Consumers Power Company

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Harold R Denton, Director
Office of Nuclear Reactor Regulation
Division of Licensing
US Nuclear Regulatory Commission
Washington, DC 20555

MIDLAND PROJECT
MIDLAND DOCKET NO 50-329, 50-330
SAFETY EVALUATION REPORT INFORMATION
FILE: 0505.16, 0.4 SERIAL: 16644
ENCLOSURES: (1) DRAFT QUESTION 260.1
(2) RESPONSE TO DRAFT QUESTION 260.1

Enclosure (1) was provided to Consumers Power Company as a draft question (request for additional information) concerning items to be included in whole or in part to the operational quality assurance program at the Midland Plant. Clarification of the question was provided by W Haass and J Spraul of the NRC Staff. The operational QA program is applied to Seismic Category I and Quality Group A, B and C items identified in FSAR Table 3.2-1. In addition, appropriate elements of the operational QA program are applied to the items identified in the draft Question 260.1 as described in Enclosure (2) to this letter. It is our expectation that the response should be satisfactory and will close out the open item with respect to the Safety Evaluation Report. The response will be incorporated into the Midland FSAR upon receipt of the formal question.

As stated in the Quality Assurance Program Description for Operational Nuclear Power Plants, CPC-2A, "The Operational Phase Quality Assurance Program, applies to items and activities affecting the quality of safety-related structures, systems, components and related consumables during operation, maintenance, testing and all modifications." The determination of the safety-related status of structures, systems, and components is made based on the criteria in Regulatory Guide 1.29, ie, those necessary to ensure:

1. The integrity of the reactor coolant pressure boundary.

2. The capability to shut down the reactor and maintain it in a safe shutdown condition.

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3. The capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the guideline exposures of 10 CFR 100.

The pertinent QA program requirements which will be applied to safety-related items will be determined in a graded manner using tools such as plant technical specifications and other docketed analyses.

James W. Cook

JWC/JNL/dsb

CC RJCook, Midland Resident Inspector, w/o
WHaass, NRC, w/a
RHernan, NRC, w/a
RWHuston, Washington, w/a
DBMiller, Midland, w/a
GBSlade, Midland, w/a

CONSUMERS POWER COMPANY
Midland Units 1 and 2
Docket No 50-329, 50-330

Letter Serial 16644 Dated April 21, 1982

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Power Company submits this letter containing information to address and resolve the remaining open item related to Chapter 17 of the Midland FSAR on the operations quality assurance program.

CONSUMERS POWER COMPANY

By _____
J W Cook, Vice President
Projects, Engineering and Construction

Sworn and subscribed before me this 21st day of April 1982.

_____
Notary Public
Jackson County, Michigan

My Commission Expires September 8, 1984

mi0382-0052a100

MIDLAND
REQUEST FOR ADDITIONAL INFORMATION

260.0 Quality Assurance Branch

260.1 Section 17.1.2.2 of the standard format (Regulatory Guide 1.70) requires the identification of safety-related structures, systems and components controlled by the QA Program. You are requested to supplement and clarify Table 3.2-1 of the Midland FSAR in accordance with the following:

a. The following items do not appear on FSAR Table 3.2-1. Add the appropriate items to the table and provide a commitment that the remaining items are subject to the pertinent requirements of the FSAR operational quality assurance program or justify not doing so:

1. Safety-related masonry walls (see IE Bulletin No 80-11).

2. Biological shielding within the auxiliary building and reactor building.

3. Missile barriers within the reactor building, auxiliary building, diesel-generator building and service water pump structure as appropriate.

4. Spent fuel pool and liner.

5. Pressurizer PORV block valve.

6. Control rods.

7. Control rod drives.

8. Reactor building hydrazine spray pumps.

9. Component supports (including snubbers, hangers, and similar supports) and support structures for all components designed to Seismic Category 1 requirements.

10. Turbine stop valves.

11. Main steam block valve (Unit 1 only).

12. Crosstie valves leading to the process steam lines.

13. Underground cable system.

14. Transformers.

15. Induction motors (IE).

16. Instrument cables.

17. Raceway installations containing IE cables and other raceway installations whose failure could damage safety-related items.

18. Control room smoke detectors and toxic gas monitors.

19. Radiation monitoring (fixed and portable).

20. Radioactivity monitoring (fixed and portable).

21. Radioactivity sampling (air, surfaces, liquids).

22. Radioactive contamination measurement and analysis.

23. Personnel monitoring internal (eg, whole body counter) and external (eg, TLD system).

24. Instrument storage, calibration and maintenance.

25. Decontamination (facilities, personnel and equipment).

26. Respiratory protection, including testing.

27. Contamination control.

28. Accident-related meteorological date collection equipment.

29. Expendable and consumable items necessary for the functional performance of safety-related structures, systems, and components (ie, weld rod, fuel oil, boric acid, snubber oil, etc.).

30. Main dike slope adjacent to the emergency cooling water pond.

31. Baffle dike slope adjacent to the emergency cooling water pond.

32. Permanent dewatering system.

33. Emergency water cooling reservoir.

34. Valve operators for all safety-related valves.

35. Motors for all safety-related pumps.

36. ECCS pump room ventilation.

37. Measuring and test equipment used for safety-related strutures, systems and components.

b. Provide a commitment that the safety-related instrumentation and controls (I&C) described in Section 7.1 through 7.6 of the FSAR plus safety-related I&C for safety-related fluid systems will be subject to the pertinent requirements of the FSAR QA Program. This can be done by another footnote to Table 3.2-1.

c. Enclosure 2 of NUREG-0737, "Clarification of TMI Action Plan Requirements" (November 1980) identified numerous items that are safety-related and appropriate for OL application and therefore should be on Table 3.2-1. These items are listed below. Add the appropriate items to Table 3.2-1 and provide a commitment that the remaining items are subject to the pertinent requirements of the FSAR operational QA Program or justify not doing so.

		NUREG-0737 (Enclosure 2) Clarification Item
(1)	Plant-safety-parameter display console	I.D.2
(2)	Reactor coolant system vents.	II.B.1
(3)	Plant shielding.	II.B.2
(4)	Post accident sampling capabilities.	II.B.3
(5)	Valve position indication.	II.D.3
(6)	Auxiliary feedater system.	II.E.1.1
(7)	Auxiliary feedwater system initiation and flow.	II.E.1.2
(8)	Emergency power for pressurizer heaters.	II.E.3.1
(9)	Dedicated hydrogen penetrations.	II.E.4.1
(10)	Containment isolation dependability.	II.E.4.2
(11)	Accident monitoring instrumentation.	II.F.1
(12)	Instrumentation for detection of inadequate core-cooling.	II.F.2
(13)	Power supplies for pressurizer relief valves, block valves, and level indicators.	II.G.1
(14)	Safety-grade trip anaticipatory.	II.K.2(10)
(15)	Automatic PORV isolation.	II.K.3(1)
(16)	Automatic trip of reactor coolant pumps.	II.K.3(5)

(17)	Emergency plans (and related equipment).	III.A.1.1/III.A.2
(18)	Equipment and other items associated with the emergency support facilities.	II.A.1.2
(19)	Inplant iodine radiation monitoring.	III.D.3.3
(20)	Control-room habitability.	III.D.3.4

RESPONSE TO DRAFT QUESTION 260.1

Question 260.1a

Pertinent elements of Consumers Power Company's Quality Assurance Program Description for Operational Nuclear Power Plants, CPC-2A will be applied to items in question 260.1 numbered as follows:

1, 2, 3, 5, 6, 7, 8, 15, 17, 29, 33, 35, 36, 37

The following items are subject to pertinent elements of CPC-2A with the clarifications provided:

4. Pertinent elements of CPC-2A will be applied to the spent fuel pool. Even though the spent fuel pool liner is not a safety-related item, pertinent elements of CPC-2A will be applied.

9. Pertinent elements of CPC-2A will be applied. See Midland FSAR Table 3.2-1 and notes A and B to Table 3.2-1.

10, 11, 12. The turbine stop valves, main steam block valves (unit 1 only) and the crosstie valves leading to the process steam lines are not safety-related. However to maintain a high degree of reliability for these valves, it is our intention to apply pertinent elements of CPC-2A to the turbine stop valves, main steam block valves (Unit 1 only) and selected crosstie valves.

13, 14, 16. Pertinent elements of CPC-2A will be applied to Class 1E underground cable systems, Class 1E transformers, and Class 1E instrument cables.

18. The control room smoke detectors and toxic gas monitors are part of the control room isolation system and pertinent elements of CPC-2A will be applied to them.

19, 20, 21, 22, 23, 24, 25, 26, 27, 28. Pertinent elements will be applied as required by Section 2.2.5e in CPC-2A. CPC-2A will be revised to address its applicability to associated equipment

30, 31. The main dike slope and the baffle dike slope adjacent to the emergency cooling water pond are not safety-related. Pertinent elements of CPC-2A will be applied to the main dike slope and the baffle dike slope adjacent to the emergency cooling reservoir to assure that the safety function of the emergency cooling reservoir is not impaired.

32. The permanent dewatering system is not safety-related, however elements of CPC-2A will be applied to this system to insure compliance with the safety technical specifications.

34. Pertinent elements of CPC-2A will be applied to the valve operators for all safety-related valves that must establish or maintain a specified position in response to an accident.

Question 260.1b

The safety-related instrumentation and controls (I & C) described in Section 7.1 through 7.6 of the FSAR plus safety-related I & C for safety-related fluid systems will be subject to pertinent elements of CPC-2A.

Question 260.1c

Pertinent elements of Consumers Power Company's Quality Assurance Program Description for Operational Nuclear Plants, CPC-2A, will be applied to items in question number 260.1.c, numbered as follows:

1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12 ,13, 14, 15, 16, 20

The following items are subject to pertinent requirements of CPC-2A with the clarifications provided:

8: Emergency power for the Class 1E Pressurizer Heaters is subject to the pertinent requirements of CPC-2A.

17, 18, 19: The Emergency Plans and selected equipment specified in these items are subject to CPC-2A, as stated in paragraph 2.2.5e of CPC-2A. CPC-2A will be revised to address its applicability to associated hardware.