



Consumers
Power
Company

Stephen H. Howell
Senior Vice President

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

August 22, 1979
Howe-231-79

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

POOR
ORIGINAL

MIDLAND NUCLEAR PLANT -
INSPECTION REPORT NO 50-329/79-14 AND NO 50-330/79-14

The enclosure to this letter is a response to your letter of August 1, 1979, (as adjusted by your letter of August 17, 1979) which transmitted the subject Inspection Report and which requested our written statement on an item of noncompliance.

BWM/lb

Enclosure: Consumers Power Company's Response to Inspection
Report No 50-329/79-14 and No 50-330/79-14

7910010 587

1062 343

9-4-79

POOR
ORIGINAL

CONSUMERS POWER COMPANY'S RESPONSE TO
INSPECTION REPORT NO 50-329/79-14 AND NO 50-330/79-14

Description of Infraction

Appendix A of Report No 50-329/79-14 and 50-330/79-14 provided the following:

"10 CFR 50, Appendix B at Criteria V, states in part: 'Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings . . .'

The Bechtel Power Corporation, 'General Purging Specification, G27, GPS- . . 'Internal Gas Purging' at drawing number GPS-1-4 (Rev), which is entitled 'Water Soluble Paper or Film Dams', states, in part: 'Wadding of the paper or film into the pipe is prohibited.'

Contrary to the above, a review of records and interviews with personnel showed that on May 11, 1979, Field Weld 13, which joins 8-inch pipe runs 2G-CB-15-613-11 and 2G-CB-15-613-2-12, was made using a purge dam which consisted of wadded, soluble paper. This weld was made in the Unit 2, Reactor Building Spray system headers."

Response

We have evaluated the above item of noncompliance. The results of our evaluation are as follows:

1. The welder failed to follow the procedure when installing the purge dam.
2. Bechtel Quality Control failed to issue a nonconformance report when the wad of paper was noted in the radiograph. Although the Quality Control Engineer did note foreign material in the pipe on the daily sheet of radiographic results, an NCR to document the abnormal condition should also have been issued.
3. Bechtel Quality Control failed to document the paper removal operation on a Field Inspection Report.
4. Bechtel Quality Control failed to issue a nonconformance report when it was evident that the wad of purge paper was installed contrary to procedural requirements.
5. We receive copies of all Bechtel nonconformance reports; therefore, proper identification of the discrepancy by Bechtel Quality Control would have resulted in our being notified of the condition.

POOR
ORIGINAL

The following corrective actions have been taken to address the above conditions:

1. Bechtel Quality Assurance issued three Quality Action Requests (QARs SD-207, SD-208 and SD-209) relative to the above subject. The responses to the QARs indicated the following corrective actions and also that the particular incident would not have affected the safety of the plant and was, therefore, not reportable per 10 CFR 50.55(e).
2. All welders have been instructed in the proper purge dam installation technique.
3. Our Director of Quality Assurance personally discussed this subject with some of the Bechtel Quality Control Engineers involved in the particular instance.
4. All Quality Control Engineers have been instructed in training sessions as to the necessity of reporting and documenting known discrepancies in accordance with the Bechtel Quality Control Program.
5. Bechtel has been requested by Consumers Power Company to initiate a change to the welding Quality Instruction (QCI) to clearly require the Quality Control Engineer to inspect the proper application of purge dams on a surveillance basis. It is expected that the revision to the QCI will be implemented by 9/15/79.

The corrective actions taken as detailed above will preclude recurrence of this incident.

JLC/BWM/lb
8/22/79