



Consumers
Power
Company

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

May 4, 1984

Mr J E Karr
Stone and Webster Michigan, Inc
P O Box 1963
Midland, MI 48640

MIDLAND ENERGY CENTER PROJECT - GW07020
STONE AND WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW
NONCONFORMANCE IDENTIFICATION REPORT NUMBER 024 DATED 03-23-84
FILE 24.2 SERIAL 37885 CSM-0770 LW-13-84

In pursuance of Nonconformance Identification Report number 024, a response is attached to address your concerns delineated in your Nonconformance Identification Report Form.

Should you or your staff have any questions on the content, contact Lonnie Worley at extension 7707.

Handwritten signature: D L Quamme

D L Quamme
Site Manager

CC DDJohnson, MEC
BHPeck, MEC
NIREichel, MEC
TASpellman, MEC
JBKepler, Regional Administrator, Region III
JJ Harrison, Chief, Midland Section, Region III
BBurgess, NRC Resident Inspector
RAWells, MEC

PRINCIPAL STAFF

RA	DE	PRP
D/RA	DE	
A/RA	DRISP	
RC	DRMA	
PAO	SCS	orig + 3 ✓
SGA	ML	
ENF	File	✓

8405210266 840504
PDR ADOCK 05000329
S PDR

MAY 14 1984

Handwritten: DmB 54-329

Handwritten: IE 01 11

Response to Nonconformance Identification Report number 024 dated March 23, 1984.

Station 501 is located in the radwaste building. Distribution as well as maintenance of this station is now the responsibility of FDCC. Centralization of distribution and maintenance activities on-site was part of the corrective action plan submitted in response to MCARR-DAT-1. This station has not been released by MPQAD to support Q-work.

The following items address each of the concerns identified:

1. Findings a, c, d. Drawing A-871, sheet 7 and C-855 did not have the current revisions on the sticks. Both of these drawings had already been identified as missing prior to the audit by the Document Control personnel manning Station 501. Corrections have been made. All other locations on distribution for these drawings were checked and the correct revision was at all other locations. The Document Control personnel manning the station have been reminded of the importance of obtaining missing drawings.

Drawing C-898, revision 17 is on the stick. Revision 18 was processed in Document Control on March 6, 1984. It has not been distributed and should not be on any construction sticks. Daily monitoring of total processing time will continue until the performance goal of forty-eight hours is reached.

2. Findings b, e. Drawing C-397, Revision 1 is an old drawing (1974) that may be considered illegible. Document Control has replaced this drawing and checked its legibility at all other locations. The Document Control Internal Audit Group will check for legibility as part of their checklist. This group is being formed as part of the Document Control Corrective Action Plan.

Drawing C-1422 was illegible. Corrective action has been taken. All other distribution points receiving C-1422 have been checked and the drawing was legible.

3. Findings f, g, 1(1) Drawing series M-401 - M-445 and C-1000 - C-1099 are in the system 38 register (DDR). The Auditors were given sections of the registers as requested. The Auditors were informed that any additional drawings not on the sections given to them were available in Document Control on registers or through terminal call-up.

No request was made by the Auditors. No corrective action is deemed necessary by Document Control.

4. Findings i, j, k. The mechanical sticks have not been released for use as controlled drawings. Two signs, outside the door and near these sticks, indicate that employees must verify any mechanical drawings against the registers before use. If the current revision is not available, individuals must obtain the latest copy from Document Control. Station 501 is staffed full-time with Document Control personnel who provide assistance in reading registers.

No corrective action is planned outside of our current program of establishing and releasing distribution stations.

5. Findings 1, 2, 3. There is no procedural requirements limiting the placement of "information only" drawings in controlled stations. All drawings stamped "for information only" are P&ID's. FPD-1000, revision 20 was issued on March 23, 1984 and allows P&ID's to be distributed as controlled documents.

The "information only" stamp was required to be placed on the original P&ID according to FPD-1.000, revision 19. Therefore, when copies were run the stamp would become black (xerox) or blue (blue line).

Document Control will proceed to comply with new procedural requirements as the mechanical documents in Station 501 are prepared for release.

6. Findings h, m. The Auditors noted that drawing M-524-1, revision 25/F1 was not stamped "controlled". Document Control checked the drawing on March 23, 1984 and found it was stamped "controlled".

Bundles of uncontrolled drawings are located in a corner of Station 501 on the floor wrapped with rubber bands. These drawings are being stored in Station 501 for use in bringing up another distribution station. We do not feel it is remotely possible that someone would mistake these drawings as those that are to be used by personnel within the station. In addition, the stations are staffed full-time with Document Control personnel if someone questioned their purpose. No corrective action is deemed necessary.

7. Quality Action Request number RA-00156 dated 03-29-84 was written in response to Nonconformance Identification Report number 024 and closed on 05-02-84.

LWW

5/4/84



Consumers
Power
Company

MIDLAND PROJECT
QUALITY ASSURANCE DEPARTMENT
QUALITY ACTION REQUEST

6. QAR Number

RA-00156

7. Date Issued

3/29/84

8. Revision

0

9. Page 1 of 5

1. Requirement

FFG 7.300 Rev 4
FPD 3.000 Rev 11
FPD 1.000 Rev 19

10. ASME Related

☐ Yes ☒ No

2. Deficiency Stone and Webster NIR-024 identifies the following deficiencies during a CIO evaluation of controlled document station 501:

- 1) Attachments not referenced or attached
- 2) Illegible drawings
- 3) "Drawing stamp" errors have been identified
- 4) Superseded drawing on stick
- 5) Drawing series were missing from System 38 (DDR files) and could not be verified

11. Potential 50.55(e)

☐ Yes ☒ No

3. QAR Originated by

4. Discipline/Division/Section

5. Response Due Date

12. Date Reported to MPQA M

13. Action Item No.

15. Item Priority

17. S/U Code

19. Action Organization

20. QAR Reviewed by

14. Discipline

16. Trend Code

18. Resb Code

Bechtel Field
Document Control

21. Date

22. Cause

23. Proposed Corrective Action

SEE ATTACHED SHEETS

SEE ATTACHED SHEETS

24. Responsible Organization/Person

25. Proposed Completion Date

26. Disposition Concurrence

27. Disposition Action Taken

28. Method of Disposition Verification

29. QAR Closed by

SEE ATTACHED FOR CLOSURE JUSTIFICATION.

SW 5/2/84
MPQAD Date

☒ Acceptable

☐ Unacceptable

☐ Superseding QAR

NA SW 5/2/84
PFQCE (ASME Only) Date

QUALITY ACTION REQUEST
CONTINUATION SHEET

QAR NO: RA-00156

DATE: 3/29/84

REV: 0

PAGE 2 OF 5

(Block #2 continued)

6) Attachment status of drawings does not always reflect System 38 (DDR)

7) Possible uncontrolled drawings in a controlled drawing area

Response to NIR 024, dated March 23, 1984, QAR RA-00156, dated March 28, 1984

Subject: Controlled Document Station 501/Document Control Center

Station 501 is located in the radwaste building. Distribution as well as maintenance of this station is now the responsibility of FDCC. Centralization of the distribution and maintenance activities on site was part of the corrective action plan submitted in response to MCARR-DAT-1. This station has not been released by MPQAD to support Q-work.

Note: For ease of reading, the findings have been grouped by subject. The letter identification noted on the NIR has been retained for cross-referencing.

1. Wrong Revisions on Sticks (Findings a, c, d)

Drawings A-871, sheet 7 and C-855 did not have the current revisions on the sticks. Both of these drawings had already been identified as missing prior to the audit by the document control personnel manning station 501. Corrections have been made. All other locations on distribution for these drawings were checked and the correct revision was at all other locations. The document control personnel manning the station have been reminded of the urgency in obtaining missing drawings.

Drawing C-898, Rev. 17 is on the stick. Rev. 18 was processed in document control on March 6, 1984. It has not been distributed (as of March 23, 1984) and should not be on any construction sticks. No corrective action will be taken. Daily monitoring of total processing time will continue until the performance goal of 48 hours is reached.

2. Drawing legibility (findings b, e)

Drawing C-397, Rev. 1 is an old drawing (1974) that may be considered illegible. Document Control will replace this drawing and check its legibility at all other locations. The Document Control Internal Audit Group will check for legibility as part of their checklist. This group is being formed as part of the document control corrective action plan.

Drawing C-1422 was illegible. Corrective action has been taken. All other distribution points receiving C-1422 have been checked and the drawing was legible.

3. Inability to Verify Drawings Because They Were Missing From System 38 Register (Findings f, g, 1 (1))

Drawing series M-401 - M-445 and C-1000 - C-1099 are in the system 38 register (DDR). The auditors were given sections of the registers as requested. The auditors were informed that any additional drawings not on the sections given to them were available in document control on registers or through terminal call-up.

No request was made by the auditors. No corrective action is deemed necessary by document control.

4. Audit of Mechanical Drawings (Findings i, j, k)

The mechanical sticks have not been released for use as controlled drawings. Two signs, outside the door and near these sticks, indicate that employees must verify any mechanical drawings before use against the registers. If the current revision is not available individuals must obtain the latest copy from document control. Station 501 is staffed full-time with document control personnel who provide assistance in reading the registers.

No corrective action is planned outside of our current program of establishing and releasing distribution stations.

5. "Information Only" Drawings in Controlled Document Location (Findings 1, (2), (3))

There is no procedural requirement limiting the placement of "information only" drawings in controlled stations. All drawings stamped "for information only" are P&ID's. FPD-1.000, Rev. 19 required that all P&ID's be stamped "for information only". FPD-1.000, Rev. 20 was issued on March 23, 1984 and allows P&ID's to be distributed as controlled documents. There was no procedural violation, and no corrective action is deemed necessary by document control.

The "information only" stamp was required to be placed on the original P&ID according to FPD-1.000, Rev. 19. Therefore, when copies were run the stamp would, of course, become black (xerox) or blue (blue line). There is no procedural violation and no corrective action is planned.

Document Control will proceed to comply with new procedural requirements as the mechanical documents in station 501 are prepared for release.

6. Other Miscellaneous Findings (h, m)

The auditors noted that drawing M-524-1, Rev. 24/F1 was not stamped "controlled". Document Control checked the drawing on March 23, 1984 and found it was stamped "controlled". No corrective action is deemed necessary.

Bundles of uncontrolled drawings are located in a corner of station 501 on the floor wrapped with rubber bands. These drawings are being stored in the radwaste station for use in bringing up another distribution station. We do not feel it is remotely possible that someone would mistake these drawings as those that are to be used by personnel within the station. In addition, the stations are staffed full time with document control personnel if someone questioned their purpose. No corrective action is deemed necessary.

Summary

Based on the results of Bechtel internal auditing (QA) and a review of the responses to these findings station 501 appears to be meeting all document control requirements as well as the objectives of the document control action plan.

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

DATE OF NONCONFORMANCE:

MARCH 23, 1984

NIR NUMBER 024

IDENTIFICATION/LOCATION OF ITEMS:

CONTROLLED DOCUMENT STATION 501 / DOCUMENT CONTROL CENTER

DESCRIPTION OF NONCONFORMANCE: DURING CIO'S ON GOING EVALUATION OF SITE DOCUMENT CONTROL, A RANDOM SAMPLE OF 200 DRAWINGS WAS SELECTED FROM THE 5533 DRAWINGS DISTRIBUTED TO STATION 501. OF THESE 200 DRAWINGS, THE FOLLOWING DISCREPANCIES WERE NOTED.

a) DWG. #A-871 SHEET 7. REVISION 1 WAS SHOWN IN THE SYSTEM 38 REGISTER (S-38-R) AS HAVING BEEN ISSUED TO THE FIELD ON 2-17-84. STATION 501 HAD REV. 0 ON THEIR STICK.

b) DWG. #C-397 REV. 1 IS NOT LEGIBLE

c) DWG. #C-855. REV. 21 IS AT STATION 501 WITH ONLY DCN'S 20 & 21 ATTACHED. S-38-R SHOWS REV. 22 WAS ISSUED TO THE FIELD WITH ONLY FCR-7442 ATTACHED. ON 2-23-84.

d) DWG. #C-898. REV 17 IS AT STATION 501 WITH DCN-18 AND

Burt J. Kason
INITIATOR

PROGRAM MGR

J. E. Kason

DATE MARCH 23, 1984

DATE

3-23-84

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT

NEW NIR#

CONCURRENCE

INITIATOR

PROGRAM MGR

DATE

DATE

DATE

REMARKS

d-cont) FCR-7365 ATTACHED. S-38-R SHOWS REV. 18 WAS ISSUED ON 3-6-84 WITH ONLY FCR-7365 ATTACHED.

e) DWG. #C-1322 REV. 0 - ILLIGIBLE.

f) DWG. SERIES M-401 THRU M-445 WERE MISSING FROM THE S-38-R AND COULD NOT BE VERIFIED.

g) DWG. SERIES C-1000 THRU C-1099 WERE MISSING FROM THE S-38-R AND COULD NOT BE VERIFIED.

h) DWG. #M-524-1 REV 24/F1. NOT STAMPED "CONTROLLED."

i) DWG. #M-524-1 REV 24/F1. S-38-R SHOWS THAT IDCN-9765 AND FCR C-6364 SHOULD BE ATTACHED, HOWEVER THESE ARE NOT ATTACHED AT STATION 501.

j) DWG. #M-658-13 REV. 8/F2. S-38-R SHOWS THAT ICS-7 SHOULD BE ATTACHED, HOWEVER THIS IS NOT ATTACHED AT STATION 501.

k) DWG. #M-660-7 REV 15/F1. S-38-R SHOWS THAT IDCN'S 3872 AND 23852 SHOULD BE ATTACHED, HOWEVER THESE ARE NOT ATTACHED AT STATION 501.

l) DWGS. M-417-1B, M-431-1B, M439-2B, M-440A, M443A, AND M445-1 WERE FOUND TO BE

(-CONT.)

DISCREPANT AS DESCRIBED BELOW:

- 1) NOT SHOWN IN S-38-R - SEE ITEM f ABOVE.
- 2) "INFORMATION ONLY" DRAWINGS IN A CONTROLLED DOCUMENT STATION.
- 3) "INFORMATION ONLY" STAMP^{ed} WAS COPIED FROM THE ORIGINAL AND WAS THEREFORE BLUE IN COLOR, AND NOT AN ORIGINAL STAMP IN RED INK.

m) LAYING IN ONE CORNER OF STATION 501 IS A COMPLETE SET OF UNCONTROLLED DRAWINGS. THESE DRAWINGS ARE ON STICKS AND ROLLED UP WITH RUBBER BANDS AROUND THEM

To LWorley

FROM JMHarrison

DATE May 1, 1984

SUBJECT MIDLAND ENERGY CENTER PROJECT -
QAR RA-00156
FILE 17.0 SERIAL 27878

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

LWW 8-84

CC

Response to NIR 024 dated March 23, 1984 controlled Document Station 501.

During overview conducted May 1, 1984 by Document Control Action Group items A through L were found to have been corrected.

- Item A Drawings A871 sheet 7 revision 1 on stick files at Station 501.
- Item B Drawings C-397 (new copy requested per reproduction request number 24530 (attached)).
- Item C Drawing C-855 R-22 with attachments DCN 22/FCR 7442 per DDR (DCN(s) 20 and 21 incorporated on revision 22)
- Item D Drawing C-898 R-18 on stick files FCR 7365 attached (DCN 18 incorporated revision 18)
- Item E Drawing C-1322 R-0 legible copy on stick files at Station 501.
- Item F Series M-401 through M-445 are on DDR.
- Item G Drawing series C-1000 through C-1099 are on DDR.
- Item H Drawing M-524-1 revision 24/F1 is stamped controlled.
- Item I Drawing M-524-1 revision 24/F1 -IDCN 9765 and FCR - 6364 are attached to drawing at Station 501.
- Item J Drawing M-658-13 revision 8/F2 - IDCN 7 is attached at Station 501.
- Item K Drawing M-660-7 revision 15/F1 IDCN 3872 was pulled back 04-18-84 (attached) IDCN 23852 attached to revision 15/F1 at Station 501.
- Item L (See item F above)
- Item M (See item 6 QAR RA-00156) Drawings are stored in area and controlled by clerk in Station 501.

ITEM 10

Page 22

FORM NO 886.2
ISSUED: 6/17/75

DOCUMENT CONTROL CENTER
JOB 7250

PULLBACK

Bechtel Power Corporation

DISTRIBUTION LOG/TRANSMITTAL LOG

PULLBACK

ALL ISSUED DOCUMENTS SHOULD BE VOIDED OR DESTROYED

REV'D BY: _____
DATE: _____

STG	DRAWING NO.	REV	YR	2	DOC TYPE	DCN	DCN	PCN	PCN	ICB	ISS	BECHTEL DIST.	CONSUMERS DIST.	W.P. DIST.	N/D DIST.	REV	REV
100	FSK-M	1	0	3	SPR	3193	SBY/DCN			1437		438 501					0
100	2EGB-4-3	1	0			133	SBY/DCN			1437		438 501					2
100	FSK-M	1	0	0	SPR	3193	SBY/DCN			1437		438 501					3
100	2HCB-154-2-NV	1	0			317	SBY/DCN			1437		438 501					0
100	M-660	7	1	14	MD	317	SBY/DCN			1437		438 501					0
100	M-660	7	1	14	MD	317	SBY/DCN			1437		438 501					0
	E36	1	0	19	EG	3130	SBY/DCN			1437		438 501					2
	E37	1	0	11	EG	31354	SBY/DCN			1437		438 501					3
	E46	1	0	58	EH	3130	SBY/DCN			1437		438 501					14
	E408	1	0	17	ES	3130	SBY/DCN			1437		438 501					7
200	EG06	2	0	12	EJ	31313	SBY/DCN			1437		438 501					7
200	E607	2	0	9	EJ	31304	SBY/DCN			1437		438 501					7
200	E608	2	0	9	EJ	31304	SBY/DCN			1437		438 501					0
200	E609	2	0	11	EJ	31304	SBY/DCN			1437		438 501					7

NOTE: ALL PULLBACKS MUST BE DESTROYED, * INTERNAL APPROVAL, (+) FINAL APPROVAL, () FINAL APPROVAL WITH NO INTERNAL APPR
RETURNED ATTACHMENT AGAINST DOCUMENT

Note to all users: RETIRED PULLBACKS REQUIRE RETIREMENT SYMBOL ANNOTATED ON PARENT DOCUMENT: Ref FID 2.100

9-0-0000

REPRODUCTION REQUEST

Date Requested 3-28-84 Requested By D. Badore Approved By _____
Date Required ASAP Area 501 Ext. 7057 Return Original _____

TYPE OF REQUEST (Check One Request Type ONLY)

Full Size X Xerox _____ Manuals _____
Half Size _____ Specs. _____ Inter-Office _____
FSK _____ Corres. _____

DOCUMENT IDENTIFICATION NUMBER

NUMBER OF PAGES NUMBER OF COPIES

(ITEM B)

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

	1

OPERATOR
<u>[Signature]</u>
DATE
<u>[Date]</u>

INSTRUCTIONS FOR COPIES:

PAPER SELECTION: X
Blueprint _____
Sepia _____
Velum _____
Mylar _____
White _____
Color Choice _____
3 Hole Drilled _____
Left _____
Right _____
Bottom _____
Top _____

STAPLED: X
Left _____
Right _____
Bottom _____
Top _____

STAMP: (All Issue Documents will be stamped UNCONTROLLED unless otherwise noted)

UNCONTROLLED _____
FOR INFORMATION ONLY _____
ISSUED FOR BIDS _____
CONTROLLED REPLACEMENT X _____
READY FOR DISTRIBUTION _____
NO STAMP REQUIRED _____

SIZE
11" x 17" X
8 1/2" x 14" _____
Half Size _____
Reduced _____
Other _____

SPECIAL INSTRUCTIONS
Two-Sided _____
Copy Lighter _____
Copy Darker _____
Paper Clipped _____
Sorted (but not stapled) _____

COMMENTS

Controlled replacement

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

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~~X~~ DWG. #C-397 REV. 1 IS NOT LEGIBLE

c) DWG. #C-855. REV. 21 IS AT STATION 501 WITH ONLY DCN'S 20 & 21 ATTACHED. S-38-R SHOWS REV. 22 WAS ISSUED TO THE FIELD WITH ONLY FCR-741P ATTACHED. ON 2-23-84.

d) DWG. #C-898. REV 17 IS AT STATION 501 WITH DCN-18 AND

Burt J. Kassar
INITIATOR

DATE MARCH 23, 1984

PROGRAM MGR

J. E. Kinn

DATE

3-23-84

CORRECTIVE ACTION BY:

IDENTIFY ORGANIZATION TAKING CORRECTIVE ACTION

VERIFICATION SAT UNSAT

INITIATOR

DATE

NEW NIR#

DATE

CONCURRENCE

PROGRAM MGR

DATE

REMARKS

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g) DWG. SERIES C-1000 THRU C-1099 WERE MISSING
FROM THE S-38-R AND COULD NOT BE VERIFIED.

h) DWG. #M-524-1 REV. 24/FI. NOT STAMPED "CONTROLLED."

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HOWEVER THESE ARE NOT ATTACHED AT STATION 501.

j) DWG. #M-658-13 REV. B/FI. S-38-R SHOWS THAT
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HOWEVER THESE ARE NOT ATTACHED AT STATION 501.

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