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SUBJECT: Forwards "Matl Traceability Task Force Matl Control & Traceability Issue Final Rept."

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REQUEST FOR INFORMATION: MATERIAL TRACEABILITY ISSUES

Dear Mr. Burch:

Pursuant to your request, please find attached a copy of the final Material Traceability Task Force report. This report summarizes the findings and corrective actions initiated by this Task Force, and provides resolution of material traceability issues at H. B. Robinson.

If you have any questions regarding this matter, please contact me at (803)-383-1499.

Very truly yours,

Charles R. Dietz  
Manager  
Robinson Nuclear Project Department

RDC:dwm

Enclosure

cc: L. W. Garner  
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MATERIAL TRACEABILITY TASK FORCE  
MATERIAL CONTROL AND TRACEABILITY ISSUE  
FINAL REPORT  
FEBRUARY 28, 1990

PURPOSE

The Material Traceability Task Force was formed to improve procedure control and traceability of Q-List material.

OBJECTIVES

Through various meetings of the Task Force the following objectives were defined.

1. Determine RNPDP major vulnerability in the traceability of material.
2. Determine methods used by other utilities in the control and traceability of material.
3. Determine the procedural controls necessary to assure the control and traceability of material.
4. Implement the necessary procedure controls for the control and traceability of field issued material.

CONCLUSIONS

Objective 1. Vulnerability

It was determined that RNPDP's major vulnerability was in the area of structural shapes, i.e., angle iron, plate, unistrut, etc., and that this was due to various problems in the loss of traceability documents used in the field.

Objective 2. Methods Used by Other Utilities

Research into the methods used by other utilities, i.e., V. C. Summer (SCE&G), Oconee (Duke Power), and Harris (CP&L), revealed that SCE&G and Duke were very consistent in how they trace material. Duke uses the same system at all of its units and SCE&G uses a similar system. Their material is marked at the time of issue with metal stamps for structural shapes, marking on containers or boxes of small items, and stenciling on tubing and valves. Material in the field was controlled by an assigned number provided by Material Control. This number provided the traceability back to the receipt inspection. Field personnel were responsible for maintaining the traceability of the material in the field. CP&L's Harris Plant has the same basic system with the exception that a PIC Ticket is issued with the material and traceability is controlled by the information on the ticket. Field personnel are responsible for material traceability in the field.

Objective 3. Procedure Control

It was determined that existing QA/QC and Material Control Unit (MCU) procedures OQA-402, "Receipt and Inspection," PMC-001, "Plant Material and Equipment," adequately cover the receipt inspection and storage aspects of control and traceability. Maintenance had no actual material control procedure but relied on the green QA Accept Tag issued with the material as their means of material traceability. The Modification Implementation Unit has a procedure, MIP-006, "Control of Field Issued Material," for the control of material but it is not adequate for the traceability issue.

Based on the findings of Objective 2 and 3, the following recommendations were made for the control of field issued material:

- \* Material control and traceability of field issued material should be the responsibility of the personnel responsible for its use in the field.
- \* Material should be marked at the point of issue using metal stamps for structural shapes and other stampable items, such as valves, motors, pumps, etc., and marking small items by container box or on the item itself.
- \* The Purchase Order number and the Purchase Order item number should be the controlling number for traceability. Heat numbers and other numbers such as lot number, serial number, etc., when required by a standard, requirement, or controlling document should also be used.
- \* QA/QC should witness the initial transfer of traceability information during receipt inspection. QA/QC should perform surveillance of the traceability transfers in the field to ensure procedure compliance.
- \* Material Control Unit should continue material storage and be the sole control of stored material. The MIU existing storage area should be consolidated with the MCU storage to reduce storage areas. All excess material should be returned for stock or salvage to the MCU.
- \* Field issued material should be staged for installation purposes but not allowed for long term storage.

Objective 4. Implementation

Recommendations of Objective 3 were adopted and implemented in the following manner:

- \* Quality Control will continue to receipt inspect material to current procedures.
- \* The MCU revised procedures PMC-002, "Receiving Plant Material and Equipment," and PMC-004, "Issuing Plant Material and Equipment," to remove the use of the QA Accept Tag and the duplicate QA Accept Tag, and added that structural shapes are to be stamped and other material is to be marked on the container or the item itself with the Purchase Order and item number.

- \* Maintenance and MIU developed procedure MMM-028, "Control of Field Issued Material." MMM-028 requires that field personnel maintain material traceability through transfer of traceability information. The material issue document is to remain with the work document until close out of the project.
- \* Material storage areas are to be consolidated and controlled by the MCU only.
- \* QA/QC to perform surveillance of field compliance to procedures.

SCHEDULE OF EVENTS

Material storage consolidation is in progress and scheduled for completion by June 1, 1990.

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