



# STONE & WEBSTER MICHIGAN, INC.

P.O. Box 2325, BOSTON, MASSACHUSETTS 02107

PRINCIPAL STAFF			
KA	Lee	IMP	
D/FA		DE	
A/FA		DESH	
RC		LAH	
LO		DES	6/17/83 ✓
EA			
ERI			

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

November 8, 1983  
J. O. No. 14509  
NRC File #83-11-08

RE: DOCKET NO. 50-329/330  
MIDLAND PLANT - UNITS 1 AND 2  
OVERVIEW OF THE CONSTRUCTION ON COMPLETION PROGRAM  
REPORT NO. 21

A copy of the Construction Implementation Overview Report No. 21 for the period October 31, 1983 through November 4, 1983 is enclosed with this report. No Management Review Committee Meetings were held during this reporting period.

Evaluations of CCP activities including the final report of an allegation of improper welding, and matrices of Open Items, NIRs, and Hold Points, are attached.

Very truly yours,

S. W. Baranow  
Program Manager

SWB/ka

cc: JHarrison, US NRC Glen Ellyn, IL  
RCook, US NRC Midland (site)  
DQuamme, CPCo Midland (site)  
RBKelly, S&W  
APAmoruso, S&W  
RGBurns, S&W

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PDR ADOCK 05000329  
G PDR

Report No. 21

October 31, through November 4, 1983

Personnel on Site

Stone & Webster Michigan, Inc.

A. Amoruso  
S. Baranow  
F. Bearham  
J. Barr  
R. Carpeggiani  
J. Chawla

D. Cooke  
R. Corson  
J. Langston  
C. Marrs  
D. MacBay  
T. Parker

R. Scallan  
J. Seely  
W. Sienkiewicz  
A. Smith  
W. Taylor  
J. Thompson  
G. Foley (temporary)

Meetings Attended

<u>Date</u>	<u>Attendees</u>	<u>Purpose</u>
November 1, 1983 through November 4, 1983	Consumers Power Company Bechtel Power Company Stone & Webster CIO MPQAD	Daily Staff Management Meetings
November 3, 1983	Consumers Power Company Bechtel Power Company Stone & Webster CIO MPQAD	Bi-Weekly Staff and Meetings with Team Supervisors
November 1, 1983	Consumers Power Company Stone & Webster CIO Bechtel Power Company MPQAD	QVP/Status Assessment
November 2, 1983 and November 3, 1983	Consumers Power Company Bechtel Power Company Zack MPQAD Stone and Webster CIO	Area Team and System Team Review Meeting
November 4, 1983	Consumers Power Company Bechtel Zack B & W Stone & Webster CIO	Weekly Sub-Contractors MTG

November 1, through November 4, 1983 - During this period, CIO attended daily staff management meetings and bi-weekly meetings with staff and team supervisors.

The main focus of attention during the week was the Stop Work Orders issued by MPQAD. At the daily meetings, details of current status and proposed actions are described as well as the logistics to resolve the problems in a timely manner.

Subjects discussed at the daily staff management meetings were:

- Stop Work Orders
- NCR Dispositions
- Delays in Dispositioning/Closing NCRs
- Audit Findings
- NRC Concerns
- Document Control
- Training Progress
- Progress with Procedure Issuance
- Major Meetings
- Status of System 38
- Other Administrative Activities
- Manpower Loading

Subjects discussed at the bi-weekly meetings with staff, team supervisors and support personnel were:

- Training
- Staffing to support Module 340 activities
- Punch List Coding

### Meetings

November 1, 1983 - QVP/Status Assessment. At this meeting, the main items discussed were assignments of key people to the teams that will assess Module 340 and preparations for this effort.

The major restraint affecting Module 340 is the Stop Work Order issued on the improper use of FCRs and FCNs. A schedule for releasing the Stop Work Order has not yet been established, but for planning purposes, it was decided to assume that the Stop Work Order will be closed and work released on November 30, 1983.

November 2 and 3, 1983 - Area and System Team Review Meetings. At these meetings, an item that is considered to be a restraint is discussed. Action person(s) are assigned to pursue the resolutions for removing restraints. Also discussed is the schedule for completing actions assigned to each restraint item and the progress in meeting the schedule.

### ACTIVITIES

#### 1. Training Records

CIO completed a sampling inspection of Construction Training Records of 8 members of the Field Engineering Staff, 2 members of Area Team Number 24, 5 members of Field Procurement, 4 members of Sub-Contractors, 5 members of Management, and 4 members of the Construction General Services Organization.

Eight-hundred thirty-four (834) individual records were reviewed. The number of discrepancies that were noted resulted in a rejection of the training records for the 28 people sampled and issuance of NIR 007.

Principal categories of discrepancies were:

(a) course roster not completed properly, (b) training classes not documented, (c) reading assignments not documented, and (d) training records not completed consistently.

NIRs 006 and 007 has been issued as a result of these discrepancies.

#### 2. Allegation

On October 26, 1983 - CIO received an anonymous phone call alleging that welding was being performed, contrary to approved procedures. (See CIO Report No. 20, dated October 31, 1983 for details of the initial investigation).

CIO met with Mr. L. Harrison (BPCo) to complete the investigation into the allegation. A weld was selected at random, joint HBC-4-2-1. CIO reviewed the welding records generated during the initial welding and subsequent repair welding on the joint. The initial welding was performed utilizing approved procedure number P1-A-LH. The weld was completed using procedure P1-A-LH and accepted by BPCo and the Authorized Nuclear Inspector on August 9, 1981. This particular weld later became the subject of NCR 2781 for being undersized. A repair was made using approved procedure P1-T-B. This repair was inspected and accepted by BPCo and the Authorized Nuclear Inspector. A review of the code (QW-2.01.3 and QW-202.2) indicated that either P1-A-LH or P1-T-B could be used singly or in combination. In addition, BPCo Technical Specification G-27, Subsection Form 84 Mechanical allows the use of either P1-A-LH (SMAW) or P1-T (TIG) for this weld.

In conclusion, CIO has determined that the allegation was factual with regard to the weld sequence. As the BPCo procedures utilized were approved and the intent of ASME code and the Technical Specification were complied with, CIO has determined that no non-compliance conditions exist. This closes the CIO investigation of the allegation.

### 3. PQCI Stop Work Order

On November 3, 1983 - MPQAD issued a Stop Work Order on the use of eight Electrical/Instrumentation PQCI's. The PQCI's specified inspection requirements for in-process and final inspections of welding, but these requirements were not consistent.

The potential for this problem was discussed in CIO Weekly Reports numbers 9, 11 and 18.

### 4. FCP/FCN Stop Work Orders

On October 22, 1983 - MPQAD issued Stop Work Orders because of concerns about processing design changes.

CIO has been attending meetings of the Stop Work Steering Committee and is developing checklists for use in evaluating steps taken to resolve FCP/FCN discrepancies. Attributes for these checklists are being extracted from.

(a) Flow Chart Plan

(d) FID - 2.400 Rev. 4

(b) FPD - 1.000 Rev. 16

(e) PEP - 4.62.1 Rev. 0

(c) FPD - 2.000 Rev. 10

(f) ADP - 2.12 Rev. 0

In addition, a sampling of FCR/FCNs will be reviewed to determine the adequacy of corrective actions.

GENERAL

1. Signed affidavit and resume of W. C. Taylor, Assistant Superintendent of Field Quality Control, has been transmitted to Mr. J. J. Harrison, US NRC, Glen Ellyn, IL.
2. In accordance with the latest PQCI Control Log dated October 26, 1983, 65 PQCI's are listed as active. The status of CIO checklists for these PQCI's follows:
  - (a) approved - 37
  - (b) under revision and draft review - 28

Zack Training

3. In accordance with a pre-established CIO monitoring schedule of Zack activities, CIO performed a review of 36 training records of 2 Field Engineers. Results were determined to be satisfactory and were documented on Checklist MP-MIS-Z-025 which was developed to meet the requirements of Zack MB-FP-16 "On-going Training" Rev. 1.

This procedure is being revised to include matrices, required reading lists and formalizing training packages.

This revision is currently in review by MPQAD. Upon receipt of the approved version, CIO will develop a new Checklist and repeat the evaluation.



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

Observation Number	Observations	Originating Document/Date	CPCo Response Document/Date	Status Open/Closed	Close-Out Document/Date
030	Need to review Vendor Equipment Verification Program - MPQAD/SMO	Report No. 5 7/18/83		Open	
031	NIRs 002, 003, 004 and 005 were issued on October 3, 1983 for discrepancies observed in the review of Training Records of 6 of 45 MPQAD personnel.	Report No. 16 10/3/83		Open	
032	NIR 006 issued on October 27, 1983 to address discrepancies observed during sample inspection of Construction Training Records of Teams 5, 6, 8, 9, 12, 13, 16, 17, 19, 20, 25, 26 (27/28) 29, 30, 31, 32/33 and BHO staff.	Report No. 20 10/31/83		Open	

STONE & WEBSTER MICHIGAN, INC.  
CONSTRUCTION IMPLEMENTATION OVERVIEW  
NIR LOG SUMMARY

NIR NO.	MPQAD NCR NO. QAR NO.	SUBJECT	DATE OF ISSUE	DATE DISP. BY MPQAD	DATE CLOSED	REMARKS
001	N/A	Training Records	8/15/83	8/15/83	8/17/83	NIR Issued as closed-no corrective action required
002	QAR RT 00005	Forms from both procedures B-3M and B-3M-1 are intermixed in training records	10/4/83	10/12/83		
003	QAR RT 00006	Yearly vision examination was exceeded	10/4/83	10/12/83		
004	RT 00007	OJT training records not available in training records. Revision number not listed on OJT Record	10/4/83	10/12/83		
005	QAR RT 00011	Personnel Certification Form QA-116-1, Attachment D is unavailable in record files	10/4/83	10/12/83	10/20/83	Memo to CPCo advising that NIR-005 can be closed out. Records for Level II certifications have been verified by CIO
006		Discrepancies in three areas of Construction Training Records	10/27/83			



STONE & WEBSTER MICHIGAN, INC.  
CONSTRUCTION IMPLEMENTATION OVERVIEW  
NIR LOG SUMMARY

NIR NO.	MPQAD NCR NO.	SUBJECT	DATE OF ISSUE	DATE DISP.	DATE CLOSED	REMARKS
007		Discrepancies in two areas of Construction Training Records for the following teams No. 24, Field Procurement, Sub-Contractors, Management, Field Engineering Staff and Construction General Services Organization	11/7/83			

STONE AND WEBSTER ENGINEERING CORPORATION  
NONCONFORMANCE IDENTIFICATION REPORT

QCI 15.01  
Attachment 4.1  
Revision 2  
Page 1 of 2

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 Lu Bussard

DATE NOVEMBER 7, 1983

DATE November 7, 1983

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION	SAT	UNSAT
INITIATOR		
DATE		

NEW NIR#

DATE

CONCURRENCE

PROGRAM MGR

DATE

REMARKS

NIR 007

- 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.

STONE & WEBSTER MICHIGAN, INC.  
CONSTRUCTION IMPLEMENTATION OVERVIEW  
HOLD POINT LOG SUMMARY

NO.	SUBJECT	ORIGINATING DOC/DATE	CPCo RESPONSE DOC/DATE	STATUS OPEN/CLOSED	CLOSE-OUT DOC/DATE
001	Adequacy of drawings A8 - large bore pipe hangers. CIO established Hold Point when MPQAD issued 2 NCRs against the use of red-lined drawings which were voided by Project Engineering.	Report No. 6 7/25/83	Letter 8/9/83	Closed	Report No. 9 8/15/83
002	Material traceability of installed hangers(E3). CPCo response dated 7/1/83 indicated report on material traceability was to be issued in a timely manner. Due to uncertainty of when the report would be issued, a Hold Point was established by CIO.	Report No. 6 7/25/83	Letter 8/9/83	Closed	Report No. 9 8/15/83
003	Has a program been developed and responsibilities established for personnel assigned to process nonconformances?  Has a meeting been held with Project Engineering to discuss methodology of processing non-conformances?	Report No. 6 7/25/83	Letter 8/9/83	Closed	Report No. 9 8/15/83

STONE & WEBSTER MICHIGAN, INC.  
CONSTRUCTION IMPLEMENTATION OVERVIEW  
HOLD POINT LOG SUMMARY

NO.	SUBJECT	ORIGINATING DOC/DATE	CPCo RESPONSE DOC/DATE	STATUS OPEN/CLOSED	CLOSE-OUT DOC/DATE
004	Evaluation of Phase I Management Review Committee meetings.	Report No. 1 6/3/83 through Letter of 6/30/83	Letters 7/1/83 8/9/83	Closed	CIO Letter to J.G. Keppler dated 10/12/83
005	CPCo has committed to develop a Vendor Equipment Verification Program. Program is required before implementation of Phase II.	Report No. 18 10/17/83		Open	
006	NIRs 002, 003, 004 and 005 issued October 3, 1983 to address discrepancies observed during a sample inspection of Training Records of 6 of 45 MPQAD personnel. Corrective action must be completed before any inspections can be performed by the 45 personnel in question.	Report No. 18		Open	
007	Evaluation of Management Review of results of Phase I activities. Evaluation of Management Review Committee plans and procedures for Phase II implementation.	Report No. 19 10/24/83		Open	



Re-worded

STONE & WEBSTER MICHIGAN, INC.  
CONSTRUCTION IMPLEMENTATION OVERVIEW  
HOLD POINT LOG SUMMARY

NO.	SUBJECT	ORIGINATING DOC/DATE	CPCo RESPONSE DOC/DATE	STATUS OPEN/CLOSED	CLOSE-OUT DOC/DATE
008	<p>NIR 006 has been issued on October 27, 1983 to address discrepancies observed during the sample inspection of 2,054 Construction Training records of 31 members of Teams 5, 6, 8, 9, 12, 13, 16, 17, 19, 20, 25, 26, (27/28), 29, 30, 31, (32/33) and BHO staff.</p> <p>Corrective action must be completed before any walkdown, assessments can be performed by the personnel in question.</p>	Report No. 20 10/31/83		Open	
009	<p>NIR 007 has been issued on November 7, 1983 to address discrepancies observed during sample inspection of 834 Construction Training records of 18 members of Team 24, Field Procurement, Sub-Contractors, Management, F.E. staff and Construction General Services Organization.</p> <p>Corrective action must be completed before any walkdown, assessments can be performed by the personnel in question.</p>	Report No. 21 11/7/83		Open	