



**Consumers
Power
Company**

James W. Cook
Vice President - Projects, Engineering
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December 20, 1983

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

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3rd sig.

MIDLAND ENERGY CENTER GWO 7020
INSPECTION REPORT NO 50-329/83-23 (OSC) AND 50-330/83-24 (OSC)
File: 0485.16 UFI: 42*05*22*04 Serial: CSC-7066
70*01

REFERENCE: (1) R F Warnick letter to J W Cook, dated November 17, 1983
Inspection Report No 50-329/83-23 (OSC) and 50-330/83-24
(OSC)

This letter, including Attachment 1, provides our response to Reference 1,
which transmitted the subject Inspection Report and requested our response to
the Notice of Violation.

James W. Cook

JWC/BHP/RHW/klw

Attachment

cc: RFWarnick, ERC Region III
JJHarrison, NRC Region III
RNGardner, NRC Region III
RBLandsman, NRC Region III
RJCook, NRC Senior Resident Inspector, Midland Site
RLBurgess, NRC Resident Inspector, Midland Site

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OC1283-0001A-CN01

DEC 27 1983

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

Letter Serial CSC-7066 Dated December 20, 1983

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 the response to R F Warnick letter to J W Cook dated November 17, 1983.

CONSUMERS POWER COMPANY

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

Sworn and subscribed before me this 23 day of December, 1983.

Barbara F. Townsend
Notary Public

My Commission Expires Sept 8, 1984

CONSUMERS POWER COMPANY'S RESPONSE TO
US NUCLEAR REGULATORY COMMISSION, REGION III
INSPECTION REPORT NO. 50-329/83-23 (OSC) & 50-330/83-24 (OSC)

Appendix (Notice of Violation) to Inspection Reports No. 50-329/83-23 (OSC) and 50-330/83-24 (OSC) provides an Item of Noncompliance to 10 CFR 50, Appendix B. The NRC statement and our response are given below:

NRC STATEMENT

10 CFR 50, Appendix B, Criterion V, states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures, or drawings."

CPC-1A, Policy No. 5, Instructions, Procedures and Drawings, states, in part, "Instructions for controlling and performing activities affecting quality of equipment or activities such as . . . inspecting . . . are documented in instructions, procedures, specifications, checklists and other forms of documents."

Contrary to the above, the Project Quality Control Instructions (PQCI) for the inspection of (1) the static cone penetrometer tests at OBS-4 and (2) the calibration of the hydraulic meters, failed to require the verification that the calibration stickers were affixed to the apparatus as required by UST Procedure QCP-21. As a result, calibration stickers were not affixed to the hydraulic meters measuring penetrometer resistance rendering the accuracy of the instruments to be indeterminate.

CONSUMERS POWER COMPANY RESPONSE

In accordance with this Notice of Violation, explanation of corrective action is as follows;

1. Corrective Action Taken and the Results Achieved:

CPCo has initiated a nonconformance report, QAR No. RS-00024, regarding the omission of calibration stickers at the subject equipment. The equipment was calibrated in accordance with Project requirements and documentation was on file certifying this. The PQCI required a review of calibration records and verification that the instruments had been calibrated prior to use. This review was completed per requirements on the subject equipment. Therefore, the accuracy at the time of use was not indeterminate. However, the omission of the calibration sticker on the equipment was contrary to U.S. Testing requirements and the PQCI did not require verification that the sticker had been applied.

A requirement for calibration stickers has been added to the U.S. Testing technicians checklist for load cell calibration and the PQCI for Inspection of Static Cone Penetrometer Test has been revised to require a

QC Inspector check that a calibration sticker has been affixed. Calibration stickers have been affixed to the equipment in question.

2. Corrective Action to be Taken to Avoid Further Noncompliance:

The inclusion of the calibration sticker requirement in the Load Cell Calibration Checklist will require a technician to affix the sticker and the Static Cone Penetrometer PQCI will require a QC Inspectors check of this quality attribute in the future.

3. Future Compliance will be Achieved as Follows:

Closure of QAR RS-00024 on November 19, 1983, indicated that the subject nonconforming condition had been brought into compliance with Project requirements and satisfactory measures had been taken to prevent reoccurrence.