



**Consumers
Power
Company**

Dean L. Quamme
Site Manager
Midland Project

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

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January 5, 1984

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

MIDLAND ENERGY CENTER GWO 7020

OBSERVATIONS NO 036 & NO 038

File: BL.1.7, 0655 UFI: 99*08, 53*50*04 Serial: CSC-7134

Attached is Bechtel's complete response to your Observations No. 036 and No. 038.
Please advise if this response is adequate to close out these observations.

DLQ/DDJ/klp

cc: JGKeppler, NRC Region III w/a
JJHarrison, NRC Region III w/a
RJCook, NRC Site w/a
BHPeck, MEC w/a
RAWells, MPQAD w/a
NIREichel, MEC w/a

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Bechtel Power Corporation

Post Office Box 2167
Midland, Michigan 48640



December 30, 1983

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

Attention: D.L. Quamme

Midland Plant Units 1 & 2
Bechtel Job 7220
REVIEW OF STONE & WEBSTER'S
CCP OVERVIEW REPORT NO. 26
BCCC-8864

Dear Mr. Quamme:

Construction's review of Stone & Webster's Overview Report No. 26 identified two (2) open (Construction) action items, specifically, Observations Nos. 36 and 38.

Detailed below is our complete response on the observations:

Observation No. 36:

Control of field proposed changes are governed by FPD-2.000. FPD-2.000 will continue to allow use of FCNs for both "Q" and "Non-Q" items. There has not been any deviation from this practice in the past, nor do we anticipate any change in the future. FCNs will still be utilized as a method for controlling field changes for both "Q" and "Non-Q" items.

Observation No. 38:

The checklists as shown in Attachment "N" of FPM-7.000 and Attachment "B" of FPM-9.200 or otherwise developed by the field, are intended to be used as guidelines/aids by the team field engineer(s) to assure consistency during status assessment and hanger installation. The checklist is not intended to cover in detail every hanger in every situation or to substitute for requirements called for in the technical documents. Therefore, the checklist will not govern field engineering inspection/acceptance and will not be retained for record purposes. The design drawings, procedures and specifications contain the key requirements for hanger installation and inspection.

The field engineer(s) and superintendent's acceptance of completed work is shown by the signoff of the Construction Work Package (CWP) (FPG-7.300) which accompanies each "Q" hanger. In addition to the CWP, the field engineer is required to initial the P119/129 form (Stress Walkdown Form)

D.L. Quamme
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signifying that installation meets design requirements for all "Q" and critical non-Q hangers. (See attached letter D.B. Miller to J.A. Rutgers, Section 7.d, Serial CSM-0655, dated 7/1/83: Management Review Meeting, May 18, 1983.)

If you have any questions concerning the above, please contact B.T. Foote at Ext. 7507.

Very truly yours,

G.A. Hierzer
G.A. Hierzer
Site Manager

GAH
GAH/MAD/BR/BTF/MRM/lcc

Written Response Requested: No

Attachments: (1) D.B. Miller ltr. to J.A. Rutgers, dated 7/1/83
Serial CSM-0655

(2) Copies of Observations Nos. 36 & 38

CC: N. Reichel



Consumers
Power
Company

Donald B Miller, Jr
Site Manager
Midland Project

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

July 1, 1983

Mr. J. A. Rutgers
Bechtel Tower Corporation
P.O. Box 1000
Ann Arbor, MI 48106

MIDLAND ENERGY CENTER
MANAGEMENT REVIEW MEETING, MAY 18, 1983
STATUS REPORT AND CLOSURE OF ACTION ITEMS
File: 0655 UFI: 99*08 Serial: CSM-0655

Reference: D B Miller letter to JARutger
Serial CSM-0647 dated 5-25-83
"Mgt Review Mtg, 5-18-83"

Attached please find the status and closure of action items identified in the reference from the Bulk Hanger Organization Phase 1 Management Review.

By separate memorandum, copies of this same information are being sent to the appropriate Consumers Power Company personnel.

Donald B Miller, Jr

Attachments

CC: LHCurtis
GAHierzer
EMHughes
JMilandin
GLRichardson
TJValenzano

STATUS ASSESSMENT MANAGEMENT REVIEW
FOLLOW-UP

The following items identified during the Hanger Team Status Assessment Management Review have been resolved.

1. Resolve Use of After-The-Fact FCRs

--Project Management

Response - The project has committed to use a nonconformance report to document any nonconforming condition on the finished portion of partially complete work items observed during the status assessment activity. This was committed to in our June 10, 1983 letter to the NRC.

2. Obtain Release of Training from NRC and Train the Team --Project Management

Response - The project has submitted a letter to the NRC (June 3) explaining the CCP. The NRC had comments on that submittal and the project submitted Revision 1 to the CCP on June 10, 1983. Release of training was given by the NRC on June 20, 1983.

3. Redline Incorporation Status (Informal Response made to D B Miller. D B Miller to discuss with MPQAD. Bechtel to respond to D B Miller input)

Response - Redlines for small bore pipe hangers have been incorporated in the drawings and the drawings have been re-issued. (An exception list is available) Redlines against large bore pipe hangers will be incorporated as part of the seismic reanalysis being performed by Project Engineering. The forecast completion date for this activity is 9/15/83.

The use of redlines was discontinued on March 8, 1983. FCRs/FCNs will be used in the future for change initiation and approval.

4. LAQTS Bolt Impact

--TJValenzano to Provide Input

Response - The commitment to the NRC to locate indeterminant LAQTS bolting material will be incorporated into the CCP. The planned program is outlined in letter dated June 16, 1983 (Serial 23277) from J A Pastor, "LAQTS Bolt Study Integration into the CCP".

5. System Interaction Requirements for Status Assessment

--DBMiller to write up results of FWB/DBM Meeting

Response - F W Buckman met with D B Miller to discuss the requirements of system interaction (SI) walkdowns on status assessment. FWB and DBM both agree that the two programs are not prerequisites for each other, but should be coordinated for efficient use of resources. This was discussed with NRR and NRR had no restraints to starting the SI walkdowns.

6. Verify J A Rutgers Memo Satisfies "Q" Designation Problems

--D B Miller

Response - Based on BLC-16893 and the closure of the two items listed in that letter, CPCo is satisfied with Bechtel's response.

7. Management Review Team Comments

- a. There are not adequate management controls written into the program procedures to establish responsibility for assuring qualified personnel are assigned to perform hanger statusing activities. --Bechtel

The following is a statement of Bechtel policy and philosophy regarding the qualification requirements to fill project positions.

Key to the selection process is "knowledge requirements". People are assigned to positions based on their ability to fulfill the required duties and responsibilities. A judgement regarding this ability is made. The selection process is not restricted to applicants/employees who have formal education. There are a wide variety of ways to obtain job-related skills, and the objective is that people filling positions have these skills.

If candidates for employment from outside Bechtel do claim educational degrees or applicable work experience, Bechtel has a standard procedure for verifying such claims. Briefly, at least the highest degree claimed and all employment during the past year is verified. The information supplied by the candidate on the employment application is verified verbally or in writing. The form documenting verification is filed in the employee's master personnel file.

Judgment regarding the abilities of candidates from within Bechtel is made using a resume of Bechtel and outside experience and formal evaluations of performance in previous Bechtel positions.

In summary, the suitability of candidates for project positions is judged based on past performance. Adequate performance on the project is confirmed by evaluation of work in the current positions.

The Construction Training Program addresses the application of professional skills and knowledge to the unique procedures, specifications and requirements of the Midland Project. FPG-2.000 (Training of Construction Personnel) requires that an individual's supervisor ensure that personnel know and understand the training requirements and verify that all required training is complete.

The Team charters

FPG 9.800	Bulk Hanger Organization
FPG 9.700	System Team Charter
FPG 7.400	Area Team Charter

will require that an individual's training is received prior to performing work. The Team Supervisor is responsible for ensuring that this is accomplished.

This will be implemented with the above procedures by the dates indicated:

	<u>Training Requirements</u>	<u>Supervisory Responsibility</u>
FPG 9.800	Complete	7/8/83
FPG 9.700	7/8/83	7/8/83
FPG 7.400	7/8/83	7/8/83

7. b. The formal training programs for construction personnel should include examinations at the completion of training to assure the training objectives have been met. --Bechtel

A Training Evaluation Team (TET) has been established to evaluate effectiveness of training and to make recommendations for changes to the program. The TET function is covered in Bechtel Guideline G-4.00. Rather than use examinations to test student comprehension of presented material, the training effectiveness will be checked initially and then monitored periodically by sampling the class attendees using an appropriate combination of oral questions, written questions and observation of applications of the process covered in the training.

Reports will be made to the training coordinator and project management for action.

7. c. Several questions of the review team remain unresolved pending approval of a revision to FPM-9.200. --Bechtel

The revision to FPM-9.200 has been issued. Unresolved questions have been addressed to the satisfaction of the review team.

7. d. The use of a checklist for conduct of hanger statusing was recommended by the review team. The BHO disagrees with the team's position.

The design drawings, procedures and specifications contain the key requirements for hanger installation and inspection. the checklist as shown in Attachment "B" in FPM-9.200, Rev. 0 is to be used as a guideline/memory key indicator to the team field engineer to assure consistency during status assessment and hanger installation. The checklist is not intended to cover in detail every hanger in every situation or to substitute for requirements called for in the technical documents. Therefore, the checklist will not govern field engineering inspection/acceptance and will not be retained for record purposes.

The field engineer and superintendent's acceptance of completed work is shown by the signoff of the Construction Work Package (CWP) (FPG-7.300) which accompanies each "Q" hanger. In addition to the CWP, the field engineer is required to initial the P119/129 form (Stress Walkdown Form) signifying that installation meets design requirements for all "Q" and critical non-Q hangers.

Status Assessment Management Review - Follow-up

7. e. There is still no overall CCP procedure which identifies external restraints to program implementations such as third party over-inspections or management review team "hold points". --D B Miller

CPCo letter to Bechtel dated 6-7-83 (Serial 23091) describes the CCP Management Review process including NRC release points. Also all Project II networks have been changed to reflect NRC hold points and CCP logic. Stone & Webster hold points have not been determined as of this time. Stone & Webster hold points will be determined after NRC acceptance of S&W.

7. f. Coordination of MPQAD, Teams, etc., to ensure optimizing work. --D B Miller

Response - CPCo letters have been written to address work priorities for MPQAD hanger teams. The scheduling process is nearing completion for providing priorities to the various groups. These actions allow start of the status assessment.

7. g. Establish references and a reference tracking system. --D B Miller

The review process for field procedures includes a technical review by the Project Field Engineer or designee. This review includes a consideration of potential impact on other procedures and initiates changes to these procedures if required. The list of references in each procedure provides a guide for this part of the PFE review.

Each procedure change will also be reviewed by the appropriate Assistant Project Field Engineer and Lead Discipline Supervisor to determine additional training needs and they will inform the Training Coordinator who will ensure updating of lesson plans, training matrices and scheduling of training for affected personnel. (paragraph 5.6, FPG 2.000)

7. h. Resolve relationship between hanger & system teams --Bechtel

Response - FPM-9.200 (Bulk Hanger Organization Hanger Walkdowns) Sections 3.2, 5.3, 5.5, 5.6, 5.8.2 and 5.9 and FPM-9.800 (Bulk Hanger organization Charter) Section 5.4 define the System/Hanger Team relationship.

7. i. Hangers on turned-over systems must be inputted into the master punchlist. --R E McCue

Response - NCRs written on turned-over equipment are processed through the test group as an action addressee. A process has been established to ensure that identified work is added to the master punchlist.

7. j. Review the MPQAD training program instructions for possible selected use. --Bechtel

Response - Some of the MPQAD modules will be used. The MPQAD Train-the-Trainer format was used. Also, MPQAD is part of a training evaluation team that will monitor the implementation of construction training.

Status Assessment Management Review - Follow-up

7. k. Add to training program procedure the present practice of revision review currently being used.

Response - The process for review of construction procedures revisions for any new training requirements has been incorporated into Rev. 3 of FPG-2.000, paragraphs 5.5 and 5.6.

8. Stone & Webster Report Received on Management Review.

--D B Miller

Response - The report was received and the action items have been closed. (D B Miller letter to Stone & Webster dated July 1, 1983, File: 0655, B1.1.4)

9. Need to Have Milandin Flowchart for Future Management Reviews.

--D B Miller

Response - The flowchart has been received and will be used at future meetings.

10. Need Procedure to Handle hanger Lists.

--Bechtel

Response - The procedure to handle hanger lists is covered in FPG-7.500, Section 7.

11. Lesson Plans in Place with the New Format.

--Bechtel

Response - A guideline (G5.00) for Lesson Plan Development has been issued. Lesson plans required for Hanger Team Training are being prepared and approved prior to scheduled training.

12. Complete QA Procedures Necessary to Support Team Status Assessment Activities.

--MPQAD

The procedure for processing commodity lists within MPQAD (tentatively assigned Number 1-4) is dependent upon the field procedures describing preparation and control of the lists. This procedure is presently scheduled for issuance by July 8, 1983. All other required procedures are completed.

13. Establish Scope of PQCI P.230 Vs Normal Inspection QCIs.

--MPQAD

All hangers which have a closed P-2.10 inspection report will be reinspected in accordance with PQCI P-2.30. All other hangers which may have closed IRs (P2.00, C1.50, etc) on parts of the hangers will be inspected under the Construction Completion Program.

STONE & WEBSTER MICHIGAN, INC.
MIDLAND NUCLEAR COGENERATION PLANT
CIO ITEMS

ITEM NO.	CLASSIFICATION	OBSERVATIONS	ORIGINATING DOCUMENT/DATE	CPCO RESPONSE DOCUMENT/DATE	STATUS OPEN/CLOSED	CLOSE-OUT DOCUMENT/DATE
034	Tracked Action	NIR 008 issued on November 14, 1983 to address five unsatisfactory conditions observed during the review of 50 training levels assignments in the System Team Training Matrix of the Construction Training Program.	Report No. 22		Open	
035	Tracked Action	CIO observed that dielectric isolation spacers for galvanic protection of copper pipe to galvanized steel pipe supports were missing in some areas on this system, Small Bore (Instrument Air) KAC Systems, drawing FSK-J-30-0220 Sheet 2 Rev.7.	Report No. 22 11/14/83		Open	
036	Tracked Information	At team meeting of teams 26 and 27 held on November 22, 1983, a decision that FCNs would no longer be issued for "Q" items was discussed. The method for controlling changes has not been finalized.	Report No. 24 11/29/83		Open	
037	Tracked Action	CIO observed that two boards with protruding nails lying in Cable Tray IAKA019 (Q Tray) had punctured the cable jacket of a "Q" cable. The cable is Q-channel A, 480V. MCC. WCR C00925 was issued by MPQAD on November 22, 1983. CIO will track this item to assure that corrective action (repair) has been performed to approved procedures.	Report No. 24 11/29/83		Open	

- 4) CIO performed a 100% re-inspection of the corrective actions of the Construction Training Records that were determined to be discrepant as noted on NIRs 006 and 007. Records were in compliance with the requirements of Procedure FPG-2.000 Rev. 6 and considered to be satisfactory.

In addition, CIO performed 100% inspection of the records of two members of Team 27/28. Records selected were examined and were found to be in compliance with FPG-2.000 Rev. 6. The results of the CIO evaluation of the records sampled were considered to be satisfactory.

The acceptance of the training records by CIO of the two members, qualifies them to perform Status Assessment for Phase I activities. Training records of other members of Team 27/28 will require sampling for CIO review before they will be permitted to perform Status Assessment and before NIRs 006 and 007 can be closed.

- 5) Meetings attended are summarized in Attachment A.

NEW CIO OBSERVATION

Tracked Information Item - #38

In reviewing a checklist developed by Bechtel Lead Field Engineers as aid in conducting Status Assessments to Procedure FPM-7.000 Rev. 1 (Mechanical System Status and Completion), the CIO noted that the checklist does not include all of the attributes required by the procedure.

If special checklists are to be used in statusing, these lists should be addressed by an administrative procedure that provides details on how the lists are to be prepared and used.

Consumers Power Company is being requested to provide background on this item.

OPEN ITEMS, NONCONFORMANCES, AND HOLD POINTS

Open CIO items are summarized in Attachment B. Item 031 was closed during the reporting period.

Open CIO Nonconformance Identification Reports (NIRs) are summarized in Attachment C. NIRs 002, 003, and 004 were closed during the reporting period.

Open CIO Hold Points are summarized in Attachment D. Hold Point 006 was closed during the reporting period.