



STONE & WEBSTER MICHIGAN, INC.

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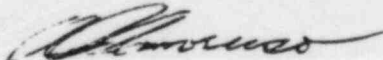
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Nuclear Regulatory Commission
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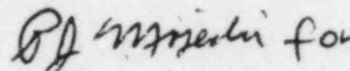
December 15, 1983
J. O. No. 14509

Re: DOCKET NO. 50-329/330
MIDLAND NUCLEAR COGENERATION PLANT
MONTHLY THIRD PARTY ASSESSMENT MEETING

The protocol governing communications for the Remedial Soils and Construction Completion Programs at the Midland Plant, specifies a monthly meeting to discuss third party assessment activities and assigns preparation of the minutes of those meetings to Stone & Webster.

Enclosed are minutes of the meeting held on December 8, 1983.


A. P. Amoruso
Project Manager
CIO


A. S. Lucks
Project Manager
Underpinning and Remedial Soils

Enclosures

cc: JWCook, CPCo
DLQuamme, CPCo
RAWells, CPCo

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MINUTES OF THE MEETING OF DECEMBER 8, 1983

STATUS OF INDEPENDENT ASSESSMENT OF UNDERPINNING AND REMEDIAL SOIL WORK

Purpose

This was a Public meeting to discuss the Third Party Overview activities of Stone & Webster (S&W) and observations encountered regarding underpinning and remedial soils work.

Summary

A.S. Lucks opened the Assessment Team's presentation by stating it would consist of three parts: first, A.S. Lucks would address two of three action items assigned at the previous Public meeting; second, W.E. Kilker would cover the Assessment Team's activities for the month; and third, W.C. Craig would address the third action item with a presentation on his report concerning the change and nonconformance documents.

A.S. Lucks began the first part of the presentation addressing the first of two action items. This first item concerned a question by the NRC as to whether two NCRs written against a concrete pour were related to problems with U.S. Testing. A.S. Lucks stated that the governing specification for the concrete cylinders in question required that the forms be removed between 12 and 24 hours after placement or after 7 days. QC had not verified compliance with the requirement so MPQAD issued two NCRs against QC. This problem was not related to U.S. Testing.

The second action item concerned the status of the Stop Work Order review of change documents pertaining to soils. A.S. Lucks presented the status as of December 6, 1983. The breakdown is as follow:

- Total civil FCRs/FCNs related to soils - 856
 - Phase I review of FCRs/FCNs indicating potential problems - 410
 - Phase 2 review of the 410 Phase I documents that contain problems
- 208

A.S. Lucks indicated that the most significant result as of December 6th. was that no NCRs have been issued for the soils area from either Phase 1 or Phase 2 reviews. The Assessment Team along with the CIO Team are reviewing the Phase 1 product. This review has not been completed and there are no Assessment Team conclusions to date. Mr. Wells confirmed the soils figures and added that 8 NCRs had been written so far for the total effort. These relate to questions of generic implementation.

W.E. Kilker opened his presentation by indicating that, due to the Stop Work Order no construction progress had been accomplished on the underpinning. A summary of the Assessment Team activities during the period November 5 through December 6, 1983, follows :

- A review of crack monitoring procedures and activities of the subcontractor Wiss, Janney & Elstner (WJE) was the major Assessment Team effort during this time. The review results indicated:

1. Minor data recording problems.
- 2) A procedural violation where the subcontract used a procedure with a hold indicated on it. The related specification did not have a corresponding hold on it. NIR 16 was issued.
- (3) Incomplete entry of crack monitoring data for a particular wall. NIR 18 was issued.

4. Prior to the Assessment Team review NCRs and QARs had been issued against WJE for procedural violations. An Assessment Team observation stated that not enough attention was given by Consumers Power Company (CPCo) in performing the crack mapping.
5. More attention should be paid to coordinating procedure changes with specification changes and vice versa.
- 6.) The MPQAD group follow-up for closing out inspection reports should be more prompt. No PIPRs had been issued for the crack monitoring. NIR 19 was issued.

In summary, three NIRs (16, 18, 19) and numerous NCRs and QARs have been written concerning data on this subject. They require resolution prior to continuing construction upon release of the Stop Work Order. The data itself is basically sound and should not be voided. Problems were mainly procedural, for example, attention to minor details and timeliness for closeout. Mr. Harrison stated that the NRC has issued a document to Mr. Quamme dated December 6, 1983, placing a hold on soils work until this issue is resolved.

● An overview of FSO prepared Work Activity Packages (WAPs) by the Assessment Team continued. Two overviews were conducted, one on Piers E/W5 and grillages and the other on anchor bolt installation in the Service Waste Pump Structure. Mr. Landsman asked that in the future weekly reports, the subject of the WAP be identified along with the WAP number. W.E. Kilker agreed.

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- The Assessment Team commitment to review past weekly reports for open items with closures that may not have been fully documented, has been completed. All open items identified as requiring verification of closure have now been closed.
- The last activity was summarized by A.S. Lucks concerning the S&W review of FCR/FCN resolution.

The status of NIRs is as follows:

- NIR 14 is in the process of being closed on the basis of a response that has been prepared by MPQAD. This NIR indicated that the receipt inspection did not properly identify a certain grade of nut to be used with particular bolts on the grillages at Pier 8. A programmatic investigation produced a revision to the receipt inspection procedure that now requires a 100 percent inspection where before it was done on a sampling basis. PQCI will verify that the nuts actually installed are those specified on the drawing. On this basis the NIR will be closed.
- NIRs 16, 18, and 19 have been previously addressed in the discussion of crack monitoring.
- NIR 17 addressed the Phase 1 review of the change document that is being conducted as a result of the Stop Work Order. Later dialogue indicated that the MPQAD review was preliminary and did not match the Assessment Team interpretation of the applicable procedure. The procedure was changed to clarify this point. The affected FCRs were disposed of in accordance with the Assessment Team interpretation and the NIR was closed.

W.C. Craig opened the summary of the Assessment Team report "Evaluation of Change/Nonconformance Documents" by explaining that the report was initiated due to Assessment Team's concerns expressed in Weekly Reports 40, 43, and 46, about the time it was taking to construct piers.

A familiarization process was conducted where Mr. Craig took the following actions:

- A review of design drawings
- Visits to the site and work areas
- Attendance at appropriate meetings
- An evaluation of change and nonconformance documents to establish trends
- Review of governing procedures
- An evaluation of the organizational structure for processing the change and nonconformance documents.

The results indicated that the effect of FCRs and FCNs on construction warranted further investigation.

An analysis of change/nonconformance response times was performed using a large sample of the documents. They were classified to show impact by subject matter. The results indicated that although response times in general, looked good on a day to day basis, the unique importance of sequencing to underpinning efforts magnified the effect on the construction schedule.

The recommendations that resulted from this study were then presented.

Recommendation No. 1

A program implemented to review both existing and new construction procedures,

project quality control instructions, and project specifications should receive a high priority. This effort should:

- define poor quality attributes,
- ensure that activities are more consistent with the
- intent of the specifications,
- clarify quality requirements
- define better utilization of technical resources in achieving quality goals.

Response to Recommendation No. 1

The Bechtel Field Soils Organization (FSO) presented a proposal for the QAP review program to CPCo. management. The generic concept of the QAP review program was accepted by CPCo management. CPCo's management assigned the lead responsibility of this activity to MPQAD and established a Task Force approach involving a full committee and subcommittee.

The Task Force committee established guidelines as follows:

- a. Select subject for a pilot review program
- b. Develop guidelines for the subcommittee
- c. Identify subcommittee representatives
- d. Schedule activities
- e. Review subcommittee recommendations
- f. Make recommendations to management.

The subcommittee reviewed installation of Hilti Expansion Anchors and covered the PQCI, Construction Procedure, and the specification and made recommendations to the Task Force committee regarding proposed revisions to these documents.

A second procedure covering structural steel was selected for review. After the review of the second procedure is completed, the subcommittee will make further recommendations to full committee.

The final extent of this effort and the decision to review other procedures is contingent upon the recommendations that will be made to CPCo's management by the Task Force committee after the completion of the review of the second procedure.

Recommendation No. 2

Expedite the underpinning design work so that the associated design calculations and drawings may be transmitted to the job site along with necessary technical support. This will expand the ability of the Resident Engineer to approve the change or non-conformance documents in the shortest time possible. Maximum engineering support at the jobsite would assist with problems encountered with this type of work.

Response to Recommendation No. 2

The design calculations for the Borated Water Storage Tank were delivered to the site as of November 2, 1983.

The design calculations for the Service Water Pump Structure will be delivered to the site in two phases. An initial review of the proposed delivery dates coincides appropriately with the construction activities.

The design calculations for the Auxiliary Building, with the exception of computer calculations or extremely complex calculations, will be delivered to the site in three phases. An initial review of the delivery schedules indicates that they coincide appropriately with the construction activities. These calculations will also be supported with additional design personnel

assigned to the jobsite.

The Resident Engineering Soils Organization has been reorganized and an additional Group Lead dedicated to the handling of FCRs, FCNs and design-related NCRs and vendor drawings has been assigned. Seven additional designers have been assigned to this organization.

Bechtel has issued a memorandum covering the reorganization of the Resident Structural Engineering Soils Group, assignments of increased responsibility at the jobsite, and the goal of having the capability for 80 percent final approval of change documents at the jobsite.

Technical support is currently onsite for the engineering consultants of Hanson Engineering Inc. and Mueser, Rutledge, Johnston and DeSimone.

Recommendation No. 3

FCRs should receive final approval by the Project Engineer shortly after interim approval has been granted.

Response to Recommendation No. 3

Bechtel procedure entitled " Field Change Request/Field Change Notices, PEP No. 4.62.1, Rev. 1, dated December 2, 1983 has established time intervals from interim to final approval of FCRs and FCNs. An expected approval time, a maximum approval time, and an overall approval time for initiation to final approval have been stipulated.

This procedure also establishes guidelines for the updating of drawings and covers this in terms of all change documents and specifies a maximum time for updating drawings from the issuance of the first document and a maximum time after the issuance of a fifth document.

The response time will be improved with the delivery of the calculations to the jobsite, increase in the staff of the Resident Structural Engineering Soils Group and its reorganization as described in the Responses to Recommendations No. 2.

Bechtel has also instituted a review for drafting completeness on the change documents in order to expedite the turnaround time on drawing update.

CPCo. proposes to phase out the use of interim approval on the FCRs and FCNs and expects to implement this in the first quarter of 1984.

Recommendation No. 4

NCRs should have trend analysis performed which relate the number of NCRs to the level of construction effort. Also, the NCRs should be classified by subject, and this should be issued and reviewed to assist in providing an indicator to problem areas.

Response to Recommendation No. 4

Bechtel performed a one-time study of NCRs that relates the NCR to the construction effort in terms of man-hours. This study indicated a direct correlation between the number of NCRs issued and the level of effort in terms of man-hours that was being expended. However, no trending of quality can be made from this study.

Bechtel has entered all of the NCRs in a computerized logging system that permits the NCRs to be sorted by date, subject matter, response time, and other attributes.

The FSO has developed and is using an NCR evaluation form which will review each NCR issued and determine if there is a need to take corrective action

on the methods used to accomplish the work. The FSO is also performing a detailed evaluation of all NCRs related to welding.

MPQAD is developing a trend analysis system to be applied plantwide that will evaluate the total number of attributes against a number of unsatisfactory attributes versus time for each activity and attribute. It is expected that this new trend analysis will be implemented in the first quarter of 1984.

Recommendation No. 5.

It is important that Bechtel continues to strive to reduce the response time on critical NCRs that could delay the work.

Response to Recommendation No. 5

The FSO will continue to identify and status critical NCRs at the weekly Engineering/Construction meetings which are attended by AAPD Project Engineering, Resident Engineering, Field Engineering, MPQAD, SMO, and the Independent Assessment Team.

The Resident Engineering Soils Organization has been expanded with additional personnel onsite who have specific responsibility and authority to disposition design-related NCRs. This should reduce the current response time and minimize the response time on priority NCRs which could impact the progress of the work.

Bechtel will continue to give priority to the NCRs being reviewed by MPQAD.

Mr. J. Mooney and Mr. R. Wells then provided the following responses to the five items requiring CPCo action from the November public meeting.

1. Compare the findings of the MPQAD audit of U.S. Testing with results of Field Engineering's evaluation.

The primary purpose of the Field Engineering evaluation of U.S. Testing was conducted with the goal of assessing management, staffing, and ability to meet project demands. It was not an audit directed at identifying non-conforming programmatic QA requirements. However, CPCo compared the results of the Field Engineering evaluation with the MPQAD and confirmed that the Field Engineering evaluation observations had not identified non-conforming items that had been missed by the MPQAD audit. U.S. Testing has continued to make progress in improving their operation and a new manager, Mr. Lawrence Smetana is on site.

2. Evaluation of the concrete work truck mixer drum rotation problem.

Several discussions have been held between the NRC Region III Staff since the November public meeting. CPCo now understands what is required to resolve the problem. CPCo will provide a response on this item to Region III within the next several days.

3. Transfer of the lessons learned from the Auxiliary Building underpinning to the Service Water Pump Structure underpinning.

A task force has been formed to review the auxiliary building underpinning activities. The task force is compiling a matrix of lessons learned which will be used to review the underpinning for the Service Water Pump Structure. The matrix is scheduled for completion by December 16, 1983 and the review has a targeted completion day of January 30, 1984.

4. QC inspection of non-structural welding on Q materials

Based upon review of the QC inspections of non-structural welds, it was determined that when the QC inspectors were verifying the welding engineer's sign-off on non-structural welds, they have been reinspecting the welds for possible damage to base Q materials

even though this was not required by the PQCI. This was verified by 100 percent interview of the QC inspectors. However, there was one exception, the tack welding of jackstand guides to pier baseplates was not inspected by MPQAD. In this case, reinspection has found that the welds are satisfactory. The PQCI will be modified to require that this aspect be documented in future.

5. Crack mapping problems

An extensive review of the crack mapping program has been undertaken. Problems were identified with respect to procedural attributes, specifications, and timeliness of reporting and review. Several NCRs and QARs were issued. On November 30, 1983 a status report was provided to Region III and the specific corrective actions were documented in a letter to Mr. Harrison dated December 2, 1983. All corrective action will be accomplished before work resumes.

Mr. Landsman asked whether the revised procedures would be under level 3 approval. CPCo replied that they would be Level 1. Mr. Landsman and Mr. Harrison also expressed concern that the QA overview had not been performed for an activity that had been ongoing for some 2 years. CPCo pointed out that the overview requirements had only been in existence for some 10 months, but they realized that this function had been missed. The corrective action will be taken to prevent recurrence.

This concluded the presentations at which point Mr. Harrison stated that the status of the required actions from the November meeting are:

- S&W actions--all items closed

- CPGCo actions -- Items 1 and 4 closed, with the other items remaining open

Questions and Answers

Mr. J. Harrison and Dr. R. Landsman asked several questions concerning items included in Assessment Team Weekly Reports Nos. 59 through 62:

1. Could Stone & Webster elaborate on Item 59-18 that refers to a hold on a crack monitoring procedure? The part of the Wiss, Janney and Elstner crack mapping procedure dealing with crack monitoring after the loading of the E/W8 grillages was designated as being on hold. The crack monitoring was performed using this procedure. The specification did not indicate that there should have been a hold. The crack monitoring was completed at the appropriate time but the hold was still indicated in the procedure. NIR No. 16 was issued because of this.
2. On page 2 of Weekly Report No. 59 it is mentioned that the review of Weekly Reports No. 30 through 59 identified 8 items that required verification of closure. Were these included in the open item list? Yes. The correct number was 5 items.
3. Item 59-5 indicates that the 4 hour time requirement for reporting two new 10 mil cracks at the SWPS was exceeded by a large amount (18 days). The NRC stated that action must be taken to avoid such delays in the future. The initial report was made some 2 days after the cracks were noted but the data sheets were illegible and this resulted in the long delay in noting the alert level.

4. Item 59-13 reports that the Assessment Team received strength test results for the plasticized concrete mix design. Did the Assessment Team state whether they were satisfactory? No, the results were requested for information only.
5. Item 59-16 indicates that the SWO was revised to allow the processing of interim approved FCRs and the completion of the SWPS/CWPS seals. Why was this action taken? The interim approved FCRs had to be processed so that they could be included in the SWO corrective action. The work on the SWPS/CWPS seals was a maintenance type item.
6. Item 59-17 mentions two NCRs on Carlson meter concrete curing at Pier W8. Was Pier W8 loaded with open NCRs? The NCRs were written based upon a QA Overview of Inspection Reports. Pier 8 was completed during the summer and the QA overview of old Inspection Reports was conducted during November. Therefore, these NCRs were not issued when the pier was loaded. CPCo will respond to this item at the January public meeting.
7. Item 59-6Q identifies a welding consultants report that was given to the Assessment Team. What were the contents of the report? The welding consultant was retained by MPQAD to review the welding inspection because there had been a number of NCRs issued in this area. The consultant, Mr. Svekric of Welding Consultants, reviewed the welding procedures and the inspections. The consultant concluded that the number of NCRs were related to the type of welds being performed and that the level of inspection was appropriate.

8. Item 60-3 indicates that crack mapping was included in the SWO. Was that the case? Yes, initially the crack mapping was stopped. Two days later it was exempted from the SWO.
9. Item 60-3Q identifies a mechanism for identifying Quality concerns. Could CPCo elaborate on this item? MPQAD has A new procedure to obtain information or clarifications is now used to replace the old QAR procedure. The new procedure is entitled " Request for Information/Action."
10. What does the last sentence of Item 60-4Q mean? The inspection of structural welds is not accomplished by the same procedure as nonstructural welds. In the case of structural welds. QC does all of the inspection.
11. On page 1, of Weekly Report No. 61, the Assessment Team reviewed a sample of the classification of change documents, being reviewed as part of Phase 1 of the SWO corrective action and found one-third did not meet the procedural requirements. Could this be elaborated upon? The batch of change documents supplied to the Assessment Team had not been subjected to the complete review process thus resulting in the high percentage of problems.
12. Is the Assessment Team finding that the Work Activity Packages (WAPs) submitted for review are in better shape than they were, say, a year ago? What is the turn around time? Yes, there has been improvement. The turn around time is about a week. but

there are reviews that take longer.

13. Weekly Report No. 61 indicates that Assessment Team questions on WAP-59 are still open. This WAP has been authorized by the NRC. Why are Assessment Team questions still open? Originally, the Assessment Team did not have any comments on it. After the work was authorized, the Assessment Team did submit questions. Additional information on this item should be presented at the January public meeting.
14. Item 61-3 deals with the wedging of the E/W8 bulkhead lagging. Could this be explained? The Assessment Team had previously discussed the need for full bearing of the lagging on the soldier pile flanges. FSO had agreed to make an addition to the drawings to address this concern. However, this was one of the items identified from the review of previous open items, as still requiring action. The Assessment Team had originally inspected the lagging and had found it to be properly wedged.
15. Item 61-9 states that there is not a settlement criterion for the rejack and lock-off for the E/W8 grillages. Should there be an acceptance criteria for settlement? There is an acceptance criteria for settlement when rejack is required due to relative movement between a pier and the building. The rejack discussed in 61-9 was required by an alert level in the steel column that transfers the load from one end of the grillage beams down into the containment building mat. Under this condition there is not a criteria for settlement. The Assessment Team has not evaluated this requirement but will do so and will be prepared

to discuss it at the January public meeting.

16. Item 61-11 mentions that Bechtel issued a memorandum giving instructions relative to the rotation of concrete truck drums. The NRC restated their concern with respect to the past use of memoranda to correct problems. It was pointed out that in this case there had not been any procedural violations that required correction.
17. Item 61-15 deals with the control of the consistency of bentonite slurry. Does the Assessment Team believe that requirements with respect to slurry consistency should be included in the procedure? Work covered by this procedure has been completed (removal of 36 inch diameter casings). In the case of the use of slurry for soldier pile installation, the procedural requirements are adequate. The NRC stated that if in the future additional slurry operations are required, consistency requirements should be included in the necessary procedures.
18. Is Item 62-2 dealing with the response time with respect to the review of crack mapping data still open? Is Bechtel's issuance of a memorandum the only action being taken? Yes, it is still open. Procedural changes are also being required to address this problem. The NRC again expressed concern with respect to the possible over-reliance on memoranda.
19. With reference to the Management Review Team's trip report that is attached to Weekly Report No. 2, is CPCo planning to address their comment.

In particular what efforts are being undertaken to reduce the time for which areas of the building remain unsupported during underpinning construction? The following steps have been taken: more road map meetings are being held prior to major activities so that everyone understands what is necessary; the availability of required materials is being reviewed prior to the start of construction operations. It is CPCo's goal to make progress in this area.

Required Action

The following actions are required by the Assessment Team:

1. In future Weekly Reports, Work Activity Package titles will be included along with the Work Activity Package number.
2. The Assessment Team will evaluate the need for a settlement criterion when rejackung of the E/W8 grillages is required by alert strain levels on the steel columns that bear on the containment mats.
3. At the January public meeting, explain why there are still Assessment Team questions open on Work Activity Package No. 59 (Refer to Item 13).

The following actions are required by CPCo:

1. Action must be taken to avoid delays in reporting alert level cracks (Refer to Item 3).
2. At the January public meeting, provide information on timing of two NCRs on Carlson meter concrete form removal (Refer to Item 13).

The following items remain open from the November meeting. CPGCo required action.

3. Evaluation of Concrete Mixer Drum Rotation
4. Transfer of Lessons Learned in Auxiliary Building underpinning to SWPS underpinning.
5. Crack Mapping Problems.

MINUTES OF THE MEETING ON DECEMBER 8, 1983

STATUS OF CONSTRUCTION IMPLEMENTATION OVERVIEW (CIO) PROGRAM

Purpose

To discuss Third Party Overview activities of Stone & Webster (S&W) and problems encountered regarding the Construction Completion Program (CCP) during November 1983.

Summary

Mr. R. G. Burns, Assistant S&W Corporate Quality Assurance Manager, outlined the classification and tracking system for items identified by the CIO and Remedial Soils Programs. Key points follow:

- ° The system has two major categories - Tracked Items and Untracked Items. Tracked Items are further divided into three subcategories - Action, Information, and Recommendation.
- ° Tracked Items require the completion of appropriate steps before the items are closed. Tracked Action Items will be closed when completed corrective measures are verified. Tracked Information and Recommendation Items will be closed when replies are received. Based on the importance of the items and confidence established by the replies, items could be closed at that time, kept open until corrective measures are verified, or kept open until amplifying information is provided. Information and Recommendation Items that are closed before all steps are accomplished, will be reviewed periodically to ensure that commitments are met before the items are retired.
- ° Untracked Items are general in nature and not conducive to tracking. These items will be documented in CIO weekly reports and reviewed periodically to monitor changes in status. Changes will also be included in weekly reports.

- ° Items identified to date will be reclassified in accordance with this new system.

Mr. A. P. Amoruso, Project Manager for the CIO Program, presented a summary of Program activities for November 1983. Three main topics were covered:

- ° Assessment Activities

The stop-work orders involving concerns about the control of design changes remained in effect during November. Since these orders prevented starting the statusing and verification parts of the CCP, assessment efforts continued to be focused on monitoring management meetings, checking the progress of teams to be used in carrying out the statusing phase of the CCP, and evaluating training programs.

Fifty-three management meetings were monitored. Management direction at these meetings appeared appropriate. Some 480 hours were expended monitoring the development of commodity lists for use in statusing and verifying conditions in the plant and monitoring training being given members of CCP teams to standardize assessment terminology. Procedures used in developing the commodity lists proved adequate and the training designed to standardize terminology met objectives. Four training presentations followed prescribed lesson plans and effectively conveyed key information.

In two of the three areas outside the CCP but within the scope of the CIO; namely, the Nuclear Steam Supply System and Heating, Ventilation, and Air Conditioning (HVAC) programs, assessment opportunities continued to be limited during November due to the lack of significant activity in those programs. For the Spatial System Interaction Program (SSIP), the third area, the analyses of twelve interactions were witnessed and found to be in accordance with Program requirements.

CIO Items, Nonconformances, and Hold Points

Five CIO items were identified during November. Two of the items were discussed during the last meeting. Topics covered by the items follow:

- ° Administrative discrepancies in the training records of construction support groups.
- ° Discrepancies in training levels of the Construction System Team Training Matrix.
- ° Missing isolation spacers for galvanic protection of copper pipes in galvanized steel supports in the non-safety related Instrument Air System.
- ° Request for confirmation that field change notices will no longer be issued for safety items.
- ° Damage to cable jacket from protruding nails in boards lying in a cable tray.

Checks for the document that specified isolation spacers for the Instrument Air System produced only an interoffice memorandum. Because memorandums may have also been used to promulgate work instructions for safety related systems, a new item is being opened requesting that Consumers Power Company (CPCo) ascertain that this is not the case. This item will be discussed at the next meeting.

One item was verified corrected and closed during November. That item addressed discrepancies in the training records of quality assurance and quality control personnel.

Three nonconformances identified by the CIO Program remained open. The three address administrative deficiencies in training records.

Six hold points established by the CIO Program remained open. These included the following:

- ° Development of a Vendor Equipment Verification Program before the start of Phase II of the CCP.
- ° Evaluation of the Management Review of the results of Phase I activities before the start of Phase II of the CCP.
- ° Correction of Training Records for Construction CCP Teams before people involved are used in the statusing part of the CCP.
- ° Correction of Training Records for Construction Support Groups before people involved are used in the statusing part of the CCP.
- ° Upgrading the level of training in five elements of the Construction System Team Training Matrix before people involved are used in the statusing part of the CCP.
- ° Verification of Phase I and II evaluations of the FCR/FCN Review before Stop-Work Orders are lifted.

Highlights of November

° Classification of CIO Items

The 37 items identified by the CIO Program through November have been reclassified in accordance with the new system described at the beginning of meeting by Mr. Burns. In the new system, seventeen items are in the Tracking Action category, sixteen are in the Tracking Information category, and four are in the Tracking Recommendation category.

Seven of the 37 items are open. Six of these are in the Tracking Action category and one is in the Tracking Information category.

° Quality Assurance Department Training Records

Four CIO nonconformances addressed administrative deficiencies in the training records of Quality Assurance Department personnel. Corrective action was taken by the Department. The effectiveness of this action was verified by the CIO, and the nonconformances were closed.

° CIO Staff

The CIO staff has increased to 29 in anticipation of the start of CCP statusing and verification. Additional people will be brought in and the mix of disciplines varied as the actual verification load dictates.

Action Items from Last Meeting

- ° Mr. Burns, S&W, presented the new system for classifying and tracking items at the beginning of the meeting. The summary of the re-classification of CIO items in the new system was presented under Highlights of November.
- ° Mr. R. A. Wells, CPCo, discussed when inaccessible items would be evaluated. The items will be evaluated during Phase I of the CCP. Concern about when such items would be evaluated came from a statement made at a Verification and Status Assessment meeting that was included in a CIO weekly report. That discussion addressed procedures that might be used if Phase II was started before Phase I finished. Mr. Wells stated that CPCo understands their obligation to obtain NRC approval if clarification or a change to the CCP is needed. Mr. J. J. Harrison, NRC, stated that the CPCo staff had recently given a comprehensive presentation on their program for inaccessible items which he thought was a good system.

Questions and Answers

- ° Mr. R. N. Gardner, NRC, asked if actions being taken to correct the specific training deficiencies identified by the CIO will be applied to all people who will be used in Phase I of the CCP.
Mr. D. L. Quamme, CPCo, stated that training required for each person will be assured before that person starts work.
- ° Mr. J. J. Harrison, NRC, asked what category in the new system would the issue concerning welding criteria in PQCI's fall into. The issue was discussed at the last meeting. Mr. Amoruso, S&W, stated that the item was a Tracking Recommendation.
- ° Mr. R. Cook, NRC, asked if discrepancies in the training program were all programmatic. Mr. Amoruso replied that the discrepancies were administrative.
- ° Mr. Harrison asked if the CIO had an opinion as to whether the action taken by the Quality Assurance Department concerning disposition of the nonconformance report on an arc strike on a fabrication produced at the Standish Fabrication Plant was proper. The item was contained in a CIO weekly report. Mr. J. C. Thompson, S&W, stated that the action was proper. The arc strike had occurred at the fabrication plant and was detected and reported by quality control personnel. Since the defect had been detected by quality control personnel, preventive action was a construction responsibility.
- ° Mr. Harrison asked if the discrepancies found in codes on the construction training matrix were similar to those that were discussed at a management review meeting in July. Mr. Wells stated that action believed appropriate in July was taken but now a different opinion is being given on the correctness of those decisions.

Mr. Harrison asked CPCo to check into the issue to see if the problem is recurring.

- ° Mr. Harrison asked if the six interactions reviewed by the CIO and included in a CIO weekly report were satisfactory. Mr. Amoruso stated that the interactions were satisfactory.
- ° Mr. Harrison asked about turnover packages between field engineers and test engineers. Mr. Quamme stated that the packages contain documentation and turnover exceptions that construction considers complete for test operations. Test engineers walk down the systems to verify that the documentation agrees with existing conditions. Errors have appeared in some of these packages, and steps have been taken to correct the problem. One of the steps is to submit preliminary packages for review.
- ° Mr. Harrison asked if the relocation of 500 pipe hangers that will require reinspection was due to rework. Mr. Wells stated that the relocations are due to rework.
- ° Mr. Harrison asked when the revision of the training matrix would be completed since an item in a CIO weekly report indicates that CCP team members will require additional training when that revision is promulgated. Mr. Quamme stated that the revision will be completed by January 15th. Special instructions have been issued to cover people who have to be put in the field before that date.
- ° Mr. Harrison asked if a procedure covers the routing of nonconformances when they are returned from Ann Arbor since an item in a CIO weekly report states that the nonconformances are being returned directly to the initiator bypassing the formal routing sequence. Mr. Wells stated that the comment in the CIO report referred to coordination needed in the routing process with CCP teams. A discussion on whether the routing problem was a nonconformance ensued, and the CIO was asked to resolve the issue.

- ° Mr. Gardner asked for clarification on why the CIO had delayed the review of field change documents that had been processed under the field change review program. Mr. Amoruso stated that the CIO review had been originally scheduled before the verification by the Quality Assurance Department. The review was rescheduled after the verification. This change was considered consistent with the CIO objective of ensuring that the Quality Assurance Department carries out their responsibilities properly.
- ° Mr. Harrison stated that a protocol infraction by the CIO had been outlined in a CIO weekly report. The infraction involved sending a copy of the transcript of the last meeting to CPCo and Bechtel but not to the NRC. Corrective action was considered appropriate.
- ° Mr. Harrison asked for clarification of a statement in a CIO weekly report that Groups I and II were not preparing for status assessment in the same way Group III was. Mr. S. W. Baranow, S&W, stated that Group III had been undergoing mockup training to standardize assessment terminology. A later report mentions that Groups I and II have since conducted similar training.
- ° Mr. Harrison asked what was going to be done with field control changes since an item in a CIO weekly report stated that field control notices would no longer be used for safety related work. Mr. Wells stated that initially after lifting stop-work orders, there would be no field control notices for safety related work. Later, after the change process has been reviewed by project engineering, a new program will be developed. This program will be more limited as to when a field change notice can be used and will only require approval of project field engineering.

- ° Mr. Harrison asked about the walkdown of systems to identify low alloy quenched and tempered steel (LAQTS) bolts. Mr. Wells stated that the effort to identify LAQTS bolts has been ongoing for over a year. The bolts have to be checked for hardness because of an industrial problem involving the control of hardness testing. Since all the LAQTS bolts in the plant may not have been located, statusing will be used to assist in that effort.

Action Items

- ° CIO resolve whether CCP teams are having a problem receiving the dispositions of nonconformances and, if a problem does exist, whether the cause is one of routing, coordination, or a procedural noncompliance.
- ° CPCo present at the January meeting the background on training level codes used in construction training matrices.