



**Consumers
Power
Company**

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Mr J G Keppler, Regional Director
Office of Inspection and Enforcement
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND NUCLEAR PLANT - NRC ITEM OF NONCOMPLIANCE
INSPECTION REPORT NO 50-329/79-13 AND NO 50-330/79-13

This letter, with its enclosure, is in response to your letter of May 30, 1979 which transmitted the results of your inspection of the Midland construction site on April 2-30, 1979 and which requested our written statement on the item of noncompliance.

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CONSUMERS POWER COMPANY RESPONSE
TO THE ITEM OF NONCOMPLIANCE
DESCRIBED IN NRC INSPECTION REPORT
NO 50-329/79-13 AND NO 50-330/79-13

NONCONFORMANCE TO HYDROSTATIC TEST PROCEDURE (50-330/79-13-01)

Description of Noncompliance

Appendix A of Report No 50-329/79-13 and 50-330/79-13 provides the following:

"10 CFR 50, Appendix B, Criterion V, states in part, "activities affecting quality shall be prescribed by documented instructions, procedure or drawings,..., and shall be accomplished in accordance with instructions, procedure or drawings.

CBI Hydrostatic Test Procedure HP-71701 Step 7.3 states in part, 'Inspect all joints and connections.'

Contrary to the above, it was determined on April 2, 1979 that all joints and connections on Incore Instrument Tank No 2T-87 could not have been physically examined using the technique employed because of confining geometry."

Response

Incore instrument tank 2T-87 was retested on May 16, 1979. A borescope was used to provide visual access to those areas that were not visually inspected previously due to the confining geometry of the tank. The test results were satisfactory.

CPCo discussed this noncompliance with both the Subcontractor (Chicago Bridge and Iron - CB&I) and Bechtel to emphasize that inspection plans may not be deviated from and that if a condition arises preventing the plan from being implemented, the hardware may not be accepted pending a formal dispositioning process. There are no plans for CB&I to do any further work on the Code portion of the tank or to do any more safety-related testing.

Bechtel is in the process of obtaining the report of the retest from CB&I. It is expected that the report will be received by July 15, 1979, at which time compliance will be achieved.

WRB
6/29/79