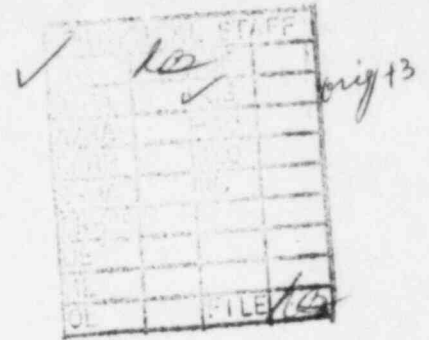


TERA



50-329
50-330

August 9, 1983

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Jackson, Michigan 49201

Mr. J. G. Keppler
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799 Roosevelt Road
Glen Ellyn, IL 60137

Mr. D. G. Eisenhut
Director, Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Docket Nos. 50-329 OM, OL and 50-³³⁰033 OM, OL
Midland Nuclear Plant - Units 1 and 2
Independent Design and Construction Verification (IDCV) Program
Meeting Summary

A meeting was held on August 5, 1983 at TERA Corporation's Bethesda, Maryland offices to discuss options for modification of the Midland IDCV program with respect to initiatives associated with Section 13 of Public Law 97-415, NRC Authorization Act for Fiscal Year 1983 (Ford Amendment). A list of participants is provided in Enclosure 1.

The meeting opened with a discussion of elements of the Ford Amendment (Enclosure 2) and specifically, NRC's plans and logistics for responding to the legislation. Darl Hood, NRC Midland Project Manager, presented an overview, pointing out that the NRC is studying six pilot programs in addition to the Midland IDCV program (Marble Hill, Millstone 3, Palo Verde, Limerick, South Texas, Beaver Valley) in an effort to report back to Congress in April 1984 on the efficacy of certain approaches to assuring and verifying the quality of nuclear power plants under construction. The headquarters of the NRC's Office of Inspection and Enforcement under the direction of James Taylor has lead for this effort. Paul Keshishian and George Gower have been assigned responsibility for implementing the NRC's activities. Mr. Hood pointed out that he felt certain minor modifications of the Midland IDCV program were necessary to make the

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program fully responsive to the intent of the Ford Amendment legislation. These "enhancements" would be to include a "horizontal slice" component in the areas of design/construction control and QA/QC implementation.

Billy Garde, Government Accountability Project, voiced her organization's concurrence that these reviews are required to be responsive to the Ford Amendment legislation and that she felt that the IDCV program should be studied as part of the NRC's response to the Ford Amendment legislation.

Louis Gibson, Consumers Power Company (CPC), reiterated CPC's agreement to provide for TERA resources to support NRC's observation of the Midland IDCV program implementation and a review of its outputs; however, he pointed out that expansions of scope were not contemplated under the agreement. He further pointed to the numerous efforts that were ongoing, and questioned the need for expansion of the program to include "process" reviews when it was considered in the overall context of these other programs which include similar elements.

Paul Keshishian, NRC, I&E, indicated that process or "horizontal slice" elements were necessary; however, he wanted a better understanding of the degree to which the current Midland IDCV program would address these so that a determination could be made relative to the need for program modifications.

Howard Levin, TERA Project Manager, indicated that the Midland IDCV program principally focused on a review of the quality of the end products of the design or construction processes rather than the processes by which these products were created. Generally, process related issues are considered only as the need arises as dictated by Findings whose root causes may potentially be related to deficiencies in the implementation of various processes. When questioned on the degree to which process issues would be reviewed, he indicated that at this point in the program certain issues were under review; however, the full set of issues would be indeterminate in view of the fact that the nature of any future Findings is unknown.

The NRC representatives asked questions relative to the ability of the Midland IDCV program to draw conclusions about the implementation of the QA plan and the degree of compliance to 10 CFR 50, Appendix B. There was general agreement of all participants that the QA plan itself meets 10 CFR 50, Appendix B and that its implementation was of interest. Levin commented that by the end of the IDCV program, TERA would at least be able to infer a conclusion relative to the implementation of QA/QC programs and conformance to 10 CFR 50, Appendix B. In certain cases, this would be more than an inference in view of the fact that objective process reviews would be undertaken as follow-up to any Findings.

All participants generally conceded that the design and construction control processes and the parallel QA/QC verification are important in producing a



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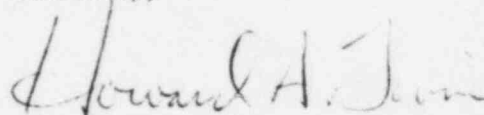
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August 9, 1983

quality constructed facility. Levin pointed out that for the evaluation of a facility in later stages of construction, a review of process issues is of lesser significance in reaching conclusions and that a more direct approach is the "vertical slice", provided quality is readily measurable by physical or other means. He further observed that "quality facilities have been attained with weaker QA/QC programs and vice versa." Levin indicated that process reviews become potentially more useful when evaluating inaccessible items or items where quality is otherwise difficult to measure.

The subject of other independent QA/QC reviews was discussed relative to their merits and cost effectiveness. It was generally concluded that a detailed point-by-point comparison to 10 CFR 50, Appendix B was not warranted. There was a general agreement that a focused review of selected issues would potentially be most effective from all accounts. A consensus was reached that TERA should develop a "white paper" for consideration by CPC and NRC as a potential option. The paper should address perspectives identified in the meeting tempered by TERA's experience to identify an option that is complementary to the existing IDCV program. The decided turn-around time was approximately one week.

Sincerely,



Howard A. Levin
Project Manager
Midland IDCV Program

cc: Participants
F. Buckman, CP
D. Miller, CPC (site)
B. Palmer, CPC (site)
Midland IDCVP Service List
J. Taylor, NRC, I&E HQ



TERA CORPORATION

**SERVICE LIST FOR MIDLAND INDEPENDENT DESIGN
AND CONSTRUCTION VERIFICATION PROGRAM**

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ENCLOSURE I

List of Participants

Meeting to Discuss Options for Modification of the Midland IDCV Program with Respect to Initiatives Associated with Section 13 of Public Law 97-415 (Ford Amendment)

Nuclear Regulatory Commission

D. Hood, NRR
P. Keshishian, I&E
G. Gower, I&E

Consumers Power Company

L. Gibson

TERA

H. Levin
D. Tulodieski
R. Snaider
H. George (partial)
J. Martore
J. Richardson

Government Accountability Project

B. Garde



*13(b) The Commission shall conduct a study of existing and alternative programs for improving quality assurance and quality control in the construction of commercial nuclear powerplants. In conducting the study, the Commission shall obtain the comments of the public, licensees of nuclear powerplants, the Advisory Committee on Reactor Safeguards, and organizations comprised of professionals having expertise in appropriate fields. The study shall include an analysis of the following:

(1) providing a basis for quality assurance and quality control, inspection, and enforcement actions through the adoption of an approach which is more prescriptive than that currently in practice for defining principal architectural and engineering criteria for the construction of commercial nuclear powerplants;

(2) conditioning the issuance of construction permits for commercial nuclear powerplants on a demonstration by the licensee that the licensee is capable of independently managing the effective performance of all quality assurance and quality control responsibilities for the powerplant;

(3) evaluations, inspections, or audits of commercial nuclear powerplant construction by organizations comprised of professionals having expertise in appropriate fields which evaluations, inspections, or audits are more effective than those under current practice;

(4) improvement of the Commission's organization, methods, and programs for quality assurance development, review, and inspection; and

(5) conditioning the issuance of construction permits for commercial nuclear powerplants on the permittee entering into contracts or other arrangements with an independent inspector to audit the quality assurance program to verify quality assurance performance.

For purposes of paragraph (5), the term 'independent inspector' means a person or other entity having no responsibility for the design or construction of the plant involved. The study shall also include an analysis of quality assurance and quality control programs at representative sites at which such programs are operating satisfactorily and an assessment of the reasons therefor.

13(c) For purposes of -

(1) determining the best means of assuring that commercial nuclear powerplants are constructed in accordance with the applicable safety requirements in effect pursuant to the Atomic Energy Act of 1954; and

(2) assessing the feasibility and benefits of the various means listed in subsection (b);

the Commission shall undertake a pilot program to review and evaluate programs that include one or more of the alternative concepts identified in subsection (b) for the purposes of assessing the feasibility and benefits of their implementation. The pilot program shall include programs that use independent inspectors for auditing quality assurance responsibilities of the licensee for the construction of commercial nuclear powerplants, as described in paragraph (5) of subsection (b). The pilot program shall include at least three sites at which commercial nuclear powerplants are under construction. The Commission shall select at least one site at which quality assurance and quality control programs have operated satisfactorily, and at least two sites with remedial programs underway at which major construction, quality assurance, or quality control deficiencies (or any combination thereof) have been identified in the past. The Commission may require any changes in existing quality assurance and quality control organizations and relationships that may be necessary at the selected sites to implement the pilot program.

13(d) Not later than fifteen months after the date of the enactment of this Act, the Commission shall complete the study required under subsection (b) and submit to the United States Senate and House of Representatives a report setting forth the results of the study. The report shall include a brief summary of the information received

from the public and from other persons referred to in subsection (b) and a statement of the Commission's response to the significant comments received. The report shall also set forth an analysis of the results of the pilot program required under subsection (c). The report shall be accompanied by the recommendations of the Commission, including any legislative recommendations, and a description of any administrative actions that the Commission has undertaken or intends to undertake, for improving quality assurance and quality control programs that are applicable during the construction of nuclear powerplants."

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