



Consumers
Power
Company

Dean L. Quamme
Site Manager
Midland Project

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

December 9, 1983

50-329

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Mr S W Baranow
Stone & Webster Michigan, Inc
P O Box 1963
Midland, MI 48640

PRINCIPAL STAFF			
✓	SA	for	
	SVRA		
	SVR		
	SA		
	SSA	SS	✓ orig-13
	ENF	File	for

MIDLAND ENERGY CENTER GWO 7020
NIR 006 AND 007
File: 0655, B1.1.7 UFI: 99*08 Serial: CSC-7077

Attached is our complete response to NIR 006 and 007. Please advise if these commitments are acceptable to resolve these NIR's.

DLQ/DDJ/klp

cc: RAWells, MPQAD w/a
NIReichel, MEC w/a
BHPeck, MEC w/a
RJCook, NRC w/a
JGKeppler, NRC w/a
JJHarrison, NRC w/a

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PDR ADOCK 05000329
A PDR

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1801/11

Bechtel Power Corporation

Post Office Box 2167
Midland, Michigan 48640



December 9, 1983

Consumers Power Company
P.O. Box 1963
Midland, MI 48640

Attention: D.L. Quamme

Job 7220 Midland Project
CONSTRUCTION REVIEW OF STONE &
WEBSTER'S NIRS 006 & 007
BCCC-8804

Dear Mr. Quamme:

Reference: CPGO Ltr. D.L. Quamme to G.A. Hierzer dated December 7, 1983
Serial No. CSC-7069

Outlined below is Construction's complete response and proposed corrective action for the subject NIRS.

1. The discrepancies listed for the class attendance roster are acknowledged. The use of the class attendance rosters was effective on September 28, 1983. Each roster since that date will be reviewed and corrected in conformance with Attachment D to FPG-2.000.
2. (Reading Records)
 - A. Illegibility occurs when the preparers run copies from poor masters instead of obtaining copies from the Training Department.
 - B. As noted on Attachment C, the format may vary as long as all information is included.
 - C. There is only one official training record and that is stipulated in paragraph 9 of FPG-2.000. The Team Record and the Team Status Report (TSR) are informal management tools and are not official records. The TSR is being replaced by the Training Exception Report Printout (TERP).

Addressing the two specifics listed.

*Krantzfelder - Completed FPD-2.000 at Level 5 on 8/18/83.
Paragraph 6.3, FPG-2.000 applies.

*Hull - Spec. M-204 appears on the latest TERP (attached).
This means he has not received the required training.

3. (Inconsistencies)

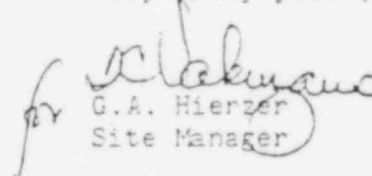
- A. FPG-2.00Q is being revised to stipulate that all corrections will be a line out in ink. The corrector will initial and date.
- B. All entries will be made in ink.
- C. Review specified in para. 1 above will include the listing of all applicable documents on the class attendance rosters.
- D. See para. 1 above.
- E. The Course Roster form is now furnished to the instructor with his copy of the Training Schedule to assure that the proper form is used.


4. The referenced letter stated that our original response regarding the Training Records Group review of a 10% random sample of the training files is unacceptable. We concur that a 10% sample is inadequate and regret the choice of words. In fact over 100% verification takes place. When training records indicate an individual is 100% complete a verification of the record takes place. This may occur long before the individual is assigned to status assessment. In addition, the supervisor is provided with an exception report showing the training requirements outstanding. Discrepancies between records which may be maintained by the supervisor and the Training Records Group are reconciled on a continuous basis using this management tool. Requirements, therefore, are documented in the exception report.

An additional 100% verification of records is made prior to an individual actually being assigned to status assessment by the Training Records Group. This occurs when the supervisor presents a listing of individuals to be assigned.

If you have any questions regarding the above, please contact E.H. Pillsbury at Ext. 7507.

Very truly yours,


G.A. Hierzer
Site Manager


GAH/MAD/BTF/lcc

Written Response Requested: No

Attachment: S&W NIRs (Nonconformance Identification Report) Nos.
006 & 007

CC: N. Reichel

DATE OF NONCONFORMANCE: November 7, 1983

NIR NUMBER 007

IDENTIFICATION/LOCATION OF ITEMS:

DESCRIPTION OF NONCONFORMANCE:

During the review of 834 non-manual Construction Training Records, two areas of discrepancies were observed which were not in compliance with the requirements of FPG-2.000 Rev. 5, "Training of Construction Personnel." (The following Teams were evaluated #24, Field Procurement, Sub Contractors, Managements, F.E. Staff, and CGSO.

(See attached for descriptions fo Discrepancies)

Walter H. Sienkiewicz
INITIATOR

PROGRAM MGR Subcontract

DATE NOVEMBER 7, 1983

DATE November 7, 1983

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT

NEW NIR#

CONCURRENCE

INITIATOR

PROGRAM MGR

DATE

DATE

DATE

REMARKS

- 1) Course Rosters Attachment D to FPG-2000 exhibited one or more of the following discrepancies.

<u>BLOCK NO.</u>	<u>ENTRY REQUIRED</u>	<u>ENTRY RECORDED</u>
1	CCP	DWG. No. Fig. No. Course No.
2	(a) Name of lesson (b) Procedures (c) Revision	Either a, b, or c missing
6	Location of Session	Bechtel
	In addition some entries were left blank	

- 2) In addition to these violations, inconsistencies were noted in 6 areas:

(1) Modification to records, some lined through, signed and dated and others simply lined through. (2) Some entries on course register are completed using pencil while most are in ink. (3) Difficulty is experienced in determining the accuracy of records where attendance at a course carries credit for several others. (4) Some entries carried the revision number to procedures and some omitted the revision. (5) Proper "Course Roster Form" as listed in Procedure FPG-2.000 were not utilized. (6) Some courses on Rosters contain information not identical to matrix listing.

It is recommended that the disposition to this NIR include a commitment to verify training records of each individual prior to status assessment assignment.

STON AND WEBSTER ENGINEERING CORP. INC.
NONCONFORMANCE IDENTIFICATION REPORT

OC1 15.01
Attachment 4.1
Revision 2

PAGE 1 OF 2

DATE OF NONCONFORMANCE: OCTOBER 27, 1983

NIR NUMBER 006

IDENTIFICATION/LOCATION OF ITEMS:

BECHTEL DOCUMENT CONTROL CENTER

DESCRIPTION OF NONCONFORMANCE:

During the review of 2054 non-manual Construction Training Records, three areas of discrepancies were observed which were not in compliance with the requirements of FPG-2.000 Rev. 5, "Training of Construction Personnel." (The following Teams were evaluated #5, 6, 8, 9, 12, 13, 16, 17, 19, 20, 25, 26, (27/28), 29, 30, 31, 32/33), BHD Team Staff.

(See attached for descriptions of Discrepancies)

Walter H. Sienkiewicz
INITIATOR

DATE October 28, 1983

PROGRAM MGR

Subramanian
DATE October 28, 1983

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT

NEW NIR#

CONCURRENCE

INITIATOR

PROGRAM MGR

DATE

DATE

DATE

REMARKS

- 1) Course Rosters Attachment D to FPG-2.000 exhibited one or more of the following discrepancies.

<u>BLOCK NO.</u>	<u>ENTRY REQUIRED</u>	<u>ENTRY RECORDED</u>
1	CCP	DWG. No. FIG. No.
2	(a) Name of lesson (b) Procedures (c) Revision	Either a, b, or c missing
6	Location of Session	Bechtel
10	(a) Signature (b) Print Last Name	Either a or b missing
5	Instructor Name	Instructor Department
In addition many entries were left blank		

- 2) Reading Records Attachment C to FPG-2.000 exhibited one or more of the following discrepancies:

Reading Record

- 1) The department and or assignment lines are illegible or incomplete.
- 2) Assigned reading performed on October 11, 1983 and September 29, 1983 were not documented on Reading Form Attachment C, Rev. 5.
- 3) Team Records and TSR (Training Status Report) show training completed. Document Control Files showed no record of training. For example:

<u>NAME</u>	<u>TEAM #</u>	<u>TRAINING REQUIREMENT</u>	<u>DISCREPANCY</u>
Kranzfelder	Management	FPD-2.000 Code 2	No Record in File
J. Hull	32/33	M-204 Code 5	No Record in File

In addition to these violations, inconsistency was noted in 4 areas: (1) Modification to records, some lined through, signed and dated and others simply lined through. (2) Some entries on course register are completed using pencil while most are in ink. (3) Difficulty is experienced in determining the accuracy of records where attendance at a course carries credit for several others. (4) Some entries carried the revision number to procedures and some omitted the revision. (5) Proper "Course Roster Form as listed in Procedure FPG-2.000 were not utilized. (6) Some courses on Rosters contain information not identical to matrix listing.

It is recommended that the distribution to this NIR include a commitment to verify training records of each individual prior to status assessment assignment.