



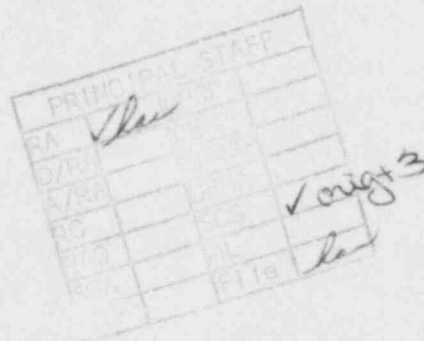
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Company**

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March 14, 1984

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MIDLAND ENERGY CENTER GWO 7020  
INSPECTION REPORT NO. 50-329/84-03 (OSC) AND 50-330/84-03 (OSC)  
File: 0485.16 UFI: 42\*05\*22\*04 Serial: CSC-7460  
0.4.2 70\*01

REFERENCE: (1) R F Warnick letter to J W Cook, dated February 15, 1984  
Inspection Report No. 50-329/84-03 (OSC) and 50-330/84-03 (OSC)

This letter, including Attachment 1, provides our response to Reference 1, which transmitted the subject Inspection Report which requested our written response to the item of noncompliance therein.

Consumers Power Company

By

James W. Cook  
James W. Cook

Sworn and subscribed to before me on this 19 day of March, 1984.

Barbara R. Hanson  
Notary Public

My commission expires

Sept 8, 1984

JWC/BHP/klw

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JJHarrison, NRC Region III  
RNGardner, NRC Region III  
RJCook, NRC Senior Resident Inspector, Midland  
RBLandsman, NRC Region III  
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3/8/84

CONSUMERS POWER COMPANY'S RESPONSE TO  
US NUCLEAR REGULATORY COMMISSION, REGION III  
INSPECTION REPORT NO. 50-329/84-03 (OSC) & 50-330/84-03 (OSC)

Appendix (Notice of Violation) to Inspection Report No. 50-329/84-03 (OSC) and 50-330/84-03 (OSC) provides an item of noncompliance to 10 CFR 50, Appendix B. The NRC statement and our response are given below:

NRC STATEMENT

"10 CFR 50, Appendix B, Criterion V states, in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, or a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Bechtel Specifications for Installation, Inspection and Documentation of ASME Section III Pipe Supports, Hangers, and Restraints for Piping in a Nuclear Power Plant, Specification No. 7220-M-326 (Q) states, in part, "After installation, the snubber assembly shall be protected from physical damage due to normal construction activities by providing wooden, heavy cloth, or other similar suitable protective covers.

Contrary to the above, four of the mechanical snubbers installed in Unit 2 Containment south D ring and adjacent areas were not protected from physical damage due to normal construction activities by providing the required protective covers.

This is a Severity Level IV violation (Supplement II)."

CONSUMERS POWER COMPANY RESPONSE

In accordance with this Notice of Violation, an explanation of corrective action is as follows:

1) Corrective Action Taken and the Results Achieved

A complete reinspection of all Q mechanical snubbers was concluded on February 3, 1984. Any snubbers found uncovered were appropriately covered. No physical damage was noted.

2) Corrective Action To Be Taken To Avoid Further Noncompliance

Corrective action taken on systems in Construction Status (Non Turned Over) is as follows:

- A. B&W Construction Company FCP No. 800 has been revised to reflect a maximum period of 60 days between documented inspections of each mechanical snubber.

- B. Bechtel Maintenance Information Form F-10-359 (Mechanical Snubbers) has been revised to reflect a 100% documented inspection of all Q mechanical snubbers within a 60-day period.
- C. In addition, a periodic documented check will be established to assure that any snubber deficiencies are identified and corrected during the 60-day inspection interval. Unlike the 60-day inspection, the periodic check will be based on a two week cycle, will exclude Unit 1, and will be conducted on an area basis only checking those snubbers which are accessible. This two week periodic check will be fully operational by April 15, 1984.
- D. A tag is being attached to each installed Q mechanical snubber with appropriate wording noting that if the wrapping around the snubber must be removed, then it must be reinstalled after completion of the work. Tagging will be completed by April 15, 1984.
- E. Bechtel has issued a Quality Bulletin to all site personnel (including B&WCC) stating that anyone who finds a snubber uncovered should report this situation to management. Also, Bechtel has reissued memorandums to Bechtel staff personnel reiterating this position.

3) Full Compliance Will Be Achieved As Follows:

All of the actions noted in 2) above are being implemented. This 60-day 100% inspection coupled with the two week periodic check of all areas should preclude further noncompliance. Additionally, the CPCo Testing Department will continue the necessary inspection/surveillance program on Q mechanical snubbers beyond the system turn-over date. In fact, these snubbers will be covered and protected up until the time of Functional Testing and then reprotected until system operation.