

UNITED STATES NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Report of Construction Inspection

IE Inspection Report No. 050-346/77-04

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Davis-Besse Nuclear Power Station
Unit 1
Oak Harbor, OH

License No. CPPR-80
Category: B

Type of Licensee: PWR (B&W) 2772 MWt, 926 MWe

Type of Inspection: Special, Announced

Dates of Inspection: February 16-18, 1977

Principal Inspector: *K. R. Naidu*
K. R. Naidu

3/2/77
(Date)

Accompanying Inspectors: None

Other Accompanying Personnel: None

Reviewed By: *E. L. Jordan*
E. L. Jordan, Chief
Engineering Support Section

3/2/77
(Date)

8002050686

SUMMARY OF FINDINGS

Inspection Summary

Inspection of February 16-18, 1977, (Unit 1, 77-04): Selectively reviewed the Nonconformance Reports documented by the various contractors and Bechtel to ascertain whether adequate corrective action was taken prior to closure of the reports. Selectively reviewed the QA audits on Field Changes to ascertain whether such changes were documented and incorporated in the as-built drawings. No items of non-compliance were identified.

Items of Noncompliance

None.

Licensee Action on Previously Identified Enforcement Items

Not reviewed.

Other Significant Items

A. Systems and Components

None.

B. Facility Items (Plans and Procedures)

None.

C. Managerial Items

None.

D. Deviations

None.

E. Status of Previously Reported Unresolved Items

None.

Management Interview

- A. The following persons attended the Management Interview at the conclusion of the inspection.

Toledo Edison Company (TECo)

L. E. Roe, Vice President, Facilities Development
J. D. Lenardson, Quality Assurance Manager

- B. Matters discussed and comments on the part of management personnel were as follows:

The inspector stated that he selectively reviewed the Nonconformance Reports documented by the various contractors and Bechtel, and determined that adequate corrective action was taken prior to closure of the reports. The inspector stated that he selectively reviewed QA audits and established that field changes are being documented by the respective contractors to ensure incorporation into as-built drawings.

REPORT DETAILS

Persons Contacted

The following persons in addition to those listed in the Management Interview section of this report, were contacted during this inspection.

A. Bentley and Sons (Bentley)

D. Ponke, Quality Control Engineer - Civil

Bechtel Corporation (Bechtel)

J. D. Heaton, Project Field Quality Control Engineer
B. P. Hesselburg, QC Engineer - Civil
T. L. Horst, Field Engineer
W. C. Lowery, Quality Assurance Engineer Electrical

Fishbach and Moore (FM)

H. Faschold, Quality Control Inspector

ITT Grinnell (Grinnell)

D. Giguere, QC Supervisor
C. Keller, QC Inspector

Inspection Results

1. The inspector selectively reviewed the Nonconformance Reports (NCRs) generated by the various contractors on site, to ascertain whether corrective action has been taken to resolve the nonconformance identified in an orderly manner, prior to closure of the NCR.

a. A. Bentley and Sons (Bentley) The inspector reviewed the following NCRs generated by this contractor.

- (1) NCR 8-194 dated October 10, 1975 identified that on October 1, 1975, an unauthorized fillet weld was installed on the expansion bellows ring assembly ring piece mark 36-6 to 105-5 utilizing CB&I drawing No. 36-Revision 1 and Bechtel drawing C-105 Rev. 6.

Recommended disposition instructed CB&I to remove the unauthorized weld and reweld in accordance with the approved CB&I QA/QC program.

CB&I letter dated November 24, 1975, stated that this rework will be accomplished prior to structural overload test. CB&I speed letter dated August 24, 1976, informed TECo that the work was completed and reinspected.

An NCR contained the necessary signoffs and was closed on August 25, 1976. The closure of the NCR is considered acceptable.

- (2) NCR 8-198 dated July 19, 1976, indicated that during the rigging operations of the polar crane approximately 60 feet of cable separated from the guide rope and fell. A kink approximately 12' from the end of the multistranded cable was formed. The crane manufacturer (P&H) was consulted and the 15' of hoist cable was cut off from the cable. This NCR is considered to have been closed in an acceptable manner.
- (3) NCR 8-129 dated July 26, 1976, identified two broken #7 rebar in the Diesel Generator Room on Line G +39; elevation 595' between Line 3 and Line 4 which could not be cadwelded or lap spliced due to space limitations.

It was recommended to obtain the approval of the construction manager to weld the rebar in accordance with an approved welding procedure ABSP-15 Revision 8 which complied with AWS D-12.1-61. The completed welds were to be subjected to Magnetic Particle (MP) Inspection.

Records indicated that the welds were MP inspected by Testmaster Company, Perrysburg, Ohio and identified no deficiencies.

This NCR is considered to have been closed in an acceptable manner.

- (4) NCR 8-170 dated October 28, 1974, identified the following:
- (a) Section "A" on detail 5 on drawing C173 specified 1/2" of shims to be placed between the top of the anchor restraint and the surface of the shieldwall. Due to the "as-built" location of the anchor sleeve extending through the shield wall, the top of the anchor restraint must be placed approximately 2 1/2" from the surface of the shield wall to properly align the anchor restraint with the sleeve.

Recommended action: Eliminate the shims and fill the void between the anchor restraint and the shield wall with Embeco 679 grout.

During the inspection in the containment, the inspector observed that the void between the anchor restraint and the shield wall was filled with grout.

- (b) Embedment of "Weg-It" bolts mounting the anchor restraint to the wall be lessened by approximately 2".

Recommended corrective action: "Use as is" based on the fact that the "Weg-It" anchors in question are loaded in shear. The shear value as shown in the catalog (58,000 lbs) is independent of embedment length.

- (c) Anchor Restraint on the east shield wall was grouted in place on May 21, 1974, as described in items (a) and (b) above.

Recommended corrective action: Recommendation is to "Use as is" based on the fact that the anchor restraint on the east shield wall was placed per conditions described above in items (a) and (b) and that recommended corrective action was done as described under items (a) and (b).

- (d) A problem resulted in the placement of the anchor bolt due to the alignment of the anchor restraint and the yoke assembly at the top of the anchor bolt caused by the "as built" location of the anchor sleeve extending through the shield wall. The anchor bolt could not clear the pipe restraint.

Recommended corrective action: To properly align the anchor restraint, the anchor bolt, and the yoke assembly at the top of the anchor bolt, reaming was to be done on the yoke assembly (approximately 5/8"). A groove was to be made in the sleeve surrounding the main steam line restraint to allow for fit up.

The closure of the NCR is considered satisfactory.

- (5) NCR 8-155 dated October 19, 1973, identified that 16 pieces of stringers for staircase from elevation 603' to 671'2" were not galvanized as specified on drawing C-168,

Rev. 3, note 3. The stringers were painted by method II as per specification 7749-C-47A subsections 6.2 and 6.5.

Recommended corrective action: Bechtel Engineering approves "use as is." The finish paint shall be in accordance with specification 7743-A-24.

Bagwell Coatings, Inc., letter dated December 1, 1976, indicated that the staircase inside the containment was painted in accordance with specification A-24.

This NCR is considered to have been closed in acceptable manner.

b. ITT Grinnell (Grinnell)

The inspector reviewed the following NCRs generated by this contractor.

- (1) DR F-820 dated August 18, 1976, indicated that anchor bolts for hanger 33B-GCB-H34 experienced a pull out of 3/4".

Recommended corrective action: Install 7/8" B7 studs through the wall with plate on opposite side of wall. Plate was to be same size as hanger base plate with same center line dimensions. Holes in both plates to be increased to 15/16" diameter.

On October 16, 1976, this was reported closed. The RIII inspector verified that the as-built drawing 33-B-GCB-1-H34 sketch 8-133, Rev. F3 of 3 reflects this change.

- (2) DR F-823 dated August 25, 1976 indicated that flued head Penetration 43A was cut 4" short to accommodate FSK-M-HBB-10-2 drawing. OD of the remaining weld end was oversize, actual reading at the weld area and 3" back of weld area was 1.360". Coupling ID 1.330". OD of the weld prep area was ground to accommodate the coupling weld on one end.

Recommended corrective action: That since the weld could not be made due to the wall mismatches, that the grinding of the pipe be accepted and the fabrication be approved as now installed.

Bechtel approved the deviation based on the final wall thickness being .190 (UT value) which is more than the .179" minimum allowable. This resolution is considered acceptable.

- (3) DR F-791 dated July 21, 1976, indicated that instead of using 4 concrete anchor bolts the base plate was welded to the embedment plate over which it was extending.

Recommended corrective action: To leave the anchor as installed because the calculated forces on the weld and embedded channel were well within allowable stress limits. The RIII inspector verified and determined that the drawing C-656 Rev. 7, dated August 10, 1976, indicated that the as-built condition was incorporated. The resolution is considered acceptable.

- (4) DR F-843 dated November 19, 1976, indicated that bonnet nuts were missing.

Recommended corrective action: was to replace missing bonnet nuts with new ones of the same size and specification as the original nuts. The RIII inspector reviewed a typical P.O. - PO TOL-B-430 dated May 20, 1976, receipt inspection records and certificates of conformance for five 5/8"-18 stainless steel ASME SA⁴³⁵ Grade 660 studs and determined them acceptable.

The closure of the NCR is considered acceptable.

- (5) DR F-746 dated June 11, 1976, indicated that gate valves were installed for test connections instead of globe valves indicated on P&ID M-033 drawing.

Recommended corrective action: to leave the gate valves as installed as they would not have any detrimental effect on the system.

The closure of the NCR is considered acceptable.

- (6) DR F-828 dated August 8, 1976, identified that holes in base plate were drilled on 5 1/2" centers instead of 8" centers as shown on drawing C-619, Rev. 4.

Recommended corrective action: To use the base plate with holes on 5 1/2" centers as the existing design and stresses on the bolts and base plate are within allowable limits.

The resolution is considered acceptable.

c. Babcock and Wilcox (B&W)

The inspector reviewed the following NCRs (designated Reports of Nonconformance) generated by this contractor. B&W performs inspections and documents the findings in Reports of Inspection (ROI). As a result of items of nonconformances identified in the above ROIs, NCRs are generated and approvals for dispositions are sought. Upon completion of corrective action, reinspections are conducted, findings are documented in ROI and the NCRs are closed.

(1) RNC 283

Report of Inspection #30525 dated June 30, 1976, indicated that review of the recorder heat strip charts for the post weld heat treatment of the main steam line welds FW2B1 and 2B2 revealed that the specified temperature was exceeded. Temperature charts were enclosed, which indicated the temperature range $450^{\circ} \pm 25^{\circ} \text{F}$ was exceeded.

As a result of the above, NCR 283 was generated and the disposition "use as is" was recommended and accepted, since the weld was post weld heat treated at 1000°F and also subsequent radiographs of both welds were acceptable. It was mentioned that the ASME Section IX code 1971 edition permitted this deviation.

The above NCR was closed by "Report of Inspection" #30571 on July 9, 1976.

The closure of the NCR is considered acceptable.

(2) RNC 284

Report of Inspection #30564 dated July 6, 1976, indicated that during the Post Weld Heat Treatment the temperature range of $1100 - 1150^{\circ} \text{F}$ was not reached because some heating pads were burned.

NCR 284 was generated to identify this discrepancy. The corrective action recommended was to "accept as is" since the lower temperatures than specified were maintained for a longer period of time thus conforming to paragraph NB4623.3(c) of the ASME Section III, 1971 code. Temperature was maintained above 1000°F for a minimum of 3 hours per inch of thickness of the weld. Report of Inspection #30569 cleared the above NCR. The closure of this NCR is considered acceptable.

(3) RNC 245

The above NCR was generated on April 22, 1976 as a result of Report of Inspection #22284 which identified an unqualified weldor performing welding on Pressurizer Surge Line Drain Weld FW #1.

Recommended corrective action was to remove the weld and replace in accordance with Field Construction Procedure Deviation #135-02, Rev. 2. The welding was authorized inadvertently due to the supervisor's error. Field Procedure Deviation #135-02 outlined operation description: (a) 010 Remove Weld #1 by grinding, (b) 020 weld per attached work record index, and (c) 030 upgrade per 9A-147. Report of Inspection #17975 dated May 20, 1976, indicated the verification of the satisfactory completion of the work outlined.

The closure of the nonconformance is considered acceptable.

(4) RNC 251

The above NCR was generated on March 1, 1976, as a result of ROI #19280 which identified that two 3 1/8" diameter holes for the vent valve exercise tool adjacent to the y-axis were not located 51 1/2" from the axis line as required by the drawing, for the Reactor Internals - lower core support assembly. Recommended corrective action was for TECo to purchase a modified "Vent Valve Exercise Tool" and accept the equipment "as is." This discrepancy resulted from a manufacturing error. A new tool was manufactured and was considered satisfactory. The closure of the NCR is considered acceptable.

(5) RNC-247

The above NCR was generated as a result of ROI 19254 dated February 23, 1976, which indicated that the cleanliness of 28" Reactor Coolant Pipe Spool A-67-3 was degraded for approximately 4' from the steam generator 1B.

Recommended corrective action was to solvent clean the area followed by grade 1 demineralized water rinse to restore cleanliness to class B, but to inspect in accordance to specification 9A 128 Rev. 1. ROI 19225 verified that corrective action was satisfactorily completed.

The closure of the NCR is considered acceptable.

(6) RNC-221

The above NCR was generated as a result of ROI 21849 dated December 19, 1975, which identified the presence arc strikes on the 28" reactor coolant pipe and RC pump case.

Recommended corrective action was to blend grind the area of arc indications and examine the area by macroetch and liquid penetrant in accordance with Deviation Report 27-04.

ROI 25620 dated April 29, 1976, verified that grinding and macroetch was performed and determined acceptable.

The closure of this NCR is considered satisfactory.

d. Lum-Irsay Company

The inspector reviewed the following NCRs generated by this contractor.

- (1) NCR-LI-001 dated April 6, 1976, identified that the Power Terminal Connectors were for AWG-14 and therefore not according to the Bechtel specification 7748-E-11.

Recommended corrective action was to "use as is" the AWG-14 terminal connectors since these were the correct ones recommended by GE, the manufacturer. The specification appears to be in error.

The closure of NCR is considered acceptable.

- (2) NCR LI-014 dated October 27, 1976 identified that electrical panels for the control room emergency system installed by Fishbach & Moore were not in accordance with approved LI seismic qualification drawings. However, a reinspection determined that the panels were installed to Bechtel seismic Class 1 drawings (instead of LI drawings). The necessary GPDE approvals were indicated on the NCR.

This closure of this NCR is considered satisfactory.

- (3) NCR LI-0003 dated August 3, 1974, identified that the "Control Room Emergency A/C unit 533-1 and 2" panels contained Westinghouse relays type BF 11F. Recommended

corrective action to "use as is" was approved by GPDE on October 3, 1974. NRC IE Circular 76-02 dated August 17, 1976 identifies problems on such relays and the RIII inspector alerted the licensee of the 76-02 circular. Corrective action taken will be reviewed during a subsequent inspection.

e. Johnson Controls Company (Johnson)

The inspector reviewed the following NCRs generated by this contractor.

- (1) NCR 335 dated November 16, 1976, indicated that the length of 11" between reference points A1 & A (reference drawing 1/f PI 310, Rev. 3) did not meet the offset of 13 3/4" for seismic analysis calculations.

Recommended corrective action by GPDE was to rework the tube length to meet specification M328. Nonconformance Report Supplement indicated that the rework was completed, reinspected and determined acceptable on December 28, 1976.

The NCR closure is considered acceptable.

- (2) NCR 331 dated November 20, 1976, indicated that instruments installed per drawing PSL-1137, revision 1 did not meet specification 7749-M-328 supplement 1 figures 8 & 10 Revision 2.

Recommended corrective action by GPD was that the present as-built installation was studied by the computerized stress program and that offset dimensions were acceptable. The NCR was to be referenced on the 1/F Planner.

The NCR closure is considered acceptable.

- (3) NCR 323 dated August 25, 1976 identified that J21-1N2 type "Dragon Valve" serial #N11763 leaked at the welds.

Recommended corrective action was to replace the valve with another one from the warehouse and return the defective valve to the vendor. Supplement to NCR 325 reported that the valve was returned to the vendor.

The NCR closure is considered acceptable.

- (4) NCR 303 dated August 16, 1976, indicates that the use of "U" bolts were deleted from the installation of flow transmitter FT-RC1A1 as per Revision 4 of 1/F-FT-RC1A1.

Bechtel GPDE analyzed the installation and informed the contractor on August 13, 1976, that the installation is acceptable.

The resolution of the NCR is considered acceptable.

f. Fischbach & Moore, Inc (F&M)

The following documents the review of NCRs generated by this contractor.

- (1) NCR B-364 dated November 12, 1976, identified that rebar was hit while drilling anchor holes for the base plate of a support. The hole was drilled at an offset to the original drawing.

Recommended corrective action approved by GPDE on December 1, 1976, was to "use as is."

The closure of the NCR is considered acceptable.

- (2) NCR B-146 dated August 20, 1975, indicated that several cables listed on the NCR were not in accordance with the latest revision. GPD reviewed the finding and informed the contractor those cables listed were designated "spares."

The resolution is considered acceptable.

- (3) NCR B-158 dated August 26, 1975, indicated that Inspection Report IR-0398 identified routing discrepancies. Bechtel was requested to review routing problems and provide updated pull cards. Bechtel reviewed the findings and asked the contractor to reinspect the routing. The actual pull card was enclosed showing that the routing was in fact correct.

The RIII inspector considered the closure of the NCR to be incomplete and the licensee was so informed. The inspector discussed the issue with the contractor's representative who agreed to add a note in the original NCR that the problem did not exist after reinspection. The closure is now considered satisfactory.

g. Chicago Bridge & Iron (CBI)

The inspector reviewed the following NCRs generated by this contractor.

- (1) NCR RAD #2 Ex Rev. 0 dated January 4, 1977, indicated that four pad plates 10" x 1" x 1' -9" identified on

Bechtel drawing C-107, Revision 12 for the Polar Crane Girder were omitted by inadvertent oversight.

Bechtel GPD approved "accept as is" since the functioning of the polar crane is not affected because the welding of polar crane locks directly to the polar crane girder. The closure of the NCR is considered acceptable.

h. Bagwell Coatings, Inc. (Bagwell)

The following documents the review of NCRs generated by this contractor.

- (1) NCR 10256-1RW dated October 25, 1976, identified that the shelf life on 36 gallons of Amercoat 66 Brown identified by Batch No. 6-410342 had expired.

Recommended corrective action was to dump the paint. Letter from Bagwell dated October 30 stated that the paint was dumped in the waste and was witnessed by a Bechtel QC representative.

This NCR is considered to be appropriately closed.

- (2) NCR 09306-1RW dated September 30, 1976 indicated that 25 gallons of phenoline thinner was received without certifications. A certification dated October 6, 1976 from, Carboline was provided and the NCR was closed on November 26, 1976.

The closure of the NCR is determined acceptable.

i. Bechtel Site NCRs

The following documents the review of NCRs generated by Bechtel.

- (1) NCR 1124 dated November 10, 1976, (addressed to B&W) indicated that the incore instrument tube seismic restraints in the containment were not installed for instrument tubes #14 and #43 (section B) in accordance with drawing C624, Rev. 3 and B&W FCP #72.

Recommended corrective action was taken to install the seismic restraints. The final disposition and related documentation was verified by Bechtel QC representative and was determined acceptable on December 15, 1976.

The closure of the NCR was determined acceptable.

- (2) NCR 1135 dated December 6, 1976, indicated that during torquing operations, the ECCS cooler coil water head cracked.

Recommended corrective action was to remove the cracked head, procure a replacement (head, gasket, epoxy and resin) to coat the interior with Lum-Irsay supplied epoxy and replace the coil head.

The Bechtel QC on January 13, 1977, reported that the replacement of the cooler coil water head was completed satisfactorily.

The closure of the NCR is considered satisfactory.

- (3) NCR 1092 dated September 11, 1976, identified that during the static leak test of the spent fuel pool per FTP-DB-009 Rev. 1, water was detected in Zone 1 wall channel, and that as such the condition did not meet the acceptance criteria of the specification. The leakage measured during the seven day test period was 3 ml. Recommended disposition was to use-as-is since the water collected was attributed to possible condensation and not leakage. It was stated that the NDE results of the spent fuel liner welds were reviewed prior to the hydrotest and determined to be acceptable. Further, it was determined that no further accumulation was observed after a period of 4 days. The closure of the NCR is considered acceptable

- (4) NCR 1045 dated June 22, 1976, identified that during the F&M repair work performed on NCR B-236, a bead of weld was deposited on "Hilti-kwik" bolts to facilitate torquing and achieve proper anchor setting. However, on removal of the Hilti-kwiks, damage to concrete was observed. Recommended corrective action was to remove loose concrete and patch with nonshrink grout.

Similar instances of nonconformances were identified on the NCR and were resolved with the necessary approvals of GPD and correction taken was verified by Bechtel QC on September 7, 1976.

The closure of the NCR is considered acceptable.

- (5) NCR 745 dated August 12, 1975, which identified that the Johns Manville A250 Expansion Bellows were not installed on the emergency lock, personnel lock or equipment hatch when they were placed. Work on this is still in progress and the Bechtel NCR Log indicates that this item is still open.

The RIII inspector reviewed the progress on the installation of the bellows and observed that the work was still in progress for the installation of bellows for the equipment hatch. Visual inspection of the personnel hatch bellows indicated that the field patches at three locations had separated. The licensee was notified of this condition. Bechtel informed the RIII inspector that subsequently a field engineer inspected the bellows, corroborated the RIII inspector's findings and documented the adverse condition of the bellows. Corrective action taken will be reviewed during a subsequent inspection.

2. Review of QA Audits Relative to Field Change Notices (FCNs) and Design Change Notices (DCNs)

The inspector reviewed the following QA audit reports to ascertain whether the electrical contractors (FM), the instrumentation contractor (Johnson), and Bechtel initiated necessary corrective action to the FCNs and DCNs in the relevant drawings to generate "as-built" drawings.

a. Review of FM Drawing Control Audit

Audit Report #334 issued on June 9, 1976, documented the results of an audit conducted by TECo QA on the adequacy of the control of is drawings and change documentation, FCNs and DCNs by schbach and Moore QC. Compliance to FM QC Manual Revision G Level 1 Section VI titled "Document Control" was being scrutinized. The following two Audit Finding Reports (AFR) were enclosed to the audit report.

- (1) AFR 488-E dated May 27, 1976, identified that out of a sample of 27 drawings only 6 drawings referenced the outstanding FCNs and DCNs. Also 70 drawings were sampled and 7 of them were not current. Recommended corrective action was to revise the FM QC manual section VI, to review all "Q" drawings for inclusion of FCNs and DCNs and replace superceded drawings with current drawings.

Corrective action taken was verified by the auditor on August 2, 1976 and determined satisfactory.

- (2) AFR 489-E dated June 3, 1976, identified that though FM QC noted nonconformances during FM audits, followup of corrective action was inadequate. Instances were found where FCNs, DCNs, FSKs and ADTs were not being attached to the relevant drawings to alert FM engineering that the necessary changes are to be incorporated into the drawings. Corrective action recommended was to have all drawings reference outstanding change documents. FM QC was to audit this activity after the work was completed. Corrective action taken was verified by the auditor on July 22, 1976, and determined satisfactory.

The inspector established that the FM control of document changes was satisfactorily reviewed and necessary corrective action was taken to correct adverse conditions identified in the audit report.

b. Review of Johnson Drawing Control Audit

Audit Report #383 issued on October 4, 1976, documented the results of an audit performed by TECo QA on the adequacy of Johnson's control of the field changes; specifically compliance to Johnson's procedure QAs-621, Rev. 3 titled Drawing and Specification Control procedure was being audited. AFR 533-E dated August 25, 1976 was attached which indicated that a sample of 56 drawings were verified to establish whether the relevant FCNs were referenced there in. It was determined that 2 drawings did not reference the latest FCN revisions.

Corrective action recommended was to insert the latest FCN revisions on the relevant drawings. Corrective action was taken on October 11, 1976 and in addition, the print control personnel were cautioned to reference FCNs on drawings until the changes were incorporated regardless of the revision number referenced on the FCN. Corrective action taken was verified on October 20, 1976.

The inspector established that the Johnson control of document changes was satisfactorily reviewed and necessary corrective action was taken to correct adverse findings.

c. Review of Bechtel Drawing Control Audit

Audit Report #382 issued on October 4, 1976 documented the results of a TECo Audit on the adequacy of the Bechtel

Field Construction Management for compliance to Bechtel Field Engineering Instruction (FEI) -16, Rev. 3 dated December 15, 1975, titled Field Change Notices and FEI-18 Rev. 4, dated July 22, 1976, titled Design Document Control. The following items were identified.

- (1) 69 drawings were reviewed for current drawing revisions, 5 were not correct.
- (2) All 49 open DCNs, FCNs and ADTs were correctly listed on the drawings.
- (3) Review of the FCN Log Book indicated that 42 FCNs for the period August 29, 1975 through February 9, 1976, were open; several FCNs dated back to February 24, 1975.
- (4) A sample of 14 open FCNs prepared between December 1975 through February 1976 indicated that 4 FCNs were not listed in the applicable drawings.

Corrective action recommended was to (1) correct the findings and (2) to review the FCN Log Book for all other open FCNs and obtain the necessary FCN closure actions.

Corrective action verified to be complete was relative to the findings being corrected and a complete review of the FCN log. In separate memos, Bechtel Gaithersburg was requested to furnish resolutions on certain outstanding FCNs and replies were pending.

The inspector established that the Bechtel control of Field Design Changes was satisfactorily reviewed and necessary corrective action was being taken to resolve outstanding items.