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May 6, 1983

Mr J G Keppler, Regional Administrator
US Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND NUCLEAR COGENERATION PLANT
INSPECTION REPORT NO 50-329/83-03(OSC) AND 50-330/83-03(OSC)
FILE: 0.4.2, 0485.16 UFI: 70*01, 42*05*22*04 SERIAL: CSC-6688

Reference: (1) J G Keppler letter to J W Cook, dated April 7, 1983
Inspection Report No 50-329/83-03(OSC) and 50-330/83-03(OSC)

This letter, including Attachment 1, provides our response to Reference 1, which transmitted the subject Inspection Report and which requested our written response to the items of noncompliance therein. Reference 1 also requested that reviews of our quality program be performed to ensure that no other informal documents, such as the Attachment 10 form, are being used to identify nonconforming conditions that are not included in our corrective action system. On March 4, 1983, Consumers Power Company initiated, with the issuance of MPQAD Quality Action Request F-292, action to review Bechtel instructions, guidelines and procedures for proper quality classification. These actions are continuing and we are correcting problems as they are identified. When the quality classification of these documents is established, we will initiate additional reviews to ensure that the practices identified in these documents are consistent with the Quality Assurance Program requirements. Special emphasis will be placed on identifying informal documents used to control nonconforming conditions. The extent of the review effort, our findings, and the corrective action will be reported at a later date. Management personnel have been alerted to the necessity of preventing the occurrence of other informal documents for identifying nonconformances. In addition, Inspection personnel have been instructed to identify and report all observed nonconformances using the appropriate official documents provided within the established nonconformance/corrective

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action system. We consider these actions, when complete, will resolve this issue.

Consumers Power Company

By

James W. Cook
James W Cook

Sworn and subscribed to before me on this 6th day of May, 1983.

Patricia A. Luffer
Notary Public

My commission expires 3-4-86

JWC/BHP

CC: RFWarnick, NRC Region III
JJHarrison, NRC Region III
RNGardner, NRC Region III
RJCook, NRC Senior Resident Inspector, Midland Site
RBLandsman, NRC Region III
BLBurgess, NRC Resident Inspector, Midland Site

BCC RCBauman, P14-314B
WRBird, P14-418A
FWBuckman, P14-113A
JEBrunner, M-1079
NRC Corres File, P24-517
MLCurland, Midland
LEDavis, Bechtel-Midland
MADietrich, Bechtel-Midland
GFEwert, Midland
FDField, Union Electric
WJFriedrich, Midland
MEGibbs, IL&B
WDGreenwell, Bechtel Ann Arbor
DEHorn, Midland
EMHughes, Bechtel AA
KEMarbaugh, Midland QA/NO
BWMarguglio/DJones, JSC-220A/206B
JKMeisenheimer, Midland
DBMiller, Midland (3)
JAMooney, P14-115A
JARutgers, Bechtel Ann Arbor
PSteptoe, IL&B
DATaggart, Midland
RAWells, Midland
RCWilliams, IL&B Washington
REWhitaker, Midland

CONSUMERS POWER COMPANY'S RESPONSE TO
US NUCLEAR REGULATORY COMMISSION, REGION III
INSPECTION REPORT NO 50-329/83-03(OSC) & 50-330/83-03(OSC)

Appendix (Notice of Violation) to Inspection Report No 5-329/83-03(OSC) and 50-330/83-03(OSC) provides items of noncompliance to 10 CFR 50, Appendix B. The NRC statement and our response for each item of noncompliance are given below:

NOV Item A.1.a & b (83-03-01A)

"Measures were not established to control the issuance of Administrative Guidelines which described activities affecting quality. The Administrative Guidelines were not reviewed for adequacy or approved for release by the licensee. Two examples were:

- a. Administrative Guideline M4.00, Piping System Walkdowns, Revision 0, October 28, 1982.
- b. Mechanical Guidelines for System Turnover, Revision 1, no date."

Response

(1) Corrective Action Taken and Results Achieved:

This item is associated with identified concerns which have been documented by MPQAD Quality Action Request F-292 issued March 4, 1983 and also documented by the Biennial Audit Finding AMS-83-9-7F issued March 23, 1983 which formally documented the nonconforming condition of procedure classification. Follow-up actions from the above have identified some Bechtel site administrative instructions and guidelines as not properly classified. These instructions and guidelines have been identified and are currently being reviewed and processed by the procedures review team as part of the Construction Completion Program (CCP). These guidelines are/will be submitted for Consumers Power Company Site Management and MPQAD approval as needed to support quality-related activities. All Q-Listed administrative guidelines are being changed to be field instructions or field procedures or are being incorporated into field procedures or field instructions.

(2) Corrective Action Taken to Avoid Further Noncompliance:

Refer to response given for NO Item D.2.b, c and d.

(3) Full compliance will be achieved by July 1, 1983.

NOV Item A.2 (83-03-01A(2))

"The CPCo Soils Section was using an out-of-date drawing C1424, Revision 2, instead of Revision 3 to review and approve underpinning Pier 11 work."

Response

(1) Corrective Action Taken and Results Achieved:

- a. Discrepant drawing was corrected by Document Control Center on the day notified, February 4, 1983.
- b. All controlled design documents in the Construction Department were audited against the current drawing index. This verification disclosed that 97 documents were missing or outdated and that 160 document changes were similarly discrepant. The Construction Superintendent was notified and discrepant drawings were removed from the active file until corrected. Corrections were completed February 24, 1983.
- c. The CPCo - Site Management Office (SMO) Construction Department uses remedial soils work drawings and procedures for reviews of work, and changes to work, in conjunction with the NRC and CPCo Work Authorization Procedure, dated August 12, 1982. All design changes for remedial soils activities are reviewed by SMO - Construction to determine if the change requires NRC review and authorization to proceed, or to continue, with the work. Since several documents and document changes were determined to be discrepant, it is possible that reviews of work were not properly conducted by SMO - Construction. After the documents were brought up to date by the Document Control Center, SMO - Construction personnel went back and reviewed all current revisions to drawings. It was determined that no modifications to, or reauthorizations of, previously submitted Work Authorizations were required as a result of this review.

(2) Corrective Action Taken to Avoid Further Noncompliance:

- a. Evaluation disclosed that a large part of the problem was attributed to untimely and inconsistent response to additional distribution requirements. Midland Project Procedures Manual, Bulletin, Comm-14, is being revised to simplify the flowpath of requests and to specify the method for backfitting additional distribution requests. This is targeted for completion by June 1, 1983.
- b. The Construction Department files will be audited at least once every three months to verify accuracy.
- c. Document Control Center personnel will be retrained on the processing and filing of design documentation. This step was completed March 15, 1983.
- d. All other controlled document files maintained by the Document Control Center will be audited for similar discrepancies.

NOV Item A.2 (83-03-01A(2)) Continued

- (3) Full compliance will be achieved June 1, 1983.

NOV Item B (83-03-01A(1))

"On September 22, 1982 during audit M01-333-2, auditors determined that unofficial Attachment 10 Forms were being used by QC Inspectors to document nonconformances and deficiencies instead of using In Process Inspection Notices. This audit finding was drafted in pencil, however, the finding was not included in the above audit report and there was no evidence that a management review of this finding was conducted."

Response

(1) Corrective Action Taken and Results Achieved:

The improper use of Attachment 10 forms should have been specifically referenced in the Audit Finding. The Audit Finding cited was issued as Audit Finding Number M01-333-2-14F (Action Item S-1739) dated October 20, 1982. The draft Audit Finding and the issued Audit Finding both cited the noncompliance with Bechtel Field Procedure FPB-6.000, Paragraph 5.2.2. The issued Audit Finding stated, "Systems are being turned over for pressure testing to Quality Control for inspection with items found to be incomplete or not yet installed," which was the concern cited in the draft finding via the form of an Attachment 10. The Attachment 10 was a Field Engineering form. It was not referred to in the final Audit Finding Report in part because the manner in which it was being used had been stopped immediately after the auditors had identified the practice. This effectively accomplished immediate corrective action, and MPQAD management was aware of the finding and action. In addition, the MPQAD site auditing section will perform audits with attention to reporting observations in light of this violation.

(2) Corrective Action Taken to Avoid Further Noncompliance:

- a. The corrective action reported in (1) above is complete with regard to auditing requirements.
- b. Correction action to be taken in regard to previously issued Attachment 10 forms is described in the response to NOV Item C.
- c. An ongoing review of project programs and procedures to check for informal documents being used for identification of nonconformance is being conducted.

(3) a. Full compliance has been achieved.

b. Full compliance has been achieved.

c. Full compliance will be achieved upon completion of the review effort.

NOV Item C (83-03-01C)

"A determination of significance and corrective action was not taken on approximately 500 Attachment 10 forms which were written by QC Personnel and were identified as containing nonconformance and deviations that were adverse to quality."

Response

(1) Corrective Action Taken and Results Achieved:

A review has been performed to determine the significance of having utilized the Attachment 10 forms. Twenty (20) Attachment 10s (completed prior to September 1982) were selected for review along with the corresponding test packages. As a result of the review, it has been concluded that:

- a. Discrepancies were either reworked prior to the hydrostatic test or documented on NCRs and so noted on the Attachment 10.
- b. All discrepancies were resolved and properly documented during installation inspections performed prior to performance of the hydrostatic test. Consequently, corrective action was taken on all Attachment 10 identified nonconformances.
- c. Performance of the hydrostatic test PQCI/IR T-1.00 was not compromised by the use of Attachment 10 forms.

In addition, completed hydrostatic test packages are being reviewed under a separate evaluation initiated as a result of routine quality assurance activities. This review will also evaluate the completeness and acceptability of the installation records (ie QCIR/IR's) necessary to support the performance of the hydrostatic tests. Any discrepancies associated with these records will be identified as part of this review and appropriate corrective actions taken.

(2) Corrective Action Taken to Avoid Further Noncompliance:

Use of Attachment 10 forms to identify deficiencies was stopped immediately after discovery by the MPQAD audit in September, 1982. Inspection personnel have been and are continuing to be instructed through the MPQAD training and certification program to document all observed nonconformances in accordance with approved nonconformance procedures.

(3) Full compliance has been achieved.

NOV Item D (83-03-01D)

"'Q' activities, including the performances of load calculations for 'Q' electrical conduit hangers, were being accomplished in accordance with non-'Q' work procedures/instructions."

Response

(1) Corrective Action Taken and Results Achieved:

a. Classification of Procedures:

The procedural aspects of this item have been documented by Quality Action Request F-292 issued March 4, 1983 and also documented by the Biennial Audit Finding Report AMS-83-9-7F issued March 23, 1983 (which formally documented the nonconforming condition of procedure classification).

MPQAD has reviewed Field Procedures for proper quality-related classification including proper "Q" and "non-Q" designations of quality-related procedures. This review has resulted in the identification of thirty-three Field Procedures initially assessed as incorrectly classified "non-Q". Other than incorrect classification, no items of noncompliance with procedural content were identified. These procedures are currently being revised as part of the Construction Completion Program in support of the system, area and hanger teams.

With regard to the inclusions of proper "Q" notations within the procedure's margin to indicate the specific portions of the procedure as quality-related, MPQAD has reviewed and identified approximately 30 additional typical procedural sections (in addition to the section of FPE 3.000 cited in the Inspection Report) that were not correctly classified as quality-related. The review did not identify any item of noncompliance with procedural content. Since the correct classification for procedural sections has been a problem, this practice is being revised to identify whether the procedure contains quality-related content and eliminate the practice of identifying subportions or paragraphs of the procedure as "Q" or "non-Q". Specifically, Bechtel Field Procedure FPG-1.000, Revision 3, entitled "Initiating and Processing Field Procedures, Instructions and Administrative Guidelines and Specifications," will be approved by May 10, 1983 to reflect this action.

NOV Item D (83-03-01D) Continued

b. Load Calculations

Field Procedure FIE-3.320 is a procedure developed to number the seismic raceway hangers, not to verify the adequacy of the hanger to support the load. This procedure should not have been used to calculate hanger loadings. NRC M01-9-3-152 has been issued to identify the need for specific requirements to perform and document results of the verification of the adequacy of loads on class 1E hangers. The actual instructions for performing the load calculations are provided in the Project Engineering Drawings E42b(Q) and E39(Q). These are the only documents which have this information in them. It consists of weights per length of raceway and allowable load tables for different types of raceway supports. Calculations were performed; however, in the vast majority of cases, supports do not require written calculations per se due to large capacity of support compared to small actual loading. FPE-3.000, Paragraph 5.1, states that the raceway "shall be installed in accordance with the latest issued for construction layout drawings and referenced details as well as 7220-E42 and E-42B ..."

FIE-3.320 will be revised to clarify its intended purpose and scope. A new quality-related field procedure is being developed to address the controls and verification of the adequacy of the loading of class 1E hangers.

(2) Corrective Action Taken to Avoid Further Noncompliance:

- a. As stated above, the mechanism to establish specific portions of a procedure as "Q" is being eliminated and will be reflected in a revision to Bechtel Field Procedure FPG-1.000 which will be approved by May 10, 1983.
- b. Internal MPQAD Procedures are being revised to establish MPQAD review criteria for Bechtel-Site Procedures, Instructions and Guidelines. The MPQAD Procedure will provide a means for reviewing non-quality-related procedures on a periodic basis to ensure their appropriate classification. This procedure, entitled "MPQAD Review and Approval of Bechtel-Site Procedures, Instructions, and Guidelines" (Procedure N-6), is scheduled for approval by May 16, 1983.
- c. With regard to audits of procedures, instructions and guidelines, MPQAD Procedure F-1M, entitled, "Audits," is being revised to clarify that audits verify that quality-related activities are governed by quality-related procedure or instructions and that such procedures or instructions are correctly classified as "quality-related." This procedure is scheduled to be approved by June 1, 1983.

NOV Item D (83-03-01D) Continued)

- d. All Field Procedures (both Q and Non-Q) are being submitted to MPQAD for review.
 - e. FIE-3.320 will be revised to clarify its intended purpose and scope.
 - f. A new quality-related field procedure, being developed, will address the controls and verification of the adequacy of the loading of Class 1E hangers.
- (3) a. All existing Bechtel Field Procedures have been reviewed for proper classification. This activity is complete. All revisions to Field Procedures will be submitted to MPQAD for review in accordance with new requirements. This activity is ongoing.
- b. Full compliance for the specific procedures referred to in 2a, 2b, 2c, 2e and 2f, above is scheduled for completion by approximately June 15, 1983.