



Consumers  
Power  
Company

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Mr J G Keppler, Regional Director  
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MIDLAND NUCLEAR PLANT - NRC ITEM OF NONCOMPLIANCE  
INSPECTION REPORT NO 50-329/79-10 AND NO 50-330/79-10

This letter, with its enclosure, is in response to your letter of June 6, 1979 which transmitted the results of your inspection of the Midland construction site on May 14-17, 1979 and which requested our written statement on the item of noncompliance.

*Stephen H. Howell*

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CONSUMERS POWER COMPANY RESPONSE  
DESCRIBED IN IRC INSPECTION REPORT  
NO 50-329/79-13 AND NO 50-330/79-13-01

Inconsistencies in Design Basis Documents Concerning  
Material Specifications for the Prestressing System

Description of Noncompliance

Appendix A of Report No 50-329/79-10 and 50-330/79-10 provides the following:

"10 CFR 50, Appendix B, Criterion III, requires, in part, that measures shall be established and executed to assure that regulatory requirements and the design basis as specified in the license application for structures are correctly translated into specifications, drawings, procedures and instructions. Also, it provides that measures shall be established for the identification and control of design interfaces and for coordinates among participating design organizations.

EPCo Topical Report CPC-1-A Policy No 3, Section 3.4 states, in part, 'the assigned lead design group or organization (ie, the NSSS supplier, A&E, supplier or CPCo) assure that designs and materials are suitable and that they comply with design criteria and regulatory requirements.'

CPCo is committed to ANSI N45.2 (1971), Section 4.1, which states, in part, 'measures shall be established and documented to assure that the applicable specified design requirements, such as a design basis, regulatory requirements . . . are correctly translated into specifications, drawings, procedures, or instruction.'

Contrary to the above, measures did not assure that design basis were included in drawings and specifications nor did they provide for the identification and control of design interfaces. As a result, two inconsistencies were identified in the license application and in other design basis documents. Specific examples are set forth below.

- a. Construction specification C-2, Rev 11, dated November 16, 1978, Section 11.1 specifies material for prestressing system sheathing to conform to ASTM A-366-66 or 68, .22 gauge cold rolled carbon steel while FSAR Section 3.8.1.6.3 indicate the sheathing material to be material meeting the requirements of ASTM A-53, Type E or S, Grade B.

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- b. Construction specification C-49, Rev 2, Section 6.2.2 specifies the chemical limitation on the corrosive protective filler material for the prestressing system to be 5ppm for chlorides, nitrates and sulfides while FSAR Table 3.8-25 indicates the maximum allowable to be 2ppm (chlorides), 4ppm (nitrates) and 2ppm (sulfides). In addition, the Inryco Quality Control manual requires the material chemical properties to be the same as FSAR Table 3.8-25."

Response

FSAR Change Notices to correct the noted deficiencies are in process and will be incorporated into the FSAR by amendment no later than August, 1979. A Specification Change Notice (C-49-9004) will be processed by July 6, 1979 which will change the requirements in the Specification to be 2, 4 and 2 ppm for chlorides, nitrates and sulfides, respectively.

A program of re-review was initiated June 25, 1979 of selected sections of the FSAR. The completion of this program is scheduled for the end of 1979. The review activity specifically looks for inconsistencies and/or inaccuracies between sections of the FSAR and between the FSAR and design documents.