Oversight Observations:

1) ASL Observations
    a. Purchase Order# 4500042197 was issued to Dubose National Engineering Services with Z299.3 and N285.0. COIR N-COI-00120-00001, Item 5.10 & Appendix D has a requirement that audit report and checklist will be submitted to OPG if supplier QA program is Z299.3 or above. There was no evidence found that Aecon supplied the audit report and checklist to SNC for OPG acceptance.
    b. Purchase Order#75501 was issued to Pinacle who acts as distributor. Pinacle had subcontracted to TK Corporation (the manufacturer of the product). As per Aecon procedure QCP 306.5 para 6, TK Corporation should be in Aecon's ASL for the applicable scope of work. There was no evidence found that TK corporation was listed in Aecon's approved supplier list. This issue had been previously identified (repeat issue) during OPG's EPC requalification audit in February 2015 and documented under OPG NCAR 28150524-15. (Category 2)

2) Pinacle Purchase Order#75501 receiving inspection package included inspection certificate# 20140401801 and ABSA Statutory Declaration for CRN# 0A09067.25. Both documents had listed TK Corporation as the manufacturer; however the address for TK Corporation on each document did not match. Also, Pinnacle did not provide any copies of TK Corporation's Quality Program Certificate(s). (Category 2)

3) Purchase Order 4500046311 Receipt Inspection was completed to WI-047 for Customer Supplied Materials, instead of QCP 405.7 "Receiving, Receiving Inspection & Source Inspection of Nuclear Items". (Objective evidence - Job # A00004, Inspection Report). (Category 2)

4) Receiving Inspection Procedure QCP 405.7 "Receiving, Receiving Inspection & Source Inspection of Nuclear Items states "that visual and dimensional inspection will be performed as applicable". It is not clear who determines when visual and dimensional inspection is applicable. (Category 1)

5) ITP for materials purchased to Z299.3 (PO 4500042197) was not included in Material Receiving Report. This ITP was also not accepted by SNC as per Z299.3 clause 3.5.6.1. COIR N-COI-00120-00001 item # 4.37 has a requirement that ITP should be submitted to OPG for acceptance. Requirements for ITPs are also outlined in Section 18 of 628411-0000-00000-50IM-0001 R00 Project Procurement Plan – Darlington Heavy Water Waste Management Building – West Annex. (Category 2)

6) Aecon was unable to provide Qualification records for one QA Inspector at the time of oversight. (Category 2)

7) Supplier "Pinacle" is listed in Aecon approved supplier list for supply of small products in accordance with NCA 3812. It is not clear if Aecon's audit covered Pinacle for NCA 3862.1 and NCA 3856.3 as required by the NCA 3812. No small products were supplied for this project at the time of this oversight (Category 1)

Note: Categorization is in accordance with N-GUID-09701-10022 R03.

The following do not represent a violation of codes, standards, contracts or procedures. However they are listed as potential areas for further improvements and enhancement of Aecon's Program:

1) RI Procedures QCP 405.7 does not include any requirements to verify that there is no presence of foreign material.

2) Photos are taken during RI activities, however not attached to the receiving documentation package. This practice is acceptable as per Procedure QCP 405.7 Section 4.2(a). However it will be a good practice if photos are attached to the receiving documentation package for future traceability.

3) CFSI Training is completed as part of overall Receiving Inspection Training (procedure rollout). No independent training specific to CFSI is done. Potential area for improvement with available information from COG & EPRI. Also, Aecon personnel other than QA should be part of CFSI training.