



STONE & WEBSTER MICHIGAN, INC.

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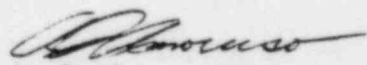
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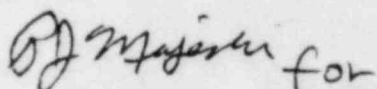
March 27, 1984
J.O. No. 14509

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MONTHLY THIRD PARTY ASSESSMENT MEETING
MIDLAND NUCLEAR COGENERATION PLANT

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 March 8, 1984.


A. P. Amoruso
Project Manager
CIO

 for
A. S. Lucks
Project Manager
Underpinning and Remedial Soils

Enclosures

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MINUTES OF THE MEETING OF MARCH 1984

STATUS OF INDEPENDENT ASSESSMENT
OF UNDERPINNING AND REMEDIAL SOILS WORK

PURPOSE

The purpose of the public meeting was to report the status of the Stone & Webster Assessment Team activities and observations regarding underpinning and remedial soils work.

SUMMARY

Mr. Lucks opened the meeting by stating that P. Majeski would present a summary of the Assessment Team activities and observations. This summary covers weeks 72 through 75 which corresponds to January 29, 1984, through February 25, 1984.

P. Majeski began the summary with the status of underpinning work at the auxiliary building. Four piers are currently under construction at both the east and west sides. During the last month activities have included excavation, lagging, and concreting.

At the service water pump structure, lagging have been installed to a depth of approximately four feet in the area of underpinning. Wale seats and

wales are being installed at the east end of the structure and on the east side of the north wall.

The next area addressed was a summary of Assessment Team activities. These activities were:

- o Resident Engineering Document Control
- o Underpinning Construction
- o QA, QC Performance
- o Field Document Control Upgrading
- o U.S. Testing Upgrading
- o Crack Monitoring
- o Welding Procedures
- o Work Activity Packages

On february 17 and 18, the Assessment Team reviewed Resident Engineering's controlled documents to determine whether:

- o Attachments to Resident Engineering documents were being posted properly.
- o Lessons learned from Phase III reviews of Field Document Control are being applied to Resident Engineering Documents.

The Assessment Team reviewed the attachments to Resident Engineering copies of Civil (Soils) Drawings and specifications. The associated

correspondence and applicable procedures are being reviewed, and the Resident Engineering staff was interviewed.

These reviews have resulted in two findings. The first finding identifies discrepancies in the posting of attachments to drawings and specifications which resulted in the issue of NIR 22. The second finding indicates a need for better response by Engineering to communications between Engineering and Construction concerning potential problems. Copies of correspondence between Site Management and Engineering, indicating the need for attention to these document control problems, were received one month before the discrepancies in NIR 22 were found by the Assessment Team.

Corrective actions that are being taken to address the discrepancies include, a review and upgrading of documents where necessary, and revision of document control procedures.

The Assessment Team will continue to review document control procedures and overview the Resident Engineering corrective actions.

The Assessment Team's second activity concerned underpinning construction. Specifically, the team observed chemical grout installation, installation of wale seats and wales in the service water pump structure, also the installation of drift steel, lagging and backpacking. All observed work was performed in a satisfactory manner and according to construction procedures.

The third Assessment Team activity was an overview of QA/QC functions. This activity included, a review of inspector certifications and closed inspection report for completeness, review of the stick files of Field Document Control and MPQAD for proper posting of attachments, an evaluation of QC performance demonstrations, and a review of the training of crafts people. These observed functions were performed according to the project requirements.

The fourth Assessment Team activity concerned the upgrading of Field Document Control. The Assessment Team has continued to review the progress in this area. The Field Soils Organization (FSO) has recently assumed responsibility for the document control of both underpinning subcontractors. The Assessment Team will continue to monitor the activities in this area.

The fifth Assessment Team activity addressed the upgrading of U.S. Testing. U.S. Testing continues to make improvements in preparing work instructions, and the cross-training of technician and the laboratory chief. The Assessment Team is satisfied with the progress made in the past month.

An overview of crack mapping was the sixth Assessment activity covered in this summary. Weekly Report 74 stated that 25 Nonconformance Reports (NCRs) were written against crack mapping activities over the period of a few weeks. An Assessment Team review of these NCRs revealed that they were minor in nature and did not invalidate the data nor did they indicate incomplete mapping of the cracks. The fact that MPQAD uncovered these deficiencies indicates that the inspection process is functioning properly.

The Assessment Team considers Engineering's response to preclude recurrence to be appropriate and will continue to overview the crack mapping activities including those of MPQAD.

For the seventh activity, the Assessment Team completed a review of the welding procedures. All Assessment Team comments have been incorporated into the welding procedure and NIR 21 was closed. An FSO welding engineer conducted a field evaluation of past welding to ensure that no welds had been made under conditions of severe external shrinkage restraint. No welds of this type were found. An overview by the Assessment Team confirmed this finding and this item is also closed.

The final Assessment Team activity was an overview of five work activity packages (WAPs). All of these overviews are complete. They are:

- o WAP 58 - Brackets and Struts at E/W-10, Struts at E/W-11 and Mass Excavation of Zones Y/Z - 3
- o WAP 74 - Auxiliary Building Slab Support Brackets at E1 614
- o WAP 75 - Concrete Encasement of Concrete Stress Meters for SWPS
- o WAP 77 - SWPS Install Phase II A/B Solder Beams
- o WAP 80 - Auxiliary Turbine Building Vertical Movement Monitoring

This concluded the summary of Assessment Team activities.

Mr. Majeski then summarized the status of the Nonconformance Identification Reports (NIRs) that were active during the past month:

- o NIR 20 which concerned the calibration of concrete admixture dispensers was closed.
- o NIR 21 which concerned the weld tech sheets for the subcontractors welding procedures was closed as discussed above in the summary of activities.
- o NIR 22 concerns discrepancies in posting attachments to Resident Engineering drawings and specifications. This NIR remains open until the corrective actions that were discussed in the summary of activities have been satisfactory completed.

Mr. Majeski concluded his presentation by stating that there are currently ten open items from the daily meetings that require action prior to closure.

Mr. Lucks stated that there were no open Action Items for Stone & Webster or Consumers Power from the last meeting and indicated that Mr. J. Mooney of Consumers Power would give a presentation on the Quality Action Point (QAP) program.

Mr. Mooney indicated that the QAP program was initiated to evaluate and, if necessary, improve procedures and documentation that support construction. The program consists of a QAP Committee (chartered in September of 1983)

and a QAP Subcommittee. The intent was to pick a representative construction activity (system installation) and have the Subcommittee review the support documentation along with the associated procedures to evaluate the efficiency of the implementation.

The Committee was responsible for determining the system to be reviewed, the guidelines of the review, the members of the Subcommittee, and overseeing of the Subcommittee activities. The Subcommittee was responsible for conducting and documenting the review, evaluating the results, and submitting recommendations for improvements.

After reviewing three construction processes under this program, the Subcommittee came to the following general conclusions:

1. Design documents were adequate
2. Associated procedures are comprehensive
3. Inspections were appropriate

The Subcommittees' recommendations included guidelines and philosophy for developing future procedures and PQCIs. These conclusions and recommendations are still to be reviewed and approved by the full committee. This concluded J. Mooney's presentation.

QUESTIONS AND ANSWERS

The NRC asked several questions concerning items included in Weekly Reports 72 through 75.

1. The Assessment Team observation on page 2 of Weekly Report 72 concerns the policy for retiring documents and mentions that it was determined upon lifting the Stop Work Order that a procedure was needed to ensure proper implementation of retired attachments. Why is this procedure needed after the extensive corrective actions were completed to lift the Stop Work Order? It has been determined that there is a need that was highlighted by the duration of the Stop Work Order, to use one time deviations for periods longer than the 30 day period given in the original procedure. An interim method to allow retired documents to stay with the appropriate drawings longer than 30 days if necessary has been developed. This interim method has been and will be in effect until the procedure is issued.
2. Page 3 of Weekly Report 72 indicates a lack of progress in the QAP program. Would Stone & Webster explain the details behind this statement? The Assessment Team had been concerned about the apparent lack of progress with the QAP program. However, it was later determined that key members of the Subcommittee had been involved with the corrective action for the Stop Work Order and the crack mapping program, activities which took priority. Based upon recent activities, the Assessment Team is now satisfied with progress on the QAP program.
3. For item 72-12, what is the background for issuing NIR 21? Weld qualification forms had not been filled out properly. These discrepancies did not effect the actual qualification of the weld

and had no impact on hardware, but was a matter of providing the correct information on the form.

4. The NRC asked for more specifics concerning AWSD 11-80 where the preheat requirements tie into welding under conditions of severe external shrinkage. Consumers Power indicated that they would provide those specifics.
5. Concerning item 72-17, does Consumers Power intend to turn the work on the Borated Water Storage Tank foundations back to Construction, according to the philosophy agreed upon for major activities? Consumers Power was asked to consider this.
6. Item 72-16 discusses deleting the "AR" stamp from the appropriate document when work is completed on a active retired FCR. Does this mean that the appropriate document will have no indication on it that there is an associated retired FCR? "AR" designation is replaced with an "R" designation so there will be identification of an associated retired document.
7. When Stone & Webster indicates in the last line of the opening paragraph on page 3 of Weekly Report 73, that the contractor has established appropriate measures and controls to ensure that the documents are handled properly, was that in reference to Field Document Control? Yes.

8. Page 4 of Weekly Report 73 indicates NIR 21 was closed. Where is this addressed in this report? Stone & Webster indicated that the details of the closure were distributed separately, and discussed in item 74-2 of Weekly Report 74.
9. Regarding Item 73-2, that requests clarification on whether vendor documents and FSK drawings will be listed on the drawing register. The NRC was of the opinion that those documents were already on the drawing register. Stone & Webster indicated that the request for clarification resulted from a review of the new computerized drawing register intended under System 38. The documents in question are on the existing drawing register which will be replaced by the computerized system. The computerized system will also include vendor documents and FSK drawings.
10. The last sentence on page 2, paragraph 3 of Weekly Report 74 discusses a need for a more coordinated effort between FSO and MPQAD to ensure that differences in interpretation of design requirements are resolved in a more timely manner. Can Stone & Webster elaborate on this? Stone & Webster observed a situation where differences in interpretation of a change to a drawing for a drift invert delayed a concrete pour from Friday to Monday while FSO and MPQAD resolved the problem. This concern is minor. Consumers Power indicated that it was a conscious decision to delay the pour until Monday. The difference in interpretation was resolved quite quickly.

11. Page 3 of Weekly Report 74 addresses 25 NCRs written against the crack mapping program. The NRC is surprised at the magnitude of the number of NCRs being written after the improvements that have been instituted in the program. SWEC stated that the NCR discrepancies were minor and repetitive in nature and did not invalidate the data. The nature of these NCRs indicate a very effective MPQAD review. Consumers Power stated that, with the recent changes, the crack mapping program is very adequate, but QAR 141 has been issued to track and address the problems that remain. A two team approach to crack mapping is now in effect and the subcontractor is assigning a full-time QA engineer to this work.
12. For item 74-8 would someone explain what Weldcrete is? Weldcrete is a bonding agent used in concrete patching or grouting installations.
13. Was item 74-10, an NCR concerning the identification of non-Q material, a material identification problem with the vendor?
Yes.
14. What are the circumstances of Item 74-12 concerning incomplete penetration of Hilti bolts? Consumers Power stated that, on a specific occasion, one out of six bolts did not meet the penetration requirements. Engineering evaluation concluded that the remaining five were adequate and accepted the condition.

15. Are the 15 NCRs mentioned in Item 74-15 included in the previously discussed 25 NCRs against crack mapping? Yes.
16. In Item 74-17, what type of misunderstanding existed between MPQAD and the FSO? This was the same item discussed above in Item 10. Consumers Power indicated that some details of a design change needed to be interpreted because there were no specific requirements or standards addressing them. The discussion between MPQAD and the FSO centered on this interpretation. Stone & Webster stated that the Assessment Team's concern was that the resolution of this type of problem should be deferred to Engineering as soon as it is recognized, to preclude delays.
17. Item 74-20 states that a system for tracking renewal of certification for quality related equipment is in effect. Is this system new? If so, what occurred prior to this? The Assessment Team was concerned about the possibility of renewal of equipment certification causing a work delay. The question was intended to verify that tracking was occurring for all quality related equipment. There is an existing certification system.
18. Item 74-23 states that the U.S. Testing Manual is being reviewed by Project Engineering and an issue date is forecast. Has MPQAD reviewed the manual for quality impact? Yes. Has the manual been issued? Yes. The manual was also reviewed by the Assessment Team and found to be satisfactory.

19. Item 74-25 concerns the loosening of washers on expansion anchors. Is this generic or an isolated issue? Consumers Power stated that this was an open item still under evaluation. To date it has occurred with washers on drift sets against very rough concrete.
20. The last paragraph on page 2 of Weekly Report 75 cites discrepancies in the documents controlled by Resident Engineering Document Control Stations. After all the corrective action to the FSO Document Control System initiated during the Stop Work Order, why do these discrepancies exist? The Assessment Team indicated that the Stop Work Order dealt with whether the register controlling the FSO stations reflected additions to the change documents that were made by Engineering. This problem did not exist with respect to the Resident Engineering register. Consumers Power indicated that control of Resident Engineering documents was in Ann Arbor and outside the scope of the Stop Work Order. QAR 137 has been issued to resolve these issues and all documents are being checked. Is anyone sure that the drawings in Ann Arbor are satisfactory? That will not be resolved until QAR 137 is closed and MPQAD has completed checking the documents. The NRC expects an update on the action taken to resolve this issue and its impact.

21. In the third paragraph on Page 3 of Weekly Report 75 it is mentioned that a presentation on the importance of the system used to control field documents. Was this a "toolbox" meeting? It was a presentation to the craftsmen by the subcontractors' field engineer during a Quality Awareness Session.
22. Why does NIR 20 on the bottom of page 3 of Weekly Report 75 state that it's closed and the last sheet of the report says it's open? The daily meeting takes place in the morning and this NIR must have been closed late in the day on the Friday of this report. The details of the closure will be on Weekly Report 76.
23. Item 75-5 discusses two procedures for a Consumers Power trend analysis program. Isn't there a program in effect now? Yes, the current program is manual. This item addresses converting the manual system to a computerized system.
24. Has Consumers Power responded to Item 75-15? Consumers Power stated that they had responded. The Assessment Team indicated that the response had not been evaluated yet, and that NIR 22 was still open. The NRC stated that they would review the details of the response during the normal course of NIR resolution.

Required Action

No open action items are required for the Assessment Team from this meeting.

The following item remains open for Consumers Power Co. from the February meeting:

1. The NRC and Consumers Power Co. will confer on the crack mapping survey data presented during February.

MINUTES OF THE MEETING ON MARCH 8, 1984

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 February 1984.

Summary

Mr. A. P. Amoruso, Project Manager for the CIO Program, presented a summary of Program activities for February 1984. The following topics were covered:

° Assessment Activities

Opportunities to assess the Construction Completion Program (CCP) increased during February due to the lifting of the remaining restraints of stop-work orders that had been issued because of concerns about field change and document control problems. Status assessment and quality verification inspection activities of the CCP increased during the month in accordance with controls established by Consumers Power Company. These activities received the principal focus of the CIO. Other activities that were assessed included document control corrective measures, the Midland Project Quality Assurance Department (MPQAD) audit program, training presentations, and training records. Summaries of these activities follow:

- Status Assessment and Quality Verification Inspections. Statusing and verification inspections in the five modules of Unit 2 that had been released were checked. These checks found that procedures and instructions were being complied with, documents in use agreed with master registers, and personnel carrying out the work had been properly trained. No CIO nonconformances were identified.

- Document Control Corrective Measures. To verify the adequacy of steps taken to correct document control problems, the Field Document Control Center (FDCC), the Field Document Distribution List (FDDL), and activities in the field were checked. Approximately 4000 documents issued from the FDCC were reviewed. No major discrepancies were noted. Minor discrepancies, such as illegibility, clipped reproductions, and assembly errors, were detected in less than 1% of the documents. The FDDL was checked, and a couple of discrepancies were identified. These discrepancies were a work print request that was not reflected in the FDDL and documents that were distributed but not requested. Documents being used in the field for statusing and quality verification inspections were routinely checked for correctness. No discrepancies were found.
- MPQAD Audit Program. Site auditing activities were evaluated. Several discrepancies were identified in audits that had been performed prior to the establishment of a distinct audit group in the MPQAD organization in June 1983. These discrepancies included using correction fluid on a report instead of lining out and inserting corrections, documenting non-conformances detected during an audit as observations instead of by Audit Finding Reports, and closing out an audit before a recommended procedural revision had been made. Also, the need to review past audits to assure adequacy, proper closeout, and identification of applicable criteria from 10CFR50, Appendix B, was addressed. Since June 1983, audits have been conducted thoroughly and orderly. Several recommendations for improving the program were provided. These recommendations covered the definition of responsibilities, procedural controls for tracking and statusing findings, training certifications, and auditor records.

- Training Presentations. Two training presentations for non-manual construction personnel and one for MPQAD personnel were evaluated. These presentations followed lesson plans and met training objectives.
- Training Records. Some 2000 training records, representing some 115 construction people, were inspected by sampling. The most significant discrepancy found was missing revision numbers on documents listed on the training sheets for one person. Training records for some 650 MPQAD people were also inspected by sampling. Minor discrepancies were noted in less than 1% of records checked. These discrepancies included illegibility of signatures and missing signature dates.

In programs outside the CCP, but being monitored by the CIO, assessment activities during the month focused on the Spatial System Interaction Program (SSIP). The analyses of 39 interactions were witnessed. These analyses were found to be following governing procedures. Activity level in the Nuclear Steam Supply System (NSSS) and Heating, Ventilation, and Air Conditioning Program (HVAC) was low during the month but is expected to increase in March.

° CIO Items, Nonconformances, and Hold Points

Ten CIO items were identified during February. These items follow:

- Request for the plan of action to resolve procurement control deficiencies identified in an MPQAD audit.
- Request for copies of audit reports addressing Criterion XVIII, 10CFR50, Appendix B.
- Request for a list of CCP teams and associated scopes of work and schedules.
- Request for the quality assurance program, procedures, and target list used by Mark Technologies Corporation for the Spatial System Interaction Program.

- Request for clarification of training requirements for CCP teams conducting status assessment of raceways.
- Request for information on how source documents listed in lesson plans are updated.
- Recommendation that instructors continue to be evaluated no later than the first training class taught on a subject.
- Review of past audits to assure applicable criteria from 10CFR50, Appendix B, are addressed.
- Review of audits performed prior to June 1983 to assure that adequacy and closeout requirements are met.
- Recommendations to improve the audit program.

Nine items were closed during February. The three items addressing administrative problems with training records were closed after the problems were corrected. The request to ascertain that controlled documents were used to perform safety related work was closed after the policy governing that subject was repromulgated and problems identified during the field change resolution program were corrected. The item addressing the need to ensure that documents were processed through the field change resolution program before being used for diesel generator work was closed upon completion of the resolution program before diesel generator work began. The request for controls for checklists that did not contain all attributes of governing procedures was closed when a policy statement was issued requiring that all checklists contain all attributes of governing procedures. The item providing recommendations to improve the status assessment and work print program was closed after the recommendations were adopted. The item addressing the need for formal direction on processing Q Interface construction work packages was closed after the meaning of the Q Interface term was promulgated. The request for the quality assurance program, procedures, and target list used by Mark Technologies Corporation was closed when the material was provided.

Five nonconformances identified by the CIO Program were open at the end of February. These nonconformances follow:

- Transmittals for safety related vendor documents not being sent as required to MPQAD and the Project Supplier Quality Representative.
- Corrections to an audit report made by correction fluid.
- Nonconformances detected during an audit classified as observations instead of by audit finding reports.
- Corrective action for an audit finding not accomplished before closing the audit.
- FDDL not updated after processing a work print request. Unsolicited drawings received by one station.

Six nonconformances were verified corrected and closed during February. Two of the nonconformances involved administrative discrepancies in training records of CCP team members, one involved level of training discrepancies in the construction team training matrix, and three involved document control discrepancies. Three Hold Points established by the CIO Program were open at the end of February. These Hold Points follow:

- 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.
- Reinstatement of the requirement to certify the accuracy of thermocouples and extension wires for post weld heat treatment before using the thermocouples.

Four Hold Points were released during February. Three of the Hold Points involved training records and the training matrix. The fourth Hold Point involved the completion of the field change resolution program.

° Highlights of February

The principal effort of the CIO Program during February was monitoring status assessment and sampling verification inspections of Phase 1 of the CCP. Mr. J. E. Karr, CIO Site Program Manager, presented a summary of this effort. The following main topics were covered:

- Status Assessment

Five modules of Unit 2 have been released for status assessment. These areas are Module 340, the area outside the D-ring in the reactor building; Module 120, elevation 584 of the auxiliary building; Module 410, elevation 614 of the turbine building; Module 102, the east pipeway of the auxiliary building; and Module 800, the service water pump structure. A summary of activities in the modules follows:

- Module 340. All of the principal disciplines are engaged in statusing. These disciplines are architectural, civil, controls, electrical, instrumentation, and mechanical. Assessment is about 9% complete.
- Module 120. Architectural, civil, electrical, instrumentation, and mechanical disciplines are engaged in statusing. Assessment is 18% complete.
- Module 410. The only safety related item identified in this area is an equipment pedestal. A closed inspection report exists for the item. Therefore, status assessment is not required.
- Module 102. Electrical, instrumentation, and mechanical disciplines are engaged in statusing. Assessment is 11% complete.
- Module 800. Civil, electrical, and mechanical disciplines are engaged in statusing. Assessment is less than 1% complete.

- Verification Inspections

Inspections have not started in three of the five modules released for verification. These areas are Modules 102, 120, and 410. Inspections in Module 340 are about 1½% complete and in Module 800 less than 1% complete.

- Findings

No CIO nonconformances have been identified in the status and verification activities accomplished to date.

° Miscellaneous Items

- CIO Staff

The CIO staff increased to 33 during February in preparation for the projected workload in March.

- Concerns of Consumers Power Company Employees

- A Consumers employee contacted a member of the CIO team and expressed his opinion that a supervisor was in trouble with upper management because the supervisor insisted on maintaining a firm position on quality assurance concerns. The supervisor was contacted. He said that similar statements had come from those working for him, but upper management had not expressed any dissatisfaction with his work.
- A Consumers employee contacted a member of the CIO team and stated that he thought work prints were being received that should not have been issued because the prints were on exception lists. A check of the prints that the person was concerned about determined that the documents had been removed from exception lists before being distributed.

Questions and Answers

- ° Mr. B. L. Burgess, NRC, asked if the CIO would be looking at several hangers which were installed as Q items in Module 410 but are not now listed as Q items.

Mr. Karr stated the CIO was aware of the hangers. The hangers are in an area that will not be released for work for about six weeks. A decision on whether the hangers will be included in status assessment is expected before release of that area.

- ° Mr. J. J. Harrison, NRC, asked for additional information on the potential problem in the Spatial System Interaction Program regarding the amount of detail provided in the target list for appurtenances, boundaries, and plant locations. This item was mentioned in the CIO Weekly Report.

Mr. Karr stated that the initial target list that was reviewed did not appear to have sufficient detail to develop envelopes that would be adequate for identifying all interactions. Subsequent discussions and a more detailed target list have resolved this concern.

Mr. Harrison asked if the type of things identified would impact interactions that had been completed perviously.

Mr. Karr stated there would be no impact.

- ° Mr. Harrison asked if the CCP could be impacted during the six to nine months needed to consolidate commitments made to the NRC on a single computerized list.

Mr. D. L. Quamme, CPCo, stated that commitments are now on several lists and are being consolidated on one list for easier management control. Commitments are being tracked during the consolidation.

- ° Mr. Harrison stated that the NRC staff has reviewed resumes and affidavits furnished for CIO people. The review included checks for independence and technical adequacy. The review found the documents to be in order.

- ° Mr. Harrison asked about the resolution of the CIO item concerning the classification of field changes attached to uncontrolled specifications maintained at the CPCo document control center.
Mr. R. A. Wells, CPCo, stated that the problem involved erroneously marking uncontrolled documents as controlled and then being uncertain on how to correct the error. The problem is being resolved by removing the uncontrolled documents, which are not needed, from the control center. Then, all documents at the center will be controlled and handled in accordance with established practices.
- ° Mr. Harrison asked for background on the statement in a CIO Weekly Report that site audits had been fractionalized.
Mr. Karr stated that before June 1983, audits were performed by individuals selected from the quality assurance organization to perform specific audits. The individuals had other primary responsibilities. This type of arrangement could not be easily controlled. In June 1983, a distinct site audit group was established which eliminated the previous problems.
Mr. Harrison asked if any case was found where an individual audited the function that the individual was responsible for.
Mr. Karr stated that none had been found.
Mr. Burgess asked if the people used for those earlier audits were certified and if the certifications were documented.
Mr. Karr stated that no cases were found of certifications not being documented. However, the whole life of the project was not checked.
- ° Mr. Harrison asked for additional information on the change in the number of PQCIs which would contain welding criteria for electrical applications. The change was mentioned in a CIO Weekly Report.

Mr. Wells stated that welding criteria would now appear in two PQCIs instead of one as previously planned. This would allow the criteria to be removed from all electrical PQCIs.

- ° Mr. Harrison asked what the responses would be to the three CIO non-conformances addressing discrepancies in the site audit program.

Mr. Wells stated that the current practice is not to use correction fluid. The use of correction fluid noted by one of the CIO non-conformances occurred in 1982 and appeared to be an isolated situation that did not cause a quality problem. The CIO non-conformance on the improper documentation of nonconformances identified during audits was apparently caused by the judgment call of the audit team leader at the time. The team leader apparently thought that the items were better classified as observations than nonconformances. This audit occurred in 1981. Present practices would avoid similar situations. The CIO nonconformance on the closure of an audit before recommended corrective action was accomplished appears to be a situation in which the action had been implemented but not documented at the time of closure. The audit occurred in 1981.

- ° Mr. Harrison asked if the use of interoffice memorandums and TWXs in resolving field changes to documents was a part of the field change review process.

Mr. Wells stated that he thought interoffice communications became a part of the review if documents referenced such communications.

Mr. Harrison asked Consumers Power Company to look into how interoffice communications were reviewed during the field change resolution program.

- ° Mr. Harrison asked if the requirement for checklists to contain all attributes of governing documents had been proceduralized. He also asked what method is used to ensure that checklists agree with the latest document revisions.

Mr. Quamme stated that written instructions have been given to Bechtel.

Mr. Harrison asked that Consumers Power Company address the status of proceduralizing checklist requirements at the April meeting.

- ° Mr. Harrison asked how changes to reference documents for lesson plans are incorporated in training. He also asked how instructors are evaluated.

Mr. Wells stated that changes to reference documents are reviewed for significance. If the validity of training is affected, lesson plans are changed accordingly. Supervisors initially evaluate instructors on their ability to teach. Afterwards, instructors are evaluated by students.

Mr. Harrison asked that the practices for incorporating changes to reference documents in training programs and for evaluating instructors be maintained as action items.

- ° Mr. Harrison asked if the public had any questions. The following items were discussed:

- NRC audit of crack mapping.
- Activities outside the CCP but within the CIO scope.
- Vendor equipment verification program.
- Procedures for handling concerns of site people.

Action Items

° CPCo

- Discuss how interoffice communications were reviewed during the field change resolution program.
- Discuss the status of proceduralizing checklist requirements at the April meeting.
- Discuss the practices for incorporating changes to reference documents in training programs and for evaluating instructors.