



**Consumers
Power
Company**

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August 21, 1981

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

MIDLAND PROJECT -
INSPECTION REPORT NO 50-329/81-08 AND 50-330/81-08
FILE: 0.4.2 SERIAL: 13649

Reference: NRC Letter, R F Heishman to J W Cook, dated July 23, 1981

This letter, including all attachments, provides Consumers Power Company's response to the referenced letter which transmitted the subject Inspection Report and which requested our written statement regarding one item of noncompliance described in Appendix A of the reference.

Consumers Power Company

By

James W. Cook
James W Cook

Sworn and subscribed to before me this 21st day of August, 1981.

Barbara Rhinerson
Notary Public, Jackson County, Michigan
My commission expires September 3, 1984

WRB/MJS/lr

CC: RJCook, USNRC Resident Inspector
Midland Nuclear Plant

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CONSUMERS POWER COMPANY'S RESPONSE TO NOTICE OF
VIOLATIONS DESCRIBED IN NRC INSPECTION REPORT
DOCKET NO 50-329/81-08 AND 50-330/81-08

Appendix A (Item of Noncompliance 329/81-08 and 330/81-08) provides:

"10 CFR 50, Appendix B, Criterion XIII states, in part, that 'Measures shall be established to control the handling, storage, shipping, cleaning and preservation of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration.'

Bechtel Power Corporation Field Procedure No FPG-5.000, Maintenance/Inspection of Material Equipment Release for Construction states, in part, that 'maintenance activities to maintain the integrity of the item or its containers to include; Maintain all closures and sealing tape, . . . and providing maintenance in accordance with Manufacturer Maintenance instructions as applicable to the item being maintained.' This statement is made in reference to developing protective environments for equipment.

Contrary to the above, the following instances of failure to provide adequate storage conditions for equipments were noted during the inspection period.

1. The appropriate manufacturers instructions for storage of the Control Rod Drive Primary AC Breakers states, in part, that 'The cabinets, transformers and voltage regulator will be stored in an enclosed dry area where the temperature and humidity conditions remain constant. Relative humidity conditions greater than 70% and temperatures of less than 40°F should be avoided. Recommended long term storage parameters should fall within 60 to 85°F and 30 to 60% relative humidity.' These criteria have been accepted as the storage requirements, including the provisions of ANSI N45.2.2 which is referenced in the above-referenced Field Procedure FPG 5.000.

On June 15, 1981, after heavy rain, the Resident Inspector noted that water was on the floor in the area where the Unit 2 breakers are installed. An approximately 3-inch wide by 4 foot high opening to the outside environment existed where the room is adjacent to the Unit 2 containment. Also, the dehumidifier was not operating; the protective polyethylene cover over the breakers was open at the top and damaged; and the area cleanliness did not appear to meet the requirements of the ANSI Standards or the intent of the storage maintenance and inspection activities. Similar conditions were noted in the area where the Unit 1 CRD primary breakers are stored, with the exception that the opening was about one foot shorter and water was not on the floor.

2. The storage requirements for the new and spent fuel storage racks as described in the supplier's procedure for 'Packaging, Storage Prior to Shipping, Handling, Shipping and On-Site Storage of New and Spent Fuel Storage Racks' and referenced in licensee's storage maintenance procedure F-1-582 requires the fuel storage racks to be covered and protected from the environment.

On June 29, 1981, it was noted that the covering was badly torn on one of the fuel storage racks located at position L13M in the Poseyville laydown area which allowed exposure of the fuel rack to the environment.

3. The storage requirements for the battery chargers as referenced in the licensee's storage maintenance procedure F-10-127 require that the ventilation openings be covered.

On June 29, 1981, it was noted that the ventilation openings were not covered on the battery chargers and some of the cabinets were open on battery chargers and associated equipments. It was also noted that industrial dust was being created from grinding operations from the installation of heating, ventilation and air conditioning systems in the area of the battery chargers at this time.

This is a Severity Level V violation (Supplement II.)"

Consumers Power Company's Response

All of the above conditions have been corrected. The individual actions taken for each of the items is described below. Bechtel maintenance engineers were provided additional training in accordance with the requirements of FPG-5.000 ("Maintenance/Inspection of Materials and Equipment Released for Construction.") Midland Project Quality Assurance Department (MPQAD) has scheduled a comprehensive audit to begin August 31 to provide a current assessment of the overall effectiveness of and the compliance to procedure FPG 5.000. If the need for further corrective action is identified, this will be tracked by the issuance of the audit report and audit finding reports as appropriate.

Consumers Power Company's NCR M-01-9-1-076 was written to document the failure to supply appropriate storage conditions for Unit 1 and 2 Control Rod Drive Primary AC breakers. The immediate action requested to restore appropriate storage conditions was to: a) Clean up the area, b) replace or repair the fire retardant covers, c) install desiccant inside the breakers, d) install operable dehumidifiers and e) seal the temporary roof. MPQAD has confirmed that items a through d have been accomplished. Item e was determined to not be appropriate as it was discovered that the water source was the dehumidifier and not a leaky roof. An evaluation was made for possible detrimental effects from the excess humidity on the life and operation of the CRD AC breakers. It was determined that there was no evidence of corrosion or other deleterious effects due to the temporary exposure of the CRD AC breakers to the excess humidity. Bechtel Field Engineering has determined that the temporary exposure to the excess humidity would not affect breaker operation over the projected plant lifetime.

The fuel storage racks stored in the Poseyville laydown area were reinspected by MPQAD personnel on June 30, 1981. The fuel storage racks were confirmed to be stored to required storage conditions with the appropriate protective coverings.

The battery chargers and associated equipment in the battery rooms were reinspected by MPQAD personnel on June 30, 1981 to ensure that protective coverings were protecting ventilation openings and that the cabinets were closed. This inspection showed that the required storage conditions for these units had been restored.