

AMERICAN ELECTRIC POWER SERVICE CORPORATION
GENERAL PROCEDURE CHANGE SHEET

CHANGE SHEET
NO. 4

PROCEDURE NO. 15.1 REVISION NO. 1

TITLE: Noncompliance and Corrective Action

PG. 1 OF 1

PREPARED BY: R. F. Kroeger

DATE: 10/19/84

REVIEWED BY: M. P. Alexich

DATE: 10/21/84

CONCURRENCE: H/A

DATE: _____

APPROVED BY: John E. Dolan

DATE: 10/24/84

TYPE OF
CHANGE

☒ PERMANENT
☐ TEMPORARY

EFFECTIVE DATE: 11/9/84

EXPIRATION DATE: _____

DESCRIPTION OF CHANGE

1. Added Para. 3.5 setting policy on NCR cancellation.
Added Para. 3.6 setting policy on reporting of Electrical Equipment Environmental
Qualification deficiencies. Renumbered existed para. 3.5 & 3.6
3. Revised para. 6.1.1 to add Equipment Qualification deficiencies to list of typical
noncompliances.

REASON(S) FOR CHANGE

1. To establish a policy on cancellation of NCRs, and escalation of concerns if they
exist after cancellation.
2. To establish a mechanism for compliance with 10CFR50.49.h
3. Revised Para. 6.1.1 to add Equipment Qualification deficiencies to list of typical
noncompliances.

INSTRUCTIONS FOR INCORPORATING CHANGE

Remove Page 1 & 2, insert page 1 & 2 C.S.1

Remove Page 3 C.S.3 & Page 4, insert Page 3 C.S.4 & Page 4

8411280300 841121
PDR ADDCK 05000315
F PDR

GENERAL PROCEDURE CHANGE SHEET INDEX

AEPSC GENERAL PROCEDURE NO. 15.1

REV. NO. 1[illegible]

* UPON ISSUE OF NEXT REVISION OF THE SUBJECT PROCEDURE

AEPSC GENERAL PROCEDURE NO. 15.1
NONCOMPLIANCE AND CORRECTIVE ACTION

1.0 PURPOSE

This procedure establishes the policy and administrative activities for (1) reporting, (2) corrective and (3) establishing measures to preclude the recurrence of noncompliance identified within AEPSC.

2.0 APPLICABILITY

2.1 This procedure applies to noncompliances with the QA Program requirements of AEPSC General Procedure No. 2.1 while the implementing activities are under the direct control and responsibility of AEPSC.

2.2 Management appraisals/evaluations/reviews which identify intra-division findings are excluded from the reporting requirements of this procedure unless the finding identifies an apparent discrepancy in the design of a system, component or structure which would prevent or degrade systems, components or structures from performing their design functions.

2.3 Noncompliances identified by audits conducted in accordance with General Procedure 18.1 are excluded from the reporting requirements of this procedure except as noted therein.

3.0 POLICY

3.1 Any activity known or suspected to contain a noncompliance shall be properly identified, reported and corrected, through the use of the Noncompliance Report (NCR).

3.2 Any noncompliance, identified by AEPSC personnel while at the Donald C. Cook Nuclear Plant, shall be reported in accordance with established Plant procedures.

3.3 The intent of this procedure is to provide the basic requirements and directions for noncompliances identified within AEPSC. It shall be incumbent upon the involved AEPSC Division Manager to review this procedure and to assure that, when necessary, additional procedures are developed for the respective Division to fully implement the requirements of this procedure.

3.4 Any individual in AEPSC can originate an NCR. If a member of a section is the originator, the Section Manager shall sign the NCR to authorize its issuance and confirm that the appropriate person is being assigned the corrective action. Where the originator is the Section Manager, only this Manager's signature is required for issuing.

- 3.5 Once an NCR has been initiated, it cannot and shall not be cancelled without due cause. Such cause shall be documented either on the NCR itself, or in a separate memo, and a copy of said documentation forwarded to the AEPSC Manager of Quality Assurance. The Originator of a cancelled NCR has the obligation and right to escalate his concern to successive levels of management if he feels that a quality related problem still exists, after NCR cancellation. CS 4
- 3.6 Deficiencies in electrical equipment environmental qualification shall be documented via an NCR with a mandatory response due 30 days from date of NCR issue. When applicable, such deficiencies shall be reported to the NRC within sixty days of discovery per 10CFR50.49h. CS 4
- 3.7 All AEPSC Personnel share equally in the obligation and responsibility to report and identify noncompliances. CS 4
- 3.8 Departures from this procedure shall not be made without the express written consent of the AEPSC Vice Chairman, Engineering and Construction. CS 4
- 4.0 DEFINITIONS
- 4.1 Deficiency - An inadequacy in a procedure or its methodology which does not provide suitable direction to meet established requirements. Deficiencies occur where documentation is nonexistent, inadequate or incorrect.
- 4.2 Deviation - An inadequacy in the implementation of an established procedure. Deviations occur where documentation is correct, adequate and acceptable but the implementing organization does not adhere to the specified directions.
- 4.3 Discrepancy - Suspected or unsubstantiated condition requiring further evaluation.
- 4.4 Noncompliance - A deviation from, or deficiency in, an approved procedure or method; or a discrepancy in the design of a system, component or structure which would prevent or degrade systems, components or structures from performing their design functions.
- 4.5 Commitment List - A list of promised actions by AEPSC organizations/personnel that is prepared and maintained in accordance with General Procedure No. 2.2.
- 4.6 Originator - Any AEPSC personnel who have knowledge of a noncompliance.
- 4.7 Responder - Person to whom a Noncompliance Report (NCR) is addressed and/or who replies to the NCR originator.
- 4.8 Software - Documentation or paperwork.

5.0 RESPONSIBILITIES

- 5.1 Originator - Responsible for the determination of the need for and the complete processing of an NCR, including notification to affected organizations, in accordance with this procedure.
- 5.2 Originator's Section Manager - Confirms the need to proceed and assures NCR is assigned to appropriate individual or organization.
- 5.3 Responder - The person to whom the NCR is sent. This person is responsible for the preparation of a meaningful, clear response to the Originator as well as accomplishing other tasks defined in this procedure.
- 5.4 Responder's Section Manager - Authorities corrections to be made.
- 5.5 NS&L - Responsible for indicating reportability of NCR finding and for performing reporting functions when applicable.
- 5.6 Quality Assurance - Responsible for maintaining Commitment List; auditing AEPSC OH organization for compliance with this procedure; and verifying that preventive measures have succeeded.

6.0 NONCOMPLIANCE PROCEDURE

6.1 General

6.1.1 Noncompliances, typically, include:

- (1) failure to perform prescribed verification activities;
- (2) departure or inadvertent omission from approved procedure specifications, drawings, etc.;
- (3) calculational logic or technical document error;
- (4) error in procedural document;
- (5) failure to have adequate or required procedures;
- (6) failure to transcribe activities affecting quality into written documents;
- (7) a group of nonconformances that show a trend requiring correction;
- (8) supplier's report does not address requirements;
- (9) erroneous entry in supplier's documentation;
- (10) documentation incomplete, missing or illegible.
- (11) equipment qualification deficiencies

6.1.2 A graphic presentation of the noncompliances cycle is shown in Attachment 1.

|CS 4

6.1.3 Noncompliances identified within AEPSC shall be processed in accordance with this procedure except noncompliances identified at a supplier. Supplier noncompliances shall be processed under the AEP approved Supplier QA program. AEPSC's involvement shall be limited to the contractual agreements established in the procurement document.

6.2 Reporting and Documenting a Noncompliance (Originator)

6.2.1 Noncompliances shall be documented and reported in a timely manner. Noncompliances shall be identified and processed on AEPSC form GE-60, "Noncompliance Report" (NCR) and processed in accordance with the instruction on its reverse side. (Ref. Attachment 2).

6.2.2 The NCR number consists of four parts as follows:

RQA - 81 - 49 - 1

"-1" is always used in the preparation of an NCR. The -1 designation will be changed only after one or more commitments are made in response to the NCR. If one commitment is made, this part of the number changes to "C1" from "-1". If two or more commitments are made, each is assigned to its own number i.e. C1, C2, etc.

indicates sequential number of NCRs written for the year in a specific AEPSC organization.

indicates the year in which the NCR was written.

indicates a Report (NCR) originated by Quality Assurance. To create this part of the NCR number always start with the letter "R" then add the appropriate suffix from the listing below.

AMERICAN ELECTRIC POWER SERVICE CORPORATION
GENERAL PROCEDURE CHANGE SHEET

CHANGE SHEET
NO. 4

PROCEDURE NO. 15.1 REVISION NO. 1

TITLE: Noncompliance and Corrective Action

PG. 1 OF 1

PREPARED BY: R. F. Kroeger *R. F. Kroeger*

DATE: 10/19/84

REVIEWED BY: M. P. Alexich *M. P. Alexich*

DATE: 10/21/84

: _____ DATE: _____

: _____ DATE: _____

: _____ DATE: _____

CONCURRENCE: N/A

DATE: _____

APPROVED BY: John E. Dolan *John E. Dolan*

DATE: 10/24/84

TYPE OF
CHANGE

☒ PERMANENT
☐ TEMPORARY

EFFECTIVE DATE: 11/9/84
EXPIRATION DATE: _____

DESCRIPTION OF CHANGE

1. Added Para. 3.5 setting policy on NCR cancellation.
- Added Para. 3.6 setting policy on reporting of Electrical Equipment Environmental Qualification deficiencies. Renumbered existed para. 3.5 & 3.6
3. Revised para. 6.1.1 to add Equipment Qualification deficiencies to list of typical noncompliances.

REASON(S) FOR CHANGE

1. To establish a policy on cancellation of NCRs, and escalation of concerns if they exist after cancellation.
2. To establish a mechanism for compliance with 10CFR50.49.h
3. Revised Para. 6.1.1 to add Equipment Qualification deficiencies to list of typical noncompliances.

INSTRUCTIONS FOR INCORPORATING CHANGE

Remove Page 1 & 2, insert page 1 & 2 C.S.1

Remove Page 3 C.S.3 & Page 4, insert Page 3 C.S.4 & Page 4

GENERAL PROCEDURE CHANGE SHEET INDEX

AEPSG GENERAL PROCEDURE NO. 15.1

REV. NO. 1[illegible]

* UPON ISSUE OF NEXT REVISION OF THE SUBJECT PROCEDURE

AEPSC GENERAL PROCEDURE NO. 15.1
NONCOMPLIANCE AND CORRECTIVE ACTION

1.0 PURPOSE

This procedure establishes the policy and administrative activities for (1) reporting, (2) corrective and (3) establishing measures to preclude the recurrence of noncompliance identified within AEPSC.

2.0 APPLICABILITY

2.1 This procedure applies to noncompliances with the QA Program requirements of AEPSC General Procedure No. 2.1 while the implementing activities are under the direct control and responsibility of AEPSC.

2.2 Management appraisals/evaluations/reviews which identify intra-division findings are excluded from the reporting requirements of this procedure unless the finding identifies an apparent discrepancy in the design of a system, component or structure which would prevent or degrade systems, components or structures from performing their design functions.

2.3 Noncompliances identified by audits conducted in accordance with General Procedure 18.1 are excluded from the reporting requirements of this procedure except as noted therein.

3.0 POLICY

3.1 Any activity known or suspected to contain a noncompliance shall be properly identified, reported and corrected, through the use of the Noncompliance Report (NCR).

3.2 Any noncompliance, identified by AEPSC personnel while at the Donald C. Cook Nuclear Plant, shall be reported in accordance with established Plant procedures.

3.3 The intent of this procedure is to provide the basic requirements and directions for noncompliances identified within AEPSC. It shall be incumbent upon the involved AEPSC Division Manager to review this procedure and to assure that, when necessary, additional procedures are developed for the respective Division to fully implement the requirements of this procedure.

3.4 Any individual in AEPSC can originate an NCR. If a member of a section is the originator, the Section Manager shall sign the NCR to authorize its issuance and confirm that the appropriate person is being assigned the corrective action. Where the originator is the Section Manager, only this Manager's signature is required for issuing.

- 3.5 Once an NCR has been initiated, it cannot and shall not be cancelled without due cause. Such cause shall be documented either on the NCR itself, or in a separate memo, and a copy of said documentation forwarded to the AEPSC Manager of Quality Assurance. The Originator of a cancelled NCR has the obligation and right to escalate his concern to successive levels of management if he feels that a quality related problem still exists, after NCR cancellation. CS 4
- 3.6 Deficiencies in electrical equipment environmental qualification shall be documented via an NCR with a mandatory response due 30 days from date of NCR issue. When applicable, such deficiencies shall be reported to the NRC within sixty days of discovery per 10CFR50.49h. CS 4
- 3.7 All AEPSC Personnel share equally in the obligation and responsibility to report and identify noncompliances. CS 4
- 3.8 Departures from this procedure shall not be made without the express written consent of the AEPSC Vice Chairman, Engineering and Construction. CS 4
- 4.0 DEFINITIONS
- 4.1 Deficiency - An inadequacy in a procedure or its methodology which does not provide suitable direction to meet established requirements. Deficiencies occur where documentation is nonexistent, inadequate or incorrect.
- 4.2 Deviation - An inadequacy in the implementation of an established procedure. Deviations occur where documentation is correct, adequate and acceptable but the implementing organization does not adhere to the specified directions.
- 4.3 Discrepancy - Suspected or unsubstantiated condition requiring further evaluation.
- 4.4 Noncompliance - A deviation from, or deficiency in, an approved procedure or method; or a discrepancy in the design of a system, component or structure which would prevent or degrade systems, components or structures from performing their design functions.
- 4.5 Commitment List - A list of promised actions by AEPSC organizations/personnel that is prepared and maintained in accordance with General Procedure No. 2.2.
- 4.6 Originator - Any AEPSC personnel who have knowledge of a noncompliance.
- 4.7 Responder - Person to whom a Noncompliance Report (NCR) is addressed and/or who replies to the NCR originator.
- 4.8 Software - Documentation or paperwork.

5.0 RESPONSIBILITIES

- 5.1 Originator - Responsible for the determination of the need for and the complete processing of an NCR, including notification to affected organizations, in accordance with this procedure.
- 5.2 Originator's Section Manager - Confirms the need to proceed and assures NCR is assigned to appropriate individual or organization.
- 5.3 Responder - The person to whom the NCR is sent. This person is responsible for the preparation of a meaningful, clear response to the Originator as well as accomplishing other tasks defined in this procedure.
- 5.4 Responder's Section Manager - Authorities corrections to be made.
- 5.5 NS&L - Responsible for indicating reportability of NCR finding and for performing reporting functions when applicable.
- 5.6 Quality Assurance - Responsible for maintaining Commitment List; auditing AEPSC OH organization for compliance with this procedure; and verifying that preventive measures have succeeded.

6.0 NONCOMPLIANCE PROCEDURE

6.1 General

6.1.1 Noncompliances, typically, include:

- (1) failure to perform prescribed verification activities;
- (2) departure or inadvertent omission from approved procedure specifications, drawings, etc.;
- (3) calculational logic or technical document error;
- (4) error in procedural document;
- (5) failure to have adequate or required procedures;
- (6) failure to transcribe activities affecting quality into written documents;
- (7) a group of nonconformances that show a trend requiring correction;
- (8) supplier's report does not address requirements;
- (9) erroneous entry in supplier's documentation;
- (10) documentation incomplete, missing or illegible.
- (11) equipment qualification deficiencies

6.1.2 A graphic presentation of the noncompliances cycle is shown in Attachment 1.

CS 4

6.1.3 Noncompliances identified within AEPSC shall be processed in accordance with this procedure except noncompliances identified at a supplier. Supplier noncompliances shall be processed under the AEP approved Supplier QA program. AEPSC's involvement shall be limited to the contractual agreements established in the procurement document.

6.2 Reporting and Documenting a Noncompliance (Originator)

6.2.1 Noncompliances shall be documented and reported in a timely manner. Noncompliances shall be identified and processes on AEPSC form GE-60, "Noncompliance Report" (NCR) and processed in accordance with the instruction on its reverse side. (Ref. Attachment 2).

6.2.2 The NCR number consists of four parts as follows:

RQA - 81 - 49 - 1

"-1" is always used in the preparation of an NCR. The -1 designation will be changed only after one or more commitments are made in response to the NCR. If one commitment is made, this part of the number changes to "C1" from "-1". If two or more commitments are made, each is assigned to its own number i.e. C1, C2, etc.

indicates sequential number of NCRs written for the year in a specific AEPSC organization.

indicates the year in which the NCR was written.

indicates a Report (NCR) originated by Quality Assurance. To create this part of the NCR number always start with the letter "R" then add the appropriate suffix from the listing below.

AMERICAN ELECTRIC POWER SERVICE CORPORATION
GENERAL PROCEDURE CHANGE SHEET

CHANGE SHEET
NO. 4

PROCEDURE NO. 15.1 REVISION NO. 1

TITLE: Noncompliance and Corrective Action

PG. 1 OF 1

PREPARED BY: R. F. Kroeger *R. F. Kroeger*

DATE: 10/19/84

REVIEWED BY: M. P. Alexich *M. P. Alexich*

DATE: 10/21/84

: _____

DATE: _____

: _____

DATE: _____

: _____

DATE: _____

CONCURRENCE: ii/A

DATE: _____

APPROVED BY: John E. Dolan *John E. Dolan*

DATE: 10/24/84

TYPE OF
CHANGE

☒ PERMANENT
☐ TEMPORARY

EFFECTIVE DATE: 11/9/84
EXPIRATION DATE: _____

DESCRIPTION OF CHANGE

1. Added Para. 3.5 setting policy on NCR cancellation.
Added Para. 3.6 setting policy on reporting of Electrical Equipment Environmental Qualification deficiencies. Renumbered existed para. 3.5 & 3.6
3. Revised para. 6.1.1 to add Equipment Qualification deficiencies to list of typical noncompliances.

REASON(S) FOR CHANGE

1. To establish a policy on cancellation of NCRs, and escalation of concerns if they exist after cancellation.
2. To establish a mechanism for compliance with 10CFR50.49.h
3. Revised Para. 6.1.1 to add Equipment Qualification deficiencies to list of typical noncompliances.

INSTRUCTIONS FOR INCORPORATING CHANGE

Remove Page 1 & 2, insert page 1 & 2 C.S.1

Remove Page 3 C.S.3 & Page 4, insert Page 3 C.S.4 & Page 4

GENERAL PROCEDURE CHANGE SHEET INDEX

AEPSC GENERAL PROCEDURE NO. 15.1

REV. NO. 1[illegible]

* UPON ISSUE OF NEXT REVISION OF THE SUBJECT PROCEDURE

AEPSC GENERAL PROCEDURE NO. 15.1
NONCOMPLIANCE AND CORRECTIVE ACTION

1.0 PURPOSE

This procedure establishes the policy and administrative activities for (1) reporting, (2) corrective and (3) establishing measures to preclude the recurrence of noncompliance identified within AEPSC.

2.0 APPLICABILITY

2.1 This procedure applies to noncompliances with the QA Program requirements of AEPSC General Procedure No. 2.1 while the implementing activities are under the direct control and responsibility of AEPSC.

2.2 Management appraisals/evaluations/reviews which identify intra-division findings are excluded from the reporting requirements of this procedure unless the finding identifies an apparent discrepancy in the design of a system, component or structure which would prevent or degrade systems, components or structures from performing their design functions.

2.3 Noncompliances identified by audits conducted in accordance with General Procedure 18.1 are excluded from the reporting requirements of this procedure except as noted therein.

3.0 POLICY

3.1 Any activity known or suspected to contain a noncompliance shall be properly identified, reported and corrected, through the use of the Noncompliance Report (NCR).

3.2 Any noncompliance, identified by AEPSC personnel while at the Donald C. Cook Nuclear Plant, shall be reported in accordance with established Plant procedures.

3.3 The intent of this procedure is to provide the basic requirements and directions for noncompliances identified within AEPSC. It shall be incumbent upon the involved AEPSC Division Manager to review this procedure and to assure that, when necessary, additional procedures are developed for the respective Division to fully implement the requirements of this procedure.

3.4 Any individual in AEPSC can originate an NCR. If a member of a section is the originator, the Section Manager shall sign the NCR to authorize its issuance and confirm that the appropriate person is being assigned the corrective action. Where the originator is the Section Manager, only this Manager's signature is required for issuing.

- 3.5 Once an NCR has been initiated, it cannot and shall not be cancelled without due cause. Such cause shall be documented either on the NCR itself, or in a separate memo, and a copy of said documentation forwarded to the AEPSC Manager of Quality Assurance. The Originator of a cancelled NCR has the obligation and right to escalate his concern to successive levels of management if he feels that a quality related problem still exists, after NCR cancellation. CS 4
- 3.6 Deficiencies in electrical equipment environmental qualification shall be documented via an NCR with a mandatory response due 30 days from date of NCR issue. When applicable, such deficiencies shall be reported to the NRC within sixty days of discovery per 10CFR50.49h. CS 4
- 3.7 All AEPSC Personnel share equally in the obligation and responsibility to report and identify noncompliances. CS 4
- 3.8 Departures from this procedure shall not be made without the express written consent of the AEPSC Vice Chairman, Engineering and Construction. CS 4
- 4.0 DEFINITIONS
- 4.1 Deficiency - An inadequacy in a procedure or its methodology which does not provide suitable direction to meet established requirements. Deficiencies occur where documentation is nonexistent, inadequate or incorrect.
- 4.2 Deviation - An inadequacy in the implementation of an established procedure. Deviations occur where documentation is correct, adequate and acceptable but the implementing organization does not adhere to the specified directions.
- 4.3 Discrepancy - Suspected or unsubstantiated condition requiring further evaluation.
- 4.4 Noncompliance - A deviation from, or deficiency in, an approved procedure or method; or a discrepancy in the design of a system, component or structure which would prevent or degrade systems, components or structures from performing their design functions.
- 4.5 Commitment List - A list of promised actions by AEPSC organizations/personnel that is prepared and maintained in accordance with General Procedure No. 2.2.
- 4.6 Originator - Any AEPSC personnel who have knowledge of a noncompliance.
- 4.7 Responder - Person to whom a Noncompliance Report (NCR) is addressed and/or who replies to the NCR originator.
- 4.8 Software - Documentation or paperwork.

5.0 RESPONSIBILITIES

- 5.1 Originator - Responsible for the determination of the need for and the complete processing of an NCR, including notification to affected organizations, in accordance with this procedure.
- 5.2 Originator's Section Manager - Confirms the need to proceed and assures NCR is assigned to appropriate individual or organization.
- 5.3 Responder - The person to whom the NCR is sent. This person is responsible for the preparation of a meaningful, clear response to the Originator as well as accomplishing other tasks defined in this procedure.
- 5.4 Responder's Section Manager - Authorities corrections to be made.
- 5.5 NS&L - Responsible for indicating reportability of NCR finding and for performing reporting functions when applicable.
- 5.6 Quality Assurance - Responsible for maintaining Commitment List; auditing AEPSC OH organization for compliance with this procedure; and verifying that preventive measures have succeeded.

6.0 NONCOMPLIANCE PROCEDURE

6.1 General

6.1.1 Noncompliances, typically, include:

- (1) failure to perform prescribed verification activities;
- (2) departure or inadvertent omission from approved procedure specifications, drawings, etc.;
- (3) calculational logic or technical document error;
- (4) error in procedural document;
- (5) failure to have adequate or required procedures;
- (6) failure to transcribe activities affecting quality into written documents;
- (7) a group of nonconformances that show a trend requiring correction;
- (8) supplier's report does not address requirements;
- (9) erroneous entry in supplier's documentation;
- (10) documentation incomplete, missing or illegible.
- (11) equipment qualification deficiencies

6.1.2 A graphic presentation of the noncompliances cycle is shown in Attachment 1.

| CS 4

6.1.3 Noncompliances identified within AEPSC shall be processed in accordance with this procedure except noncompliances identified at a supplier. Supplier noncompliances shall be processed under the AEP approved Supplier QA program. AEPSC's involvement shall be limited to the contractual agreements established in the procurement document.

6.2 Reporting and Documenting a Noncompliance (Originator)

6.2.1 Noncompliances shall be documented and reported in a timely manner. Noncompliances shall be identified and processes on AEPSC form GE-60, "Noncompliance Report" (NCR) and processed in accordance with the instruction on its reverse side. (Ref. Attachment 2).

6.2.2 The NCR number consists of four parts as follows:

ROA - 81 - 49 - 1

"-1" is always used in the preparation of an NCR. The -1 designation will be changed only after one or more commitments are made in response to the NCR. If one commitment is made, this part of the number changes to "C1" from "-1". If two or more commitments are made, each is assigned to its own number i.e. C1, C2, etc.

indicates sequential number of NCRs written for the year in a specific AEPSC organization.

indicates the year in which the NCR was written.

indicates a Report (NCR) originated by Quality Assurance. To create this part of the NCR number always start with the letter "R" then add the appropriate suffix from the listing below.

CONTROLLED DOCUMENT TRANSMITTAL ACKNOWLEDGEMENT

TO: NRC, Bethesda

QA FILE NO.: G00002

DATE: 10/05/84

CONTROLLED COPY NO.:

THIS IS TO ACKNOWLEDGE RECEIPT OF THE
CONTROLLED DOCUMENT ISSUE PACKAGE
CONSISTING OF THE FOLLOWING:

DOCUMENT TITLE	
AEPSC General Procedure Change Sheet No. 3 for G. P. 15.1	
Noncompliance and Corrective Action	
THIS ISSUE IS: <input type="checkbox"/> ORIGINAL ISSUE <input checked="" type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> RE-ISSUE OF COMPLETE DOCUMENT WITH REVISIONS	
QA-10-84	
REV. NO. <u>1</u>	DATE: <u>10/05/84</u> DCN: <u>G00002</u> CDRAR: REV. NO. <u>4</u> DATE: <u>08-23-84</u>
QA-10-84	
CDAL: REV. NO. <u>- - -</u>	DATE: <u>08-16-83</u> DCN: <u>G00002</u> QA FILE NO: <u>G00002</u>

DOCUMENT TITLE	
THIS ISSUE IS: <input type="checkbox"/> ORIGINAL ISSUE <input type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> RE-ISSUE OF COMPLETE DOCUMENT WITH REVISIONS	
REV. NO. <u> </u>	DATE: <u> </u> DCN: <u> </u> CDRAR: REV. NO. <u> </u> DATE: <u> </u>
CDAL: REV. NO. <u> </u>	DATE: <u> </u> DCN: <u> </u> QA FILE NO: <u> </u>

DOCUMENT TITLE	
THIS ISSUE IS: <input type="checkbox"/> ORIGINAL ISSUE <input type="checkbox"/> PARTIAL REVISION <input type="checkbox"/> RE-ISSUE OF COMPLETE DOCUMENT WITH REVISIONS	
REV. NO. <u> </u>	DATE: <u> </u> DCN: <u> </u> CDRAR: REV. NO. <u> </u> DATE: <u> </u>
CDAL: REV. NO. <u> </u>	DATE: <u> </u> DCN: <u> </u> QA FILE NO: <u> </u>

RECEIPT ACKNOWLEDGEMENT SIGNATURE: _____

REGISTERED HOLDER

DATE:

RETURN TO: W.D. Geiger

1 Riverside Plaza

ORIGINATOR

ROOM NO.: 20th floor (AEPSC QA)

AMERICAN ELECTRIC POWER SERVICE CORPORATION
GENERAL PROCEDURE CHANGE SHEET

CHANGE SHEET
NO. 3

PROCEDURE NO. 15.1 REVISION NO. 1

TITLE: Noncompliance and Corrective Action

PG. 1 OF 1

PREPARED BY: R. F. Kroeger

DATE: 9/24/84

REVIEWED BY: _____

DATE: _____

:

DATE: _____

:

DATE: _____

:

DATE: _____

CONCURRENCE: N/A

DATE: _____

APPROVED BY: R. F. Kroeger

DATE: 9/24/84

TYPE OF
CHANGE

☒ PERMANENT

EFFECTIVE DATE: 10/5/84

☐ TEMPORARY

EXPIRATION DATE: _____

DESCRIPTION OF CHANGE

Correct typographical error in section 6.1.1(5) Change Sheet No. 1

Revise section 6.2.3 to provide organizational codes for the NSDRC Subcommittee and
correct for organizational changes.

REASON(S) FOR CHANGE

To enable NSDRC and NSDRC Subcommittee to issue Noncompliance Reports.

INSTRUCTIONS FOR INCORPORATING CHANGE

Remove page 3 and 4 of 11 C.S.1

Insert page 3 and 4 of 11 C.S.3

Remove page 5 and 6 of 11

Insert page 5 and 6 of 11 C.S.3

GENERAL PROCEDURE CHANGE SHEET INDEX

AEPSG GENERAL PROCEDURE NO. 15.1

REV. NO. 1[illegible]

* UPON ISSUE OF NEXT REVISION OF THE SUBJECT PROCEDURE

5.0 RESPONSIBILITIES

- 5.1 Originator - Responsible for the determination of the need for and the complete processing of an NCR, including notification to affected organizations, in accordance with this procedure.
- 5.2 Originator's Section Manager - Confirms the need to proceed and assures NCR is assigned to appropriate individual or organization.
- 5.3 Responder - The person to whom the NCR is sent. This person is responsible for the preparation of a meaningful, clear response to the Originator as well as accomplishing other tasks defined in this procedure.
- 5.4 Responder's Section Manager - Authorities corrections to be made.
- 5.5 NS&L - Responsible for indicating reportability of NCR finding and for performing reporting functions when applicable.
- 5.6 Quality Assurance - Responsible for maintaining Commitment List; auditing AEPSC OH organization for compliance with this procedure; and verifying that preventive measures have succeeded.

6.0 NONCOMPLIANCE PROCEDURE

6.1 General

6.1.1 Noncompliances, typically, include:

- (1) failure to perform prescribed verification activities;
- (2) departure or inadvertent omission from approved procedure specifications, drawings, etc.;
- (3) calculational logic or technical document error;
- (4) error in procedural document;
- (5) failure to have adequate or required procedures; |c.s.3
- (6) failure to transcribe activities affecting quality into written documents;
- (7) a group of nonconformances that show a trend requiring correction;
- (8) supplier's report does not address requirements;
- (9) erroneous entry in supplier's documentation'
- (10) documentation incomplete, missing or illegible.

6.1.2 A graphic presentation of the noncompliances cycle is shown in Attachment 1.

6.1.3 Noncompliances identified within AEPSC shall be processed in accordance with this procedure except noncompliances identified at a supplier. Supplier noncompliances shall be processed under the AEP approved Supplier QA program. AEPSC's involvement shall be limited to the contractual agreements established in the procurement document.

6.2 Reporting and Documenting a Noncompliance (Originator)

6.2.1 Noncompliances shall be documented and reported in a timely manner. Noncompliances shall be identified and processed on AEPSC form GE-60, "Noncompliance Report" (NCR) and processed in accordance with the instruction on its reverse side. (Ref. Attachment 2).

6.2.2 The NCR number consists of four parts as follows:

RQA - 81 - 49 - 1

"-1" is always used in the preparation of an NCR. The -1 designation will be changed only after one or more commitments are made in response to the NCR. If one commitment is made, this part of the number changes to "C1" from "-1". If two or more commitments are made, each is assigned to its own number i.e. C1, C2, etc.

indicates sequential number of NCRs written for the year in a specific AEPSC organization.

indicates the year in which the NCR was written.

indicates a Report (NCR) originated by Quality Assurance. To create this part of the NCR number always start with the letter "R" then add the appropriate suffix from the listing below.

6.2.3 Codes for other organizations are as follows:

CE - Civil Engineering Div.	NE - Nuclear Operations Div.
CH - Chemical Engineering Sec.	NF - Nuclear Materials & Fuel Management Sec.
DD - Design Div.	NL - Nuclear Safety & Licensing
DA - DD/Architectural Sec.	NO - Nuclear Operations Sec.
DC - DD/Control Services Sec.	NR - Radiological Support Sec.
DE - DD/Electrical Sec.	PR - Purchasing Department
DM - DD/Mechanical Sec.	PV - Piping and Valves Sec.
DS - DD/Structural Sec.	QA - Quality Assurance
EE - Electrical Engin.	SA - Subcommittee on Audit
EV - Environmental Div.	SC - Subcom. on Proposed Changes
FP - Fire Protection	SE - Subcom. on Security & Emergency Plan
HP - Heat Ex. & Pumps	SO - Subcom. on Corp. & Plant Occurrences
HV - Heating and Ventil.	TB - Turbine Section
IC - Instru. and Control	
ME - Mechanical Eng. Staff	
MH - Materials Handling Sec.	
NC - NSDRG	

C.S.3

6.2.4 Each AEPSC organization shall establish the methods to control unique assignment of numbers to each NCR prepared.

6.3 Evaluation (Responder):

An evaluation shall be conducted by the Responder to determine the cause of the noncompliance. The cause shall be entered on the NCR. The evaluation shall be of sufficient depth so as to develop meaningful corrective and preventive measures based on the cause.

6.4 Classification (Responder)

The Noncompliance shall be classified for two different features: Type of Noncompliance (deficiency/deviation); and Reportability of Noncompliance.

6.4.1 Type of Noncompliance:

The Responder shall determine and indicate on the NCR the type of Noncompliance based on the evaluation performed in paragraph 6.3 above. The noncompliance shall be either a deficiency or deviation as defined in section 4.0 above.

6.4.2 Reportability of Noncompliance:

The Responder shall interface with the Nuclear Safety and Licensing Section of the Nuclear Engineering Division (NS&L) and obtain a classification of reportability for the noncompliance. The NS&L assigned classifier shall initiate

reporting activities as required, independent of any action related to the NCR being processed as follows:

- (1) LER/SPECIAL REPORT - Notify Donald C. Cook Nuclear Plant, Plant Manager immediately by telephone and follow up by sending a copy of NCR to the Plant Manager.
- (2) 10CFR Part 21 - Direct the responder, by letter, to initiate a Part 21 Package in accordance with General Procedure No. 31. Follow up by sending a copy of the NCR and letter to the AEPSC Manager of QA for inclusion of this direction as a commitment on the AEPSC Commitment List.
- (3) OTHER - Initiate, coordinate and perform the action necessary to assure that appropriate reporting requirements are fulfilled.

6.5 Disposition (Responder)

The Responder shall identify measures to both:

- (a) remove the noncompliance; and
- (b) preclude recurrence of the noncompliance.

6.5.1 Removal of a deficiency type noncompliance shall be accomplished by revising the associated document(s) or creating a new document(s).

6.5.2 Removal of a deviation type noncompliance shall be accomplished by the implementing organization enforcing existing documentation and, where necessary, by addition of special measures (e.g. additional surveillance activities; additional and/or more frequent inspections; personnel training; etc.).

6.5.3 Preventing recurrence shall be accomplished by removing the identified cause of the noncompliance.

6.5.4 The Responder's supervisor shall approve the disposition to authorize its implementation.

AMERICAN ELECTRIC POWER SERVICE CORPORATION
GENERAL PROCEDURE CHANGE SHEET

CHANGE SHEET
NO. 3

PROCEDURE NO. 15.1 REVISION NO. 1

TITLE: Noncompliance and Corrective Action

PG. 1 OF 1

PREPARED BY: R. F. Kroeger

DATE: 9/24/84

REVIEWED BY: _____

DATE: _____

:

DATE: _____

:

DATE: _____

:

DATE: _____

CONCURRENCE: N/A

DATE: _____

APPROVED BY: R. F. Kroeger

DATE: 9/24/84

TYPE OF
CHANGE

☒ PERMANENT

EFFECTIVE DATE: 10/5/84

☐ TEMPORARY

EXPIRATION DATE: _____

DESCRIPTION OF CHANGE

Correct typographical error in section 6.1.1(5) Change Sheet No. 1

Revise section 6.2.3 to provide organizational codes for the NSDRC Subcommittee and correct for organizational changes.

REASON(S) FOR CHANGE

To enable NSDRC and NSDRC Subcommittee to issue Noncompliance Reports.

INSTRUCTIONS FOR INCORPORATING CHANGE

Remove page 3 and 4 of 11 C.S.1

Insert page 3 and 4 of 11 C.S.3

Remove page 5 and 6 of 11

Insert page 5 and 6 of 11 C.S.3

GENERAL PROCEDURE CHANGE SHEET INDEX

AEPSC GENERAL PROCEDURE NO. 15.1

REV. NO. 1[illegible]

• UPON ISSUE OF NEXT REVISION OF THE SUBJECT PROCEDURE

5.0 RESPONSIBILITIES

- 5.1 Originator - Responsible for the determination of the need for and the complete processing of an NCR, including notification to affected organizations, in accordance with this procedure.
- 5.2 Originator's Section Manager - Confirms the need to proceed and assures NCR is assigned to appropriate individual or organization.
- 5.3 Responder - The person to whom the NCR is sent. This person is responsible for the preparation of a meaningful, clear response to the Originator as well as accomplishing other tasks defined in this procedure.
- 5.4 Responder's Section Manager - Authorities corrections to be made.
- 5.5 NS&L - Responsible for indicating reportability of NCR finding and for performing reporting functions when applicable.
- 5.6 Quality Assurance - Responsible for maintaining Commitment List; auditing AEPSC OH organization for compliance with this procedure; and verifying that preventive measures have succeeded.

6.0 NONCOMPLIANCE PROCEDURE

6.1 General

6.1.1 Noncompliances, typically, include:

- (1) failure to perform prescribed verification activities;
- (2) departure or inadvertent omission from approved procedure specifications, drawings, etc.;
- (3) calculational logic or technical document error;
- (4) error in procedural document;
- (5) failure to have adequate or required procedures;
- (6) failure to transcribe activities affecting quality into written documents;
- (7) a group of nonconformances that show a trend requiring correction;
- (8) supplier's report does not address requirements;
- (9) erroneous entry in supplier's documentation;
- (10) documentation incomplete, missing or illegible.

|c.s.3

6.1.2 A graphic presentation of the noncompliances cycle is shown in Attachment 1.

6.1.3 Noncompliances identified within AEPSC shall be processed in accordance with this procedure except noncompliances identified at a supplier. Supplier noncompliances shall be processed under the AEP approved Supplier QA program. AEPSC's involvement shall be limited to the contractual agreements established in the procurement document.

6.2 Reporting and Documenting a Noncompliance (Originator)

6.2.1 Noncompliances shall be documented and reported in a timely manner. Noncompliances shall be identified and processes on AEPSC form GE-60, "Noncompliance Report" (NCR) and processed in accordance with the instruction on its reverse side. (Ref. Attachment 2).

6.2.2 The NCR number consists of four parts as follows:

RQA - 81 - 49 - 1

"-1" is always used in the preparation of an NCR. The -1 designation will be changed only after one or more commitments are made in response to the NCR. If one commitment is made, this part of the number changes to "C1" from "-1". If two or more commitments are made, each is assigned to its own number i.e. C1, C2, etc.

indicates sequential number of NCRs written for the year in a specific AEPSC organization.

indicates the year in which the NCR was written.

indicates a Report (NCR) originated by Quality Assurance. To create this part of the NCR number always start with the letter "R" then add the appropriate suffix from the listing below.

6.2.3 Codes for other organizations are as follows:

CE - Civil Engineering Div.	NE - Nuclear Operations Div.
CH - Chemical Engineering Sec.	NF - Nuclear Materials & Fuel Management Sec.
DD - Design Div.	NL - Nuclear Safety & Licensing
DA - DD/Architectural Sec.	NO - Nuclear Operations Sec.
DC - DD/Control Services Sec.	NR - Radiological Support Sec.
DE - DD/Electrical Sec.	PR - Purchasing Department
DM - DD/Mechanical Sec.	PV - Piping and Valves Sec.
DS - DD/Structural Sec.	QA - Quality Assurance
EE - Electrical Engin.	SA - Subcommittee on Audit
EV - Environmental Div.	SC - Subcom. on Proposed Changes
FP - Fire Protection	SE - Subcom. on Security & Emergency Plan
HP - Heat Ex. & Pumps	SO - Subcom. on Corp. & Plant Occurrences
HV - Heating and Ventil.	TB - Turbine Section
IC - Instru. and Control	
ME - Mechanical Eng. Staff	
MH - Materials Handling Sec.	
NC - NSDRC	

C.S.3

6.2.4 Each AEPSC organization shall establish the methods to control unique assignment of numbers to each NCR prepared.

6.3 Evaluation (Responder)

An evaluation shall be conducted by the Responder to determine the cause of the noncompliance. The cause shall be entered on the NCR. The evaluation shall be of sufficient depth so as to develop meaningful corrective and preventive measures based on the cause.

6.4 Classification (Responder)

The Noncompliance shall be classified for two different features: Type of Noncompliance (deficiency/deviation); and Reportability of Noncompliance.

6.4.1 Type of Noncompliance:

The Responder shall determine and indicate on the NCR the type of Noncompliance based on the evaluation performed in paragraph 6.3 above. The noncompliance shall be either a deficiency or deviation as defined in section 4.0 above.

6.4.2 Reportability of Noncompliance:

The Responder shall interface with the Nuclear Safety and Licensing Section of the Nuclear Engineering Division (NS&L) and obtain a classification of reportability for the noncompliance. The NS&L assigned classifier shall initiate

reporting activities as required, independent of any action related to the NCR being processed as follows:

- (1) LER/SPECIAL REPORT - Notify Donald C. Cook Nuclear Plant, Plant Manager immediately by telephone and follow up by sending a copy of NCR to the Plant Manager.
- (2) 10CFR Part 21 - Direct the responder, by letter, to initiate a Part 21 Package in accordance with General Procedure No. 31. Follow up by sending a copy of the NCR and letter to the AEPSC Manager of QA for inclusion of this direction as a commitment on the AEPSC Commitment List.
- (3) OTHER - Initiate, coordinate and perform the action necessary to assure that appropriate reporting requirements are fulfilled.

6.5 Disposition (Responder)

The Responder shall identify measures to both:

- (a) remove the noncompliance; and
- (b) preclude recurrence of the noncompliance.

6.5.1 Removal of a deficiency type noncompliance shall be accomplished by revising the associated document(s) or creating a new document(s).

6.5.2 Removal of a deviation type noncompliance shall be accomplished by the implementing organization enforcing existing documentation and, where necessary, by addition of special measures (e.g. additional surveillance activities; additional and/or more frequent inspections; personnel training; etc.).

6.5.3 Preventing recurrence shall be accomplished by removing the identified cause of the noncompliance.

6.5.4 The Responder's supervisor shall approve the disposition to authorize its implementation.

AMERICAN ELECTRIC POWER SERVICE CORPORATION
GENERAL PROCEDURE CHANGE SHEET

CHANGE SHEET
NO. 3

PROCEDURE NO. 15.1 REVISION NO. 1

TITLE: Noncompliance and Corrective Action

PG. 1 OF 1

PREPARED BY: R. F. Kroeger

DATE: 9/24/84

REVIEWED BY: _____

DATE: _____

:

DATE: _____

:

DATE: _____

:

DATE: _____

CONCURRENCE: N/A

DATE: _____

APPROVED BY: R. F. Kroeger

DATE: 9/24/84

TYPE OF
CHANGE

☒ PERMANENT

EFFECTIVE DATE: 10/5/84

☐ TEMPORARY

EXPIRATION DATE: _____

DESCRIPTION OF CHANGE

Correct typographical error in section 6.1.1(5) Change Sheet No. 1

Revise section 6.2.3 to provide organizational codes for the NSDRC Subcommittee and
correct for organizational changes.

REASON(S) FOR CHANGE

To enable NSDRC and NSDRC Subcommittee to issue Noncompliance Reports.

INSTRUCTIONS FOR INCORPORATING CHANGE

Remove page 3 and 4 of 11 C.S.1

Insert page 3 and 4 of 11 C.S.3

Remove page 5 and 6 of 11

Insert page 5 and 6 of 11 C.S.3

GENERAL PROCEDURE CHANGE SHEET INDEX

AEPSC GENERAL PROCEDURE NO. 15.1

REV. NO. 1[illegible]

* UPON ISSUE OF NEXT REVISION OF THE SUBJECT PROCEDURE

5.0 RESPONSIBILITIES

- 5.1 Originator - Responsible for the determination of the need for and the complete processing of an NCR, including notification to affected organizations, in accordance with this procedure.
- 5.2 Originator's Section Manager - Confirms the need to proceed and assures NCR is assigned to appropriate individual or organization.
- 5.3 Responder - The person to whom the NCR is sent. This person is responsible for the preparation of a meaningful, clear response to the Originator as well as accomplishing other tasks defined in this procedure.
- 5.4 Responder's Section Manager - Authorities corrections to be made.
- 5.5 NS&L - Responsible for indicating reportability of NCR finding and for performing reporting functions when applicable.
- 5.6 Quality Assurance - Responsible for maintaining Commitment List; auditing AEPSC OH organization for compliance with this procedure; and verifying that preventive measures have succeeded.

6.0 NONCOMPLIANCE PROCEDURE

6.1 General

6.1.1 Noncompliances, typically, include:

- (1) failure to perform prescribed verification activities;
- (2) departure or inadvertent omission from approved procedure specifications, drawings, etc.;
- (3) calculational logic or technical document error;
- (4) error in procedural document;
- (5) failure to have adequate or required procedures;
- (6) failure to transcribe activities affecting quality into written documents;
- (7) a group of nonconformances that show a trend requiring correction;
- (8) supplier's report does not address requirements;
- (9) erroneous entry in supplier's documentation;
- (10) documentation incomplete, missing or illegible.

|c.s.3

6.1.2 A graphic presentation of the noncompliances cycle is shown in Attachment 1.

6.1.3 Noncompliances identified within AEPSC shall be processed in accordance with this procedure except noncompliances identified at a supplier. Supplier noncompliances shall be processed under the AEP approved Supplier QA program. AEPSC's involvement shall be limited to the contractual agreements established in the procurement document.

6.2 Reporting and Documenting a Noncompliance (Originator)

6.2.1 Noncompliances shall be documented and reported in a timely manner. Noncompliances shall be identified and processes on AEPSC form GE-60, "Noncompliance Report" (NCR) and processed in accordance with the instruction on its reverse side.
(Ref. Attachment 2).

6.2.2 The NCR number consists of four parts as follows:

RQA - 81 - 49 - 1

"-1" is always used in the preparation of an NCR. The -1 designation will be changed only after one or more commitments are made in response to the NCR. If one commitment is made, this part of the number changes to "C1" from "-1". If two or more commitments are made, each is assigned to its own number i.e. C1, C2, etc.

indicates sequential number of NCRs written for the year in a specific AEPSC organization.

indicates the year in which the NCR was written.

indicates a Report (NCR) originated by Quality Assurance. To create this part of the NCR number always start with the letter "R" then add the appropriate suffix from the listing below.

6.2.3 Codes for other organizations are as follows:

CE - Civil Engineering Div.	NE - Nuclear Operations Div.
CH - Chemical Engineering Sec.	NF - Nuclear Materials & Fuel Management Sec.
DD - Design Div.	NL - Nuclear Safety & Licensing
DA - DD/Architectural Sec.	NO - Nuclear Operations Sec.
DC - DD/Control Services Sec.	NR - Radiological Support Sec.
DE - DD/Electrical Sec.	PR - Purchasing Department
DM - DD/Mechanical Sec.	PV - Piping and Valves Sec.
DS - DD/Structural Sec.	QA - Quality Assurance
EE - Electrical Engin.	SA - Subcommittee on Audit
EV - Environmental Div.	SC - Subcom. on Proposed Changes
FP - Fire Protection	SE - Subcom. on Security & Emergency Plan
HP - Heat Ex. & Pumps	SO - Subcom. on Corp. & Plant Occurrences
HV - Heating and Ventil.	TB - Turbine Section
IC - Instru. and Control	
ME - Mechanical Eng. Staff	
MH - Materials Handling Sec.	
NC - NSDRC	

C.S.3

6.2.4 Each AEPSC organization shall establish the methods to control unique assignment of numbers to each NCR prepared.

6.3 Evaluation (Responder)

An evaluation shall be conducted by the Responder to determine the cause of the noncompliance. The cause shall be entered on the NCR. The evaluation shall be of sufficient depth so as to develop meaningful corrective and preventive measures based on the cause.

6.4 Classification (Responder)

The Noncompliance shall be classified for two different features: Type of Noncompliance (deficiency/deviation); and Reportability of Noncompliance.

6.4.1 Type of Noncompliance:

The Responder shall determine and indicate on the NCR the type of Noncompliance based on the evaluation performed in paragraph 6.3 above. The noncompliance shall be either a deficiency or deviation as defined in section 4.0 above.

6.4.2 Reportability of Noncompliance:

The Responder shall interface with the Nuclear Safety and Licensing Section of the Nuclear Engineering Division (NS&L) and obtain a classification of reportability for the noncompliance. The NS&L assigned classifier shall initiate

reporting activities as required, independent of any action related to the NCR being processed as follows:

- (1) LER/SPECIAL REPORT - Notify Donald C. Cook Nuclear Plant, Plant Manager immediately by telephone and follow up by sending a copy of NCR to the Plant Manager.
- (2) 10CFR Part 21 - Direct the responder, by letter, to initiate a Part 21 Package in accordance with General Procedure No. 31. Follow up by sending a copy of the NCR and letter to the AEPSC Manager of QA for inclusion of this direction as a commitment on the AEPSC Commitment List.
- (3) OTHER - Initiate, coordinate and perform the action necessary to assure that appropriate reporting requirements are fulfilled.

6.5 Disposition (Responder)

The Responder shall identify measures to both:

- (a) remove the noncompliance; and
- (b) preclude recurrence of the noncompliance.

- 6.5.1 Removal of a deficiency type noncompliance shall be accomplished by revising the associated document(s) or creating a new document(s).
- 6.5.2 Removal of a deviation type noncompliance shall be accomplished by the implementing organization enforcing existing documentation and, where necessary, by addition of special measures (e.g. additional surveillance activities; additional and/or more frequent inspections; personnel training; etc.).
- 6.5.3 Preventing recurrence shall be accomplished by removing the identified cause of the noncompliance.
- 6.5.4 The Responder's supervisor shall approve the disposition to authorize its implementation.