

DOCUMENTATION TRANSMITTAL

DMB

PRINCIPAL STAFF			
RA	<input checked="" type="checkbox"/>	DPRP	<input checked="" type="checkbox"/>
D/RA		DE	
A/RA		DRMSP	
RC		DRMA	
PAO		SCS	
SGA		ML	
ENF		FI	

Krieg 3

To: Stone & Webster - CIO
PO Box 1963
Midland, MI 48640

Transmittal No: CIO- 0069
Date: 6-6-84

Attention: Don Brown

The documentation listed below ___ is provided herewith, X was previously provided on 6-6-84; as requested by Don Brown.

Documentation Description: Nonconformance Report - A-00124

CIO ___ has X has not been placed on routine transmittal for the described documentation.

Jeanne Kinn
Signature

8406150223 840606
PDR ADOCK 05000329
S PDR

- CC RJCook, NRC Site (w/a, unless voluminous)
JJHarrison, NRC Region III (w/a, unless voluminous)
DDJohnson, SMO (w/o)
JGKeppeler, NRC Region III (w/a, unless voluminous)
BHPeck, SMO (w/o)
NIRichel, SMO (w/o)
RAWells, MPQAD (w/o)
CMThompson - File 24.2 (w/a, unless voluminous)

MI0384-0001A-QL06

JUN 11 1984

IEO1
1/1

MIDLAND PROJECT
QUALITY ASSURANCE
DEPARTMENT

NONCONFORMANCE REPORT

ORIGINAL

16 NCR NO.

A-00124

17 DATE ISSUED

1/24/84

18 REV

0

19

PAGE 1 OF 1
74PM 4/24/84
43-27-84 4P

1 ITEM LOCATION

Warehouse & Field (Location to be determined by actionee)

2 ITEM DRAWING/PART NO.

Spec. 7220-C-231(Q)

3 ITEM PART NAME

Weldcrete (Manuf. by Larson Corp.)

4 ITEM SERIAL NO.

N/A

5 ITEM DESCRIPTION

Concrete Adhesive

INPUT TO DCC

DATE: MRS 5-4-84

6 ITEM STARTUP SYSTEM NO.
PGMOO

7 REFERENCE DOCUMENT

Spec. 7220-G-33(Q)/BQ-TOP-1

8 ASME-A.N.I. REQUIRED

☐ YES ☒ NO

9 INSPECTION RECORD NO.

MSA-83-11-06F

LOG NO.

N/A

REV NO.

N/A

10 RESPONSIBLE ORGANIZATION

BPCo - PE (AA)

NONCONFORMANCE DISCOVERED DURING:

☒ AUDIT

☐ POST INSPECT

☐ TURNOVER

☐ DESIGN

☐ RECEIVING

☐ CONST

☐ RELEASE FOR INSPECT

☐ POST TURNOVER

☐ PRE-OP TEST

☐ FINAL TURNOVER

☐ OVERINSPECT

12 REQUIREMENT BQ-TOP-1, Section 7.2, Supplier Inspection, states:

"Items which are typically excluded from the Surveillance Inspection Program include materials and standard manufactured products (catalog items) where required quality can be adequately determined by receipt inspection or post installation check out or test. Also excluded are materials where important physical & chemical properties are independently verified on samples taken at the supplier's facilities or at the jobsite."

13 NONCONFORMANCE Contrary to this requirement, no objective evidence has been provided for assuring that Weldcrete was a satisfactory material to be used in quality related applications. Furthermore, Weldcrete did not meet the following requirements:

1. Procurement from a supplier on Evaluated Supplier List (ESL-Q).
2. Basis for acceptance to technical requirement (i.e., physical, chemical, affect of irradiation, etc. as applicable.)
3. Shelf life controls
4. Alternate methods of assurance of acceptability for Q-related application.

See MSA-83-11-06F for Corrective Actions and Commitments.

14 NCR ORIGINATED BY (PERSON)

Al Notarmuzi 1/24/84
DATE

15 NCR ORIGINATED BY (DISCIPLINE)

MPOAD Site Audit Branch

16 NUMBER OF HOLD TAGS (IF APPLIED)

As Needed 3 Tags

21 LOCATION OF HOLD TAGS Warehouse #1

Containers Segregated. Exact Field Locations By Actionee Cannot be Determined at this time.

2 POTENTIAL 50.55(e)

☐ YES ☒ NO

24 ACTION ITEM NO.

SO 4358

26 ITEM PRIORITY CODE NO.

1

28 NCR REVIEWED BY:

Al Notarmuzi

3 REPORTED TO MPQA MANAGER

DATE N/A

25 DISCIPLINE:

C

27 TREND CODE

A-7

DATE:

24 Jan 84

CONTINUED ON REVERSE

F-2M/1A (Rev 1)

DOCUMENTATION

30 PROCESS CORRECTIVE ACTION

☐ YES☒ NO

QAR NO. _____

31 RECOMMENDED DISPOSITION

☐ REWORK☐ SCRAP/REJECT☐ REPAIR☒ USE AS IS

32 CONDITIONAL RELEASE

☒ YES☐ NO

31A ADDITIONAL INFORMATION

ITEM 1) PROCUREMENT NOT REQUIRED FROM ESL SOURCE. WELDCRETE IS PURCHASED PER G-33 (a). THIS IS NOT A NON-CONFORMANCE.

ITEMS 2, 3 & 4) PROJECT ENGINEERING TO RESOLVE. J. Hawley 3/12/84

33 DISTRIBUTION FOR ACTION

CONSTRUCTION/PROJECT ENGINEERING.

34 DISPOSITION CONCURRENCE

<i>[Signature]</i> PROJECT FIELD ENGINEER	3/25/84 DATE	<i>[Signature]</i> MPQAD CONCURRENCE	4/24/84 DATE	N/A PFQCE (ASME)	N/A DATE
<i>[Signature]</i> LEAD DESIGN ORG	3/25/84 DATE	N/A CP Co SMO (for turned over systems)	N/A DATE	N/A PQAE (ASME)	N/A DATE
				N/A A.N.I. (ASME)	N/A DATE

35 DISPOSITION ACTION TAKEN

Use As Is

RECEIVED

MAR 13 1984

Midland Project

36 METHOD OF DISPOSITION ACTION VERIFICATION

RESULT OF DISPOSITION ACTION VERIFICATION

☐ ACCEPTABLE☐ UNACCEPTABLEIF UNACCEPTABLE, REFERENCE
SUPERCEDING NCR NUMBER _____

37 NCR CLOSED BY

[Signature]
MPQAD4/26/84
DATE

A.N.I. (ASME)

DATE

CHPN
4/24/84

Block 35: DISPOSITION ACTION TAKEN

Recommended Disposition:

Nonconforming Item No:

1. Weldcrete as manufactured by Larsen is the stipulated material per Specification Reference G-33 (Q).
2. No nonconformance exists. Material supplied was the stipulated brand from the stipulated manufacturer. (Specifications C-231, Paragraph 17.1, C-195, Paragraph 5.1h and C-194, Paragraph 10.5.6.
3. Reference Telex No. N103 dated April 18, 1984 from Larsen Products Corporation stating their shelf-life position for weldcrete (attached). Present manufacturer's instructions require weldcrete to be stirred prior to its use and stirring is verified by inspection using PQCI's C-1.10, Section 2.1 A.3, UP-C-1.012, Section 2.1 B3 and UP-C-2.008 Section 2.1 A.
4. Weldcrete is a trade name product manufactured by Larsen Products Corp. This product has been used successfully for over seven years at the Midland Energy Center for Q-related application. The engineering requirements in Specification C-231, Paragraph 17.1, C-195, Paragraph 5.1h and C-194, Paragraph 10.5.6 require weldcrete by Larsen Products Corp. This requirement is also specified in the Purchase Orders and is verified at receipt inspection. A listing of all purchase orders for weldcrete is available from Purchasing.

Block 29: CAUSE

No documentation of supplier evaluation and clarification was required for C of C approval.

Page 4 of 7 ^{OPM}
4/24/84

APR 18 1984

BECHTEL MIDL

TLX N 103 APRIL 18 1984 ATTN: BILL FRAZIER, BECHTEL POWER CORP.

RE JOB NBR 7220.

THE SHELF LIFE FOR WELD-CRETE IS KNOWN TO BE INDEFINITE. STIR
BEFORE USING.

REGARDS, DANIEL J. GOEKE, EXECUTIVE VICE PRESIDENT
LARSEN PRODUCTS CORP.
REPLY TO TLX 904059 WSH

BECHTEL MIDL

MIDLAND PROJECT
QUALITY ASSURANCE
DEPARTMENT

NONCONFORMANCE REPORT
CONTINUATION SHEET

NCR NO.

A - 00124

DATE ISSUED

1-24-84

REV

0

PAGE

5

OF

7

CRM

424/84

BLOCK 31A CONTD

Engineering disposition

Corrective action item 1

WELDCRETE is a standard catalog item manufactured by Larsen Products Corporation. The material, in accordance with 1982 Sweet's catalog Section 3.1/Lar, complies to the requirements of ASTM C-39, C-78 and C-190. It is a standard product commonly used in the industry as a bonding agent. If the material can be certified that it meets the requirements of ASTM C-39, C-78 and C-190, it can be used in safety related structures.

Project engineering specified Codes 1 and 4 for procurement of WELDCRETE against Specification 7220-G-33(Q). Code 1 "certificate of conformance (C of C) to procurement document" requires supplier to submit a statement certifying that the material meets the requirements of applicable codes and standards.

Project Engineering is not aware of any functional non conformances of "WELDCRETE" used to date at Midland Plant. Hence the disposition for material used to date is "USE AS IS"

For project engineering's response to Recommended ^{Corrective} Action 2 through 5, please see Bechtel project management response to Audit Finding MSA 83-7-02F (Bechtel Letters J.A. Rutgers to R.A. Wells, Com 142433 dated 2/10/84 and com 145330 dated 3/15/84)

[Signature]
3/27/84

[Signature] 3/27/84

[Signature] for P.V. Raghupathy 3/28/84



AUDIT FINDING REPORT

MSA-83-11-06F--

706.7
4/24/84
QUALITY ASSURANCE

1. Installation Check Out or Test (continued):

installation check out or test. Also excluded are materials where important physical and chemical properties are independently verified on samples taken at the supplier's facilities or at the jobsite."

Contrary to these requirements, no objective evidence was provided to meet these policies for assuring that Weldcrete was a satisfactory material to use in quality related application.

Furthermore, procedural requirement for procurement of Weldcrete did not meet the following:

- 1) Procurement from a supplier on the Evaluated Supplier List (ESL-Q).
- 2) Basis of acceptance of Weldcrete to specific technical requirements (i.e. physical, chemical, affect of irradiation, etc. as applicable).
- 3) Shelf life controls.
- 4) Alternative methods of assurance of acceptability for Q-related application.

II. BPCo Procedure FPG-8.000, Field Material Requisitions, Rev 8, cross references BPCo Specification 7220-G-33Q - Q-listed Bulk/Shelf Bulk and ANSI N45-2.13, Quality assurance requirements for control of procurement items and services for Nuclear Power Plants. Section 10 outlines the requirements for Certificate of Conformance, which was required by BPCo Purchase Order.

Contrary to the above, the Certificate of Conformance for Weldcrete did not provide for the requirements of ANSI N45.2.13, Sect 10, Para 2.d, e, f.

- d. The certificate should be attested to by a person who is responsible for this quality assurance function and whose function and position are described in the Purchaser's or Supplier's quality assurance program.
- e. The certification system, including the procedures to be followed in filling out a certificate and the administrative procedures for review and approval of the certificates, should be described in the Purchaser's or Supplier's quality assurance program.
- f. Means should be provided to verify the validity of Supplier certificates and the effectiveness of the certification system, such as during the performance of audits of the Supplier or independent inspection or test of the items. Such verifications should be conducted by the Purchaser at intervals commensurate with the Supplier's past quality performance.

COMMENDED CORRECTIVE ACTION (continued)

- 3) Take appropriate actions to evaluate the manufacturer/supplier as required and taken corrective actions as appropriate, based on the results of the evaluations.
- 4) BPCo project documentation should be reviewed to clarify QA requirements of Q-listed materials/service/equipment relative to documentation and to incorporation in safety-related systems.
- 5) Forward documentation to MPQAD Site Audit Division.



Consumers
Power
Company

CONDITIONAL RELEASE ORIGINAL

MIDLAND PROJECT
QUALITY ASSURANCE DEPARTMENT

1. PAGE 1 OF 1

2. PROJECT: <u>7220 MIDLAND</u>		3. NCR <u>A-00124</u>	11. CONDITIONAL RELEASE NO: <u>A-00124-01</u>
4. SPECIFIC ITEM(S) TO BE CONDITIONALLY RELEASED NAME: <u>WELDCRETE (MADE BY CARSON CORP.)</u> PART NO(S): <u>N/A</u> SERIAL NO(S): <u>N/A</u> QUANTITY: <u>SEGREGATED CONTAINERS</u> LOCATION: <u>WAREHOUSE #1</u>			12. FILE NO: <u>16.0</u> 13. DISTRIBUTION: BT Foote, Bechtel-Midland BWMarguglio/DJones, JSC-220A WNMcDougall, MPQAD ROLiver, MPQAD-Soils DFronk, MPQAD DATaggart, MPQAD LRJassmore, MPQAD

5. AUTHORIZED WORK OR USE: TO BE ABLE TO USE WELDCRETE
IN NON-Q AREAS

6. LIMITATIONS ON CONDITIONAL RELEASE: NO USE OF WELDCRETE IN "Q"
APPLICATIONS

7. JUSTIFICATION (GIVE COST SCHEDULE & SAFETY IMPLICATIONS IF THIS CR IS NOT AUTHORIZED)
TO CONTINUE NON-Q GROUTING OPERATIONS

8. DATE OF EXPECTED CR CLOSURE: <u>N/A</u>	9. REQUESTOR'S SIGNATURE/DATE: <u>Oakley Sirino 2/21/84</u>	9A. PROJECT FIELD ENGINEER (BECHTEL ONLY) <u>SH GRMiche</u>
10. PQAE (BECHTEL ASME ONLY) <u>N/A</u>	9C. ANI SIGNATURE/DATE (ASME) <u>NA</u>	10. PROJECT MANAGEMENT APPROVAL SIGNATURE/DATE: <u>Steve Hokeal 2/21/84</u>
14. MPQAD APPROVAL SIGNATURE/DATE: <u>[Signature] 2/21/84</u>	15. CR TAGS APPLIED BY- SIGNATURE/DATE: <u>[Signature] 2/21/84</u>	16. CR TAGS REMOVE/CR CLOSED - SIGNATURE/DATE: <u>[Signature] 5/1/84</u>

To BTFoote, Bechtel-Midland

FROM HPNunes/ACAshworth, MPQAD

DATE January 25, 1984

SUBJECT MIDLAND ENERGY CENTER PROJECT
TRANSMITTAL AND RECEIPT OF ORIGINAL/ACTION
NCR's
FILE 16.0

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE

CC

The following original/action copy of NCR's are being transmitted to you for action. Please sign acknowledging receipt of the below listed NCR's and return to MPQAD.

NCR #A-00124

Transmitted by

ACAshworth 1-25-84

Received by

Smeltzer JAN 25 1984