

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

September 5, 1975

R. C. Knop, Senior Reactor Inspector, Projects Unit 1

OPERATIONS QUALITY ASSURANCE INSPECTION FOR DAVIS-BESSE 1

TI 4000/2, "Quality Assurance for Operations," contained the following inspection timing guidelines for completion of that temporary instruction:

"The Directorate of Licensing should normally complete their review of the applicant's QA program for operations approximately 6 months prior to the scheduled fuel loading date. DL will inform the applicant by letter that Regulatory approval of their program is contingent upon implementation of the program (verified by RO) at least 90 days prior to fuel loading. DL will advise the applicant that if this schedule cannot be maintained, they should revise their fuel loading date accordingly.

Between 6 and 5 months prior to the scheduled fuel load date, (within 1 month after DL program review) the initial RO inspection is conducted in accordance with this instruction. The Regional Office transmits inspection findings to the applicant, RO:HQ and DL (via RO:HQ).

Between 5 and 4 months prior to the scheduled fuel load date, DL will send a second letter to the applicant, identifying areas where the FSAR needs to be amended, and invites management to a joint DL/RO meeting to discuss identified problems, if necessary. The second letter will again iterate the need for a fully implemented QA program 90 days prior to fuel loading.

Between 4 and 3 months prior to the scheduled fuel load date, RO conducts a re-inspection, as necessary, of the applicant's QA program. Inspection findings are transmitted to the applicant, RO:HQ, and DL (via RO:HQ).

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If the applicant's QA program or its implementation is found to be inadequate, DL will advise the applicant 3 months prior to the scheduled fuel load date that fuel loading should be rescheduled pending satisfactory resolution of identified problems. Additional re-inspections that may be necessary to resolve identified problems should be scheduled, as appropriate, by the Regional Offices."

This temporary instruction was superseded by Change Notice 75-06 which transmitted MC 2513 and related procedures. The procedures associated with MC 2513 appear to correspond to the individual sections of TI 4000/2 as follows:

<u>OIE PROCEDURE</u>	<u>TI 4000/2 SECTION</u>
35700B	1
35702B	2
35704B	3
35706B	4
35708B	5
35710B	6
35712B	7
35714B	8
35716B	9
35718B	10
35720B	11
35722B	12
35724B	13
35726B	14
35734B	18
35736B	19

Specific MC 2513 procedures do not appear to exist for the following sections of TI 4000/2:

- 15 "Communication within the Licensee's Organization"
- 16 "Services Provided by Consultants, Contractors and Vendors"
- 17 "Control of Special Processes"

The inspection timing guidance in TI 4000/2 suggests that the entire TI would have been completed in one team inspection with the results reported to the licensee and to RO (IE):HQ. However, similar guidance

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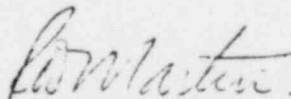
does not exist for the referenced procedures of MC 2513. The "window of opportunity" for these procedures as given in MC 2513 is the period from 6 months to 3 months prior to OL. Since there is no specific guidance calling for these procedures to be handled differently from other MC 2513 procedures, is it appropriate for me to assume, in applying these procedures to Davis-Besse Unit 1, that:

- a. The procedures need not be completed simultaneously.
- b. No report to IE:HQ is required, and that normal inspection report handling and distribution is indicated.
- c. The necessary enforcement actions indicated by these inspections are to be treated as in the case of all other MC 2513 procedures, and the enforcement recommendations of TI 4000/2 do not apply:

"The policy of the directorate is to not issue formal Notices of Violation to applicants when problems are identified during the initial (pre-licensing) inspections of the licensee's QA program for operations. The directorate (via Regional Office and RO:HQ) will recommend, when necessary, that DL delay issuance of the operating license pending resolution of identified problems.

If, in the conduct of this inspection effort, inspection findings disclose violations related to on-going construction or testing activities, then Notices of Violation should be issued for such findings, in accordance with the provisions contained in RO Manual Chapter 0800, 'Enforcement Actions.'"

Your attention to these matters will be appreciated since the licensee currently indicates April 1976 as the estimated fuel loading date in the Yellow Book.



R. D. Martin
Reactor Inspector
Projects Unit 1