TUGCO NUCLEAR ENGINEERING CPSES	PROCEDURE	REVISION	ISSUE DATE	PAGE
CONTROLLED COPY NO.	TNE-AD-4	6	8-10-84	1 OF 8
CONTROL OF ENGINEERING DOCUMENTS	PREPARED BY [signature] APPROVED BY [signature]			

FOR INFORMATION ONLY

1.0 GENERAL

1.1 PURPOSE

The purpose of this procedure is to define the general requirements for the control, issuance, and retention of engineering documents.

1.2 SCOPE

This procedure shall apply to engineering documents prepared or processed by TNE.

1.3 RESPONSIBILITIES

The TNE Manager is responsible for the overall control of TNE engineering documents. Authority for the implementation of this procedure has been delegated to the QA Staff Engineer.

2.0 PROCEDURE

2.1 DOCUMENT CONTROL

Control logs for design documents generated by TNE shall be maintained as specified in Figure 1. These Document Control Logs shall contain the document type, current revision, and pertinent information relative to the transmittal of the document to organizations outside of TNE.

2.2 DOCUMENT ISSUANCE

Engineering documents generated by TNE, which are required for general site usage, shall be transmitted via written transmittal to the CPSES Document Control Center (DCC) for reproduction, distribution, and duplicate retention. Any removal of documents from TNE files shall be controlled by TNE Files personnel.

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2.3 DOCUMENT RETENTION

TNE generated documents maintained by TNE Files shall be provided by the responsible TNE engineering discipline in accordance with the applicable procedure transmittal letter. Duplicate copies of documents retained by TNE Files shall be maintained by DCC or Gibbs & Hill/New York, as applicable.

FIGURE 1

TNE DOCUMENT CONTROL RETENTION
RESPONSIBILITY MATRIX

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX	AD-3	AD-3	DC-2
	TNE PROCEDURES	DESIGN DEFICIENCIES	SAFETY EVALUATION
PREPARE	MASTER COPY WITH FORM # TNE-AD-3.1	MASTER COPY OF CLOSED TDDR	COPY-INFORMATION ONLY
RETENTION RESPONSIBILITY	TNE FILES	TNE FILES	TNE FILES
REVISIONS	SAME AS ABOVE - PREVIOUS REVISIONS STAMPED SUPERCEDED	N/A	SAME AS ABOVE - PREVIOUS REVISION STAMPED SUPERCEDED
EXTERNAL DISTRIBUTION	CONTROLLED COPYHOLDERS OUTSIDE OF TNE; DOC FOR DUPLICATE RETENTION	CLOSED TDDR - COPY TO DOC FOR DUPLICATE RETENTION	MASTER TO TUGCO OPERATIONS SUPPORT
INTERNAL DISTRIBUTION	CONTROLLED COPYHOLDERS WITHIN TNE; INFORMATION COPIES AS REQUESTED	OPEN TDDR - REPORTING PERSONNEL, RESPONSIBLE SUPERVISING ENGINEERS, OTHERS AS SPECIFIED BY THE TDDR	AS REQUESTED FOR INFORMATION ONLY
FOLLOW UP	30 DAY REMINDER; 35 DAY DECONTROL	PER DUE DATE ASSIGNED TO TDDR	N/A
RETENTION TIME	PERMANENT - ALL REVISIONS	PERMANENT	PERMANENT - ALL REVISIONS
LOG	CONTROLLED PROCEDURE MANUAL INDEX - UPDATED WITH PROCEDURE ISSUE	TDDR INDEX - UPDATED MONTHLY	N/A
MAINTAINED BY	TNE FILES	TNE FILES	N/A

FIGURE 1

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX	DC-3	DC-4	DC-5		DC-6
	CALCULATIONS	SPECIFICATIONS	VENDOR DOCUMENTS		EQUIPMENT CLASSIFICATIONS
		NUMERIC REVISIONS	VDI & VDC	SUBMITTED DOCS.	
RETAIN	MASTER COPY OF CALC. AND COMPUTER PRINTOUT (IF ANY) AND DESIGN VERIFICATION REPORT (IF CL I OR II) WITH ACKNOWLEDGED FORM # TNE-DC-3.3	MASTER COPY OF : A) SPECIFICATION B) REVIEW RECORD C) DESIGN VERIFICATION REPORT (CL I OR II) WITH ACKNOWLEDGED FORM # TNE-DC-4.3	MASTER COPY OF COMPLETED VDI & VDC WITH ACKNOWLEDGED FORM # TNE-DC-5.3 BY SPEC./P.O.	MASTER COPY OF VENDOR DOCUMENTATION	MASTER COPY OF EQUIPMENT CLASSIFICATION SHEET
RETENTION RESPONSIBILITY	TNE FILES	TNE FILES	TNE FILES	DCC	TNE FILES
REVISIONS	SAME AS ABOVE - PREVIOUS REVISIONS STAMPED SUPERCEDED AND TNE # REFERENCED ON THE SUPERCEDED CAH CMC	SAME AS ABOVE - PREVIOUS REVISIONS STAMPED SUPERCEDED	N/A	SAME AS ABOVE	SAME AS ABOVE
EXTERNAL DISTRIBUTION	DCC - COPY OF COMPLETED CALCULATION AND DESIGN VERIFICATION FOR DUPLICATE RETENTION	TUGCO QA, TUGCO OPERATIONS, PROCUREMENT: COPY TO DCC (FOR CONTROLLED DISTRIBUTION OF SPEC. AND DUPLICATE RETENTION)	DCC - COPY FOR DUPLICATE RETENTION	DCC	TUGCO OPERATIONS SUPPORT
INTERNAL DISTRIBUTION	AS REQUESTED FOR REVISION OR INFORMATION	AS REQUESTED FOR INFORMATION	AS REQUESTED FOR INFORMATION	NONE	COPY TO ORIGINATOR
FOLLOW UP	N/A	N/A	N/A	N/A	N/A
RETENTION TIME	PERMANENT - ALL REVISIONS	PERMANENT - ALL REVISIONS	PERMANENT	PERMANENT	PERMANENT
LOG	CALCULATION INDEX - UPDATED MONTHLY	SPECIFICATION STATUS REPORT - UPDATED MONTHLY	FILE INDEX	NONE	REC INDEX
MAINTAINED	TNE FILES	TNE FILES	TNE FILES	N/A	TNE FILES

FIGURE 1

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX	DC-7	DC-9	DC-10
	DRAWINGS	DESIGN VERIFICATION	COMPUTER PROGRAM DESIGN VERIFICATION
RETAIN	ACKNOWLEDGED FORM & TNE DC-7.1 WITH A COPY OF DRAWING AND OTHER TRANSMITTAL DOCUMENTS	MASTER OF THE DESIGN VERIFICATION REPORT WITH APPLICABLE DOCUMENT AND TRANSMITTAL FORM; SPECIAL DESIGN VERIFICATION WITH ACKNOWLEDGED FORM (FORMS IN ACCORDANCE WITH APPLICABLE TNE PROCEDURE)	MASTER OF THE DESIGN VERIFICATION REPORT WITH APPLICABLE SUPPORTING DOCUMENTS
RETENTION RESPONSIBILITY	TNE FILES	TNE FILES	TNE FILES
REVISIONS	SAME AS ABOVE	IF COMPLETED DVR NEEDS CORRECTION, ORIGINAL COPY STAMPED SUPERCEDED AND RETAINED WITH NEW DVR	SAME AS ABOVE
EXTERNAL DISTRIBUTION	COPY TO DCC FOR DRAWING REPRO & DISTRIBUTION (BY DCTG). COPY TO DCC FOR DUPLICATE RETENTION OF DESIGN VERIFICATION REPORT (BY TNE FILES)	COPY TO DCC FOR DUPLICATE RETENTION	COPY TO DCC FOR DUPLICATE RETENTION OF DV FORM
INTERNAL DISTRIBUTION	AS REQUESTED FOR INFORMATION (DV REPORT ONLY)	AS REQUESTED FOR INFORMATION	AS REQUESTED FOR INFORMATION
FOLLOW UP	N/A	N/A	N/A
RETENTION TIME	PERMANENT	PERMANENT	PERMANENT - ALL REVISIONS
LOG	DRAWING STATUS REPORT - UPDATED MONTHLY; DRAWING FILE INDEX AND TRANSMITTAL LOG	FILE INDEX PER APPLICABLE DOCUMENT	APPROVED COMPUTER PROGRAM VERIFICATION REPORT INDEX - QUARTERLY UPDATE
MAINTAINED BY	DCTG	TNE FILES	TNE FILES

FIGURE 1

TNE DOCUMENT CONTROL RETENTION
RESPONSIBILITY MATRIX

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX	DC-11	DC-12	DC-14	DC-15
	DESIGN ENGINEERING PACKAGES	ENGINEERING CHANGE NOTICES	PREOPERATIONAL TEST DATA PACKAGES	EQUIPMENT QUALIFICATION CHECKLIST
RETAIN	MASTER OF DESIGN ENGINEERING PACKAGE AND REVIEW RECORDS WITH ACKNOWLEDGED FORM # TNE-DC-11.3	COPY OF ECN AND DESIGN VERIFICATION REPORT (CL I OR II) WITH ACKNOWLEDGE FORM # TNE-DC-12.3 (FOR INFORMATION ONLY)	COPY OF TEST DATA PACKAGE WITH COMMENT SHEET (TNE-DC-14.1) FOR INFORMATION ONLY	MASTER OF THE DOCUMENTATION REVIEW FORM. COPY OF QUALIFICATION DOCUMENTATION PACKAGE AND ACKNOWLEDGED FORM TNE-DC-15.2.
RETENTION RESPONSIBILITY	TNE FILES	TNE FILES	TNE FILES	TNE - EQ
REVISIONS	SAME AS ABOVE - PREVIOUS REVISIONS STAMPED SUPERCEDED	SAME AS ABOVE - PREVIOUS REVISIONS STAMPED -SUPERCEDED	SAME AS ABOVE	SAME AS ABOVE
EXTERNAL DISTRIBUTION	COPY TO DCC FOR DUPLICATE FILING AND/OR CONTROLLED DISTRIBUTION	MASTER TO TUGCO OPERATIONS SUPPORT COPY TO DCC FOR DUPLICATE RETENTION	COMMENTS TO S/U BY TSG	QUALIFICATION DOCUMENTATION PACKAGE TO TUGCO OPERATIONS RECORDS CENTER FOR PERMANENT RETENTION
INTERNAL DISTRIBUTION	AS REQUIRED FOR INFORMATION	DAMAGE STUDY, ORIGINATOR; OTHERS AS REQUESTED FOR INFORMATION	COMMENTS FOR INFORMATION AS REQUESTED	AS REQUIRED
FOLLOW UP	N/A	N/A	N/A	N/A
RETENTION TIME	PERMANENT - ALL REVISIONS	PERMANENT - ALL REVISIONS	ALL REVISIONS UNTIL 2 YEARS AFTER OPERATION	PERMANENT
LOG	DESIGN ENGINEERING PACKAGE INDEX - UPDATED MONTHLY	ENGINEERING CHANGE NOTICE MASTER INDEX - UPDATED MONTHLY	NONE	BY SPECIFICATION
MAINTAINED BY	TNE FILES	TNE FILES	N/A	TNE-EQ

FIGURE 1

TNE DOCUMENT CONTROL RETENTION
RESPONSIBILITY MATRIX

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX	DC-16	DC-17	DC-18	DC-20
	EQUIPMENT QUALIFICATION CERTIFICATION	DESIGN BASIS DOCUMENTS	ALARA REVIEW OF ENGINEERING DOCUMENTS	MECHANICAL EQUIPMENT QUALIFICATION PACKAGES
RETAIN	COPY OF CERTIFICATION	MASTER OF THE DESIGN BASIS DOCUMENT AND REVIEW RECORDS (AS APPLICABLE) WITH ACKNOWLEDGEMENT FORM NO: TNE-DC-17.1	MASTER OF ALARA REVIEW REPORT AND CHECKLIST WITH ACKNOWLEDGE FORM # TNE-DC-18.3	COPY OF THE COMPLETED PACKAGE AND ACKNOWLEDGED FORM TNE-DC-15.2
RETENTION RESPONSIBILITY	TNE - EQ	TNE FILES	TNE FILES	TNE - EQ
REVISIONS	SAME AS ABOVE	SAME AS ABOVE -PREVIOUS REVISIONS STAMPED SUPERCEDED	SAME AS ABOVE - PREVIOUS REVISIONS STAMPED SUPERCEDED	SAME AS ABOVE
EXTERNAL DISTRIBUTION	MASTER TO TUGCO OPERATIONS RECORDS CENTER (PER DC-15)	COPY TO DCC FOR DUPLICATE FILE AND/OR CONTROLLED DISTRIBUTION	COPY TO TUGCO OPERATIONS SUPPORT (WHEN REQUIRED BY FORM TNE-DC-18.3) AND A COPY TO DCC FOR DUPLICATE RETENTION	MASTER OF THE COMPLETED PACKAGE TO TUGCO OPERATIONS RECORDS CENTER FOR PERMANENT RETENTION
INTERNAL DISTRIBUTION	AS REQUIRED	AS REQUIRED	AS REQUESTED FOR INFORMATION ONLY	AS REQUIRED
FOLLOW UP	N/A	N/A	N/A	N/A
RETENTION TIME	PERMANENT	PERMANENT	PERMANENT - ALL REVISIONS	PERMANENT
LOG	PER DC-15	DESIGN BASES DOCUMENT LOG - UPDATED MONTHLY	ALARA INDEX - UPDATED MONTHLY	BY SPECIFICATION (AS PER DC-15)
MAINTAINED BY	TNE-EQ	TNE FILES	TNE FILES	TNE - EQ

FIGURE 1

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX

TNE DOCUMENT CONTROL RETENTION RESPONSIBILITY MATRIX	PR-2	PR-3	CP-XI-4.7	CP-XI-4.8
	VENDOR EQUIPMENT RELEASES	REPLACEMENT PARTS	WORK AUTHORIZATION PER ASME SECTION XI PROGRAM	PREPARATION, REVIEW, CONTROL AND DISTRIBUTION OF ASME SEC - XI TNE DESIGN DWG
RETAIN	COPY OF CORRESPONDENCE AND RELEASES - INFO ONLY	COPY OF REPLACEMENT PARTS EVALUATION	COPY OF WASP PACKAGE	COPY OF DESIGN DRAWINGS AND OTHER TRANSMITTAL DOCUMENTS
RETENTION RESPONSIBILITY	TNE FILES	TNE FILES	TNE FILES	TNE FILES
REVISIONS	SAME AS ABOVE	IF COMPLETED EVALUATION NEEDS CORRECTION ORIGINAL COPY STAMPED SUPERCEDED AND MAINTAINED WITH NEW EVAL. FORM	AS ABOVE	AS ABOVE
EXTERNAL DISTRIBUTION	PROCUREMENT, TUGCO JA	PROCUREMENT, TUGCO OPERATIONS DCC FOR DUPLICATE RETENTION	MASTER OF WASP PACKAGE TO THE PERMANENT PLANT RECORDS VAULT	COPY TO DCC FOR DUPLICATE RETENTION WITH D/V FORM AND AS REQUESTED
INTERNAL DISTRIBUTION	AS REQUESTED FOR INFO ONLY	OTHERS AS REQUESTED FOR INFORMATION	AS REQUESTED	AS REQUESTED
FOLLOW UP	N/A	N/A	N/A	N/A
RETENTION TIME	2 YEARS AFTER CONTRACT CLOSE-OUT	PERMANENT	PERMANENT	PERMANENT
LOG	NONE	REPLACEMENT PARTS LOG-UPDATED MONTHLY	WASP INDEX & ASME SECT. XI TNE DESIGN DWG STATUS LOG	ASME SECT. XI TNE DESIGN DRAWINGS STATUS LOG
MAINTAINED BY	N/A	TNE FILES	TNE FILES	TNE FILES

QBC-83

TEXAS UTILITIES GENERATING COMPANY

OFFICE MEMORANDUM

To B.R. Clements

Date August 15, 1984

Subject TUGCO QA, DALLAS
MONTHLY REPORT - JULY, 1984

Attached is our monthly report for July, 1984. Should you have any questions, please advise.

DN Chapman
D.N. Chapman

DNC:mm

Attachment

cc: R.E. Kahler
C.E. Jensen
D.L. Anderson
R.G. Spangler
A.H. Boren

~~Copy~~
OR C

1st Monthly Report

CAR issued if significant item that was not closed in ~~60~~ 30 days
~~AA~~ DQP & CS-7

File

FOIA-85-151
A/88

TUGCO QA, DALLAS
MONTHLY REPORT - JULY, 1984

I. Implementation of the TUGCo, QA Program - Monthly Assessment.

The qualitative evaluation of the QA audit results for this report period indicate an overall effective implementation of the TUGCo QA Program. The program was responsive to significant deficiencies identified during audit TCP-106 (see below) through the initiation of prompt corrective action.

Audit TCP-106 was conducted to assess the adequacy and effectiveness of the Unit 2 Package Flow Program. The concept of package flow control is an attempt to control safety related work through the issuance of controlled work packages. These packages would include all documents necessary to perform and document construction and inspection activities (i.e. travelers, weld data cards, inspection reports). During the audit, three deficiencies were identified which were brought immediately to the attention of Construction and QA managements. As a result, J.T. Merritt issued Stop Work Notice No. 6. Two of the deficiencies of particularly significance are: 1.) numerous examples of packages not matching the inventory card (i.e., either missing documents or containing additional documents) and 2.) personnel having no documented indoctrination or training in the program requirements. The 3rd deficiency identified the failure of the program to meeting QA Plan requirements concerning QA/QC involvement with records.

As a result of immediate corrective actions the Stop Work Order was lifted on June 21, 1984. In addition, site surveillance committed to perform additional surveillance in the area, pending a re-audit by Dallas QA. Results of these activities will be presented in future reports.

II. Pre-Award Survey/Audit Summary

During the month of July one (1) pre-award survey report was issued by TUGCo QA, Dallas. The survey was of RDF Corporation, Hudson, N.H. facility on June 12-13, 1984. As a result, RDF Corp. was recommended as a supplier of temperature and heat flow sensing devices. A total of two (2) deficiencies and four (4) comments were identified. Both deficiencies cited instances of failure to adequately follow procedures (inadequate design calculation packages and inadequate vendor records)

In addition to this survey, four (4) vendor audit reports were issued. The results of these audits are summarized below.

Vendor	Date	Deficiency and Type
Brand Industrial Services Co. (BISCo-CPSES Site)	5/28-6/1/84	Def. No. 1 - Failure to control issuance of documents (use of unapproved and uncontrolled repair or rework procedure)

II. Pre-Award Survey/Audit Summary (cont'd)

		Def. No. 2 - Failure to follow procedures (improper implementation of the IRN system)
		Def. No. 3 - Failure to establish appropriate procedures (lack of procedure for repair or replacement of seals)
Bahnson Service Company (CPSES Site)	6/25-28/84	No deficiencies identified.
Hurst Metallurgical Research Lab	6/15/84	Def. No. 1 - Failure to follow procedures (incomplete test results)
Rockwell International	6/21-22/84	No deficiencies identified.

In addition to the vendor activity described above, five (5) site audit reports were issued. These audits are summarized below.

Audit/Title	Date	Deficiency and Type
TCP-105, Turnover Completion	5/29-6-13/84	Def. Nos. 1-5 - Failure to follow procedures
		Def. No. 1 (NCR's not issued)
		Def. No. 2 (Improper change on traveler)
		Def. No. 3 (Lack of proper documentation)
		Def. No. 4 (Incomplete turnover packages)
		Def. No. 5 (Incomplete MSP)
TCP-106, Unit 2 Work Package Control	6/11-16/84	Def. No. 1 - Failure to follow procedure (Inadequate records check)

II. Pre-Award Survey/Audit Summary (Cont'd)

		Def. No. 2 - Failure to establish procedure (Lack of training)
		Def. No. 3 - Failure to establish interface
TCP-107, Engineering/ Design Control	6/18-22/84	Def. No. 1 - Failure to establish procedure (lack of procedure for ISO revisions)
TUG-59, Operations Administration	6/18-22/84	Deficiency - Inadequate procedure
TUG-61, Opns. ASME Section XI Program	6/18-25/84	Def. Nos. 1-5 - Failure to follow procedures
		Def. No. 1 (Records not stored at required location)
		Def. No. 2 - (MAR's not initiated)
		Def. No. 3 - (Evaluation not documented)
		Def. No. 4 (report completed improperly)
		Def. No. 5 (Review not performed)

III. Corrective Action Requests (CAR's)

A. No CAR's were issued in July.

B. Open CARS Over Sixty (60) Days Old

CAR-013 Issued: February 18, 1983 Against: MATSCo Corp.

This CAR was issued because of MATSCo's failure to implement corrective action commitments. This facility has been placed in a "hold" status on the TUGCo Approved Vendors List (AVL) pending verification of MATSCo's corrective action to the CAR. An audit of MATSCo is scheduled in August which will verify implementation of corrective action.

III. Corrective Action Request (CAR's) cont'd

CAR 15 & 16 Issued: December 16, 1983 Against: Gulfalloy, Inc.

These CARs were issued because of Gulfalloy's failure to implement corrective actions to deficiencies identified during a previous audit. Subsequent to the issuance of this CAR, Gulfalloy filed a vendor Part 21 report concerning an apparent falsification of quality records. Gulfalloy has been placed in a "hold" status on the TUGCo AVL. Verification of CAR corrective actions and release of the AVL hold will be made following the resolution of the vendor Part 21 report by Gulfalloy.

CAR-17 Issued: December 29, 1983 Against: TUGCo

This CAR was issued against TUGCo, QA Dallas, CPSES QA and Dallas Purchasing when failures in the quality assurance program resulted in the improper release of procurement documents. As a result of the issuance of this CAR, increased QA reviews of procurement documents and backfit reviews of issued purchase orders were initiated. In view of the small number and minor nature of the discrepancies identified during the backfit review of purchase orders, this review was terminated when 75% complete. Final resolution and closeout of this CAR is being held pending the resolution of TUG-52 and the completion of TUG-65, audits of operations procurement.

IV. Open, Additional Response Required - Audit Findings Over Sixty (60) Days Old from Date of Response

No deficiencies fall into this category.

V. Vendor Compliance

During July, 1984, the Vendor Compliance Group performed four (4) release inspections. The results are as follows:

Trip Date	Vendor	Equipment	Status
7/2-3/84	Paul Munroe/ REMCO Hydraulics	2 hydraulic snubbers	The equipment was placed on HOLD because the data package was not ready. RATING: - 376.1
7/18/84	Paul Munroe/ REMCO Hydraulics	2 hydraulic snubbers	The data package was completed, therefore the equipment was shipped.
7/12-13/84	NPS Austin	Pipehangers, supports, and misc. hardware	The equipment was shipped. RATING: 90

V. Vendor Compliance (cont'd)

7/24/84	NPS Austin	6 Constant Supports 2 Pipe Clamps Rear and forward brackets, U-Bolts Misc. hardware	A partial shipment was made however two constant supports were rejected because of unacceptable welds. RATING: 60

In addition, the Vendor Compliance Group made three (3) witness trips. The results are as follows:

Trip Date	Vendor	Status
7/11-13/84	Southwest Research Institute	Witness of fire tests
7/18/84	MATSCO	Witness calibration
7/23-26/84	Volumetrics	Volumetrics was placed on HOLD awaiting amended P.O.

VI. QA Activities of Interest

a. The following items were reported to the NRC as potentially reportable under 10CFR50.55(e)

SDAR	Date	Subject
84-16	7/10/84	Main steam relief valves may not be qualified for actual loading conditions
84-17	7/17/84	Flooding concerns during fire suppression
84-18	7/20/84	Limitorque operators on motors on W valves not IEEE qualified
84-19	7/20/84	Defective material in Diesel Generator valve springs
84-20	7/20/84	Defective material in Diesel Generator valve holders.

b. Evidentiary depositions regarding the issue of harassment, intimidation and threats began at the Glen Rose Motor Inn. Witnesses were provided by both Applicants and Intervenors.

VI. QA Activities of Interest (cont'd)

c. The U.S. Nuclear Regulatory Commission issued the Comanche Peak Special Review Team Report. Three potential enforcement items and several action items were identified regarding QA.

d. Currently twenty-six (26) audits are scheduled for the 3rd quarter which begins during this reporting period. To date, seven (7) audits have been performed.