



September 20, 1973

GLENN J. SAMPSON  
Vice President, Power

Docket No. 50-46

Mr. Boyce H. Grier  
Regional Director, Region III  
Directorate of Regulatory Operations  
U.S. Atomic Energy Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Grier:

Toledo Edison acknowledges receipt of your August 17, 1973 letter and enclosure referencing an apparent violation of AEC regulations and a nonconformance with our quality assurance program. These two items resulted from site inspections conducted by your office on July 10-11, 1973.

Following a thorough examination of the two items of concern, Toledo Edison offers the following information regarding these apparent violations including corrective actions and steps taken to avoid further occurrences.

Item 1 - Document Control 10 CFR 50 Appendix B, Criterion V.

The A. Bentley & Sons Co. (Bentley) design document, entitled "Quality Control On-Site Inspection Manual" is further supplemented by the issuance of detailed Bentley procedures (ABSP-series) referred to as Exhibit No. 2 within the Bentley QC manual.

All issues and revisions to the Bentley QC manual including all ABSP-series procedures have received full engineering review and approval for use by Toledo Edison and its agent.

The Bentley procedures referred to and reviewed by your inspector including a 12-13-71 letter has been turned over to the Toledo Edison quality assurance department and clearly marked "VOID".

The Bentley-revised procedure for document control will incorporate provisions for numerically-controlled issuance of the Bentley "QC On-Site Inspection Manual" including all attendant exhibits. The master copy of these documents will be maintained in the Bentley field office. This Bentley corrective action will be completed by October 15, 1973.

The controlled reissuance of the Bentley QC manual and attendant ABSP-series procedures will include revised title pages, deleting the unnecessary, redundant Project Engineer's signature. The combined Toledo Edison/Agent approval is rendered by the use of a formal Davis-Besse "Quality Control Program and Procedure Transmittal Form".

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Toledo Edison and Bentley have held meetings to reemphasize the importance of positive control for all key project documents and the complete avoidance of unauthorized notations thereon. This applies to all Davis-Besse participants.

Toledo Edison's quality assurance review of the work and documentation incident with this item has revealed Bentley did use only properly approved design documents, including manuals, procedures and drawings.

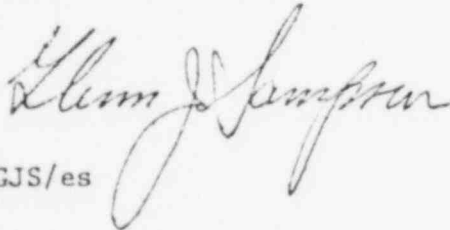
Item 2 - Document Control 10 CFR Part 50, Appendix B, Criterion V.

The Babcock & Wilcox Company Quality Control Procedure No. 9A-132, Revision 7, Section 21. through 2.3, has been reviewed and found adequate, however document control records have been amended to record the automatic transmittal of one copy of Bechtel drawings to B&W home office.

Previous records, while assuring control of documents (drawings) used in the site construction, did not indicate this off-site transmittal.

All site supervisory personnel have been reapprised of the necessity for document control. In this regard, they have been specifically advised that all documents which are to be utilized for construction must be formally transmitted to the B&W site construction office. Formal transmittal by letter or via the Bechtel drawing system will assure documented receipt control and necessary action in the case of field change notices.

Yours very truly,



GJS/es