



**Consumers
Power
Company**

James W Cook

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February 1, 1984

50-329
50-330

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

PRINCIPAL STAFF			
RA*	Class	DPRP	
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C		DRMA	
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MIDLAND ENERGY CENTER GWO 7020

DOCKET NO 50-329 AND 50-330 - AMENDED MIDLAND PROJECT RESPONSE TO NRC,
REGION III LETTER DATED MAY 23, 1983

File: 0485.16, 0.4.2 UFI: 42*05*22*04, 70*01 Serial: CSC-7187

- REFERENCES:
- (1) J W Cook letter to J G Keppler dated July 12, 1983,
Serial CSC-6781 (Amended Response)
 - (2) J W Cook letter to J G Keppler, dated June 24, 1983,
Serial CSC-6764 (Amended Response)
 - (3) J G Keppler letter to J W Cook, dated May 23, 1983
(Request for Additional Information)

This letter provides a status of the progress made towards meeting the commitments outlined in the July 12, 1983 amended response.

An extension in meeting the full compliance commitment dates is requested because of errors in the manufacturer's (TDI) inspection procedures and because the current Stop Work Orders have caused a postponement in the component inspections required to meet the commitments of the letter.

James W. Cook

JWC/BHP/JSK

Attachments

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

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

Letter Serial CSC-7187 Dated February 1, 1984

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 letter serial CSC-7187 dated February 1, 1984 from J W Cook to J G Keppler.

CONSUMERS POWER COMPANY

By JW Cook
J W Cook, Vice President
Projects, Engineering & Construction

Sworn and subscribed before me this 13 day of February, 1984.

Barbara Blunsom
Notary Public

My Commission Expires Sept 8, 1984

Attachment 1Status of the Amended Response to J G Keppler letter to J W Cook dated May 23, 1983

The status of the amended response to J G Keppler letter to J W Cook dated May 23, 1983 is submitted in the following format:

NOV Item B Identification Number

- A. Statement of Original Violation (from J G Keppler letter to T D Selby dated February 8, 1983: Notice of Violation EA 83-3.)
- B. Request For Additional Information (from J G Keppler letter to J W Cook dated May 23, 1983.)
- C. Status of Items Requiring Completion to Achieve Full Compliance

NOV Item B-2.a (82-22-08)

A. Statement of Original Violation

"Measures were not established for the selection and review for suitability of application of "Q" materials associated with the diesel generator exhaust muffler in that design drawings and specifications did not indicate the material identity of the installed muffler saddle supports and plates."

B. Request For Additional Information

"Regarding Item B.2.a, we reiterate our position that the lack of design documentation which specified the material requirements for the diesel generator exhaust mufflers constituted an item of noncompliance. Please provide any additional information supplied by the vendor regarding the traceability of the exhaust muffler materials, and as appropriate, your corrective actions and the results achieved, corrective actions taken to avoid further noncompliance, and the date when full compliance will be achieved."

C. Status of Items Requiring Completion to Achieve Full Compliance

Section C.5 of the Amended Response letter of July 12, 1983, Serial CSC-6781, identified five items requiring completion before full compliance would be achieved in the matter of lack of design documentation specifying material requirements for the diesel generator exhaust silencers. These five items and their current status for completion are described below.

5.a Statement from Amended Response

Receipt of the exhaust silencer Material Certificate of Compliance and completion of the fabrication inspection is expected by October 15, 1983. A schedule for any subsequent rework as a result of the inspection will be established at that time.

Status

A material certificate of compliance for the exhaust silencer was received from TDI on August 5, 1983. TDI has certified the exhaust silencer as being fabricated from ASTM A-36, ASTM A-285 grade C and ASTM A-569. (Copy is attached)

In order to determine the acceptability of this certification, a review was conducted of licensing commitments on quality assurance requirements for the Midland Plant, and industry requirements. The results of this review are summarized as follows:

- a. The Midland position on Regulatory Guide 1.123 commits to compliance with ANSI N45.2.13, Draft 3, Revision 3 (which was accepted by the NRC in its letter to CPCo dated August 12, 1977).

- b. ANSI N45.2.13, Draft 3, Revision 3, Section 10.2 states:

"Where not precluded by other requirements, documentary evidence may take the form of written certificates of conformance which identify the requirements met by the [procured] items."

Section 10.3.3 of the standard states:

"In certain procurement actions which do not involve direct inspection by the Purchaser, the Purchaser may accept an item or service from a supplier based only on a Supplier's certificate of conformance. . . when the item or service is of simple design involves standard materials, processes, and tests."

- c. A certified material test report (CMTR) is required for certain piping and components constructed to ASME Section III or for special application where the material's particular properties are essential to the piping or component's application. The latter case is determined by the responsible design engineer and the requirement for a CMTR is reflected in the item's procurement documents.
- d. The diesel exhaust silencers are not constructed to ASME Section III or to any other nationally recognized construction code. (The interconnecting piping is Seismic Category I, ANSI B31.1.) Consistent with current industry practice, and because the exhaust silencers are of simple design and constructed using standard materials, processes, and tests, the procurement documents do not require a CMTR.

Therefore, because the TDI material certificate of compliance meets or exceeds a certificate of conformance, it is concluded that this first step in establishing the exhaust silencers as components of acceptable quality for their function has been completed.

A fabrication inspection procedure for the exhaust silencers was received from TDI on September 1, 1983. This inspection has not yet been initiated because of a current hold on Q-related construction activities. Inspection completion is expected to be within three months of release of the current hold on Q-related construction activities. If any deficiencies are identified, a schedule for their resolution will be developed at that time.

5.b Statement from Amended Response

The exhaust silencer saddle support and center support plate extensions are replaced and NCRs 4693 and 4994 are dispositioned.

Status

Replacement of the end support and center support plate extensions has been delayed because of the current hold on Q-related construction activities. The NCRs were dispositioned on November 13, 1983.

The replacement activity is expected to be completed within four months of release of the hold on Q-related construction activities.

5.c Statement from Amended Response

NCRs M-01-9-3-158 and 495 will be resolved by October 15, 1983. A schedule for any subsequent rework resulting from this resolution will be established then.

Status

TDI, in its letter of August 2, 1983 to Bechtel, confirmed that only these four items of equipment (in addition to the exhaust silencers) and no others (requiring safety-related status) were supplied without adequate quality assurance documentation. Consistent with the approach taken to upgrade the exhaust silencer, material certificates of compliance and fabrication inspection procedures were requested and received from TDI on August 5, 1983 and September 1, 1983, respectively.

Implementation of the fabrication inspection procedure (as the next step in resolving the two NCRs) is delayed by the current hold on Q-related construction activities. Inspection is expected to be completed within three months of the release of the hold.

If any deficiencies are identified, they will be resolved on a schedule to be developed at that time.

5.d Statement from Amended Response

Further investigation to ascertain if there are any additional suspect items in the package provided by TDI is expected to be complete by August 15, 1983.

Status

TDI letter of August 2, 1983 to Bechtel identified no other safety-related equipment items (beyond those described in Section 3 above), as lacking adequate quality assurance documentation. Therefore, this action item is complete.

5.e Statement from Amended Response

The review program and schedule described in part 4 and the subsequent review is completed and any findings are addressed.

Status

A review program was developed and initiated on September 16, 1983. 115 specifications/material requisitions were identified as requiring review and to date the review of 113 has been completed without identifying any new concerns. The review of the remaining two specifications/material requisitions is still in progress and is expected to be completed by March 30, 1984.