



Consumers
Power
Company

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June 7, 1984

Mr J J Harrison, Chief
Midland Project Section
U S Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

MIDLAND ENERGY CENTER
MIDLAND DOCKET NOS 50-329 AND 50-330
EMERGENCY DIESEL GENERATOR
BURIED FUEL OIL LINES
FILE 0975, 0655, 0485.16 SERIAL CSC-7771

Reference: 1) CSC-7749 dated May 15, 1984 from DLQuamme to JJHarrison
2) CSC-7720 dated May 7, 1984 from DLQuamme to JJHarrison
3) JJHarrison to DLQuamme letter dated May 14, 1984

The purpose of this letter is to request NRC concurrence with a program we have developed to perform work on the emergency diesel generator buried fuel oil lines. This work will be performed as described in the Construction Completion Program (CCP) Field Soils Organization (FSO) interface policy statement attached to Reference 1.

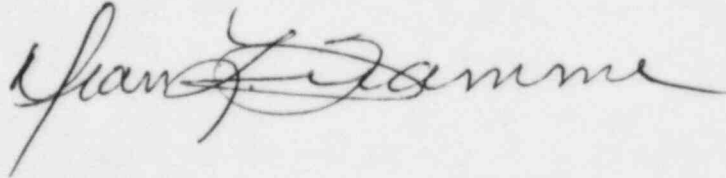
Under the Remedial Soils Work Authorization Procedure, Reference 2, requested that the excavation and backfill activities, and the installation of the missile shield for the buried fuel oil lines be allowed to proceed. Reference 2 was subsequently approved by Reference 3.

The CCP Team presently assigned the fuel oil lines has determined that due to numerous problems associated with salvaging portions of the lines, it would benefit the project to replace them with new fabrications. Major reasons in this conclusion are: (1) partial design routing revisions (2) 25 open NCRs (3) 400, two inch and smaller pipe welds would have to be cleaned of the tar like coating applied to buried piping for status assessment and QVP and (4) lines would have to be "hand" excavated as opposed to mechanical means. Confirming a conversation on June 6 1984, between your Mr. Ron Gardner and Mr. Bob Wheeler of CPCo, we request permission to proceed in the described manner, additionally, waiving the requirement of status assessment/QVP and proceed to Phase 2 of the CCP in replacing these lines.

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Our work program calls for the physical work to be done in three stages. A copy of the plan drawing is attached, showing the location of the lines and further delineating the stages we are proposing to do the work in. The staged approach allows us access to at least 2 of the 4 bays at all times to continue with the construction program presently ongoing and to prepare for the engine teardown and inspection as part of the TDI Diesel Generator Owners Group which is scheduled to begin July 2, 1984. The staged program also allows us to defer the portion of the work that runs beneath the area where the temporary Heating, Ventilation and Air Conditioning field office complex is located. After completion of the first two stages, the third stage under the HVAC field office can be completed after the complex has been relocated.



DLQ/MLE/klw

Attachments

CC Administrator, Region III
DSHood, NRR Project Manager, Washington
Midland Project Manager, Region III
Midland Resident Inspector, Midland