

THIRD PARTY CONSTRUCTION IMPLEMENTATION OVERVIEW

Approval:

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1.0 PURPOSE AND SCOPE

To establish a program whereby Stone & Webster Engineering Corporation (SWEC) performs independent evaluations and verifications of the Consumers Power Company (CPCo) Construction Completion Program, (CCP) reports progress, observations, and nonconformances to the program; specifically, to verify that:

1.1 Management performance is adequate in the following areas:

- A. Establishment of the Management Review Committee
- B. Duties and responsibilities of the Review Committee are clearly defined
- C. Procedures governing the actions of the Review Committee are in place
- D. Management reviews are complete, effective, and conducted in accordance with the requirements of the CCP Program

1.2 CCP procedures, instructions, inspection plans, records, and prerequisites for inspections/reinspections have been satisfactorily approved prior to implementation.

1.3 Specific CPCo commitments to the NRC are identified to facilitate tracking; dates for compliance (as appropriate) are adequately identified; appropriate action parties are clearly identified; committed actions have been satisfactorily resolved.

1.4 Procedures, prerequisites, and reinspection attributes in References 2.1, 2.2 and 2.3 have been approved by the Management Review Committee.

- 1.5 Personnel assigned to implement the CCP Program have been properly trained, qualified and certified in accordance with the requirements of ANSI-N45.2.6; SNT-TC-1A and MPQAD Procedure B-3M-1, Qualification and Certification of Inspection and Test Personnel. Construction and craft personnel shall be trained to meet the requirements of the Construction Training Procedure FPG-2.000.
- 1.6 The effectiveness of the Quality Verification Program based on witnessing inspections/reinspections of selected component installation, fabrication and review of applicable test/inspection reports and records.
- 1.7 Measures have been developed to ensure that NRC hold points are clearly identified and controls are in evidence to prevent continuance of work pending clearance of the hold points.

2.0 REFERENCES

- 2.1 Quality Verification Program Document, April 16, 1983
- 2.2 Construction Completion Program
 - a. Letters J.W. Cook to the NRC: January 10, 1983
April 6, 1983
April 22, 1983
- 2.3 Nonconformance Identification and Reporting Procedure

3.0 ATTACHMENTS

- 3.1 Evaluation Attribute Checklist (Later)
- 3.2 Verification Attribute Checklist (Later)
- 3.3 Nonconformance Inspection Report (Later)

4.0 DEFINITIONS

4.1 Construction Completion Program (CCP)

A program to provide guidance in planning and management of design and quality activities necessary for completion of construction of the plant and verification of completed work.

4.2 Quality Verification Program (QVP)

An element of the CCP used to confirm the quality status of safety related procurement and construction activities completed and inspected by the Engineer-Constructor personnel prior to December 2, 1982.

4.3 Evaluation

Assessment of quality related activities based upon review of procedures, plans, instructions, inspection reports, test results and additional commitments.

NOTE

Documentation resulting from resolution of CPCo commitments to the NRC and NRC Hold Points shall be 100% reviewed to verify that proper corrective action has been accomplished.

4.4 Verification

Confirming, substantiating or assuring that CCP and QVP requirements have been implemented and are active, verification actions may include documentation, hardware and management systems.

NOTE

Activities performed by CPCo under the CCP and QVP Programs will be monitored using random sampling techniques. The sampling will be based on a review of day to day activities in sufficient detail to ensure adequate implementation of the programs.

5.0 GENERAL REQUIREMENTS

- 5.1 All personnel assigned quality assurance program evaluation responsibilities shall be certified auditors in accordance with ANSI-N45.2.23 and applicable SWEC procedures.
- 5.2 All personnel assigned construction verification responsibilities shall be certified inspectors in accordance with ANSI-N45.2.6 and applicable SWEC procedures and possess the appropriate combination of education, experience and training.
- 5.3 The Third Party Construction Implementation Overview (CIO) program will be structured to determine, by evaluation of predetermined procedures and instructions, the quality practices utilized in the construction of the Midland Plant Units 1, 2, and the effectiveness of those practices.
- 5.4 A site team will be established to monitor the effectiveness of the Construction Completion Program. The team will consist of a Program Manager and two functional groups. One group will assess the completeness of compliance with procedures and inspection plans being used to complete the work. The other group will review certain aspects of construction activities which relate to the performance of the Quality Control Inspection Program. These two groups will use special procedures, checklists, and random sampling techniques to evaluate the following:
 - A. Adequacy and implementation of CPCo procedures regarding construction activities, personnel qualification, training programs, and organizational practices.
 3. Compliance of Construction Completion Program teams to prescribed procedures.

- C. Compliance of Midland Project Quality Assurance (MPQAD) personnel to applicable procedures.
- D. Compliance of construction activities to applicable procedures.
- 5.5 The Program Manager shall maintain communications with the NRC and CPCo Site Manager. Weekly progress meetings shall be held with the NRC and CPCo to discuss progress and report on nonconformance and observations.
- 5.6 Programmatic nonconformances of a serious nature shall be immediately reported to the NRC and CPCo.

6.0 PROCEDURES

- 6.1 The following procedures shall be prepared to control the activities of the Construction Implementation Overview (CIO) teams.
 - A. Quality Control Instruction 10.01 Construction Implementation Overview Assessment
- 6.2 The site teams shall develop attribute checklists for each evaluation and verification activity. Attributes shall be selected from the CCP, PQCI's, CPCo commitments to the NRC and other applicable requirements.
- 6.3 Auditors assigned to conduct evaluations shall, utilizing checklists, itemize those quality practices evident in the performance of each activity.

The results of each evaluation shall be documented on the checklist to ensure repeatability. Summaries of the results shall be tabulated weekly for presentation to the NRC and CPCo.
- 6.4 Inspectors assigned to conduct verification, shall utilizing the checklist, monitor the activities of CPCo personnel involved in CCP and QVP activities.
- 6.5 All systems verified shall be identified and documented to assure repeatability.
- 6.6 Nonconformances identified in conjunction with this procedure shall be documented on a Nonconformance Inspection Report (NIR) and processed in accordance with Reference 2.3 of this procedure.

7.0 REPORTS

- 7.1 The following reports will be submitted to NRC and CPCo and SWEC by the Program Manager.
 - A. Weekly Progress Reports

B. Final Reports on Construction Completion

- 7.2 Weekly Progress Report - Weekly Progress Reports will be submitted during the weekly meeting with CPGCo, and the NRC.
- 7.3 Final Report - A final report will be submitted 30 days after completion of the program. The report will summarize the SWEC assessment. The final report will be submitted by the Program Manager to the NRC, CPGCo and SWEC.