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**Consumers
Power
Company**

RELATED CORRESPONDENCE

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DOCKETED
USNRC

May 24, 1985

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

50-329, 330 0M/06

FEDERAL BUREAU OF INVESTIGATION
DOCKETING & SEARCH
SECTION

MIDLAND ENERGY CENTER GWO 7020
LOW HYDROGEN ELECTRODE WELDING CONTROL PROGRAM
FILE: 0505.2, 0.4.2 SERIAL: 32286

- Reference:
- (1) J W Cook letter to J G Keppler, Brookhaven National Laboratory Report Concerning Welding Program Allegations, Serial 32225, dated April 19, 1985
 - (2) Charles Norelius Letter to J W Cook, dated March 22, 1985 transmitting BNL Report on Welding Allegations, dated January 1985

Reference (1) provided our response to reference (2). This letter responds to your request for further information on item 13 in the Brookhaven Report concerning the exposure time of low hydrogen electrodes to the environment after removal from their hermetically sealed containers or drying/storage ovens. Reference 2 requested that we provide any information "to show that relief from the requirements of AWS D1.1 (as described in the BNL evaluation of Allegation 13) was granted to CPCo or Bechtel for welding activities at the Midland site."

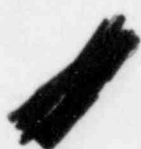
On page 13 of the BNL report the response to Allegation 13 states in part:

"Bechtel personnel at the Midland site believe their program has NRC approval. Several documents were examined which indicate an alternative program was submitted to the NRC and accepted by the Division of Reactor Construction Inspection, IE (dated December 8, 1977, G W Reinmuth to R H Engalken) but, was specific to the Palo Verde site."

At the time of the NRC investigation, Bechtel personnel believed that their program had an NRC Generic approval. The basis for the belief was: (1) an April 28, 1978 memorandum from B D Hackney to P A Martinez (copy given to Brookhaven), (2) a December 8, 1977 NRC memorandum, G W Reinmuth to R H Engelhen (copy given to Brookhaven), and (3) discussions with various Bechtel staff personnel to obtain information to support the on-going NRC investigation. See also a copy of a May 9, 1978 Bechtel memorandum written by B D Hackney to Lex and Mitchell who were management representatives within Bechtel

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Power Corporation. Copies of all three letters (Attachments 1 through 3) are provided for your information. Approvals of exposure times longer than four hours at some projects had been obtained from the NRC; the Bechtel construction sites of Palo Verde and San Onofre allowed a 12-hour exposure time and Grand Gulf allowed up to a 14-hour exposure time all in unheated containers. The testing by Bechtel for the alternative program to extend atmospheric exposure time beyond four hours was made available to the above sites and Midland. The testing was done under the provision of 5.2 of the code which allows alternative qualifications to specific code elements. The letter (Attachment 4) from the AWS Structural Welding Committee to Chicago Bridge and Iron addresses this specific item.

The Midland weld wire control program generally reflects the Bechtel corporate (M&QS) Program (WFMC-1). Over the course of the project, there have been discussions between CPCo and Bechtel as to what the specific Midland program should be and various additional conservative requirements were imposed by Consumers Power. Region III Inspectors specifically reviewed the Midland weld wire control program in March of 1978. At that time there were no findings or open items identified from that inspection.

In the BNL report summary they classify this item as not significant in that it has been responded to on a technical basis, and BNL's remaining question was that a response be provided to address the Bechtel generic or Midland specific NRC approval. As a result of our research, it has been confirmed that there was never a specific Midland approval nor does Bechtel now believe that there was ever a documented generic (Topical Report) approval obtained from the NRC. However, we believe that the relevant question in this allegation is not whether the NRC had specifically approved the out-of-oven time but whether Midland practices were in compliance with the applicable Code (AWS D1.1-72 through July 1974 addenda) to which the Project was committed. It is possible that the investigation failed to consider that the 10-hour question did not appear until the 1979 edition of the Code.

If Region III believes that more discussion or review is necessary to address this issue, we propose that such actions be deferred to when and if there is a Project restart. As stated in reference 1, we will bring specific suggestions to the NRC Staff for resolution of all remaining open items and the conclusions reached at that time can be factored into the programs used for completion of the job.

James W. Cash

JWC/WRB/lr

CC: WShafer, NRC
RLandsman, NRC
AJBoos, Bechtel

Attachments

1. Bechtel Interoffice Memorandum B D Hackney to P A Martinez, dated April 28, 1978
2. NRC Memorandum, G W Reinmuth to R H Engelhen, dated December 8, 1977
3. Bechtel Interoffice Memorandum, B D Hackney to B L Lex/M J Mitchell, Qualification of an Alternative Electrode Control Procedure, (BDH-058-07) dated May 9, 1978
4. AWS Committee letter to Chicago Bridge and Iron dated December 19, 1974

OM/OL SERVICE LIST

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Mr P Robert Brown Clark, Klein & Beaumont 1600 First Federal Bldg Woodward Ave Detroit, MI 48226	Mr John DeMeester, Esq Dow Chemical Building Michigan Division Midland MI 48640
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JOB 7220	
ACT. INFO COPY UNIT	
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FILE NO.	<i>R-1100-1-1000</i>

To P. A. Martinez

Subject Qualification of an Alternative Electrode Control Procedure - Midland Project, Bechtel Job No. 7220

Date April 29, 1978

From B. D. Hackney

Of R&E/M&QS

At 301 Mission

(768-7400)

- Copies to:
- J. R. Barbee w/o
 - R. C. Bertossa w/o
 - F. C. Breismeister w/o
 - R. Hermeston w/o
 - W. B. Keyser w/o
 - J. Newgen w/o
 - W. R. Smith, Sr. w/o

A copy of the report, "Qualification of an Alternative Electrode Program for AWS D1.1," prepared by M&QS for the Palo Verde Project is enclosed for the information and use of the Midland Project. The report has been submitted to and accepted by the NRC as a "Topical Report" thereby permitting generic use of the alternative electrode control practices and procedures described.

It is unlikely a PSAR change will be necessary since AWS D1.1 permits the type of alternate qualification performed; however, each project will need to determine the correct approach to implement the alternative procedure. Implementation of procedures should result in uniform application to essentially all phases of welding and should permit the elimination of portable rod warmers for E7018, austenitic stainless steel and nickel base electrodes.

If M&QS can be of further assistance, including additional copies of the report, please contact F. C. Breismeister or the writer.

B. D. Hackney
B. D. Hackney

BDH:hmw

Enclosures

Project Management	
Midland Plant	
Bechtel Job 7220	
Received	MAY 4 1978
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