



Consumers
Power
Company

Dean L. Quamme
Site Manager
Midland Project

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

December 12, 1983

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

PRINCIPAL STAFF			
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MIDLAND ENERGY CENTER GWO 7020
MANAGEMENT POLICY ON MAINTENANCE OF TRAINING RECORDS
File: 0400.2, Bl.1.7 UFI: 07*, 99*08 Serial: CSC-7080

Attached is a copy of the revised Bechtel Management Policy addressed to E H Pillsbury, the Training Task Force Leader. The policy reflects Stone & Webster's comments of 12/12/83.

DLQ
for DLQ/NIR/klp

cc: RAWells, MPQAD
BHPeck, MEC
DDJohnson, MEC
RJCook, NRC
JGKeppler, NRC
JJHarrison, NRC

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Bechtel Power Corporation

Post Office Box 2167
Midland, Michigan 48640



December 12, 1983

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

Attention: D.L. Quamme

Job 7220 Midland Project
MANAGEMENT POLICY ON MAINTENANCE
OF TRAINING RECORDS
BCCC-8815

Dear Mr. Quamme:

Attached is a copy of the revised Management Policy addressed to E.H. Fillsbury, the Training Task Force Leader. The policy reflects Stone & Webster's comments of 12/12/83.

Very truly yours,

A handwritten signature in dark ink, appearing to read "G.A. Hierzer", followed by a slanted line and the letters "FAC".

G.A. Hierzer
Site Manager

GAH/EJR/EHP/lcc

Attachment: Revised Management Policy

CC: N. Reichel

Written Response Requested: No

Bechtel Power Corporation

Inter-office Memorandum

To E.H. Pillsbury Date December 12, 1983

Subject Job 7220 Midland Project
STATEMENT OF POLICY
TRAINING RECORDS
0-6896 From G.A. Hierzer

Copies to At Midland, MI Ext. 7200

Of Construction

A recent audit of the Training Department by Stone and Webster has uncovered several concerns. The following Statement of Policy will clarify Bechtel's position and eliminate all concerns.

1. The CCP Training Program is a Familiarization Program based on the fact that all Bechtel personnel are technically qualified to do their job. The purpose of the CCP Training Program is to familiarize the construction personnel with the documents they will be using in completing their assigned tasks as required by the Midland Project. While it is readily admitted that accurate records are a necessity, it is also recognizable that all entries on a training record, i.e., pagination, time of instruction, location of instruction, etc., are not required to establish objective evidence of training. If all of the following essential information is on a training record, the record shall be accepted as objective evidence that the person has received the training, regardless of the format.

*Formal Instruction

All class attendance rosters prior to September 28, 1983 will have the following minimum information.

- °Subject of Class
- °Reference Documents (as taken from Training Matrix)
- °Attendee's Name
- °Instructor's Signature
- °Date of Instruction
- °Authenticating Signature of Training Group

*Reading Reports

- °Name of Employee
- °Appropriate Identification of Level of Reading or Exemption
- °Reference Documents
- °Signature of Supervisor and Date
- °Signature of Employee and Date

*As an exception to the above, any class roster prior to September 28, 1983 for:

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Interoffice Memorandum

(1) Safety Orientation (FIS-1.200, FIS-2.100,
FPS-3.000, FPS-6.000)

(2) BPC Quality Orientation (NQAM, BQAM)

will be accepted, as long as they contain any objective evidence that the training was completed.

2. Series Drawing: See T.C. Valenzano/J.T. Minor IOM O-6879 dated 12/8/83, Training Records Recording of Revisions On Series Documents.
3. White out (opaque) and correction tape: All members of the Construction Training Group have been instructed that the only acceptable method of correcting a training record is:
 - a. A permanent line out of the entry
 - b. Date and initial the line out

Level 1, 2, and 3 supervisors have been instructed that any record received with white-out corrections or correction tape will be returned to the originator. They have been furnished the proper reading form and instructed to dispose of all previous revisions of the form.

All records from September 28, 1983 to date, that have white out or taped-over corrections will be revalidated by lining out, dating and initialing. If the trainee's supervisor who originally signed the form is not available, the present supervisor may be used. Records prior to September 28, 1983 with white out or taped-on corrections will be utilized as is.

4. The individual training files are the official record as specified in paragraph 9 to FPG-2.000.
5. Illegible Documents: A document will be considered illegible if any of the essential information listed in paragraph 1 above is not readable. In this case, the Records Group will make an effort to secure a better copy. If they are unsuccessful, the document will be forwarded to the Curricula Committee to determine if credit should be given or not.
6. Retrofit of Records: Retrofit of attendance rosters prior to September 28, 1983 is neither warranted or practical.

Bechtel Power Corporation

Interoffice Memorandum

7. All Class Attendance Rosters from September 28, 1983 to date will be completed in accordance with the latest revision of FPG-2.000.

This policy is not intended to reduce the quality requirements of the Training Records. Our policy has always been and will continue to be:

- °Quality is the individual responsibility
- °Do it right the first time

Again, accurate and complete records are mandatory and care should be taken with them. At the same time remember that the form and the manner which it is completed is secondary to assuring that the essential elements are included in the form, substantiating that training requirement has been met.



G.A. Hierzer
Site Manager

GAH/EJR/lcc