceed safely and carefully according to regulations. We can consider all the relevant evidence and now ask: Is the soil remedial work being properly implemented and is Consumer's QA/QC implementation effective in maintaining the requisite standards of safety and conservatism in this work?

To conduct QA hearings instead upon reasonable assurance for the future according to high level QA/QC improvement plans and solutions, after the work in question was irrevocably underway, would be to make a mockery of the serious public safety questions at issue in this proceeding. For there is no future left, no time for QA improvement when the plant is almost finished and the soils remedial work is underway.

The QA deficiencies which have plagued this plant since the early seventies have been repeatedly condoned and overlooked on the basis of the promise of reformation, and perceived improvements which have allowed the NRC to maintain reasonable assurance for the future time and time again.<sup>13</sup> When the future comes to pass (as it has in this proceeding) only to disprove the assurances given in part 3 of 6/5/81 QA Stipulation, the NRC merely forgets the past and present, and moves on to the future once more.

In the case before us now, the continued inadequacy and deficiencies of Consumer's QA as documented in the 1980-81 SALF evaluation and subsequent I & E reports;

---

<sup>13</sup> history p. 9-10, ASLB 4/30/81 order.

as addressed by the Board in their 4/30/82 Order and 7/7/82 Memorandum; as discussed in the 4/15/82 Spessard memo; as addressed by Mr. Keppler as recently as 6/21/82; as reflected in the continuing record of NRC and audit findings regarding soils; and as discussed in the 8/20/82 Landsman memo, cannot be adequately resolved with a new QA Stipulation drawn up to reduce the importance of "factual questions now in dispute" (7/13/82 memo) by shifting the focus from the present to the future. The Board's directive in its 7/13/82 memo to "include prior differences" and their manner of resolution in prepared testimony, could only be of value if the work in question awaited the consideration of those differences.

The time has come for the NRC to follow the plan Mr. Keppler announced at the November 1980 SALP meeting--that is to lay out all the facts before the Board (leaving conclusions aside) and let them decide the increasingly difficult question "whether QA is still defensible?" This intention similarly repeated by Mr. Keppler at the close of the 6/21/82 SALP meeting would have been met in the reopened QA hearings if they had gone forward as originally planned (contested QA proceedings between the Staff and the Applicant following August testimony). But that intent is lost in the new hearing plans (7/13/82 memo).

The events surrounding the August 12, 1982 stop work as described in the 8/20/82 Landsman memo on the violation of the ASLE April 30th Order, make a contested hearing all the more imperative now. It is the intent of this motion to seek a hearing, based on a review of all the evidence before us concerning the state of QA adequacy today, as opposed to hearing statements about expected improvements, CPC commitments, or NRC suggested "QA/QC solutions" for Consumer's, as anticipated in the 7/13/82 Board Memorandum. It is the intent of this motion that hearings on the narrow question of QA adequacy with respect to soils, must precede the soils remedial work (ie. underpinning excavations) they seek to consider, if public health and safety is to be protected.



RESPONSIBILITY TO DECIDE ISSUES OF THIS PROCEEDING  
LIES WITH ASLB, NOT NRC STAFF

NRC regulations provide that "a Licensing Board may not delegate its obligation to decide significant issues to the (NRC) Staff."<sup>14</sup> It must follow then that neither should the NRC take upon itself the decision of the key QA/safety question of this proceeding in the form of a reasonable assurance judgement.

Such conclusory judgements must be left to the Board. The parties are obliged to bring forward all the relevant evidence on the question of QA adequacy to the Board for their decision, upon completion of the review of that evidence. The burden of deciding the question of QA adequacy in this case should not and does not lie with one party (the NRC) or one person (Mr. Keppler). The burden of proof of QA adequacy lies with the Applicant. And the continuation of the soils remedial work, particularly the irreversible underpinning excavation steps, cannot be permitted (according to the terms of the December 6, 1979 Order and the NRC system of regulations) in the absence of such a finding of QA adequacy by this Board.

The Board has not yet resolved "whether, and if so, to what extent the December 6 Order will be sustained" (as stated in its April 30, 1980 Order) in order to determine "the degree to which and the manner in which soils-related construction activities (and particularly the remedial actions) will be permitted to continue."<sup>15</sup>

Yet the present course of action regarding soils remedial work at the plant, leaves the implementation of this hearing issue, and its underlying decision, entirely up to the NRC staff. This becomes particularly unfair when we approach the irreversible underpinning excavations immediately at hand, without the resolution of the essential QA safety questions related to that work. It is unfair to all parties and to the public dependent on this hearing process.

---

<sup>14</sup>NRC Practice and Procedure Digest, Suppl. 1 to Digest 2, February 1980 p. 12; Public Service of Indiana, Marble Hill 1 and 2, ALAB 461, 7 NRC, 313-318 (1978).

<sup>15</sup>ASLB 4/30/80 Order, p. 7, 9.

Because the NRC has met with the Applicant and progressed in their evaluation of the technical and theoretical adequacy of the soils remedial fixes (primarily an NRR responsibility), it does not mean that the NRC has simultaneously progressed in their approval of the practical implementation of the soils remedial work (primarily a Region III, I & E responsibility) as related to the question of QA adequacy. In fact, the I & E assessment of QA adequacy appears to have regressed during the course of the soils remedial work.

Implementation of the remedial underpinning excavation work cannot proceed on its theoretical feasibility alone. Mr. Landsman and the other members of the I & E Staff closest to the remedial work, are attempting to do a conscientious and careful job of determining which remedial work should go forward, nevertheless they should not bear the burden of deciding the outcome of the complex and difficult QA/safety issues of this proceeding. Yet this is the practical reality of the present situation. The flow of NRC-CPC documents, the board notifications, and memos from Region III indicate a need for Board attention and help in resolving these difficult questions.

EXPEDIENCE AND SAFETY RESULT FROM  
PARTIAL INITIAL DECISION ON QA PRIOR TO EXCAVATION

In seeking a partial initial decision on QA, Consumer's asserted that "an early resolution of (QA) issues will benefit the public by assuring that the remedial work, when authorized, can begin promptly in accordance with the decision...If the Board issues findings in the Applicant's favor, the applicant can confidently direct resources to maintaining and improving its QA program and its implementation. If the decision outlines further requirements the applicant must meet, then resources can immediately be directed toward accomplishing them so that any authorized remedial work can begin promptly and in accordance with the Board's dictates."<sup>16</sup>

Thus the Applicant sought the Board's explicit prior approval for soils remedial actions in the form of a partial initial QA decision. That motion for a partial

---

<sup>16</sup>CPC 9/2/81 motion, p. 5.

initial decision on QA prior to implementation of the soils remedial work, which was granted by the Board in 1981, is precisely the motion I am presenting today.

Because of significant new questions concerning QA adequacy which have arisen since 1981, the motion is all the more compelling today. As cited by the Applicant in the Douglas Point Case, an early decision benefits the public by obviating "wasteful expenditures of time and money". . . and "by alerting the Applicant promptly" of the needs which must be met to ensure plant safety.<sup>17</sup> Consumer's adds. "Similarly here, a decision at a time early enough for the parties to effectively anticipate and ameliorate any concerns rather than retroactively take them into account makes the resultant benefit to the public (not just the Applicant) manifest."<sup>18</sup>

The fact that significant safety questions arose necessitating a reopening of the record on QA, only serves to strengthen the foregoing arguments presented by the Applicant. Awaiting a full (technical adequacy-QA adequacy) decision in 1983 as discussed during the August prehearing conference would be acceptable, perhaps even preferable in terms of an integrated approach, if the remedial underpinning excavation work were not permitted to proceed in the interim. But in the interest of expedience, it makes more sense to single out the narrowest QA issues (which will still protect public health and safety considerations) essential for resolution prior to implementation of the remedial underpinning excavations. Other QA and technical issues can be recalled without compromising safety.

According to my hearing proposal, the time and effort spent working out a new QA agreement between the Staff and the Applicant would be saved. The contested hearing could then go forward sooner. The eventual QA hearings will probably be about the same length whether or not an agreement between NRC and CPC is reached as past QA problems and differences will be considered by intervenors with or

---

<sup>17</sup>CPC 9/2/81 motion, p. 6.

<sup>18</sup>Ibid p. 6.

without Staff support.

Therefore not only public safety, but expedience is served by the partial initial decision I seek regarding the QA adequacy of soils remedial work.

PATTERN OF PROBLEMS AND VIOLATIONS  
IN SOILS REMEDIAL WORK

In introducing this motion, I referred to violations of QA/QC procedures, failure to institute proper QA/QC procedures, and reported violations of NRC/CPC agreements and the Board's April 30 Order, as bases for requesting a partial initial QA decision on soil related issues, prior to excavation work.<sup>19</sup>

This pattern of problems and violations in soils work extends from the original QA breakdown of the December 6, 1979 Order, to the present day. When Consumer's removed the preload at the Diesel Generator Building without NRC concurrence, it was described as a misunderstanding of the NRC position. The failure of the NRC to intercede was interpreted as approval.<sup>19a</sup>

When Consumer's continued soils remedial work (which would have been prohibited by the December 6 Order) beyond their voluntary soils workstop, at the Borated Water Storage Tanks, near the Service Water Structure, and in excavations at the Diesel Generator Building<sup>20</sup> it was called a differing interpretation of soils remedial work as defined in the December 6 Order, not a violation of that commitment.

When Consumer's proceeds without prior NRC approval in soils remedial work involving piping,<sup>21</sup> instrumentation,<sup>22</sup> drilling,<sup>23</sup> and excavating,<sup>24</sup> (and in some

---

<sup>19</sup>see attachment A. <sup>19a</sup>tr. 3238, 2827-8

<sup>20</sup>7/7/81, tr. 1127, 1215-12

<sup>21</sup>tr. 7784-88a.

<sup>22</sup>4/15/82 Spessard memo.

<sup>23</sup>items 3, 4, 5, 12, 13, 14, attachment A.

<sup>24</sup>8/20/82 Landsman memo; I & E report 82-03.

cases proceeds with this work beyond their own stopwork directives) these incidents are termed miscommunications or misunderstandings caused by varying interpretations of agreements.

Two investigations have been launched by Region III on the subject of Consumer's "possible misleading statements" and "possible violations of the Board's April 30, 1982 Order" involving soils remedial work.<sup>25</sup>

At some time we must at least consider the possibility that all these events weren't really misunderstandings at all, but were conscious violations of agreements and calculated risks undertaken because of pressure to push ahead and because of an expectation that nothing would be done about it anyway.

If these possibilities are not even considered, or the results of the Region III or Office of Investigation probes are not considered by this Board before the underpinning excavations are permitted to begin, then they might as well be dismissed altogether. For once again, inaction or failure to intercede would be interpreted by Consumer's as approval of the status quo and the soils remedial work will continue in the same manner as it has thus far proceeded.

The concerns of the Region III staff, Mr. Keppler, and this Board (in their April 30th Order) about Consumer's ability or willingness to carry out proper QA on their own initiative in the soils remedial work must be addressed now as it becomes increasingly apparant from the course of recent events<sup>26</sup> that the "Staff consultation and approval" method of handling soils remedial work which the Board set forth in their April 30th Order, is not succeeding in attaining the proper care and conservatism in the soils remedial work.

The manner in which the soils remedial events<sup>27</sup> took place and whether these events do or do not constitute violations of Consumer's own, the NRC, or Board

<sup>25</sup>4/15/82 Spessard memo; 3/20/82 Landsman memo.

<sup>26</sup>see attachment A.

<sup>27</sup>Ibid.

directives, must be resolved now in an attempt to restore the necessary Board, NRC and public assurance about the adequacy of the soils remedial work.

Whatever the underlying reason, whether or not intentional, unsafe and unconservative workmanship cannot be tolerated in the extremely difficult and "very complex" underpinning operations which as Judge Harbour cautioned "have the potential for producing irreversible damage in safety class structures."<sup>28</sup>

At the outset of this proceeding, the Board considered the necessity of providing certain soils remedial work before completion of their review and final decision.<sup>29</sup> This consideration was based upon an evaluation of "the adequacy and the potential safety impact of ongoing construction activities."<sup>30</sup> If potential for prohibiting soils remedial work by the Board was valid at the outset of this proceeding, it must also be valid today.

#### CONCLUSION

Intervenor submits that an initial partial decision in Q<sub>0</sub> with respect to soils remedial work, prior to commencement of the remedial underpinning excavations is the only hearing option able to serve public health and safety interests at this time. The recent events giving rise to safety concerns and necessitating

<sup>28</sup>tr. 7124 and 2/5/82 Board memo.

<sup>29</sup>January 81 prehearing conference question, discussed p. 10 4/30/82 Order.

<sup>30</sup>4/30/82 Board Order p. 10, tr. 754-55.



a reopening of the record on QA, which have occurred in the implementation of soils remedial work, cannot be put off until the remedial work in question is completed or irrevocably underway. The resolution of the December 6, 1979 soils QA adequacy question is imperative now.

For these reasons, as discussed in the motion, intervenor Stamiris moves that the Board:

1. Place a temporary work hold on underpinning excavation work, pending Board assurance of QA adequacy with respect to soils remedial work.
2. Request that the office of Investigation expedite their investigation of soils remedial events and possible violations of the Board's April 30 Order, in the interest of unusual safety and scheduling needs at Midland.
3. Direct all parties to begin preparing testimony at once on the question of soils-remedial QA adequacy, based upon evidence currently available.
4. Establish the earliest possible hearing dates for resolution of the soils-remedial QA adequacy issues prior to commencement of underpinning excavations.

Respectfully Submitted,

*Barbara Stamiris*

Barbara Stamiris  
5795 North River Road  
Freeland, MI 48623

cc. ASLE members  
W. Paton, NRC  
M. Miller, CPC  
Secretary, NRC

ATTACHMENT A

CHRONOLOGICAL LISTING OF SOILS-REMEDIAL EVENTS

This listing provides the basis for my assertions about ongoing problems and violations in the soils remedial work (par. 1) on which this motion is based. In listing these events, I intend only to represent a brief showing of issues relevant to the hearings I propose--issues which represent open questions and differing viewpoints ripe for adjudication.

As such, the following soil related QA events or reports warrant ASLB consideration prior to continuation of the soils remedial work.\* Some of these documents reveal significant inconsistencies which must be resolved in order to afford an accurate understanding of the events they portray.

1. 10/13/81, QAR F120  
lack of Q procedures for FVIP and control tower supports (drilling and torquing of bolts)
2. 12/15/81 closeout, audit  
M01-241-02 finding 2  
justification of well time monitoring by wrong Level inspector (CPC exh. 23)
3. 2/2/82, NCR M01-4-2-008  
40-foot hole drilled into Q soils
4. 2/26/82 incident  
3/8/82, NCR M01-9-2-038  
2 48-foot boring holes drilled into Q soils
5. 3/4/82 incident  
3/5/82 NCR M01-9-2-039  
improper drilling procedures at freezewayl involving use of grout and hole cave-in
6. 2/38 and 3/82 Inspection  
Report 82-05  
Criterion V violation: 4 instances, involving unapproved actions and lack of acceptance criteria in soils remedial work. Deviation: inadequately qualified personnel in civil/soils
7. 3/19/82 Inspection  
Report 82-06  
Criterion II and X violations: involving underpinning instrumentation

---

\*I do not have 1981 inspection reports 81-13 thru 81-20, they should be considered to the extent they contain significant soils remedial information. (I will supplement later) NCRS involving cables should be considered to the extent they involve soils remedial work (QAR F180, M01-9-2-097, -098, -099).

8. 4/15/82  
Board Notice 82-39  
4/9/82 Spessard memo on QA inadequacy in soils remedial work and possible misleading statements
9. 4/20/82  
1980-81 SALP report,  
Related Keppler statements and events  
Category 3 rating in soils evaluation, Keppler statements at 4/26/82 and 6/21/82 SALP meetings, formation of Special Inspection team (6/21/82)
10. 4/12/82 Inspection  
Report 82-03  
Criterion V violation: 3 instances involving outstanding FCRS, BWST undermining unauthorized field changes
11. 4/21/82 NCR  
M01-9-2-051  
unauthorized excavation of duct bank undermines BWST valvepit
12. 4/28/82  
verbal stopwork  
Miller to Davis letter  
nonconforming drilling by Mergentime and lack of Bechtel control
13. 4/29/82 incident  
Bechtel NCR 4199  
nonconforming drilling, hitting ductbank and damaging electrical conduit and cables, no hold tags applied until 5/10/82
14. 5/19/82 incident  
Oral Communic. Record  
OCR 0168  
drilling of obs. well 4 encountered void at 10:30 A.M., resumption of drilling on well 1a allowed till 2:40 to finish job despite stop work FSW-22
15. 5/19/82  
Stopwork Order FSW-22  
issued at 1:00, 1:15 or 1:30 P.M. (according to various times given) after Landsman and Cook inspected void, Stopwork written retroactive to 4/28/82
16. 5/20/82 SCRE-51  
(attached to 5/26/82  
Bird to Hughes letter  
55e Safety Reportability Evaluation of 5/19 void: Extent of void doesn't appear to impact any safety rel. structures or utilities.
17. 5/21/82  
NCR M01-4-2-062  
Mergentime bypassed MPQAD hold points for weld inspections, no part corrective action
18. 5/24-27/82  
Nonconforming material Release  
conditional release to fill 5/19 void, and related documents attached to 6/30/82 Paton to Marshall letter
19. 6/25/82 letter  
Brunner to Board  
Inconsistencies exist between statements in this letter and the referenced supporting documents. (Bechtel NCR 4199 is dated 4/29/82--it is said to have prompted a 4/28/82 Stopwork Order.) There is no record of the 4/24/82 incident mentioned. The FSW 22 Stopwork Order was actually issued on 5/19/82 after void incident.

20. 6/7-9/82 Audit  
M01-206-2 finds civil soils group interface on soils remedial work acceptable
21. 6/22/82  
Stopwork Order FSw-23 violations involving grouting of underpinning brackets, MPQAD verbal stopwork at 12:15, but work continued till 2:35 when brackets were grouted
22. 7/7/82  
NCR M01-4-2-084 grout improperly mixed for Turbine wall bracket
23. 7/8/82  
QAR F187 sought advice (and possible relief) on necessity of periodic field tests
24. 7/9/82  
QAR F186 sought interpretation (and possible relief) of sample point depth in well
25. 7/21/82  
QAR 189 requests explanation of "71 individual deficiencies" on IPIN's (Inprocess Inspection Notices) between 7/8/82 and 7/19/82
26. 8/17/82 letter  
Brunner to board QA organization change, J. Meisenheimer as QA Supt. for Remedial Soils Work
27. 8/20/82  
Keppler to Fitzgerald  
Investigation Request  
and related events 8/24 Landsman memo on violation of April 30 Board Order, related Stopwork (8/12/82) events, new communications vehicle and subsequent application, scope and purpose of investigation sought



CONSUMERS  
POWER  
COMPANY

James W Cook  
Vice President - Projects, Engineering  
and Construction

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

November 3, 1982

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

MIDLAND NUCLEAR COGENERATION PLANT  
MIDLAND DOCKET NOS 50-329, 50-330  
PROPOSED ORGANIZATIONAL MODIFICATION  
OF THE NUCLEAR ACTIVITIES DEPARTMENT  
FILE: 0505.813 SERIAL: 19400

Reference: July 20, 1982 Letter to H R Denton from J W Cook, Serial 17966

Meetings were held between Consumers Power Company (CP Co) and the NRC Staff on October 14 and 20, 1982 to discuss the Independent Safety Engineering Group (ISEG) concept described in NUREG-0737, Item I.B.1.2. This item is presently listed as confirmatory on the Midland docket. As a result of these meetings, CP Co is sending this letter to clarify the information submitted in the reference letter to H R Denton.

Attached is a revised copy of Appendix A, Organization Modifications of the Nuclear Activities Department and the revisions to Appendix B, Draft Technical Specifications as changed from the reference letter to H R Denton. The Draft Technical Specification sheets enclosed have been revised in general.

The Nuclear Activities Plant Organization (NAPO) described in Appendices A and B will be in place with standards and procedures at least 90 days prior to fuel load.

A submittal similar to Appendix A will also be included with the Big Rock Point and Palisades technical specification change requests which will be entered on their respective dockets for NRC approval under separate cover. The response to NUREG-0737, I.B.1.2, in the Midland FSAR will be updated to address the modified organization after NRC approval is received.

oc1082-1386a131

~~0a11120455~~

This letter should provide the information needed to close the ISEG issue on the Midland docket.

*James W. Cook*

JWC/KJT/jvm

CC DSBrinkman, US NRC  
RJCook, Midland Resident Inspector  
RHernan, US NRC  
DBMiller, Midland Construction (3)  
RWHuston, Washington  
JMPeschel, US NRC Region 3



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

Letter Serial 19400 Dated November 3, 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 additional information pertaining to the Independent Safety Engineering Group concept described in NUREG-0737, I.B.1.2.

CONSUMERS POWER COMPANY

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

Sworn and subscribed before me this   8   day of November, 1982

        /s/ Barbara P Townsend              
Notary Public  
Jackson County, Michigan

My Commission Expires September 8, 1984

APPENDIX A

ORGANIZATIONAL MODIFICATION  
OF THE NUCLEAR ACTIVITIES DEPARTMENT

APPENDIX AOrganizational Modification of the Nuclear Activities Department

CP Co proposes to modify its organization by creating a new department titled Nuclear Activities Plant Organization (NAPO) and broadening the responsibilities of the Plant Review Committee (PRC) and Safety and Audit Review Board (SARB, which will be renamed the Nuclear Safety Board - NSB). This new organization will involve the General Office and all three CP Co nuclear power plant sites (Midland, Palisades and Big Rock Point). NAPO will perform or assure that the Independent Safety Engineering Group (ISEG) functions described in NUREG-0737, Item I.B.1.2, will be accomplished. The details of how this will be accomplished will be contained in a procedure or standard that will be available 90 days before fuel load. NAPO will be responsible to report to the NSB on significant issues and findings. Integrating these functions in this coordinated manner will improve the overall safety of the plant through more effective utilization of experienced personnel.

The NAPO group will perform independent safety appraisals, perform plant trending and safety reviews on request, and act as a technical resource to the PRC and NSB. This will result in elevating the PRC and NSB from a level of issue identifiers to one of issue resolvers and also allow the senior and experienced managers who serve on these committees to better utilize their talents addressing key safety issues. In addition, the full-time availability of NAPO will permit safety reviews to be conducted in more detail than is now possible using part-time PRC members.

The Vice-President of Nuclear Operations, Executive Director of Nuclear Activities and Plant Managers can request NAPO to provide specialized technical support for problem resolution or General Office interface. NAPO will also interface with QA but not become an integral part of that organization. At present, CP Co does not plan on integrating STA's into the NAPO group but certain review functions may require STA interaction.

Since NAPO will be a single entity, individuals with a specific expertise will be available to support reviews at all sites regardless of their permanent home location. This will promote a transfer of information between the sites. It is now projected that the ultimate staffing for the NAPO group will be approximately 10 professional people at Midland, 8 at Palisades, 1 at Big Rock Point and 3 in the General Office. There will also be additional technical/secretarial help to assist them. NAPO will report off-site to the Vice President of Nuclear Operations through the Executive Director of Nuclear Activities and is therefore independent of direct line responsibility for operating the plant. Independence from plant management will be fostered by development of career paths not dependent on plant management. NAPO will increase the available technical expertise located at the plant sites and permit additional systematic assessment of plant activities.

APPENDIX B

DRAFT MIDLAND TECHNICAL SPECIFICATIONS

ADMINISTRATIVE CONTROLS16.6.1 RESPONSIBILITY

16.6.1.1 The Plant General Manager shall be responsible for overall plant operation and shall delegate in writing the succession to this responsibility during his absence.

16.6.1.2 The Shift Supervisor (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A Management directive to this effect, signed by the Vice President - Nuclear Operations, shall be reissued to all station personnel on an annual basis.

16.6.2 ORGANIZATIONOFFSITE

16.6.2.1 The offsite organization for plant management and technical support shall be as shown in Figure 16.6.2-1.

PLANT STAFF

16.6.2.2 The plant organization shall be as shown in Figure 16.6.2-2 and:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 16.6.2-1.
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while either unit is in MODE 1, 2, 3 or 4, at least one licensed Senior Reactor Operator shall be in the control room.
- c. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.\*
- d. All CORE ALTERATIONS, after the initial fuel loading, shall either be performed by a licensed Reactor Operator under the general supervision of a Senior Reactor Operator or a nonlicensed operator directly supervised by a licensed Senior Reactor Operator (or Senior Operator Limited to Fuel Handling) who has no other concurrent responsibilities during this operation.
- e. A Fire Brigade of at least 5 members shall be maintained on site at all times.\* The Fire Brigade shall neither include 3 members of the minimum shift crew necessary for safe shutdown of the unit nor any

---

\*Radiation protection coverage and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed two hours in order to accommodate unexpected absence provided immediate action is taken to restore the minimum requirements.

## ADMINISTRATIVE CONTROLS

personnel required for other essential functions during a fire emergency.

### 16.6.2.3 NUCLEAR ACTIVITIES PLANT ORGANIZATION (NAPO)

#### FUNCTION

16.6.2.3.1 The NAPO shall function to examine plant operating characteristics, NRC issuances, industry advisories, Licensee Event Reports and other sources which may indicate areas for improving plant safety. The organization shall report to the Executive Engineer - NAPO. With the concurrence of the Executive Engineer, NAPO may function as staff to the onsite and offsite review organizations and provide technical support for problem resolution and General Office interface.

#### COMPOSITION

16.6.2.3.2 The NAPO shall be composed of members located at other Consumers Power Company facilities, and onsite members at the Midland Plant. The NAPO on site shall consist of a minimum of five (5) technical personnel.

#### QUALIFICATIONS

16.6.2.3.3 Three of the full-time members shall each have a bachelor's degree in engineering, or a related science. One of the three shall have a minimum of five years professional experience which includes a minimum of two years experience in power plant operation and/or design.

Any NAPO member may be drawn upon to perform NAPO duties on a temporary basis at any nuclear plant location.

#### 16.6.2.3.4 REPORTS

Regular reports of NAPO activities shall be submitted to the NSB.

#### 16.6.2.4 SHIFT ENGINEER

The Shift Engineer shall serve in an advisory capacity to the Plant Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

### 16.6.3 PLANT STAFF QUALIFICATIONS

16.6.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter.



## ADMINISTRATIVE CONTROLS

16.6.3.2 The functions of the Radiation Protection Manager (CRPM) specified in Regulatory Guide 8.8, March 1979, shall be accomplished by an individual (or individuals) who meets or exceeds the qualifications of Regulatory Guide 1.8, May 1977.<sup>1</sup> These functions shall be carried out by either the Chemistry/Health Physics Superintendent or by a qualified individual (or individuals) who reports to him.

16.6.3.3 The Shift Engineer shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and/or operations and response and analysis of the plant for transients and accidents.

### 16.6.4 TRAINING

16.6.4.1 A retraining and replacement training program for the plant staff shall be maintained under the direction of the Director of Nuclear Operations Training and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971, 10 CFR 55, Appendix "A," and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter, and shall include familiarization with relevant industry operational experience.

16.6.4.2 The Director of Property Protection is responsible for the development, revision, approval and implementation of the Fire Brigade training program. This training shall, as practicable, meet or exceed the requirements of Section 27 of the NFPA Code-1975. Fire Brigade training drills shall be held at least quarterly.

### 16.6.5 REVIEW AND AUDIT

#### 16.6.5.1 PLANT REVIEW COMMITTEE (PRC)

##### FUNCTION

16.6.5.1.1 The Plant Review Committee (PRC) shall function to advise the Plant General Manager on all matters related to nuclear safety and to provide an examination of plant operating data.

---

<sup>1</sup>For the purpose of this section, "Equivalent," as utilized in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) Formal schooling in science or engineering, or (b) operational or technical experience/training in nuclear power.

DRAFT

ADMINISTRATIVE CONTROLS

COMPOSITION

16.6.5.1.2 The PRC shall be composed of:

- Chairman: Technical Engineer or Alternate Appointed by the  
Plant General Manager
- Member: Plant Superintendent
- Member: Operations Superintendent
- Member: Technical Superintendent
- Member: Maintenance Superintendent
- Member: Chemistry/Health Physics Superintendent
- Member: Reactor Engineer
- Member: Senior Engineer
- Member: Plant/Shift Supervisor or Shift Engineer

ALTERNATES

16.6.5.1.3 Alternate members of the PRC shall be appointed in writing by the PRC Chairman to serve on a temporary basis. However, no more than two alternates shall participate as voting members at any one time in PRC activities.

MEETING FREQUENCY

16.6.5.1.4 The PRC shall meet at least once per calendar month, with special meetings as required.

QUORUM

16.6.5.1.5 A quorum for PRC shall consist of the Chairman and four (4) voting members.

RESPONSIBILITIES

16.6.5.1.6 The PRC shall be responsible for:

- a. Review of: (1) all procedures required by Specification 16.6.8.2 and changes thereto, (2) all programs required by Specification 16.6.8.4 and changes thereto and (3) any other proposed procedures or changes thereto as determined by the PRC Chairman to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety and changes to procedures as described in the Final Safety Analysis Report.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant, systems or equipment that affect nuclear safety.

DRAFT

ADMINISTRATIVE CONTROLS

- e. Investigation of all violations of the Technical Specifications. (A report shall be prepared covering evaluation and recommendations to prevent recurrence and forwarded to the Vice President - Nuclear Operations and to the Executive Engineer - NAPO.)
- f. Review of events requiring 24-hour written notification to the Commission.
- g. Performance of special reviews and investigations and reports thereof as requested by the Plant General Manager or Chairman of NSB.
- h. Review of the Site Emergency Plan.
- i. Review of each unplanned release reportable under Specification 16.6.9.1.12 of radioactive material to the environs exceeding 25% of 10 CFR 50, Appendix "B" concentration for air and water or exceeding Appendix "C" quantities for solid materials, including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action.
- j. Review of major changes to radwaste treatment systems.

AUTHORITY

16.6.5.1.7 Authority of PRC is as follows:

- a. The PRC shall:
  - (i) Recommend in writing to the Plant General Manager approval or disapproval of items considered under Specifications 16.6.5.1.6.a. through d. above.
  - (ii) Render determinations in writing with regard to whether or not each item considered under Specifications 16.6.5.1.6.b. and d. above constitutes an unreviewed safety question.
  - (iii) Render determinations in writing with respect to the impact on safety of each item considered under Specifications 16.6.5.1.6.a., c. and e.
- b. The PRC Chairman shall:
  - (i) Provide written notification within 24 hours to the Vice President - Nuclear Operations and to the Vice Chairman of NSB of any disagreement between the PRC and the Plant General Manager; however, the Plant General Manager shall have responsibility for the resolution of such disagreements pursuant to Specification 16.6.1.1 above.

Draft

ADMINISTRATIVE CONTROLS

- c. PRC may delegate activities associated with fulfilling its responsibilities under Specification 16.6.5.1.6. Those activities specified in Specifications 16.6.5.1.7.a and b. above, however, may not be delegated.

RECORDS

16.6.5.1.8 The PRC shall maintain written minutes of each PRC meeting and shall maintain records of transactions specified in Specifications 16.6.5.1.6.b. and c.

16.6.5.2 NUCLEAR SAFETY BOARD (NSB)

RESPONSIBILITIES

16.6.5.2.1 The Nuclear Safety Board (NSB) is responsible for maintaining a continuing examination of nuclear safety-related corporate and plant activities and defining opportunities for policy changes related to improved nuclear safety performance.

FUNCTION

16.6.5.2.2 The NSB shall function to provide review of designated activities in the areas specified in Specification 16.6.5.2.3.

COMPOSITION

16.6.5.2.3 The NSB shall consist of members appointed by the Vice President - Nuclear Operations. NSB shall be chaired by the Executive Director, Nuclear Activities, the Vice Chairman, or a duly appointed alternate. The Executive Engineer - NAPO shall be the Vice Chairman and Secretary.

Collectively, the personnel appointed to NSB shall be competent to conduct reviews in the following areas:

- a. Nuclear Power Plant Operations
- b. Nuclear Engineering
- c. Chemistry and Radiochemistry
- d. Metallurgy
- e. Instrumentation and Control
- f. Radiological Safety
- g. Mechanical and Electrical Engineering
- h. Quality Assurance Practices

DRAFT

## ADMINISTRATIVE CONTROLS

An individual appointed to NSB may possess expertise in more than one of the above specialties. These individuals should, in general, have had professional experience in their specialty at or above the Senior Engineer level.

### ALTERNATE MEMBERS

16.6.5.2.4 Alternate members may be appointed in writing by the Vice President - Nuclear Operations to act in place of members during any legitimate and unavoidable absences. The qualifications of alternate members shall be similar to those of members.

### CONSULTANTS

16.6.5.2.5 Consultants shall be utilized as determined by the NSB Chairman or Vice Chairman to provide expert advice to the NSB. NSB members are not restricted as to sources of technical input and may call for separate investigation from any competent source.

### MEETING FREQUENCY

16.6.5.2.6 NSB shall meet at least once per calendar quarter during the initial year of facility operation following fuel loading and at least once every six months thereafter.

### QUORUM

16.6.5.2.7 A quorum of NSB shall consist of the Chairman and four (4) members. (The Vice Chairman may be a voting member when not acting in the capacity of Chairman.) No more than a minority of the quorum shall have line responsibility for operation of the facility. It is the responsibility of the Chairman to ensure that the quorum convened for a meeting contains appropriately qualified members or has at its disposal consultants sufficient to carry out the review functions required by the meeting agenda.

### 16.6.5.2.8 RESPONSIBILITIES

#### REVIEW

16.6.5.2.8.1 NSB shall be responsible for the review of:

- a. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- b. All events which are required by regulations or Technical Specifications to be reported to NRC in writing within 24 hours and other violations (of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements or of internal procedures or instructions) having nuclear safety significance.



DRAFT

## ADMINISTRATIVE CONTROLS

- c. Issues of safety significance identified by the Plant Manager, the NSB Chairman, Executive Engineer, NAPO or the PRC.
- d. Proposed changes in the operating license or Appendix "A" Technical Specifications.
- e. The results of actions taken to correct deficiencies identified by the audit program specified in Specification 16.6.5.2.8.2 at least once every six months.
- f. Safety evaluations for changes, completed under the provisions of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question.

## AUDITS

16.6.5.2.8.2 Audits of operational nuclear safety-related facility activities shall be performed under the cognizance of NSB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire facility staff at least once per 12 months.
- c. The performance of activities required by the operational quality assurance program (CPC-2A QAPD) to meet the criteria of Appendix "B," 10 CFR 50, at least once per 24 months.
- d. The Site Emergency Plan and implementing procedures at least once per 12 months.
- e. The Site Security Plan and implementing procedures (as required by the Site Security Plan) at least once per 24 months.
- f. Any other area of plant operation considered appropriate by NSB or the Vice President - Nuclear Operations.
- g. The plant Fire Protection Program and implementing procedures at least once per 24 months.
- h. An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- i. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.



DRAFT

## ADMINISTRATIVE CONTROLS

- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- l. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.

Audit reports encompassed by Specification 16.6.5.2.8.2 above shall be forwarded to the NSB Vice Chairman and Secretary and Management positions responsible for the areas audited within thirty (30) days after completion of the audit.

### AUTHORITY

16.6.5.2.9 Authority of NSB is as follows:

- a. For responsibilities specified in Specifications 16.6.5.2.4.1.a. and b., the NSB shall be convened. In making determinations and recommendations, the NSB may utilize reviews conducted by NAPO.
- b. The NSB Chairman shall report to and advise the Vice President - Nuclear Operations of significant findings associated with NSB activities and of recommendations related to improving plant nuclear safety performance.
- c. NSB may delegate activities associated with fulfilling its responsibilities under Specification 16.6.5.2.8. Those activities specified in Specification 16.6.5.2.9.a. above, however, may not be delegated.

### RECORDS

16.6.5.2.10 Records of NSB activities shall be prepared and distributed as indicated below:

- a. Minutes of each NSB meeting shall be prepared and forwarded to the Vice President - Nuclear Operations and each NSB member. Minutes shall be approved at or before the next regularly scheduled meeting following the distribution of the minutes.
- b. If not included in NSB meeting minutes, reports of reviews encompassed by Specification 16.6.5.2.8.1 above shall be prepared and forwarded to the Vice President - Nuclear Operations.

16.6.6 (Deleted)

DRAFT

## ADMINISTRATIVE CONTROLS

### 16.6.7: SAFETY LIMIT VIOLATION

16.6.7.1 The following actions shall be taken in the event a safety limit is violated:

- a. The reactor shall be shut down immediately and not restarted until the Commission authorizes resumption of operation (10 CFR 50.36(c)(1)(i)(A)).
- b. The safety limit violation shall be reported within 1 hour to the Commission in accordance with 10 CFR 50.36 as well as to the Vice President - Nuclear Operations and to the Chairman - NSB.
- c. A report shall be prepared in accordance with 10 CFR 50.36 and Specification 16.6.9 of this specification. (The safety limit violation and the report shall be reviewed by the PRC.)
- d. The report shall be submitted within 14 days to the Commission (in accordance with the requirements of 10 CFR 50.36), to the Vice President - Nuclear Operations and to the Chairman - NSB.

### 16.6.8 PROCEDURES AND PROGRAMS

16.6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable safety-related procedures recommended in Appendix "A" of Regulatory Guide 1.33, Quality Assurance Program Requirements, as endorsed by CPC-2A QAPD.
- b. Refueling operations.
- c. Surveillance and test activities of safety-related equipment.
- d. Site Security Plan implementation.
- e. Site Emergency Plan implementation.
- f. Site Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.
- i. Conduct of a program of interlaboratory comparison of radiological analyses.

16.6.8.2 PRC is responsible for the review of each procedure of Specification 16.6.8.1 above and changes thereto (except for Security Implementing Procedures which are reviewed and approved in accordance with the Site Security Plan).

ADMINISTRATIVE CONTROLS

The Plant General Manager shall approve such procedures and changes prior to implementation.

16.6.8.3 Temporary changes to procedures of Specification 16.6.8.1 above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, considered by the PRC at the next regularly scheduled meeting, and subsequently approved by the Plant Manager.

16.6.8.4 The following programs shall be established, implemented and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as reasonably achievable levels. The systems include the reactor building spray and safety injection system. The program shall include the following:

- (i) Preventive maintenance and periodic visual inspection requirements, and
- (ii) Integrated leak test requirements for each system at intervals not exceeding the refueling cycle.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to determine accurately the airborne iodine concentration in occupied areas under accident conditions. This program shall include the following:

- (i) Training of personnel,
- (ii) Procedures for monitoring, and
- (iii) Provisions for maintenance of sampling and analysis equipment.

c. Secondary Water Chemistry

A program for maintenance of secondary water chemistry to inhibit steam generator tube degradation. This program shall include: