

CONSUMERS POWER COMPANY
MIDLAND ENERGY CENTER

DMB

50-329
50-330

Transmittal No: CSC-7880

Date: June 12, 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	<i>h</i>	DPRP	✓ <i>Long+3</i>
D/RA		DE	
A/RA		CRMSH	
RC		DRVA	
PAO		SCS	
SGA		ML	
ENF		FTIS	<i>h</i>

Description:

Tracked Action Item 088.

NIR Signature: *[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

8406210061 840612
PDR ADOCK 05000329
S PDR

JUN 18 1984

TEO 11

ITEM/HOLD POINT NOTIFICATION FORM

Sheet 1 of 2

STONE & WEBSTER CONSTRUCTION IMPLEMENTATION OVERVIEW MIDLAND NUCLEAR PLANT J.O. NO. 14509		ITEM NUMBER 088	HOLD POINT NUMBER
REFERENCE(S) Checklists No. MP-MIS-096-005, MP-MIS-096-006, MP-MIS-096-001		<input checked="" type="checkbox"/> TRACKED ACTION ITEM	
		<input type="checkbox"/> TRACKED INFORMATION ITEM	
		<input type="checkbox"/> TRACKED RECOMMENDATION ITEM	
		<input type="checkbox"/> UNTRACKED ITEM	
CONDITION DETAILS		<input type="checkbox"/> YES (PAGE NO'S) <input checked="" type="checkbox"/> NO	
During the evaluation of Module 120D in the Aux. Bldg., for release of Phase 2 work, CIO noted the items listed on Sheet 2 that require response by CPCo. Please provide CIO with details of the corrective action which has been or will be for these items.		ATTACHMENTS	
DATE RESPONSE REQ'D. N/A	INITIATOR/DATE <i>D. L. Wells</i> 6/7/84	INITIATION APPROVED/DATE <i>J. H. Hester</i> 6-7-84	
RESPONSE (SEE NOTE) Attached is our complete response to this item.		ATTACHMENTS	
EST. CORRECTIVE ACTION COMPLETION DATE NA		RESPONDENT <i>[Signature]</i>	TITLE Const Supt
DATE 6/13/84		DATE	
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

Condition Details (Cont'd.):

- 1) Compliance with Procedure FPG-7.500 was not acceptable. Further, this procedure does not address in sufficient detail the present or intended methodology for completing the CCP.
- 2) Commodity lists provided to CIO contained many inaccuracies and incorrect information.
- 3) Administrative control of CCP Phase 1 activity was insufficient to assure accurate, complete, consistent results.
- 4) HVAC seismic support for cooler 2VM54A. The original QCIR, C304-317 W-1, lists six welders for the installation of this support. The QVP - QCIR, VCW1.00-10 documents six different welders for the same welds, these are actually marked on the base metal adjoining the appropriate welds.

The time of weld completion cannot be determined due to lack of rework documentation, thus the qualifications of the welders identified on the welds and in the QVP - QCIR, is indeterminate.
- 5) During verification of small bore support #FSK-M-2HBC-56-1-H2, the following was noted:

H.R.P. Procedure N-20 Rev. 1 and Deviation Request #259 require (in part) that item/attributes determined inaccessible by the implementing Q.C.E.'s. Supervisor shall be recorded in the CIIA Log.

Contrary to the above inaccessible items noted and concurred with in block 15 of PQCI-2.30 Rev. 5 were not recorded in the CIIA Log. Note QCIR was reviewed and accepted.
- 6) An unspecified angle (L - 2" X 2" 7½") attached to the monorail in Module 120D was not addressed during status assessment activities nor was it documented on the punchlist as work to go.

CCP PROCEDURAL/PROGRAMMATIC CHANGES

The CIO evaluation of CCP activities in Module 120D identified several procedural and programmatic concerns. These are summarized as follows:

- 1) Compliance with Procedure FPG-7.500 during the Phase 1 activities in Module 120D was not acceptable. Further, this procedure does not address in sufficient detail the present or intended methodology for completing the CCP.
- 2) Commodity lists provided the CIO contained many inaccuracies and incorrect information.
- 3) Administrative control of CCP Phase 1 activity was insufficient to assure accurate, complete, consistent results.

In response to these concerns, we plan to modify our program and take action described as follows. The basis for performing Phase 1 activities and providing an integrated statement of QVP and S/A results, for a system or area, will be a marked up set of drawings. Bechtel will be responsible for defining and providing a complete set of all applicable drawings prior to starting Phase 1 activities. The drawings provided will be similar to Status Assessment Prints (SAPs), with a "cut-off" date. For those commodities not completely defined on drawings, such as conduit supports, Bechtel will provide a list. Bechtel and MPQAD will participate in an initial "mark-up" meeting using these drawings, and other aides, such as MLCS, RVAC forms, walkdowns, etc. to define a complete Phase 1 division of responsibility. Phase 1 activities will then be performed by Bechtel and MPQAD using the same drawings as a basis. MLCS, MIRs and other systems will be updated throughout Phase 1. Any changes to the drawing basis during Phase 1 must be agreed upon by both MPQAD and Bechtel.

Before proceeding for the release to Phase 2, a final "mark-up" meeting will be held to verify completion of all Phase 1 activities. The final "end product" statement for Phase 1 will have a common Bechtel/MPQAD drawing mark-up as back-up detail to the Final Integrated Summary Statement, which is prepared as a management summary. MLCS, MIRs and other aides will also receive a final update.

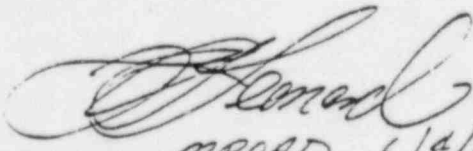
It is planned to change FPG-7.500, FIG-7.520 and related flow charts to define and proceduralize the process described above. For Phase 1 work already in progress, a "backfit" effort will be made to integrate the new drawing mark-up approach. It is expected that the required procedural changes can be completed in 2-3 weeks.

TRACKED ACTION ITEM 088
DETAIL ITEM 4

NOTE: This was previously
transmitted to CIO via
CPCo Transmittal No
CSC-7845.

Prior to the inception of the CCP, changes which necessitated rework would be implemented by construction without a formal notification to QC and without a formal "destatusing" of the existing inspection record to indicate that some of the completed attributes may have to be reinspected. After the rework was completed inspection would be requested and the existing record superseded by a new record. The times between initiation of change, completion of rework and reinspection could be substantial and since this process was interrupted by the work stoppage of December 1982, some existing inspection records do not reflect the reworked condition in the field. Thus, while reinspecting under the QVP, it is possible for the verification record to include data which are different from the existing record.

With the inception of the CCP all safety-related work and rework is managed by use of the Construction Work Package, which integrates construction ~~and~~ ^{6/4/84} and inspection activities. Prior to initiating rework a new inspection record is opened, thus reflecting the need for reinspection before the hardware is actually changed.


MPGAD 6/4/84

To DDJohnson, SMO

FROM JTChristy, MPQAD-QCD *JTChristy*

DATE June 11, 1984

SUBJECT MIDLAND ENERGY CENTER PROJECT
STONE & WEBSTER TRACKED ACTION ITEM NO. 088, ITEM 5

CC MLHorseman

**Consumers
Power
Company**

INTERNAL
CORRESPONDENCE
MPQAD-QCM-84-113

The following is Quality Control's full and complete response to Stone & Webster's Tracked Action Item No. 088, Item 5.

The fact that the inaccessible items noted in block 15 of the QCIR for small bore support FSK-M-2HBC-56-1-H2 were not recorded in the CIIA log was an oversight by the responsible Quality Control supervisor. The appropriate entries in the CIIA log have now been completed in accordance with MPQAD Procedure N-20. Quality Control's investigation of this item indicates it was an isolated incident; accordingly, the supervisor has been cautioned to be more careful in the future.

JTC/WTB/mt

Response to Paragraph 6., Item 088, S & W Item/Hold Point Notification Form.

The unspecified angle (2 x 2 x 7 $\frac{1}{2}$) attached to the monrail in Module 120D has been determined to be a temporary attachment. Removal of the angle has been added to the Construction Punchlist, Area C0053, to satisfy the 120D CIO finding.

It is Construction's position that all temporary installations will be removed prior to system/area turnover or identified as a turnover exception (TOE) per our current program.

Procedures to be reviewed and revised as required by July 2, 1984. To clarify thus position.