



**Consumers  
Power  
Company**

**James W Cook**

Vice President - Projects, Engineering  
and Construction

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

March 29, 1983

Mr J G Keppler, Regional Administrator  
US Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60117

PRINCIPAL STAFF			
RA	<i>WJ</i>	ENF	
D/RA		SCS	
A/RA		PAO	<i>orig + 3</i>
D/RRP		SLO	
DRMA		RC	
GRMSP			
DE			
ML			
OL		FILE	<i>WJ</i>

MIDLAND NUCLEAR COGENERATION PLANT  
INSPECTION REPORT NO 50-329/83-01(OSC) AND 50-330/83-01(OSC)  
FILE: 0.4.2, 0485.16 UFI: 70\*01, 42\*05\*22\*04 SERIAL: CSC-6628

Reference: (1) R F Warnick letter to J W Cook, dated March 4, 1983  
Inspection Report No 50-329/83-01 and 50-330/83-01

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 item of noncompliance therein.

Consumers Power Company

By *James W. Cook*  
James W Cook

Sworn and subscribed to before me on this *7th* day of *April*, 1983.

*Beverly A. Avery* Beverly A. Avery  
Notary Public, Jackson County, Mich

My commission expires *January 16, 1985*

JWC/BHP/lr

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

**APR 8 1983**

OC0383-0037A-MP01

8305130182 830511  
PDR ADDCK 05000329  
Q PDR

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  
FCWilliams, IL&B Washington  
REWhitaker, Midland

CONSUMERS POWER COMPANY'S RESPONSE TO  
US NUCLEAR REGULATORY COMMISSION, REGION III  
INSPECTION REPORT NO 50-329/83-01(OSC) & 50-330/83-01(OSC)

Appendix (Notice of Violation) to Inspection Report No 50-329/83-01(OSC) and 50-330/83-01(OSC) provides an item of noncompliance to 10 CFR 50, Appendix B. The NRC statement and our response are given below:

NRC STATEMENT

"10 CFR 50, Appendix B, Criterion 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.'

Consumers Power Quality Assurance Program Manual for nuclear power plants, CPC-1-A, Policy Number 5, Paragraph 3.4-D states, 'Prior to performing work or inspection on a safety-related item (structures, systems and components), suppliers are required to develop written procedures for accomplishing quality-related work activities and performing required inspection and tests. These procedures reference applicable drawings, specifications, codes and standards. The Midland Project Quality Assurance Department reviews field inspection plans or inspection procedures prior to implementation.'

B&W's withdrawal and storage of piping materials FCP 397, states, in part, 'Receive and inspect materials withdrawn in Seg 010 per 9-QPP-108. Verify material has sufficient identification per 9-MR-100. Material is to be tagged in accordance with 9-QPP-115. Place material into bin or rack as applicable and identify location of material onto Attachment A.'

Contrary to the above, the licensee issued an untagged valve, Serial Number 77855, to a welding fabrication area on December 1, 1982. As a result, there was no documentation as required by FCP 397.

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

CONSUMERS POWER COMPANY RESPONSE

In accordance with this Notice of Violation, an explanation of corrective action is as follows:

1) Corrective action taken and the results achieved.

Corrective action was taken via a CPCo letter to Bechtel dated January 14, 1983. This letter, CPCo Serial No CSC-6497, is attached. This letter was shared with NRC inspector, Mr A Sather, prior to its issuance. Since this letter was issued, the indicated actions have been implemented and no further instances have occurred.

Subsequently, the subject valve, Serial No 77855, was placed back in Bechtel stock. Bechtel had the quality verification document for this valve which assures the quality of the valve.

2) Corrective action to be taken to avoid further noncompliance.

In addition to the actions required by the above referenced letter, B&W Construction Company is also revising QC Procedure 9-QPP-108, Receiving and Inspection, for necessary changes.

3) The date when full compliance will be achieved.

With the exception of revising QC Procedure 9-QPP-108, which is anticipated to be completed by April 15, 1983, all other actions were completed by March 3, 1983.

Consumers Power would also like to provide a clarification of the wording of this Notice of Violation. Interpreted literally, the Notice states the following:

- 1) That a valve should be tagged prior to receipt inspection.
- 2) Documentation for the valve as needed in the receipt inspection process (FCP 397) was not available because the needed valve was not tagged.

There is no requirement for Bechtel to issue a tagged valve to B&W. B&W Procedure 9-QPP-108 clearly states that a valve will be tagged (accepted or rejected) after the receipt inspection process, which was not completed in this case. If the valve had been receipt inspected, it would have been rejected because the documentation was in Bechtel's custody at Ann Arbor and thus was not available to be provided to B&W at the time of valve transfer to B&W.

JWC/BHP/WRB/lr



Consumers  
Power  
Company

Midland Project: PO Box 1963, Midland, MI 48640 • (517) 631-8650

January 14, 1983

Mr. L. E. Davis  
Bechtel Power Corporation  
P.O. Box 2167  
Midland, MI 48640

MIDLAND PROJECT GWO 7020  
CHANGES TO BWCC PROCEDURES  
File: M1.0 UFI: 08\*06\*04\*01 Serial: CSC-6497

Due to recent discussions with the NRC, it is necessary that some procedural changes be instituted within the BWCC receipt/inspection process.

Specific changes to make are as follows:

- 1) BWCC FCP 397 shall be changed to show a sequence between sequences 010 and 020 wherein materials drawn from Bechtel storage are taken to a BWCC QC "Hold Area."
- 2) This BWCC QC "Hold Area" is to be in close proximity to the controlled BWCC storage bin. Items should remain in the "Hold Area" until receipt inspection is completed and items placed in storage.
- 3) Concerning the processing MWR's, the following actions shall be instituted at BWCC.
  - a. All MWR's generated by B&WCC MUST be reviewed by B&WCC Quality Control BEFORE submitting to Bechtel Subcontracts for review and signature.
  - b. B&WCC Q.C. MUST obtain, review, and retain copies of material certifications for the items listed on the MWR's. Acknowledgement of this action SHALL be documented by signing and dating the MWR's.

NOTE: Retaining copies of voluminous data packages may be excluded once they are obtained and reviewed. This exclusion shall be determined by the Q.C. Inspection Supervisors. Documenting the review on the MWR is still required.

- c. After B&WCC Q.C. has documented their review on the MWR's, the MWR's may be released to production personnel. Subcontracts may then review, sign, and date the MWR and material may be withdrawn from Bechtel.

CHANGES TO BWCC PROCEDURES  
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This required action should be completed by January 21, 1983.

*D. B. Miller*  
D. B. Miller  
Site Manager

DBM/JTW/dmw

cc: WShearn  
DJVokal  
BHPeck  
SLTaulber  
VNAsgaonkar