

U. S. ATOMIC ENERGY COMMISSION
REGION III
DIVISION OF COMPLIANCE

Report of Inspection

CO Report No. 346/70-2

Licensee: Toledo Edison Company (Davis-Besse)
Construction Permit not yet issued
Category A

Dates of Inspection: June 10 and 11, 1970

Date of Previous Inspection: May 15, 1970

Inspected By: *George C. Gower*
G. Gower Responsible Reactor Inspector 7-1-70
W. E. Vetter / for
F. Dreher Reactor Inspector (Construction) 7-1-70
W. E. Vetter / for
J. Sutton Reactor Inspector (Construction) 7-1-70

Reviewed By: *W. E. Vetter*
W. E. Vetter Senior Reactor Inspector 7-1-70

Proprietary Information: None

I. SUMMARY

Type of Facility - Pressurized water reactor.

Power Level - 872 Mwe.

Location - Southwest shore of Lake Erie, Ottawa County, Ohio.

Type of Inspection - Initial Quality Assurance Inspection.

Accompanying Personnel - G. Fiorelli.

The Toledo Edison Company (TECO) corporate offices located in Toledo, Ohio, were visited on June 10 and 11, 1970, to conduct an initial Quality Assurance Inspection. The inspection was carried out in accordance with the inspection plan dated June 2, 1970, a copy of which has been provided to CO:HQ.

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The results of this inspection are summarized below:

1. Engineering design of the plant is approximately 30% complete; B&W has started work on the major components of the NSSS. TECO is preparing to issue contracts for the containment vessel and concrete batch plant. Site construction activities have been limited to clearing, grading, exploratory work and ground water control measures.
2. TECO's QA Organization (Criterion I) for the Davis-Besse project was found to be in accordance with the PSAR and appears to function in a manner consistent with the QA program requirements. The intent of AEC QA Criterion I has been met
3. The Davis-Besse QA Program has been established in accordance with the PSAR and is responsive to the requirements of AEC QA Criterion II. Evidence of implementation commensurate with the current status of the project was observed (Criteria III, IV, V, VI, VII, and VIII). TECO has not developed internal implementing procedures to control the activities associated with Criteria X, XI, XIV, XV, and XVI.
4. The TECO audit checklists and contractor requirements relative to Criteria V, Instructions, Procedures and Drawings, appear to have been confused with the intent of Criterion VI.
5. TECO has not yet established a system for the identification of the required QA records (Criterion XVII).
6. Audit checklists have been prepared and used by TECO to implement certain parts of their audit program. It appears that improvement in the effectiveness of these checklists could be made by supplementing them with guides or procedures (Criteria IX through XVI).

II. GENERAL

A. Background

TECO committed itself and its contractors to comply with certain QA efforts as described in the PSAR and the amendments. The QA inspection was both an inspection for conformance with the application and also the extent to which the proposed Appendix B to 10 CFR 50 has been implemented in the TECO QA program.

B. Organization and Assignment of Responsibility

1. W. E. Vetter maintained administrative responsibility for the overall audit effort which included review of the planning

and conduct of the audit, as well as review of results.³
G. Fiorelli participated during the first day of the
audit activities.

2. G. Gower was in charge of the audit and responsible for generation of the planning and audit details, and audited the QA program as it relates to the proposed AEC QA Criteria I, II, III, IV, V, VI, and XVIII.
3. F. Dreher was responsible for audit of the applicant's QA program relative to Sections I, II, VII, VIII, X, XI, XIII, and XVII of the proposed AEC Criteria.
4. J. Sutton was responsible for audit of the applicant's QA program relative to Sections I, II, IX, XII, XIV, XV, and XVI of the proposed AEC Criteria.

C. Persons Contacted

Toledo Edison Company

- L. E. Roe - Chief Mechanical Engineer and Davis-Besse Project Engineer
- J. D. Lenardson - Quality Assurance Engineer, Davis-Besse Project
- R. M. Slaybaugh - Purchasing Department

Bechtel Corporation

- H. W. Wahl - Davis-Besse Project Engineer
- J. W. Adams - QA Engineer

III. PROJECT STATUS

A. Engineering

It was reported by Howard Wahl (Bechtel) that as of May 30, 1970, the total plant design effort was 30% complete.

B. Procurement

At the time of the audit purchase orders and contracts had been issued by TECO for the turbine generators, feedwater heaters, and materials testing services. B&W is currently working on the reactor vessel, steam generators, and pressurizer. B&W has issued the purchase orders for primary pumps and motors.

TECO is in the process of letting contracts for the containment vessel and concrete batch plant.

C. Construction

L. Roe estimated the overall construction effort to be 1%. Major work has consisted of site clearing, installation of a grout curtain for ground water control and some soil exploration work associated with the plant foundations.

IV. AUDIT FINDINGS

A. Criterion I, Organization

1. Discussion (with L. Roe, J. Lenardson, and R. Slaybaugh, TECO, and H. Wahl and J. Adams, Bechtel)

The TECO Davis-Besse (D-B) project organization was found to be in accordance with Figures 1B-1 and 1B-2 of the application. QA responsibilities with respect to TECO, Bechtel, and B&W are as defined in the application. The TECO "Engineering Procedures Manual" and the "Construction Management Procedures Manual" were examined and noted to contain a clear definition of work responsibilities and authority. Bechtel has the organizational freedom to identify conditions adverse to quality and to recommend, initiate, and verify implementation of solutions.

B&W has a standard supply contract with TECO to furnish the NSSS. B&W, along with others, is being considered for erection and installation of the NSSS. No firm plans for erection services have been made as yet.

At the present time, the QA Engineer, J. Lenardson, who reports directly to the Vice President of the Power Group, does not have a staff. He has obtained assistance from others in the TECO engineering organization and from Bechtel to meet the past work requirements. Mr. Lenardson plans to hire three graduate engineers (civil, mechanical, and electrical) and one welding technician to establish the site staff. Lenardson appears to be well qualified for his QA responsibilities.

Discussions with L. Roe, who reports directly to the Vice President of the Power Group and has the dual responsibilities of Chief Mechanical Engineer and the D-B Project Engineer, indicated that at present he has ten full-time engineers working

on the project and two other men about half of the time. Training and experience of the key members of Mr. Roe's staff were discussed. Considerable engineering experience with conventional power plants was apparent. Five staff members (in addition to Mr. Roe) have had previous nuclear experience. Mr. W. Nodean has a doctorate in nuclear engineering and E. Novak has a masters in nuclear engineering.

Responsibility for periodic audits of the D-B QA program has been established. Implementation of the audit function was evidenced by documented results of four audits: one to Bechtel, Gaithersburg, and three at various B&W facilities. Results of QA program audits are reported to appropriate levels of management.

2. Finding

The TECO D-B project organization agrees with the PSAR and appears to function in a manner consistent with the AEC Criterion and the QA program requirements. Evidence of authority and responsibility in accordance with project requirements was apparent.

B. Criterion II, QA Program

1. Discussion (with same group as Criterion I)

The following documents were available for review by the inspectors with the implication that they will be used on the D-B project and collectively documents the QA program.

- a. "TECO Nuclear Quality Assurance Manual"
- b. "Construction Management Procedures Manual"
- c. "Engineering Procedures Manual"
- d. "Davis-Besse Nuclear QA Manual" (prepared by Bechtel)
- e. "Project Design Criteria Manual"
- f. "Field Inspection Manual - Power and Industrial Division" - (prepared by Bechtel SF)

Also available for review were examples of the B&W "QC Manual for Nuclear Components and Fabrication;" B&W's Erection Department QC Manual for NSS Components" and CB&I's "Corporate QA Program for Nuclear Vessels and Parts."

TECO's "Nuclear Quality Assurance Manual" is not a finished document at this time. The implementing sections of the manual dealing with all the activities up through construction will be completed by July 1970 according to J. Lenardson. This document contains in its present condition sections on General Programs, Engineering, the QA program included in the PSAR, Master Q-List Index, samples of the audit forms to be used by TECO, and a Section XII document, titled "Quality Control Requirements for Contractors."

2. Finding

The results of the audit indicate that the D-B QA program has been established in accordance with the PSAR and is responsive to the requirements of the AEC QA Criterion II. There is evidence of implementation commensurate with the project status. The applicant has stated that the important sections of his QA manual, up to and including the section on construction activities, will be completed by July 1970.

C. Criterion III, Design Control

1. Discussion (with L. Roe, TECO, and H. Wahl, Bechtel)

Procedures have been developed which describe the design control function to be performed by TECO. They include verification that regulatory, design basis and QA requirements are included. Procedures exist which describe the flow and distribution of drawings, specifications and instructions within TECO and the Bechtel organizations. A system for comments, resulting from the reviews, exists and appropriate steps are provided to deal with subsequent design changes. Bechtel has been assigned responsibility for all interface considerations.

Q-List items in the process of review were noted to be associated with the containment vessel, reactor building substructure, and the concrete batch plant. Documents were reviewed which gave indication of the areas and depth of reviews made. Also noted were examples of correspondence between TECO and Bechtel on review points, etc., and general documentation practices. Mr. Roe stated that recently a design review checksheet, Form ED 6097, entitled "QC/QA Design Review," had been instituted by TECO to add standardization and improve documentation of the design review process. Mr. Roe stated his intentions to complete ED 6097 forms for the few reviews completed prior to initiation of the checksheet forms for documentation.

Mr. Roe stated that he currently has ten men being utilized in the design control process and feels TECO is fairly well covered in all areas except structural. For specialized reviews he stated that TECO would have to rely on Bechtel or other outside expertise.

Mr. Roe stated that both Bechtel and TECO had done independent calculations so far on the D-B project. Bechtel had reviewed the B&W primary system loop arrangement from the stress analysis standpoint and TECO had verified some calculations on component cooling water and decay heat removal systems both under normal and accident conditions.

2. Findings

TECO's design control program has been established in accordance with the PSAR and agrees with the intent of Criterion III. Evidence of implementation was apparent and with the minor exception of having to go back and document a few Q-List item reviewed on their internal audit form, ED 6097, TECO's documentation of their design control activities was in accordance with existing procedures.

D. Criterion IV, Procurement Document Control

1. Discussion (with L. Roe, TECO, and H. Wahl, Bechtel)

TECO will make direct purchases of all Q-List items not supplied by contractors, such as B&W and CB&I. Arrangements have been made to have all specifications, related purchase documents, and purchase orders provided to TECO for review. On some items, such as the primary pumps and motors, prior vendor approval by TECO was required.

Procedures exist which require engineering specifications for structures, systems, and equipment on the Q-List items to contain provisions for prereview and approval of the supplier's/contractor's QC/QA programs.

TECO purchase orders contain an agreed upon scope of QC services. All drawings, specifications, and other related documents are independently checked by D-B project personnel and are reviewed and approved by the project engineer prior to release.

Evidence of implementation was apparent in the case of B&W's procurement of the primary coolant pumps from Byron-Jackson. Documentation regarding this procurement was reviewed including copies of the purchase order and design specifications. Correspondence was noted to contain evidence of TECO's review and comments.

2. Findings

TECO's plans and procedures relative to procurement document control are in accordance with the PSAR and meet the intent of AEC QA Criterion IV. Examples of implementation were available to show compliance with existing procedures.

E. Criterion V, Instructions, Procedures, and Drawings

1. Discussions (with J. Lenardson and L. Roe)

Bechtel, as the construction manager, has the prime responsibility for assuring that important work related to quality is accomplished in accordance with documented instructions, procedures, or drawings, etc. Bid packages prepared by Bechtel for the containment vessel and sub-structure were shown as examples of the requirements specific to this criterion. These packages contained technical specifications, performance capabilities, test requirements, construction codes, acceptable materials, design requirements; inspection, test, and QC requirements.

TECO plans to audit Bechtel, B&W and others regarding the implementation of this criterion and, where appropriate, the performance requirements established by the instructions, procedures, and drawings.

TECO's Section XII of their contracts entitled "QC requirements for Contractors," paragraph 6.2, was noted to place more emphasis on the control of instructions, procedures, and drawings rather than on the requirement that work be properly prescribed by instructions, procedures, or drawings. The audit checklists (ED-6097, A, B, C, and D) to be used by TECO appeared to lack adequate reference to the requirements of Criterion V.

2. Finding

Review of specifications, bid packages, and QA documents indicates that the intent of AEC QA Criterion V is being met. The TECO implementing documents, Section XII to their contracts and the audit checksheets, appeared to have been confused with the intent of Criterion VI.

F. Criterion VI, Document Control

1. Discussions (with L. Roe)

TECO has a procedure governing the control of documents within the utility. Also, the "Engineering Procedures Manual" and the "Construction Management Procedures Manual" provide for the control of specifications, procedures, instructions and drawings related to the D-B project. These implementing procedures include provisions for: approvals, distribution, approval of changes, storage and markings for retrieval. Mr. Roe stated that the TECO's internal correspondence procedure in its present form did not contain provisions for voiding and destruction of obsolete documents; however, he said he has plans to correct this condition.

Implementation of the document control provisions was apparent by examples of documents currently in the review process. The TECO audit checklists include inspection points (for which audits have been made). Moreover, Section XII of the TECO contracts and purchase orders require conformance to AEC QA Criterion VI.

2. Finding

The TECO QA program provides for the control of documents in accordance with the PSAR and meets the requirements of AEC QA Criterion VI. Implementing procedures exist and examples of the required documentation observed.

G. Criterion VII, Control of Purchased Materials, Equipment, and Services

1. Discussion (with J. Lenardson)

The TECO D-B Purchasing Department is responsible for procurement. Bechtel has the responsibility for evaluating and establishing qualified sources of supply. Bechtel has the responsibility of inspection at both the vendors and suppliers as well as the site construction. All vendors and suppliers are required to submit a QA program that must be approved by Bechtel as well as TECO. TECO will audit Bechtel, the vendors and suppliers periodically for conformance to the 18 AEC criteria, stated codes, standards, and other PSAR commitments. TECO conducted a comprehensive inspection at Bechtel (Gaithersburg) on May 26, 1970. A similar type

inspection was made at the B&W Lynchburg plant on June 2, the B&W Mount Vernon plant on June 3, and the Barberton plant on June 5. All of these inspections were documented in accordance with established procedures.

2. Findings

The prime responsibility of the control of purchased materials, equipment, and services, is the responsibility of the Bechtel Corporation. However, TECO has an active program planned, and partially documented, to audit Bechtel, B&W vendors, and suppliers to assure compliance to the requirements of Criterion VII of the 18 AEC criteria. The intent of this criteria is being met by TECO.

H. Criterion VIII, Identification and Control of Materials, Parts, and Components

1. Discussion (with J. Lenardson)

TECO has provisions in their procurement documents which establish the requirements for identification and control of materials parts and components.

Bechtel's Inspection Department will have the prime responsibility of assuring that these provisions are maintained and TECO will periodically audit the vendor and Bechtel's Inspection Department. TECO intends to audit for conformance to this criterion approximately every six months.

2. Findings

The program established appears to comply with Criterion VIII. Implementation of TECO's audit function in this regard was established by a review of their audit report at B&W's three plants.

I. Criterion IX, Control of Special Processes

1. Discussion (with J. Lenardson)

Procedures for special processes will be prepared and monitored by each supplier, contractor or project engineering. All procedures will be submitted to the Bechtel Project Engineer and the TECO QA Engineer for their approval. Special process control has been included as a contract specification in the contract document. Established codes and standards will be adhered to for all processes. TECO is in the position to

require specifications above codes and standards on the basis of contract renegotiation. Bechtel's QA Department has developed forms to be used to audit special processes of each of the suppliers and contractors. TECO has formulated general QA forms, 6097A-B-C-D, to audit Bechtel, suppliers and contractors. These forms are a check-off type that will determine if QA procedures, etc. exist. TECO has conducted a comprehensive inspection of B&W plants at Lynchburg on June 2, Mt. Vernon on June 3, and the Barberton plant on June 5. The TECO audit forms were used to determine if the facilities had proper control of their special processes. These inspections were documented in accordance with established procedures.

2. Findings

TECO has not as yet formulated a detailed procedure or guide for use in conjunction with the audit form sections specific to this criterion either at the supplier shop or at the site. A detailed procedure or guide is to be formulated. At present no special processes are in use at either of the supplier shops or at the construction site. There was no detailed documentary evidence available at this time. Upon completion of a detailed audit procedure which provides adequate guidance in the use of the audit checksheets, TECO will be in accordance with AEC QA Criterion IX.

J. Criterion X, Inspection

1. Discussion (with J. Lenardson)

Requirements were not clearly defined in TECO's audit procedures. However, the need has been recognized and adequate procedures are to be developed in the form of checklist or step-by-step procedures for the auditors to follow. Audit procedures will define acceptance levels and limits according to the standards, codes and specifications. Mandatory hold points will be specified for Bechtel Inspection Department. Witness points will be listed for TECO's engineering personnel to review when practical. TECO plans to establish a file of QC and QA documentation in conjunction with Bechtel at the site. Each contractor (vendor) is required to maintain a set of QA/QC files and turn them over to TECO at the completion of a job.

TECO plans to have five people auditing Bechtel and the site contractors at the construction site. Qualifications of these auditors will be disciplined graduate engineers (or equivalent experience) in the field that they are working.

2. Findings

Upon completion of the audit procedures and checklist plan, it appears that TECO will be in accordance with Criteria X.

K. Criterion XI, Test Control

1. Discussion (with J. Lenardson)

Each contractor is required to submit test procedures as part of his QA program for approval by Bechtel and TECO. None of these procedures have been formulated as yet but it is planned that they fully describe the observations to be made and the results to be recorded as well as the prerequisites to the performance of tests and the test environment. Standards are to be set by the contract, code requirements, and design specifications. All results will be reviewed by Bechtel and audited by TECO. Following a signed release of equipment and systems by the construction management personnel, the Toledo Edison Station operating staff and engineering personnel is to also verify and sign off indicating that equipment and systems are ready for preoperational testing and startup. It is planned to have a Bechtel startup crew to assist in the preoperational tests and startup. Test specifications for the nuclear and safety related station equipment is to be prepared by Bechtel and the appropriate equipment suppliers. The test program is to be prepared by TECO Engineering operations personnel, Bechtel, and suppliers to satisfy the requirements of AEC QA Criterion XI.

2. Findings

TECO's procedures for audit of test control are in the process of being completed, however, this cannot be consummated until the contractor has prepared his QA program and submitted for approval. TECO's plans appear to meet the requirements of Criterion XI, however, there were no written procedures for review at the time of the audit.

L. Criterion XII, Calibration of Measurement and Testing Equipment

1. Discussion (with J. Lenardson)

Calibration of measurement and test equipment will be required by contract of all suppliers and contractors. This requirement will also apply to the construction management and startup organizations. Bechtel will audit procedures to be used in this system. TECO will use one of

their general forms, 6097A-B-C-D, to audit Bechtel, suppliers and contractors. TECO has not as yet formulated detailed procedures or guides specific to this criterion to supplement the audit forms.

All equipment is to be calibrated according to the manufacturers instructions and valid standards. TECO's Electrical Instrumentation Department (EID) has written procedures that are presently being used within their own company. These procedures include tagging of equipment, equipment calibration due dates, etc. Records are filed and documented within the EID.

Detailed audit procedures to be used by TECO for auditing Bechtel, suppliers, and contractors are to be formulated.

2. Findings

TECO's detailed procedures or guides for audit of Criterion XII has not been formulated. Upon completion of a supplemental guide which provides for the use of the audit form in connection with calibration of measurement and testing equipment, TECO will be in accordance with AEC QA Criterion XII.

M. Criterion XIII, Handling, Storage, and Shipping

1. Discussion (with J. Lenardson)

All purchase orders will describe required packing, handling, storage and shipping procedures, or require that such procedures be approved prior to shipping. All Q-List materials and equipment must be released for shipment by a Bechtel inspector. At that time all materials are to be thoroughly inspected prior to shipment to assure the equipment meets specifications, packed correctly, and all records are completely documented. The manufacturers are required to recommend any special type of protection the materials or equipment should receive at the site. The contractors in charge of installing equipment are to be responsible to maintain the storage accordingly. Bechtel and TECO plan to audit this storage. After the material or equipment has been installed, it will be reviewed as to the type of protection it should receive prior to preoperational testing as well as periodic clarification of these requirements. The Bechtel Materials Supervisor will issue a periodic report documenting the status of storage and preservation activities for Q-List items.

2. Findings

TECO's plans for audit of AEC QA Criterion XIII are in the formulation stage at this time and as soon as the contractors submit their storage control procedures a checkoff list is to be formulated for the TECO inspectors to follow. It appears that the intent of this criterion will be met.

N. Criterion XIV, Inspection Test and Operation Status

1. Discussion (with J. Lenardson)

The Bechtel and B&W QA programs describe practices and procedures for the D-B project regarding inspection, test and operating status. No detailed audit procedures have been formulated to supplement the audit checklists in this area. TECO's general QA audit forms, 6097A-B-C-D, will be used to audit Bechtel, suppliers and contractors. A tagging procedure to indicate the operating status of structures, systems and components has been drafted and remains to be approved by TECO. TECO's internal procedures for relaying information regarding inspection problems, deviations and unresolved problems has not been formulated.

2. Findings

Except for TECO's general audit forms, no documentary evidence of implementation was available for review. TECO plans to formulate detailed audit procedures and internal procedures for relaying information regarding problems and when completed, TECO will be in accordance with AEC QA Criterion XIV.

O. Criterion XV, Nonconforming Material Parts and Components

1. Discussion (with J. Lenardson)

The Bechtel and B&W QA programs describe practices and procedures to be used for the D-B project regarding nonconforming material parts and components. TECO plans to audit Bechtel, suppliers, and contractors using one of their general audit forms, 6097A-B-C-D. Detailed audit procedures to supplement the audit checklists have not been formulated by TECO. TECO's internal procedures for the control and disposition of nonconforming items have not been formulated. A tagging system for nonconforming items has been planned.

2. Findings

TECO is in the process of formulating detailed audit procedures to meet the intent of this criterion. Upon completion, TECO will be in accordance with AEC QA Criterion XV.

P. XVI, Corrective Action

1. Discussion

The prime responsibility for identifying reporting and implementing the necessary corrective action for conditions such as malfunctions, failures, quality deficiency and deviation lies with the contractors and suppliers performing the work. Bechtel has the responsibility of inspecting the suppliers and contractors in this area. TECO will use their general audit forms, 6097A-B-C-D, to audit Bechtel, suppliers and contractors. No detailed audit procedures have been formulated by TECO. TECO internal procedures for corrective action have not been formulated.

2. Findings

TECO has not formulated internal procedures regarding the control of corrective action. Audit procedures or guides to supplement the audit checklist have not been prepared. The intent of Criterion XVI will be met when these procedures have been successfully established.

Q. Criterion XVII, Quality Assurance Records

1. Discussion (with J. Lenardson)

At present there is not a system for identification of the required QA records. Bechtel has reviewed a master Q-List of equipment from which they plan to establish a list of the required QA records. It is planned to construct a fireproof room for the storing of all records and place one man in charge of this central storage system. Upon formulating the list of QA records, they are to be reviewed and approved by TECO. The Bechtel Project Engineer will maintain the permanent file for the collection of all controlled documents. Bechtel QC Engineer maintains a permanent file for collection of QA related documentation required throughout the procurement, construction and startup phases of the project. The system

provides for a long term retention of records in a manner and location for prompt, easy identification and retrieval of desired individual documents. Periodic audits by both Bechtel and TECO will be made of this file system to assure that it is being maintained in the proper manner. Copies of these audits will be distributed to all involved individuals.

2. Findings

It appears as soon as the QA record list has been formulated and approved and files established that the AEC QA Criterion XVII, Quality Assurance Records, will be met.

R. Criterion XVIII, Audits

1. Discussion (with J. Lenardson)

TECO's QA program provides for the periodic audit of Bechtel, B&W, other vendors and subcontractors as well as internal audits within the utility. Four audit checklists: (a) Engineering Audit Checklist, (b) Supplier Audit Checklist, (c) Construction Site Audit Checklist, and (d) Detailed Program Checklist, were available and were reviewed for content. From a general standpoint, these audit forms contained audit requirements for most of the AEC criterion. Mr. Lenardson stated that the audit forms will be supplemented with specific audit points designed to cover the critical and detailed requirements of the particular organization, vendor, or contractor. Preplanning for these audits is anticipated.

Implementation of the TECO audit program was evident in that four audits (Bechtel and B&W) had been performed. The Bechtel audit had been formally documented and submitted to upper management; the others had not been written in final form. The completed audits, including comments and recommendations, are to be submitted to Mr. G. J. Sampson, Vice President of the Power Group. Follow-up actions resulting from the TECO audits will be accomplished by institution of a "tickler" system yet to be established.

Mr. Lenardson stated that he has not established a schedule for auditing because of the early status of the project. He does intend to audit Bechtel and B&W at least twice a year and more often if required.

2. Finding

The TECO QA program provides for periodic audits, both external to the utility and within, and meets the intent of AEC QA Criterion XVIII. Evidence of implementation was available.

DIVISION OF COMPLIANCE MONTHLY REPORT, JUNE 1970

5J-340
Toledo Edison Company (Davis-Besse) - On June 10 and 11 the initial quality assurance inspection was conducted. The licensee's quality assurance organization and program were found to comply with the PSAR and meet the intent of the AEC criteria. Minor deficiencies were noted in that some procedures had not been completed. These procedures relate to phases of the present construction effort not expected to start for some time. A contractor/supplier and vendor audit program has been established.