

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

DMB

50-329
50-330

Transmittal No: CSC-7836

Date: June 1, 1984

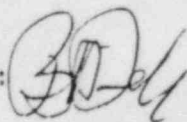
To: Stone & Webster
P O Box 1963
Midland, MI 48640

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

PRINCIPAL STAFF			
✓ RA	✓ DE	✓ DPRP	✓ orig 3
D/RA	DE		
A/RA	DRMSP		
RC	DRMA		
PAO	SCS		
SGA	ML		
ENF	File	✓	

Description:

Tracked Recommendation Item 082.

NIR Signature: 

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

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ITEM/HOLD POINT NOTIFICATION FORM

Sheet 1 of 2

STONE & WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW MIDLAND NUCLEAR PLANT J.O. NO. 14509		ITEM NUMBER 082	HOLD POINT NUMBER
		<input type="checkbox"/> TRACKED ACTION ITEM	
		<input type="checkbox"/> TRACKED INFORMATION ITEM	
		<input checked="" type="checkbox"/> TRACKED RECOMMENDATION ITEM	
		<input type="checkbox"/> UNTRACKED ITEM	
		<input type="checkbox"/> HOLD POINT NOTIFICATION	
REFERENCE(S) CIO Evaluation No. MP-MIS-092-001			
CONDITION DETAILS The results of the above referenced evaluation indicates that with the following exceptions the Audits and Management Systems (A&MS)(Jackson) meet the requirements of 10CFR 50, Appendix B, Criterion XVIII:			
1) It was not readily apparent that all of the applicable criteria of 10CFR50, Appx B had been audited for each of the major site contractors and their sub-tier contractors located on site. A matrix was developed of the audits performed by A&MS which revealed some criteria had not been audited, however, it was noted that DQAE-Ann Arbor and the site audit branch had performed audits which may meet all or some of these requirements. Furthermore, it was observed that A&MS has already instituted a mechanism to matrix audits performed in 1984 to 10CFR50, Appx B criteria.			
It is recommended that A&MS review past audits to assure that 10CFR50, Appx D requirements have been audited for on and off site contractors.			
(Continued on Sheet 2)		<div style="text-align: right;"> <input type="checkbox"/> YES (PAGE NO'S) <input checked="" type="checkbox"/> NO </div>	
ATTACHMENTS			
DATE RESPONSE REQ'D. 6/4/84	INITIATOR/DATE <i>George Fotiadis 5/10/84</i>	INITIATION APPROVED/DATE <i>John 5-14-84</i>	
RESPONSE (SEE NOTE) Attached memo DJones to BHPeck dated May 30, 1984 provides our response to this item.			
		<div style="text-align: right;"> <input type="checkbox"/> YES (PAGE NO'S) <input type="checkbox"/> NO </div>	
ATTACHMENTS			
EST. CORRECTIVE ACTION COMPLETION DATE <i>NA</i>	RESPONDENT <i>[Signature]</i>	TITLE <i>Const Supt</i>	DATE <i>6/1/84</i>
RESPONSE ACCEPTED	DATE	RESPONSE VERIFIED/CLOSED	DATE

NOTE - FOR TRACKED ACTION ITEMS ONLY, EXPLAIN CLEARLY OR REFERENCE ATTACHMENTS FOR:

1) CAUSE OF OBSERVED CONDITION 2) CORRECTIVE ACTION TAKEN 3) PREVENTIVE ACTION TAKEN

500-027(CN)


Condition Details (Cont.)

- 2) It was noted that two audits remained open from 1982 (M01-25-02-04F and M03-03-02 OIF). CIO recommends review of findings and an expeditious closure to these reports.
- 3) A review of audit reports revealed the use of liquid paper or correction tape. It was noted that Mr. Dave Jones, Section Head, Audits and Management Systems, had issued a letter on 4/25/84 to all A&MS Personnel providing direction as to the proper method of making changes to audit reports.

Some audit forms/checklists were not complete (ie., AMS-84-09 blank spaces, no indication as to audit results (satisfactory or unsatisfactory), signatures etc.).

It is recommended that these instructions be proceduralized.

- 4) During microfilming of audits, reports were assigned (dummy) cartridge numbers. Although no records were lost, some difficulty was experienced in retrievability of specific audit data. CIO recommends that original copies of records should not be destroyed until microfilming is complete and accuracy has been checked.

To BHPeck, Midland
From DJones, JSC-206E 
Date May 30, 1984
Subject MIDLAND ENERGY CENTER GWO 7020
CIO TRACKED RECOMMENDATION ITEM 082
CC BWMarguglio, JSC-220A
WCCarr, JSC-205

CONSUMERS
POWER
COMPANY

Internal
Correspondence

DJ-84-84

Following is Audit and Management Systems' response to the subject Tracked Recommendation Item.

Exception 1

It was not readily apparent that all of the applicable criteria of 10CFR50, Appendix B had been audited for each of the major site contractors and their subtier contractors located on site. A matrix was developed of the audits performed by A&MS which revealed some criteria had not been audited, however, it was noted that DQAE-Pan Arbor and the Site Audit Branch had performed audits which may meet all or some of these requirements. Furthermore, it was observed that A&MS has already instituted a mechanism to matrix audits performed in 1984 to 10CFR50, Appendix B criteria.

Response

A&MS is planning to review 1983 Midland audits of CP Co's principal suppliers and develop a matrix of 10CFR50 Appendix B criteria audited. (Note that subtier contractors are audited by the Site Audit Branch, not by A&MS). This matrix will be provided to Stone and Webster by July 1, 1984. As noted in the evaluation, A&MS has developed a new Audit Plan and an Audit Scope and Summary Form to plan audits on an 18 criteria basis and record the criteria actually audited.

Exception 2

It was noted that two audits remained open from 1982 (M01-25-02-04F and M03-03-02-01F).

Response

AFR M01-25-02-04F was closed on 5/3/84 and A&MS has received a further response to M03-03-02-01F. A&MS is requesting additional action from B&W, Lynchburg before the finding can be closed. The estimated date for completion of this additional action is 6/30/84.

Exception 3

A review of audit reports revealed the use of liquid paper or correction tape. It was noted that Mr Dave Jones, Section Head, Audits and Management Systems, had issued a letter on 4/25/84 to all A&MS Personnel providing direction as to the proper method of making changes to audit reports.

Response

Audit Procedure, F-1, is in the process of being revised and will include instructions for corrections to audit documents and will emphasize the need to complete checklists. This revision is expected to be complete by August 1, 1984.

Exception 4

During microfilming of audits, reports were assigned (dummy) cartridge numbers. Although no records were lost, some difficulty was experienced in retrievability of specific audit data.

Response

The DCCs are no longer using dummy cartridge numbers (since 1981) and A&MS will review the current STAIRS Index to ensure all past A&MS audits are retrievable. This review is expected to be complete by August 15, 1984. As acknowledgements of audit report microfilming are received from the DCC, the STAIRS Index will be reviewed to ensure the reports have been indexed correctly.

Should you have any questions regarding these response, please contact me or WCCarr.

DJ/11b