



**Consumers  
Power  
Company**

**COPY**

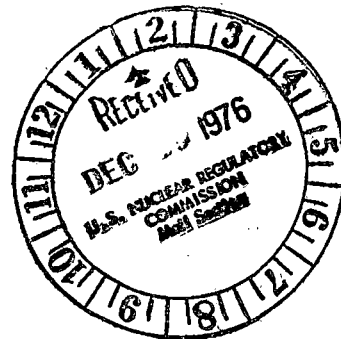
General Offices: 212 West Michigan Avenue, Jackson, Michigan 49201 • Area Code 517 788-0550

December 14, 1976

## **REGULATORY DOCKET FILE COPY**

Director of Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, DC 20555

DOCKETS 50-155 AND 50-255,  
LICENSES DPR-6 AND DPR-20,  
BIG ROCK POINT AND PALISADES PLANTS



By letter dated September 17, 1976, we informed you of our intention to incorporate Consumers Power Company's Quality Assurance Program Topical Report CPC-1A, Revision 5, into the Big Rock Point FHSR and the Palisades Plant FSAR by reference. We further stated that at the time Topical Report CPC-1A was incorporated into the FHSR/FSAR by reference, we would specify areas where this program is not fully implemented as well as a schedule for full implementation. The purpose of this letter is to notify you of the incorporation of the Topical Report CPC-1 and provide a status of and schedule for full implementation.

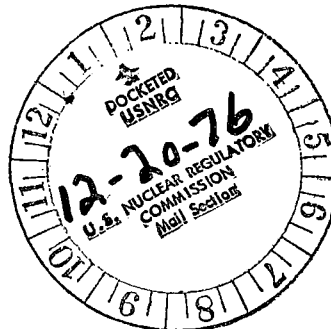
We note that there are two areas where we are considering requesting changes to CPC-1A. The first involves transferring plant Quality Control functions from the Quality Assurance Department-Production and Transmission to the Production-Nuclear Department. The second involves changes related to supplier related impositions.

We have concluded in the corporate office that this Quality Assurance Program does not involve an unreviewed safety question and are incorporating CPC-1A into the Big Rock Point FHSR and Palisades Plant FSAR by reference. In addition, the status of and schedule for implementation of CPC-1A described in the attachment to this letter are also being incorporated into the FHSR/FSAR.

Ralph B Sewell (Signed)

Ralph B Sewell  
Nuclear Licensing Administrator

CC: JGKepler, USNRC



12844

STATUS OF AND SCHEDULE FOR IMPLEMENTATION  
OF TOPICAL REPORT CPC-1, REV 4,  
CONSUMERS POWER COMPANY QUALITY ASSURANCE PROGRAM

The following is a summary of the status of and schedule for implementation of the Consumers Power Company Quality Assurance Program, Topical Report CPC-1, Revision 4. The summary is broken down by topical report policy number and responsibility areas.

POLICY 1

Production and Transmission Department

This policy has been implemented. However, an organizational change is being considered whereby plant QC functions will be transferred from QA-P&T to the Production-Nuclear Department, ie, the plant staff. These changes will be defined, requested, appropriate policies and procedures revised, and the changes implemented by August 1, 1977 assuming NRC concurrence with the proposed change is obtained.

Major Modifications

In the area of major modifications, Consumers Power Company is in full compliance with Policy 1.

POLICY 2

Production and Transmission Department

This policy has been fully implemented with the following exceptions:

A. Training - Qualification and Certification

Training to date has been on an ad hoc basis. A complete training matrix and schedule will be completed by March 1, 1977. Training for personnel will be initiated by June 1, 1977.

Required qualification and certification of personnel will be completed by January 1, 1978.

B. Q-List

The Q-List has been implemented; however, we are continuing to refine the Q-List to identify safety-related equipment on a component rather than system basis. Replacement materials and consumables will be Q-Listed by January 1, 1978.

Major Modifications

A. QA training has been provided to personnel performing major modification activities; however, it has been on an ad hoc basis rather than a formal

training program being established as required by Section 3.4. Establishment of formal training programs has commenced and full compliance for this activity is anticipated to be by June 1977.

- B. Section 3.1 requires "Consumers Power Company suppliers to respond to the Grey and Green Books (WASH Documents 1283 and 1309) and assigns responsibility for this action to the Supplier. Alternates or exceptions taken by the Supplier to comply with or implement the regulatory guidance contained in these documents will be described and delineated in the Preliminary Safety Analysis Report." In regard to this criteria, Consumers Power Company has caused its major modification suppliers to respond to the applicable requirements of the Grey and the Green Books on new procurements since the program was approved in April 1976. However, there are a number of suppliers who were performing work for Consumers Power Company prior to the approval of the Quality Assurance Program that have not had their QA programs reevaluated on the basis of the Grey or Green Books. To this end, it is anticipated that all of Consumers Power Company's principal suppliers performing major modifications, design, engineering, procurement and construction activities will have responded to the applicable requirements of the Grey and the Green Book prior to June of 1977.

### POLICY 3

#### Production and Transmission Department

This policy has been fully implemented in the General Office and partially implemented in the plants. Revisions of the Plants' Administrative Procedures for design control are under way and will be completed by June 1977; implementation will be completed by August 1977.

#### Major Modifications

In the area of major modifications, Consumers Power Company is in compliance with Policy 3.

### POLICY 4

#### Production and Transmission Department

This policy has been essentially implemented. Some further resolution is required in the area of technical evaluation of parts and materials procured from nonqualified vendors. This resolution will be completed by June 1977.

#### Major Modifications

For major modifications, full compliance with Policy 4 is dependent upon the supplier-related commitments that appear in various policies of the Consumers Power Company Quality Assurance Manual. Full compliance with Policy 4 will be achieved when supplier-related impositions throughout the entire Quality Assurance Manual have been resolved. Remaining supplier-related commitments will be placed in a Quality Assurance specification. These requirements will then be invoked

upon Consumers Power Company major modification principal suppliers through the procurement document. Completion of this task is not anticipated prior to September 1977.

#### POLICY 5

##### Production and Transmission Department

This policy has been partially implemented. Recent audits have detected inconsistencies and omissions of QA requirements in various QA documents, below the QA policy level, ie, QA Program Procedures, departmental and site procedures. Checklisting and revision of deficient procedures will be completed by October 1977. Implementation of new or revised procedures will be completed by December 1977.

##### Major Modifications

For major modifications, full compliance with Policy 5 is also dependent upon clarifying supplier-related impositions/commitments in that there are a number of Volume II-Procedures and Departmental Procedures that have not been fully written because the criteria for evaluation has been unclear. Completion of the specific procedures related thereto is anticipated also by September 1977. With regard to the overall criteria for major modifications, an extensive rewrite of Volume II-Procedures has been and is currently in progress to incorporate all requirements of Volume I-Policies into the present Volume II-Procedures. Completion of this task is set for April 1977.

#### POLICY 6

##### Production and Transmission Department

A records management system philosophy has been adopted. Centralized document control for correspondence has been implemented as of November 3, 1976.

A general subject index is currently under development and will be completed by January 1, 1977. Centralized indexing and control of all safety-related documents as they are received or generated will be initiated by February 1, 1977. A program for backfitting all pertinent documents and records has been initiated and will be completed by August 1, 1978.

A program for control of drawings has been initiated. It will be completed by January 1, 1978.

##### Major Modifications

At the present time, Consumers Power Company for major modifications complies with the provisions of document control in that each department maintains its own document control and indexing systems. However, plans are currently under way to develop an overall controlling system for documents. This system will integrate documents developed during major modification activities with those developed by the P&T Department. Full accomplishment of this activity is not anticipated prior to January 1978.

## POLICY 7

### Production and Transmission Department

This policy will be implemented by February 1977.

### Major Modifications

In this area, the major modification activities are in compliance except for procedural deficiencies which will be corrected in the Volume II rewrite. Full compliance should be achieved by April 1977.

## POLICY 8

### Production and Transmission Department

This policy has been partially implemented. A program for backfitting (ie, documenting and controlling) items has been initiated. Full implementation depends, in part, on completion of construction of storage facilities and will be completed by March 1978.

### Major Modifications

For major modifications, Consumers Power Company is in compliance with this policy except to clarify the responsibility of placing identification and control requirements on principal suppliers. This item relates to the development of a Quality Assurance specification and should be completed parallel to the development effort associated with that specification. Compliance should be achieved by September 1977.

## POLICY 9

### Production and Transmission Department

This policy has been implemented.

### Major Modifications

Consumers Power Company's major modification activities are in compliance with the provision of Policy 9, except for supplier-related impositions which require clarification in Policy 9. Program changes associated with this item will be completed by June 1977.

## POLICY 10

### Production and Transmission Department

This policy has been fully implemented with the exception of the implementation of an operations surveillance program. An operating surveillance program is under development and will be implemented by August 1977.

### Major Modifications

Consumers Power Company major modification activities are in compliance with Policy 10 except that certain impositions placed on principal suppliers through Policy 10 require clarification. This clarification and required policy change will be completed by June 1977.

### POLICY 11

#### Production and Transmission Department

This policy has been implemented.

### Major Modifications

In the area of major modifications, Consumers Power Company is in compliance with this policy.

### POLICY 12

#### Production and Transmission Department

This policy has been implemented for M&TE included in the Plant Technical Specifications and off-site portable M&TE. A study has been initiated in the control of other types of measuring and test equipment and a program will be developed by June 1977. Implementation will be completed by January 1978.

### Major Modifications

For major modifications, Consumers Power Company is in compliance with this policy except for supplier impositions which require resolution. In this regard, policy revisions will be completed by June 1977.

### POLICY 13

#### Production and Transmission Department

This policy has been partially implemented. Implementation depends in part on completion of construction of storage facilities and development of procedures to control shelf life. Implementation will be March 1977.

### Major Modifications

In the area of major modifications, Consumers Power Company complies with Policy 13.

POLICY 14

Production and Transmission Department

This policy has been implemented.

Major Modifications

In the area of major modifications, Consumers Power Company complies with Policy 14.

POLICY 15

Production and Transmission Department

This policy is partially implemented. Implementation will be completed by June 1977.

Major Modifications

In the area of major modifications, Consumers Power Company complies with Policy 15.

POLICY 16

Production and Transmission Department

This policy has been partially implemented. Revisions of QAPP, DPs and Plant Administrative Procedures on Deviation Reporting and Corrective Action are in progress. Implementation will be completed by June 1977.

Major Modifications

For major modifications, Consumers Power Company complies with Policy 16 except for the development of a system for trend analysis for corrective actions associated with major modifications. Completion of this task is scheduled for June of 1977.

POLICY 17

Production and Transmission Department

See response to Policy 6.

Major Modifications

Within Consumers Power Company, plans are currently under way in developing an over-all document control system which is considering storage, retention and indexing of records. As this development matures major modification groups will classify their records as being lifetime or nonpermanent, provide adequate protection for these records as required by ANSI N45.2.9, and clarify methods for transferring records to the Document Storage Room. Full compliance with these provisions will be achieved when the Document Storage System is implemented. Accomplishment of this activity is not anticipated prior to January 1978.

## POLICY 18

### Production and Transmission Department

This policy will be implemented by January 1977 except for qualification and certification of auditors. . Qualification and certification will be completed by January 1978.

### Major Modifications

In the area of audits, major modification activities will be in compliance in April 1977 upon completion of revisions to the Volume II-Procedures.

## POLICY 19

### Production and Transmission Department

This policy has been implemented.

### Major Modifications

In the area of major modifications, Consumers Power Company is in compliance with Policy 19.

## POLICY 20

### Production and Transmission Department

This policy has been fully implemented.

### Major Modifications

In the area of major modifications, Consumers Power Company is in compliance with the provisions of Policy 20 except for supplier-related impositions which are contained in certain policy statements. Policy changes associated with this item will be completed by June 1977.