

50-329
50-330

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC- 7412

Date: March 5, 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 Does	DPP
RA	DE
RA	DRG
	DR
AD	SCS
SGA	ML
ENF	File Does

✓ orig + 3

Description:

Closed QAR #RT-00020 which was used by MPQAD
to track CIO NIR-007.

Signature:

NIRichel

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

MAR 8 1984

8403130161 840305
PDR ADOCK 05000329
S PDR

IED/11

3. (Inconsistencies)

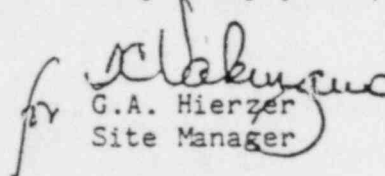
- A. FPG-2.000 is being revised to stipulate that all corrections will be a line out in ink. The corrector will initial and date.
- B. All entries will be made in ink.
- C. Review specified in para. 1 above will include the listing of all applicable documents on the class attendance rosters.
- D. See para. 1 above.
- E. The Course Roster form is now furnished to the instructor with his copy of the Training Schedule to assure that the proper form is used.

4. The referenced letter stated that our original response regarding the Training Records Group review of a 10% random sample of the training files is unacceptable. We concur that a 10% sample is inadequate and regret the choice of words. In fact over 100% verification takes place. When training records indicate an individual is 100% complete a verification of the record takes place. This may occur long before the individual is assigned to status assessment. In addition, the supervisor is provided with an exception report showing the training requirements outstanding. Discrepancies between records which may be maintained by the supervisor and the Training Records Group are reconciled on a continuous basis using this management tool. Requirements, therefore, are documented in the exception report.

An additional 100% verification of records is made prior to an individual actually being assigned to status assessment by the Training Records Group. This occurs when the supervisor presents a listing of individuals to be assigned.

If you have any questions regarding the above, please contact E.H. Pillsbury at Ext. 7507.

Very truly yours,

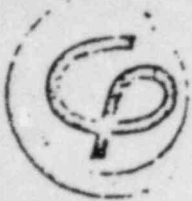

G.A. Hierzer
Site Manager

MAD exp
GAH/MAD/BTF/lcc

Written Response Requested: No

Attachment: S&W NIRs (Nonconformance Identification Report) Nos.
006 & 007

CC: N. Reichel



BECHTEL
POWER
CORPORATION

Dean L. Quamme
Site Manager
Midland Project

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

December 7, 1983

RECEIVED

DEC 7 1983

Mr G A Hierzer
Bechtel Power Corporation
P O Box 2167
Midland, MI 48640

BECHTEL POWER CORP.

100 7310

5652 ABC

MIDLAND ENERGY CENTER GWO 7020

S&W NIR's 006 AND 007

File: B1.1.7, 0655 UFI: 53*50*04, 99*08 Serial: CSC-7069

Your response to S&W NIR's 006 and 007 is unacceptable regarding the Training Records Group reviewing a 10% random sample of the training files to verify the files of personnel who have completed all requirements for status assessment. A 100% review of these training files must be conducted and results documented. This should be done on a priority basis according to the sequence in which teams will begin status assessment.

Dean L. Quamme

DLQ/DDJ/klp

cc: BHPeck, MEC
NIRreichel, MEC

DISTRIBUTION FOR QAR #RT 00020

INFO:

JABauer

WRBird

JEBranner

RBCameron

JWCook

GREagle

GFEwert

BTFoote

DEHorn

DDJohnson (2) One copy to go to S&W

JPKnight

BWMarguglio/DJones

JMMeilstrup

ERMouser

GEParker

RCSember

DATaggart

CMThompson (ALAB-2)

DMTurnbull (2)

RAWells

*FILE 16.0

*Original

MIDLAND PROJECT
QUALITY ASSURANCE DEPARTMENT

QUALITY ACTION REQUEST

ORIGINAL

6. QAR NO:

RT-00020

7. DATE ISSUED:

12/29/83

8
0

1. REQUIREMENT:

FPG-2.000 Rev 5 identifies the requirements for generating and maintaining records of the training of construction personnel.

9. PAGE 1 OF 3

10. ASME RELATED

☐ YES

☒ NO

2. DEFICIENCY:

Stone and Webster NIR #007 identified numerous discrepancies in the records kept on construction personnel.

11. POTENTIAL 50.55(e)

YES ☐ NO ☐

3. QAR ORIGINATED BY:

DMTurnbull

4. DISCIPLINE/DIVISION/SECTION

QSD

5. RESPONSE DUE DATE

1/6/84

12. REPORTED TO MPQA
MANAGER:

DATE N/A

13. ACTION ITEM NO:

SO4123

15. ITEM PRIORITY:

3

17. S/U CODE:

PGMOO

19. ACTION ORGANIZATION

Bechtel Construction
Training Coordinator

20. QAR REVIEWED BY:

AF Ewert

14. DISCIPLINE:

N/A

16. TREND CODE:

DNT

18. RESB CODE:

BC PCO FEST

21. DATE:

12/29/83

22. CAUSE:

BEFORE TO 28 SEP 83 THERE WERE NO SPECIFIC INSTRUCTIONS IN FPG 2.000 ON COMPLETING CLASS ATTENDANCE ROSTERS OR READING SHEETS.

23. PROPOSED CORRECTIVE ACTION:

REVISION 7 TO FPG 2.000 ON SIGNATURE CYCLES CLEARLY SPECIFIES: 1) REQUIRED INFORMATION ON TRAINING RECORDS. 2) POSITIVE METHOD OF CORRECTING TRAINING RECORDS. 3) DEFINED ILLEGIBILITY. 4) SUPERVISORS HAVE BEEN DIRECTED TO USE CURRENT READING FORM. SINCE THE NIR 007 WAS ISSUED, STONE & WEBSTER HAVE AUDITED THREE ADDITIONAL GROUPS OF TRAINING RECORDS. (CONT)

24. RESPONSIBLE ORGANIZATION/PERSON:

JACK MEILSTRUP - CONSTRUCTION TRAINING
1-10-84

25. PROPOSED COMPLETION DATE

1-17-84

THIS IS PROJECTED SIGN OFF DATE FOR THIS REV 7 TO FPG 2.000

26. DISPOSITION CONCURRENCE:

AF Ewert 1/17/84
QAR REVIEWER DATE

N/A *AF Ewert* 1/17/84
PQAE (ASME ONLY) DATE

27. DISPOSITION ACTION TAKEN:

FPG-2.000 REV. 7 WAS ISSUED FOR USE ON 2/9/1984.

AF Ewert 2/29/84

28. METHOD OF DISPOSITION VERIFICATION

VERIFIED THAT FPG 2.000 REV 7 IS IN MPQAD ~~CONTROLLED~~ ^{CONTROLLED} MANUAL AND THAT IT LISTS INFORMATION TO BE SHOWN ON TRAINING RECORDS, DEFINES HOW CORRECTIONS SHOULD BE MADE. AND DEFINES ILLEGIBILITY.

ACCEPTABLE ☒ UNACCEPTABLE ☐ SUPERCEDING QAR _____

29. QAR CLOSED BY

AF Ewert 3/1/84
MPQAD GFEWERT DATE

N/A *AF Ewert* 3/1/84
PFQCE (ASME ONLY) DATE

QUALITY ACTION REQUEST
CONTINUATION SHEET

DATE:

1-11-84

REV:

PAGE 2 OF 4

BLOCK 23 CONTINUED: either by sampling or a one hundred percent audit. All of the

groups have been accepted. Copies of interim responses are attached.

A. E. Russell 1/11/84 for -

STONE AND WEBSTER ENGINEERING CORPORATION
NONCONFORMANCE IDENTIFICATION REPORT

QAR No. RT-00020
Page 2 of 3
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 Sub Bureau

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.

Bechtel Power Corporation

Post Office Box 2167
Midland, Michigan 48640



December 9, 1983

Consumers Power Company
P.O. Box 1963
Midland, MI 48640

Attention: D.L. Quamme

Job 7220 Midland Project
CONSTRUCTION REVIEW OF STONE &
WEBSTER'S NIRS 006 & 007
BCCC-8804

S&W REPORTS # 20 & 21

Dear Mr. Quamme:

Reference: CPGO Ltr. D.L. Quamme to G.A. Hierzer dated December 7, 1983
Serial No. CSC-7069

Outlined below is Construction's complete response and proposed corrective action for the subject NIRS.

1. The discrepancies listed for the class attendance roster are acknowledged. The use of the class attendance rosters was effective on September 28, 1983. Each roster since that date will be reviewed and corrected in conformance with Attachment D to FPG-2.000.
2. (Reading Records)
 - A. Illegibility occurs when the preparers run copies from poor masters instead of obtaining copies from the Training Department.
 - B. As noted on Attachment C, the format may vary as long as all information is included.
 - C. There is only one official training record and that is stipulated in paragraph 9 of FPG-2.000. The Team Record and the Team Status Report (TSR) are informal management tools and are not official records. The TSR is being replaced by the Training Exception Report Printout (TERP).

Addressing the two specifics listed.

*Krantzfelder - Completed FPD-2.000 at Level 5 on 8/18/83.
Paragraph 6.3, FPG-2.000 applies.

*Hull - Spec. M-204 appears on the latest TERP (attached).
This means he has not received the required training.