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STONE AND WEBSTER MICHIGAN, INC.
P.O. BOX 1963, MIDLAND, MICHIGAN 48640

DMB

DATE	6/4/84
J. C. NO.	14509
P. O. NO.	
LTR. NO.	SWM-134
REF.	

VIA

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YOUR ATTENTION IS DIRECTED TO THE FOLLOWING:

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☐ WE TRUST THAT THESE NOTES ARE IN ACCORDANCE WITH YOUR UNDERSTANDING. IF NOT, PLEASE ADVISE US.

IMPORTANT SHOULD ANY REVISION TO DOCUMENTS OR DRAWINGS RETURNED HERewith INVOLVE A PRICE INCREASE THE SUPPLIER MUST NOTIFY STONE & WEBSTER PURCHASING DEPARTMENT WITHIN TEN (10) DAYS EVEN THOUGH A DEFINITE ESTIMATE CANNOT BE GIVEN AT THE TIME OTHERWISE, THE PURCHASER WILL CONSIDER THE REVISIONS MADE WITHOUT COST.

The following Closed CIO Item/Hold Point Notification(s) is (are) attached for your action/information:

060

DISTRIBUTION:

Job File C.3 (orig + 1)
DLQuamme, CPCo
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APAmoruso (2)
KRArndt/Chrono/Vault w/o attach(2)
Initiator

J. E. Karr
CIO Program Manager

8406120173 840604
PDR ADOCK 05000329
S PDR

JUN 7 1984

TEO1

STONE & WEBSTER
CONSTRUCTION IMPLEMENTATION
OVERVIEW
MIDLAND NUCLEAR PLANT J.O. NO. 14509

REFERENCE(S) Recommendations "MPQAD Site Auditing"
 CIO Evaluation No. MP-MIS-072-0001

ITEM NUMBER 060 HOLD POINT NUMBER

- ☐ TRACKED ACTION ITEM
☐ TRACKED INFORMATION ITEM
☒ TRACKED RECOMMENDATION ITEM
☐ UNTRACKED ITEM
☐ HOLD POINT NOTIFICATION

CONDITION DETAILS

The following recommendations and beneficial results are divided into three categories:
 (1) Management involvement, (2) Tracking of audits/audit findings (corrective action),
 and (3) Training records and certification of audit personnel.

1. Management Involvement

- a. Revis. Volume No. II Procedure 18-1 and F-IM to reflect more accurately
 duties and responsibilities of site audit branch.

Advantage

- 1) To reflect the process currently in use.

Continued on Sheet 2 of 3

☐ YES (PAGE NO.'S) ☒ NO

ATTACHMENTS

DATE RESPONSE REQ'D.	INITIATOR/DATE	INITIATION APPROVED/DATE
March 5, 1984	<i>W. B. Brown</i> 2-15-84	<i>J. E. Khan</i> 2-17-84

RESPONSE

See Attached

The responses provided via CPCo Transmittal No. CSC-7458 (Attachment No. 1), along
 with the clarification response provided via Transmittal No. CSC-7792 (Attachment No. 2)
 are acceptable. CIO considers this item closed.

☒ YES (PAGE NO.'S) *6484* ☐ NO

ATTACHMENTS

EST. CORRECTIVE ACTION COMPLETION DATE	RESPONDENT	TITLE	DATE
	<i>RCSember</i> RCSember <i>3/13/84</i>	Audit Branch Head	3/13/84

RESPONSE ACCEPTED	DATE	RESPONSE VERIFIED	CLOSED	DATE
<i>W. B. Brown</i>	<i>6-4-84</i>	<i>J. E. Khan</i>		<i>6-4-84</i>

(CN)

1. (continued)

- b. Revise Procedure No. F-IM to improve management involvement in evaluating audit results and reoccurring delinquent or inadequate responses, and establish time frame for audit responses/evaluation cycles.

Advantage

- 1) To improve adequacy and timeliness of audit responses.

2. Tracking Audits/Audit Findings (Corrective Action)

- a. Revise procedures to provide instructions for both auditing and audited organizations' responsibilities.

Advantage

- 1) Clear and complete instructions facilitate timely and adequate closure.
- 2) Define responsibilities.

- b. Develop a mechanism to assure that all applicable criterion of 10CFR50, Appendix B, have been audited annually.

Advantage

- 1) Enhances tracking, trending and planning.
- 2) Provides objective evidence that auditing program addresses pertinent criterion from 10CFR50, Appendix B, and is ongoing.
- 3) Aids in auditing/evaluating adequacy of program.

- c. Revise Procedure No. F-IM to clarify the use of an indefinite (hold) status for tracking of audit reports.

Advantage

- 1) Define criteria for use of (hold) status.
- 2) Provide instructions for auditing personnel.
- 3) Reflect current operations.

- d. Copies of all project related audit reports (on or off site) should be retained to closure for information by a site organization.

Advantage

- 1) Provides overview of complete audit program status for the project.
- 2) Provides hard copy for details of open findings.
- 3) Aid to be used in conjunction with Quail.
- 4) Improve tracking and trending.

3. Training Records and Certification of Auditors

- a. Auditors should be included in the computer tracking program for training already in use for other MPQAD personnel.

Advantage

- 1) Provide computerized tracking.
- 2) Provides instant statusing.
- 3) Provides evidence of training.
- 4) Establishes matrix of quality affecting procedures commensurate with job assignment.

- b. Copies of auditors/lead auditors' certifications should be maintained on site for personnel assigned to the project.

Advantage

- 1) Provides objective evidence of audit personnel qualification and certification.

- c. Personnel assigned to the auditing branch should be certified as auditors in accordance with Procedure No. B-6 (auditors) while in training for lead auditor certification.

Advantage

- 1) Provide objective evidence that personnel participating as audit team members are qualified and trained.

CPC-089

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Item 060
Attachment 1
Page 1 of 3

Transmittal No: CSC-7458

Date: March 14, 1984

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

Attached Is:

☐

Partial Response To

☒

Complete Response To

☐

For Your Information

☐

Other

Description:

Tracked Information Item 058

Tracked Information Item 059

Tracked Recommendation Item 060.

NIR Signature:



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
NIReichel, MEC w/a
DDJohnson, MEC w/a

Response to CIO Item #060

- 1a. Volume II, Procedure 18-1, is currently being revised and the responsibilities of the Site Audit Branch will be defined.
- 1b. The Audit Branch has full access to management and it is inherent in the responsibilities of the Audit Branch Head to advise management when higher level management involvement is required. Management is also aware of the status of open action items through the "Audit Summary Status" issued monthly. The F-1M Procedure, Audits, establishes the time frame for corrective action commitments.
- 2a. Volume II, Procedure 18-1 does address CP Co responsibilities of CP Co audited organizations. The instructions for both auditing and audited organization's responsibilities are accomplished through the entrance and exit meetings. MPQAD Procedure F-1M, Audits, is presently being revised and it will be reviewed to ensure the appropriate instructions are clear.
- 2b. The Site Audit Branch recognizes the potential net benefit for such a matrix and had started this effort prior to CIO evaluation. This is not considered a program requirement.
- 2c. Items so identified, IDE, indicate a hold due to project constraints. F-1M will be reviewed to see whether this is needed in the next revision.
- 2d. Site Audit Branch is on distribution for A&MS and DQAE audits so that their Audit Reports can be reviewed for information purposes, and they are generally retained. The Site Audit Branch does retain all information pertinent to open Findings for which responsibility is assigned to the Branch, therefore, the Site Audit Branch is aware of status of reports issued to and by the Audit Branch. DQAE and A&MS are responsible for maintaining their respective audits.
- 3a. The training and certification of CP Co Project Engineering and Construction Audit Team Leaders is performed by A&MS and the periodic status report A&MS provides to the Site Audit Branch for the 9 certified Branch auditors is adequate. The training of Audit Branch personnel is incorporated into the Site Training Matrix. The Audit Branch will discuss with A&MS the possibility of entering certification data for Audit Team Leaders into the computerized tracking system.
- 3b. As stated above, the training and certification is performed by A&MS and the certification records are available in A&MS files in Jackson.
- 3c. The selection of personnel to be assigned to the Audit Branch is based upon a number of criteria, one of which is their past audit experience. The hiring policy for the Audit Branch has been for the candidates to have the required education and audit experience to become Audit Team Leaders and only require CP Co specific training and experience under the CP Co Audit Program prior to certification. Therefore, the qualifications for certification as an Auditor in accordance with CP Co E&QA Procedure B-6 have already been met or exceeded, making the Audit Branch's policy of Audit Team Leaders-in-Training participating in audits more restrictive than certifying the same personnel as Auditors.

(continued.)

3c. (continued)

The time period between their date of hire and certification is usually limited to the time needed to participate in the required number of CP Co audits (usually less than three months). Additionally, CP Co commits to Reg. Guide 1.46 which endorses ANSI N45.2.23, 1978. This Standard only addresses the qualification and certification for Audit Team Leaders, not Auditors.

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

Transmittal No: CSC- 7792

Date: May 22, 1984

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

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

Description:

Clarification to our response to Tracked Recommendation Item 060.


Signature:

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

RECEIVED

MAY 23 1984

S & W CPC-19/ CIO
J.O. NO. 14509.00

Clarification of Response to CIO Item #060

- 1b. The formal system for tracking and closure of open audit items is QUAIL. The QUAIL Procedure (M-6), Sections 5.7 and 5.8, describe the actions taken with regards to these items. It also describes the issuance of reports to the Executive Manager, MPQAD, describing unacceptable progress in closing items. Management action is formally taken at that point.

Informally, the Audit Branch has and continues to initiate management attention to items. It is the responsibility of the Audit Team Leader and/or assigned auditor to track open items assigned to them. They are responsible for obtaining responses in a timely manner and for evaluating these responses. If the individual believes he is encountering problems which he alone cannot resolve, he, through the normal chain of command, contacts his supervisor. The upward chain includes the Audit Branch Head and the Executive Manager, MPQAD. There are numerous documented cases where this system has been utilized.

It is believed that management involvement has been, and continues to be, supportive of our efforts in closing open action items. Procedure revision to F-1M to address management involvement in the above process is not deemed necessary.

- 2c. As in 1b above, the formal tracking system is QUAIL. The tracking system referenced in this item is an interval working system used by the Audit Branch to monitor their own internal work load. It is not deemed necessary for the Audit Group to proceduralize a working tool type document.
- 3a. Audit personnel have been included into the site training program. Appropriate records are maintained in the MPQAD training files.
- 3b. Unofficial, informational type records are available on site in both the Site Audit Branch and the MPQAD training record files which provide sufficient documentation to identify certified individuals. The formal qualification and certification files for audit personnel is maintained in the CP Co office in Jackson.
- 3c. Procedure B-5 and B-6 are currently in the process of being revised/combined. The Site Audit Branch intends to meet the requirements of the current and revised procedures. Currently the Site Audit Branch is using Auditors-in-Training in order to certify personnel as Auditors for the time in which they are working towards their lead auditor certifications. There are individuals currently certified as Auditors who are in the training process for Lead Auditors.