

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

50-329
50-330

Transmittal No: CSC- 7409

Date: March 2, 1984

To: Stone & Webster
P O Box 1963
Midland, MI 48640

Attached Is: ☐ Partial Response To
☐ Complete Response To
☒ For Your Information
☐ Other

PRINCIPAL STAFF			
RA	Das	DPRP	
D/RA		DE	
A/RA		DRMSF	
PC		DRMA	
PAO		SCS	
SGA		ML	
ENF		File	Das

Description:

Closed AFR MSA-83-25-02F
Closed URI-MSA-83-25-09U
Closed URI-MSA-83-25-07U
Closed AFR-MSA-83-25-10F
Closed AFR-MSA-83-25-03F

Signature: *Arkh Wokal*

cc: JGKeppeler, NRC Region III w/a
JJHarrison, NRC Region III w/a
RJCook, NRC Site w/a
RAWells, MPQAD w/a
BHPeck, MEC w/a
NIRaichel, MEC w/a
DDJohnson, MEC w/a

8403130050 840302
PDR ADOCK 05000329
S PDR

MAR 7 1984

11 IEO1

DISTRIBUTION FOR CLOSED AFR MSA-83-25-02F

JABauer, Midland
JEBrunner, M-1079
RBCameron, Midland
JWCook, P-26-336B
GREagle, AAO-TASK
JEKarr, Stone & Webster
BWMarguglio/DJones, JSC-220A
DLQuamme/BHPeck, Midland
RCSember, Midland
RAWells, Midland
ALAB-2
GFEwert, Midland
ALPucci, Midland
DDCoppeler, Midland
THGamon, Midland
DEHorn, Midland
GEParker, Midland
WRBird, P-14-418A



CONSUMERS
POWER
COMPANY

AULIT FINDING REPORT

MIDLAND PROJECT
QUALITY ASSURANCE

AREA: Soils QA DISCIP: C

TREND: 15

PRIORITY: 2

S/U: PGM00

"AS IS" CONDITION VERSUS "AS REQUIRED"/"AS NEEDED" CONDITION WITH REFERENCES:

Procedure B-3M-1, Para 5.2.1, Dr #105, Para 5.9d, DR #53, Para 5.14.1e states:

"Candidates for Level III certification shall demonstrate proficiency in writing PQCI's/PIPs...
...Shall be responsible for collection, review for completeness and maintenance of completed personnel forms....
These forms are:
a... b... c... d...
e. Performance Demonstration Record, Att B..."

Contrary to the above, no documented objective evidence of proficiency demonstration was in package. When auditors checked referenced PQCI's/PIPs, only revisions to existing procedure were found. Also in all cases but one, personnel folders did not contain copies of original editions or major revisions of PACI's/PIPs.

NOTE: This deficiency was determined by a population sample of 100% Level IIIs and all were unsatisfactory.

AFR SER NO:

MSA-83-25-02F

PROJ/DEPT AUDITED:

MPOAD - Training

DATE OF ISSUANCE:

10/14/83

FILE NUMBER:

16.0 18.4 CLOSED

ACTION ITEM NO:

S03574

DISTRIBUTION:

JABauer	HPLeonard
AEBice	BWMargulio
WRBird	JKMisenheimer
JEBrunner	DBMiller
FWBuckman	JAMooney
RBCameron	GEPerker
JWCook	BCSember
MADietrich	TKSubramanian
GFEwert	DATaggart
BTFoote	RAWells SEE
WJFriedrich	JLWood ATTACH.
MHanbury	ALAB-2
LJesmore	DEHorn DISTRIB.
DJones	GE Parker
DPKnight	ANotarmuzi

RECOMMENDED CORRECTIVE ACTION:

- 1) Review certification files and request Level IIIs to generate PQCI's/PIPs as required.
- 2) Develop a system to ensure that Level IIIs meet all applicable requirements prior to certification.

CORRECTIVE ACTION COMMENT: Response due by 10/28/83.

- 1) PQCI's/PIPs were completed for soils prior to exit meeting.

DATE OF C/A COMPLETION: 2/28/84

DATE OF C/A EFFECTIVENESS: 2/28/84

ORG. RESP FOR C/A:

Asst. Supt. - Soils
PAE

PERSON MAKING C/A COMMENT:

D E Horn
G E Parker

METHOD OF VERIFICATION:

Verified C/A for 11 Level II's - all files acceptable.
Verified C/A for 7 Level III's - all files acceptable.
Computer print-out and checklist developed to assure requirements are met.

IS AF REPORTABLE PER 50.55(e):

YES ☐ NO ☒

IF "YES", DATE OF REPORT TO IRC:

N/A

IF "YES", TIME OF REPORT TO IRC:

N/A

IF "YES", NAME OF IRC OFFICIAL TO WHOM REPORTED:

N/A

IF "YES", WHO MADE REPORT:

N/A

AFR INSPECTOR'S SIGNATURE/DATE:

A Notarmuzi

AFR SIGNATURE/DATE:

10-14-83

AFR VERIFICATION SIGNATURE:

D D Coppeler

VERIFICATION DATE:

2/28/84

F-14-6A (REV.)

DISTRIBUTION FOR CLOSED URI MSA-83-25-09U

JABauer, Midland
JEBrunner, M-1079
RBCameron, Midland
JWCook, P-26-336B
GREagle, AAO-TASK
JEKarr, Stone & Webster
BWMarguglio/DJones, JSC-220A
DLQuamme/BHPeck, Midland
RCSember, Midland
RAWells, Midland
ALAB-2
GFEwert, Midland
ALPucci, Midland
DDCoppeler, Midland
THGamon, Midland
GEParker, Midland
WRBird, P-14-418A



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Power
Company

UNRESOLVED ITEM

MIDLAND PROJECT
QUALITY ASSURANCE

AREA: CPCo ANDISCIP: N

TREND: IS

PRIORITY: 2

S/U: PGM00 AI: S03599

6. DESCRIPTION OF UNRESOLVED ITEM:

Construction Completion Program, Rev 2, CPCo Training of MPQAD Personnel, Pg 13, Sect 3, Part A states in part:

"For PQCI's on which training was not previously conducted, the training and certification process is then started."

Contrary to the above, BOP has requested waivers of training for specific PQCI training. No waivers have been granted to date.

In addition, an MPQAD commitment to the NRC on September 29, 1982 requires training of QC personnel will be programmatic and technical, PQCI by PQCI.

Contrary to these requirements, Deviation Reports 63, 64 and 65 have been written against the MPQAD Procedures describing a process by which training & certification can be waived for "equivalent" PQCI's.

1. URI NO:

MSA-83-25-09U

2. PROJ/DEPT AUDITED:

MPQAD - Training

3. DATE OF ORIGINATION:

10/14/83

4. FILE NO:

16.0 18.4 CLOSURE

5. DISTRIBUTION:

JAEauer	GEparker
AEBice	RCSember
WRBird	TKSubramanian
JEBrunner	DATaggart
FWBuckman	RAWells
RBCameron	JLwood
JWCook	ALAB 2
MADietrich	KAMcDonald
SFEwert	AKPucci
BTfoote	
WJFriedrich	SEE
MHanbury	ATTACHED
LJesmore	DISTRIBUTI
DJones	
JPKnight	
HPLeonard	
BWarguglio	
JKMeisenheimer	
DBMiller	
JAMooney	

7. REQUIRED ACTION:

- 1) Investigate, clarify and incorporate these commitments into the Project Procedures.
- 2) Establish consistent controlled methods for achieving conformance to commitments.
- 3) Assess work performed to date based on existing certification waivers and take appropriate action if necessary for conformance to commitments.

PAD

8. ACTION REQUIRED FROM: GEParker

9. ACTION REQUIRED BY-DATE: 10/28/83

10. RESPONSE TO URI:

Per Executive Manager, MPQAD & A & T Section Head, CCP intent is being met. Training is not being waived, however equivalent training and testing is acceptable.

11. URI ORIGINATOR'S SIGNATURE/DATE:

K A McDonald

12. URI CLOSURE BASED ON:

RECEIPT OF
ACCEPTABLE
RESPONSE



ISSUANCE OF
AFR



14. AFR NO

13. AFR SIGNATURE/DATE:

10/14/83

15. CLOSURE BY SIGNATURE/DATE:

2/28/84

D D Coppeler

F-14-5 (REV. 0)

DISTRIBUTION FOR CLOSED URI MSA-83-25-07U

JABauer, Midland
JEBrunner, M-1079
RBCameron, Midland
JWCook, P-26-336B
GREagle, AAO-TASK
JEKarr, Stone & Webster
BWMarguglio/DJones, JSC-220A
DLQuamme/BHPeck, Midland
RCSember, Midland
RAWells, Midland
ALAB-2
GFEwert, Midland
ALPucci, Midland
DDCoppeler, Midland
THGamon, Midland
GEParker, Midland
WRBird, P-14-418A



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UNRESOLVED ITEM

MIDLAND PROJECT
QUALITY ASSURANCE

AREA: CPCo AMDISCIP: N

TREND: I5

PRIORITY: 2

S/U: PGM00 AI: S03597

6. DESCRIPTION OF UNRESOLVED ITEM:

CPCo Procedure B-3M-1, Rev 3, Para 5.9 states in part:

"NOTE: Candidates who fail to meet specified physical requirements may be awarded limited certification..."

Contrary to above requirements, records for Level IIIs show certifications with physical limitations which are administrative rather than physical limitations such as the following:

Can not perform QA function

Cannot perform certification of QA/QC personnel

There is no procedure implemented for exception taken to ANSI N45.2.6 for limited functional certifications.

1. URI NO: MSA-83-25-07U
2. PROJ/DEPT AUDITED: MPQAD - Training
3. DATE OF ORIGINATION: 10/14/83
4. FILE NO: ~~16.0~~ 18.4 CLOSE
5. DISTRIBUTION:
JABauer SEParker
WEBice RCSember
WRBird TKSbramanian
JEBrunner DATaggart
FWBuckman RAWells
RBCameron JLWood
JWCook ALAB-2
MADietrich ANotarmuzi
GFEwert ALPocci
BTFoote
WJFriedrich
MHanbury
LJesmore
DJones
JPKnight
KPLEonard
BWMarguglio
JMeisenheimer
BBMiller
JAMooney

SEE
ATTACHED
DISTRIBUTION

7. REQUIRED ACTION:

- 1) Remove capabilities limitation from certification form.
- 2) Limitations to job functions are in house function and should be documented separately from certification.
- 3) Devise a method for this documentation of job function.

PAD

8. ACTION REQUIRED FROM: GEParker

9. ACTION REQUIRED BY-DATE: 10/28/83

10. RESPONSE TO URI:

Reviewed 6 Level III files and all administrative limits were removed from certification records. These limits will be controlled administratively.

11. URI ORIGINATOR'S SIGNATURE/DATE:

A Notarmuzi

12. URI CLOSURE BASED ON:

RECEIPT OF
ACCEPTABLE
RESPONSE



ISSUANCE OF
AFR



14. AFR NO:

15. ACTION SIGNATURE/DATE:

D D Coppel 10/14/83

16. CLOSURE BY SIGNATURE/DATE:

D D Coppel

2/28/84

DISTRIBUTION FOR CLOSED AFR MSA-83-25-10F

JABauer, Midland
JEBrunner, M-1079
RBCameron, Midland
JWCook, P-26-336B
GREagle, AAO-TASK
JEKarr, Stone & Webster
BWMarguglio/DJones, JSC-220A
DLQuamme/BHPeck, Midland
RCSember, Midland
RAWells, Midland
ALAB-2
GFEwert, Midland
ALPucci, Midland
DDCoppeler, Midland
THGamon, Midland
DEHorn, Midland
GEParker, Midland
WRBird, P-14-418A



CONSUMER
SERVICE
COMPANY

AUL T FINDING REPORT

MIDLAND PROJECT
QUALITY ASSURANCE

AREA: CPCo AM
M Soils

DISCIP: N/S

TREND: 15

PRIORITY: 2

S/U: PGM00

"AS IS" CONDITION VERSUS "AS REQUIRED"/"AS NEEDED" CONDITION WITH REFERENCES:

Procedure B-3M-1, Rev 3, Dev 64 & Dev 99, Sec 5.7.1 states in part:

"...a field performance demonstration shall be performed for each PQCI/PIP."

Dev. 99 Performance Demonstration Instructions, Sec 1 states:

"A performance demonstration for each task must be satisfactorily completed before an individual may be certified in that task."

Contrary to the above, the performance demonstration is being waived in the Remedial Soils area, based on prior certification in equivalent PQCIs/PIPs.

AFR SER NO:
MSA-83-25-10F

PROG/DEPT AFFECTED:
MPQAD - Training

DATE OF ISSUANCE:
10/14/83

FILE NUMBER:
10.0 18.4 closed

ACTION ITEM NO:
S03582

DISTRIBUTION: HPLEonard
JABauer BWMargugliod
AEBice JKMeisenheimer
WRBird DBMiller
JEBrunner JAMooney
FWBuckman GEParker
RBCameron RCSenger
JWCook TKSubramanian
MADietrich DATaggart
GFEwert RAWells
BTFoote JLWood
WJFriedrich ALAB-2
MHanbury DEHorn
LJesmore KAMcDonald
DJones ALPucci
OPKnight SEE ATTACHED DISTRIB.

RECOMMENDED CORRECTIVE ACTION:

- 1) Obtain PDs for completion of certification of personnel
- 2) Evaluate personnel capability and work performed by personel not deemed satisfactory to determine appropriate action.

CORRECTIVE ACTION COMMITMENT: Response due by 10/28/83.

DATE OF C/A COMPLETION: 2/28/84

DATE OF C/A EFFECTIVENESS: 2/28/84

ORG. RESP FOR C/A:
Sect Head - A&T
Asst. Supt. - Soils

PERSON MAKING C/A COMMITMENT:
GFEwert
DEHorn

METHOD OF VERIFICATION:

Performance demonstration's are not being waived. Equivalency testing is an acceptable alternative to PQCI by PQCI testing as determined by Executive Manager, MPQAD and A & T Section Head. No further action is required.

IS AF REPORTABLE PER 50.55(a):

YES ☐

NO ☒

IF "YES", DATE OF REPORT TO IRC:

N/A

IF "YES", TIME OF REPORT TO IRC:

N/A

IF "YES", NAME OF IRC OFFICIAL TO WHOM REPORTED:

N/A

IF "YES", WHO MADE REPORT:

N/A

PREPARED BY SIGNATURE/DATE:

K A McDonald

K A McDonald 10-14-83

APPROVED BY SIGNATURE/DATE:

OP Knight 10/14/83

TESTIFICATION SIGNATURE:

D D Coppeler

D D Coppeler

TESTIFICATION DATE:

2/28/84

F-14-4A (REV. 3)

DISTRIBUTION FOR CLOSED AFR MSA-83-25-03F

JABauer, Midland
JEBrunner, M-1079
RBCameron, Midland
JWCook, P-26-336B
GREagle, AAO-TASK
JEKarr, Stone & Webster
BWMarguglio/DJones, JSC-220A
DLQuamme/BHPeck, Midland
RCSember, Midland
RAWells, Midland
ALAB-2
GFEwert, Midland
ALPucci, Midland
DDCoppeler, Midland
THGamon, Midland
LABotimer, Midland
DEHorn, Midland
GEParker, Midland
WRBird, P-14-418A



Consumers
Power
Company

AU. IT FINDING REPORT.

MIDLAND PROJECT
QUALITY ASSURANCE

AREA: Soils QA DISCIP: C

TREND: 15

PRIORITY: 2

S/U: PGM00

"AS IS" CONDITION VERSUS "AS REQUIRED"/"AS DESIRED" CONDITION WITH REFERENCES:

A. Procedure B-3M, Para 6.10.1, 5.10.1e & 5.10.1g states:

"Certification files shall contain as a minimum Personnel Certifications, including past Certifications and results of performance demonstrations and oral examinations."

Contrary to the above requirement, certification files of inspection personnel do not always contain past job certification or performance demonstration. Files for all Level IIIs and 20% Level IIs were checked and 5 of each level were unsatisfactory.

B. Procedure B-3M, Para 5.10.1 & 5.10.1c states that:

"Personnel certification file shall contain as a minimum, Vision Examination Record, including past years."

Contrary to the above requirements, certification files do not always contain past eye exams. The files for all Level IIIs and 20% Level IIs were reviewed and 1 and 4 were unsatisfactory, respectively.

(continued)

AFR SER NO:

MSA-83-25-03F

PROJ/DEPT ALIQUID:

MPQAD Training

DATE OF ISSUANCE:

10/14/83

FILE NUMBER:

16.0 18.6 CLOSED

ACTION ITEM NO:

S03575

DISTRIBUTION:

JABauer	HPLeard
AEBice	BWMargaglio
WRBird	JKMeisenheimer
JEBrunner	DBMiller
FWBuckman	JAMooney
RBCameron	GEParker
JWCook	RCSepher
MADietrich	TKSobramanian
GFEwert	DAtaggart
BTFoote	RAWells
WJFriedrich	JLWood
MHanbury	ALAB-2
LJJamesore	LBotimer
DDones	DEHorn
JPKnight	DDCoppeler
	ALPucci

SEE

ATTACH.

DISTRIB.

RECOMMENDED CORRECTIVE ACTION:

- 1) Perform 100% review of files and assure certified personnel have records of information required in items A, B, C and D.
- 2) Evaluate conditions created by missing documents relative to proper certification and work performed by uncertified personnel.

CORRECTIVE ACTION COMMENT: Response due by 10/28/83.

1) & 2) Soils action completed.

DATE OF C/A COMPLETION: 2/28/84

DATE OF C/A EFFECTIVENESS: 2/28/84

ORG. RESP FOR C/A:

Supv, Records
Asst. Supt, Soils
PAE

PERSON MAKING C/A COMMENT:

LBotimer
DEHorn
GEParker

METHOD OF VERIFICATION:

Mgr MPQA (E only)

WRBird

Reviewed 7 Level III's and 11 Level II's. All required forms, exams and supporting required documents in place. Corrections to records acceptable.

IS AF REPORTABLE PER 50.55(e):

YES ☐ NO ☒

IF "YES", DATE OF REPORT TO IRC:

N/A

IF "YES", TIME OF REPORT TO IRC:

N/A

IF "YES", NAME OF IRC OFFICIAL TO WHOM REPORTED:

N/A

IF "YES", WHO MADE REPORT:

N/A

AFR ISSUANCE'S SIGNATURE/DATE:

D D Coppeler
D D Coppeler

AFR SIGNATURE/DATE:

ALPucci 10/14/83

AFR VERIFICATION SIGNATURE:

D D Coppeler
D D Coppeler

VERIFICATION DATE:

2/28/84

F-1M-4A (REV. 1)



AUDIT FINDING REPORT

~~CONFIDENTIAL~~ ~~SECRET~~

MSA-83-25-03F

AS IS CURRENTLY TESTED "AS RECEIVED" CONDITIONS AND DEFECTS (CONTINUED):

C. Procedure B-3M, Para 5.10.1 & 5.10.1f states that:

"A personnel certification file shall contain the following:

An annual statement of satisfactory job performance."

Contrary to the above requirement, certified individuals packages do not always include an annual performance review. Files for all 100% Level IIIs and 20% Level IIs were checked and 14 and 7 were unsatisfactory, respectively.

D. Procedure B-3M-1(3), DR #105, Para 5.9 states:

"When Level III person determines that the candidate meets the requirements...he shall certify....by signing the appropriate Personnel Certification Form, Attachment D."

Contrary to the above, Personnel certification Form (Inspection Plan) has typed names or typed initials of certifying authority rather than signature. Files for 20% of Level IIs were reviewed and 3 were unsatisfactory.

E. Procedure B-3M(5), Para 5.6 & B-3M-1(3), Para 5.8 states in part:

"Each candidate shall be physically capable of performing his assigned task. Annual eye exams are required. Each candidate shall be able to distinguish primary colors. Candidates who fail the color test may be given a practical color exam by the Level III to cover the specific inspection activities. The Level III shall document the practical color exam results in a memorandum to the Training Supervisor and attach a copy to the Vision Examination Record."

Contrary to the above, past eye exams record a partial color blindness for one individual. Practical exams were recorded properly. However, current certification for this individual does not state this limitation, nor record a practical exam for distinguishing primary colors.