

New Hampshire Yankee Procedure

ASP-3: Nonconformances

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NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

Procedure No. ASP-3 Title: Nonconformances
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Rev. No.	Description of Revision	Revised By:	Effective Date
N/A	N/A	N/A	9/21/84

PROCEDURES VOIDED ON ISSUANCE OF ASP-3, Revision 0

ASP-3 - Nonconformances - has an effective date of 09-21-84.

The following procedures are superceded by ASP-3, (but DO NOT "VOID" PRIOR TO 09-21-84):

CONTRACTOR	PROCEDURE NUMBER	PROCEDURE TITLE
UEC	FIP-26	Nonconforming Items
UEC	FACP-1	Project Instructions for Handling UE&C Contractor NCRs/DRs
UEC	FACP-14	Contractor Nonconformance Interface Procedure
FBM	QAP-103SB1	Processing and Control of Nonconformances
HAH	QP-8	Processing of Safety and Non-Safety Related NCRs
PPC	AP-15	Reporting of Nonconformances
PPC	FGCP-315	Deficiency Reports
NSL	QAP-0155	Nonconformances

The following procedures are to be voided by the responsible contractor effective 09-21-84: (DO NOT VOID THESE PROCEDURES UNTIL THE APPLICABLE CONTRACTOR HAS NOTIFIED FDCC TO DO SO!!)

AC&S	F-N-1-0	Project Nonconformances
Grinnell	FQCP-8	Reporting and Processing of Nonconformances
PH	XV-2	Procedure for Handling NCRs and LWAs
PH	XV-3	Reporting of Deficiencies and Noncompliances to the NRC (10CFR21)
PH	XV-4	Hold Tag Usage
PTL	QC-CRN-1	Control and Reporting Nonconformances

Leave open until further notified

1.0 SCOPE

- 1.1 This procedure provides the site method for initiating, dispositioning, controlling and closing Nonconformance Reports (NCRs), Deficiency Reports (DRs), as well as other similar types of documents which identify nonconforming conditions. (Contractors and Startup shall meet all requirements of this procedure except as noted in the appropriate appendices.)
- 1.2 Included are provisions for tracking and trending of all documents which identify nonconforming conditions.

2.0 PURPOSE

- 2.1 The purpose of this procedure is to assure that conditions not conforming with design requirements such as failures, malfunctions, deficiencies, deviations and defective material and equipment are identified, evaluated, dispositioned, processed and closed in a controlled and expeditious manner. The disposition shall result in a document that provides all the required technical information necessary for implementation.

3.0 RESPONSIBILITIES

Personnel performing quality functions shall initiate NCRs. Any organization may initiate a DR.

- 3.1 The Construction Director and Project Construction QA Manager shall be responsible for overall implementation of this procedure.
- 3.2 The Engineer shall be responsible for completing, reviewing and approving the disposition of major nonconformances on the Nonconformance Report Form (Form ASP-3-01) and shall provide all information necessary to implement the disposition. He shall also assure that Major NCRs/DRs received for disposition are controlled and resolved in a timely manner and/or justify "Accept-As-Is" condition.
- 3.3 Engineer Records Management - Office Group (ERM/OG) shall be responsible for receiving, logging, tracking, statusing and distributing dispositioned Major NCRs/DRs within the engineering organization and to other applicable organizations. The group shall also be responsible for entering data from the NCRs/DRs into the Change Document Tracking System, as necessary. They also transmit a copy to the Contractor and a copy to the Field Document Control Center.
- 3.4 Site Contractors (Applies to all groups initiating NCRs/DRs. See Paragraph 3.0).

- 3.4.1 The Contractor's QA/QC organization shall be responsible for preparing, approving the description of the nonconformance/deficiency, processing, and closing NCRs. The Contractor's QA/QC Group shall also log and distribute DRs as administrative functions.
- 3.4.2 The Contractor's construction group shall be responsible in performing the remedial action in accordance with the approved disposition of the NCR. Construction personnel shall also be responsible for initiating and performing remedial action in accordance with the approved disposition of the DR and closing the DR.
- 3.4.3 The Contractor shall be responsible for dispositioning Minor NCRs.
- 3.5 The Project Construction Quality Assurance Manager shall be responsible for implementation of the Site QC Program. He shall assure compliance to this procedure through his Audit/Surveillance organization. He is also responsible for the Project Quality Trending Program.
- 3.6 Westinghouse
 - 3.6.1 The Westinghouse Site Representative (working with the DOS) shall review and disposition those NCRs which effect Westinghouse equipment. The Westinghouse representative shall provide any special instructions on the NCR.

4.0 GENERAL

4.1 Definitions

- 4.1.1 Nonconformance - A deficiency in characteristics, documentation or procedure which renders the quality of an item unacceptable or indeterminate after final acceptance inspection. Examples of nonconformance include: physical defects, test failures, incorrect or inadequate documentation or deviation from prescribed processing, inspection or test procedures. NOTE: Unsatisfactory items and conditions identified during the course of an inspection or surveillance in which the work can be reaccomplished to an approved procedure shall not be a NCR condition. These unsatisfactory conditions shall be resolved in accordance with the Contractor's QA/QC Program. All nonconformances found after final acceptance inspection requires an NCR.
- 4.1.2 Nonconformance Report (NCR) - A document which identifies and provides corrective action for a safety related and/or ASME code discrepant condition involving a material, part, component,

service or activity. An NCR shall be classified either major or minor.

4.1.2.1 Minor Nonconformance - A safety related discrepancy which can be resolved by the Contractor using one of the following dispositions. UE&C Engineering disposition is not required.

- a. Utilize approved Standard Repair Procedures
- b. Restore item to original design configuration
- c. Scrap (Return to UE&C warehouse)
- d. Return to Supplier (Contractor Supplied Material Only)
- e. Documentation deficiencies (Contractor documentation requirements for Contractor Supplied Material Only)

NOTE: A deficiency that is found during inprocess inspection that can be repaired to an approved Standard Repair Procedure shall be documented on an Inprocess Inspection Report. A nonconformance that is found after final inspection that can be repaired by an approved Standard Repair Procedure shall be documented on an NCR.

4.1.2.2 Major Nonconformance - A safety related discrepancy which does not meet the minor NCR criteria. UE&C Engineering evaluation is required. All ASME Section XI repairs shall be considered major nonconformances except for maintenance.

4.1.3 Deficiency Report - A document which identifies a non-safety related discrepant condition involving a material, part, service or component and activities, which shall be classified either major or minor. Minor deficiencies can be included as (PCS) Project Completions System punch list items.

4.1.3.1 Minor Deficiencies - A non-safety related discrepancy which can be resolved by Contractor using one of the following dispositions. UE&C Engineering disposition is not required.

- a. Utilize approved Standard Repair Procedure

- b. Restore item to original design configuration
- c. Scrap (Return to UE&C Warehouse)
- d. Return to Supplier (Contractor Supplied Material Only)
- e. Documentation deficiencies (Contractor documentation requirements for Contractor Supplied Material Only)

NOTE: A deficiency that is found during inprocess inspection that can be repaired to an approved Standard Repair Procedure shall be documented on an Inprocess Inspection Report. A nonconformance that is found after final inspection that can be repaired by an approved Standard Repair Procedure shall be documented on an NCR.

- 4.1.3.2 Major Deficiencies - A non-safety related discrepancy which does not meet the minor criteria. UE&C Engineering evaluation is required.
- 4.1.4 Design Documents - Drawings, specifications, vendor foreign prints, system descriptions, calculations and related documents (e.g., NCR, ECA) pertaining to the permanent plant design.
- 4.1.5 Affected Documents - Design documents covering the component specifically modified by the NCR/DR disposition.
- 4.1.6 Reference Documents - Related documents which are not modified by the NCR/DR.
- 4.1.7 Change Document Tracking (CDT) System - CDT is a computerized system for statusing design changes. For further details see TP-23, Project Reference Manual.
- 4.1.8 Accept-As-Is - Disposition by Engineering indicating that the discrepancy is within the requirements of the applicable codes and does not affect safety, performance and maintainability, and that the item under consideration can be used for its intended purpose. This disposition must be substantiated by data provided on the NCR/DR.
- 4.1.9 Repair - A nonconforming material disposition which permits the reprocessing of material to bring it into an acceptable condi-

tion in conformance with the applicable codes but still departs from original requirements. Complete repair instructions, must be provided on the NCR. Repairs utilizing ASME Section XI shall be in accordance with YAEC HOC-4 program.

- 4.1.10 Reject - A nonconforming material disposition that states that the item is unsuitable for its intended purpose and economically or feasibly incapable of repair.
- 4.1.11 Return to Supplier/Vendor - A disposition indicating that the item is to be returned to the Supplier for repair or replacement.
- 4.1.12 Limited Work Authorization (LWA) is utilized to request movement, or other limited activities on a controlled basis to nonconforming construction items which are on HOLD.
- 4.1.13 Potential Significant Deficiency (10CFR50.55(e)) - Deficiency found in design and construction, which, were it to have remained uncorrected, could have adversely affected the safety of operation of the nuclear power plant at any time throughout the expected lifetime of the plant. See Reference 4.2.2 for additional details and Attachment 4.
- 4.1.14 Defect/Noncompliance (10CFR21)
Defects found in a basic component or facility which could create a substantial safety hazard. (for additional detail see 10CFR 21.3)
- 4.1.15 Nonconformance Review Board (NRB) -
An advisory board to assist Engineering in evaluating and dispositioning NCR's as requested.
- 4.1.16 Project Quality Trending Program
A single project wide trending program which includes NCR input.
- 4.1.17 Contractors -
Includes Startup Test Department (STD), UE&C, YAEC and all other Site Contractors.
- 4.1.18 Hold Tag - A status tag (See Attachment 7) attached to items that are nonconforming beyond which no work shall be performed unless otherwise permitted by this procedure.
- 4.1.19 Final Acceptance Inspection - A phase of construction/fabrication during which items, activities, or documents are in the completion stages of a specific portion of work.

4.2 References

- 4.2.1 UE&C FACP-2, Handling of "Contractor Incident Interface Reports"
- 4.2.2 GEDP-0046: Response to Potential Significant Deficiencies
- 4.2.3 RM-1, Records Management
- 4.2.4 TP-23, Project Reference Manual
- 4.2.5 YAEC HOC-4
- 4.2.6 AQP-1 Trending

4.3 Attachments

- 4.3.1 Nonconformance Report (NCR)/Deficiency Report (DR) Form Attachment 1
- 4.3.2 Preparation of Nonconformance Report Form (3 sheets) Attachment 2
- 4.3.3 Flow Chart No. 1 Requirements for preparing NCR Attachment 3
- 4.3.4 Flow Chart No. 2, Potential Significant Deficiency Attachment 4
- 4.3.5 Limited Work Authorization (LWA) Attachment 5
- 4.3.6 LWA Completion and LWA Tag Attachment 6
- 4.3.7 Hold Tag and Instructions, STD Status Indicator Attachment 7
- 4.3.8 Nonconformance Report Distribution Attachment 8
- 4.3.9 Contractor Problem Report Attachment 9

4.4 Appendices

The appendices specify unique activities of the listed contractors, who will utilize other procedures for those activities.

- 4.4.1 Appendix A - UE&C
- 4.4.2 Appendix B - Startup
- 4.4.3 Appendix C - Pullman-Higgins
- 4.4.4 Appendix D - AC&S
- 4.4.5 Appendix E - Lundeen
- 4.4.6 Appendix F - Grinnell

5.0 DETAILED INSTRUCTIONS

5.1 Initiating NCRs/DRs

- 5.1.1 When a potential nonconforming condition is identified on a safety related or ASME Section III code system. The discrepant condition shall be evaluated to determine if NCR is applicable. When the deficiency is identified as a NCR, it shall be evaluated to determine the classification, Major or Minor as defined in Section 4.0 of this procedure and for reportability under 50.55e.
- 5.1.2 The applicable QA/QC personnel shall prepare an NCR by completing the form (Attachment 1) in accordance with Attachment 2.
- 5.1.3 When a potential nonconforming condition is identified on a

non-safety related system, the discrepant condition shall be evaluated to determine if a DR is applicable. When the deficiency is identified as a DR it shall be evaluated to determine the classification, Major or Minor.

5.1.4 Site personnel shall prepare a DR by completing the Form (Attachment 1) in accordance with Attachment 2.

5.1.5 NCR/DR

5.1.5.1 The discrepant condition shall be described on the NCR/DR with sufficient information to permit evaluation of the condition by the group providing the disposition.

5.1.5.2 The Contractor shall submit the original for a major nonconformance/deficiency to the ERM/OG for processing. He may contact UE&C Engineering and provide a recommended solution for a major discrepant condition. Any discrepancies identified by the Contractor as a potential 10CFR50 Part 21 or 50.55(e) violation shall be promptly forwarded to ERM/OG for evaluation by the Discipline Engineering Manager (DEM).

5.1.5.3 Minor NCR/DRs shall be processed in accordance with Attachment 3.

5.1.5.4 Each Contractor QA/QC organization shall assign numbers and maintain a log that will control and status NCRs/DRs through closure.

5.2 Nonconforming Conditions Suspected in Another Discipline Area of Responsibility

5.2.1 If a contractor discovers a suspected nonconformance in another discipline area of responsibility he shall report it to the applicable contractor QA/QC organization via a Contractor Problem Report (CPR) (Attachment 9) for evaluation. Additionally, a copy will be forwarded to the Project Construction QA Manager.

5.2.2 The applicable Contractor's QA/QC shall sequence and control each CPR received. He shall maintain a working file of the item thru completion/closure and forward a copy of each closed CPR to the initiator.

5.2.3 NCR/DR conditions for systems or partially completed systems which are turned over to Startup Test Department shall be handled as follows:

- 5.2.3.1 The Contractor or site person who discovers a nonconformance shall report it to Startup Quality Control Department Manager (SQC) via a Contractor Problem Report (CPR) Attachment No. 8.
- 5.2.3.2 Nonconformance reports shall be issued by the "N" and "NA" Certificate Holders for the ASME System until they are "N" stamped.
- 5.2.3.3 At the time of initiation of an NCR, on "Turned-Over" ASME System, the Certificate Holder shall notify the Startup Test Department of the NCR's origination. This notification may be by telephone to a person or personnel position designated by STD. The Startup Test Department shall determine whether the NCR will require that limitations be placed on the system. This can be accomplished by Telecon with the notifier documenting the Telecon on the front of the NCR in the disposition section. The Telecon must denote the "limitations" or "no limitations", (as applicable), the authorized STD representatives name and the date of authorization.
- 5.2.3.4 The placement of a "Hold" tag on a "Turned-Over" ASME system shall include the placement of an STD Status Indicator on the hold tag. The status indicator will be considered STD's acknowledgement that they have been notified and have addressed the limitations to be placed on the system. The STD Status Indicator is a blue jurisdictional sticker. (See Attachment 7)

5.3 Statusing of Nonconforming Conditions (NCRs)

5.3.1 Tagging & Segregation

- 5.3.1.1 Nonconforming conditions shall be tagged by the responsible, initiating organization with a hold tag (Attachment 6). The hold tag shall remain affixed to the nonconforming item until the NCR is closed, at which time the "Hold" tag shall be removed by the responsible QA/QC organization.
- 5.3.1.2 When practical, nonconforming items shall be stored in a segregated area to prevent their inadvertent

use or installation until the disposition is accomplished. When it is not practical to separate an item because of its physical size or when there is concern that the item or its identification could be lost, the item shall be clearly tagged to prevent it's inadvertent use.

5.3.2 Limited Work Authorization (LWA) Tag Form

LWA's are initiated by the Contractor who is requesting to perform controlled limited activities on a non-conforming item.

- 5.3.2.1 Implementation of a disposition work may proceed on non-conforming/deficient conditions, without issuance of a LWA tag/form, based upon receipt of an approved NCR/DR disposition which includes specific detailed direction. A copy of the dispositioned NCR shall be available in the general area of the disposition implementation.
- 5.3.2.2 Testing and component use by Startup Test Department may proceed on non-conforming/deficient items, without issuance of a LWA Tag/Form, or dispositioned NCR if the NCR has been evaluated by STD and determination has been that testing or Component use will not effect the nonconforming condition or cause further degradation of the item. An STD Status Indicator shall be placed on the Hold Tag.
- 5.3.2.3 Nonconforming items requested to be moved out of the Receiving Storage areas while on "Hold" status or work requested to be performed on nonconforming items or conditions which have not been dispositioned as yet, and items on "Hold" which require work other than that specified on the NCR disposition, shall be tagged with a "LWA" tag (Attachment 4.3.6), adjacent to the NCR tag, before the item or condition can be moved or otherwise processed on a limited controlled basis. Prior to tagging, a "Limited Work Authorization Request (Attachment 5) shall be initiated and approved. The LWA Request shall clearly identify the reason and any limitations or precautions. The individual responsible for the disposition of the NCR shall approve and list the limitations and/or precautions on the LWA. The applicable QA/QC Manager shall review and issue the LWA to the requesting party. The original LWA will be logged and controlled by QA/QC. Copies shall be attached to the original NCR's when required.

5.3.2.4 A LWA can be issued to cover more than (1) one NCR.

5.4 Providing Dispositions to NCRs/DRs

5.4.1 Major NCRs/DRs

- 5.4.1.1 Engineering Records Manager Office Group (ERM/OG) shall upon receipt of a Major NCR/DR from the responsible organization, log, assign and distribute to the DOS for evaluation and verify revision level with DOS. ERM/OG shall maintain all unanswered original Major NCRs/DRs.
- 5.4.1.2 Upon receipt of a Major NCR/DR, the Discipline Engineering Office Supervisor (DOS) shall evaluate the discrepant condition for potential 50.55(e) in accordance with instructions provided in Attachment 4, Flow Chart No. 2. The corporate procedure relative to Federal Regulation 10CFR Part 21 shall also be considered for conditions which do not apply to project specific 50.55(e) responsibility.
- 5.4.1.3 The DOS shall provide dispositions to NCRs/DRs to assure compatibility with design requirements.
- 5.4.1.4 The DOS will determine when interface with Vendor/Supplier such as Westinghouse is required for NCR/DR dispositions and shall obtain any required approvals.
- 5.4.1.5 The DOS will interface with the other engineering disciplines /groups, UE&C QA for NCRs dispositioned "Return to Vendor", and/or the Startup Test System Test Engineer (STE) as needed and shall obtain any required reviews.
- 5.4.1.6 For ASME Section XI repairs, the requirements of YAEK HOC-4 shall be implemented.
- 5.4.1.7 The DOS shall attach to the NCR any sketches, letters, telephone conversation memos, written information. Each sheet shall be numbered sequentially (Sheet _____ of _____) and identified with the Report Type and Numbered as shown on Attachment 1. Calculations may be referenced, when used as design justification etc., which are necessary part of the disposition.

5.4.2 Minor NCRs

5.4.2.1 The designated Contractor person shall disposition the minor NCR utilizing the definitions in sections 4.1.2.1 and 4.1.3.1.

5.4.2.2 Upon completion and approval of the disposition, a copy of the NCR shall be sent to the appropriate Supervisor for implementation.

5.5 Distribution of Dispositioned NCRs/DRs

5.5.1 ERM/OG will transmit the dispositioned original Major NCR/DR to the applicable Contractor QA/QC organization with a copy to the Contractor for implementation, and one to the Field Document Control Center for distribution.

5.5.2 Document Control shall make distribution of the major NCRs/DRs in accordance with Attachment 8.

5.5.3 Minor NCRs shall be distributed as deemed necessary by each Contractor organization however, a copy shall be forwarded to CDT after initiation, disposition, and closing.

5.6 Responsible Contractor and Construction and QA/QC Organization

5.6.1 The Contractor, upon receipt of the dispositioned NCR, (Note: does not apply to DR) shall implement the disposition in accordance with applicable site procedures. The Hold Tag shall remain a status symbol. However, the contractors construction copy of the dispositioned NCR shall be available at the work location.

5.6.2 Upon receipt of the dispositioned NCR the Contractor QA/QC Manager will immediately review the NCR disposition in detail. If significant problems are found that violate code or quality requirements he shall issue a Stop Work Order (SWO). The SWO will not be lifted until the issue(s) is resolved. Minor problems will be resolved by interfacing with the applicable parties. Field Document Control Center (FDCC) shall transmit a copy of the dispositioned NCR to the ANI. The ANI's signature of the transmittal shall be his acknowledgement of receipt.

5.7 NCR/DR Revisions

5.7.1 For technical changes an NCR/DR may be revised by adding a capital letter to the number. Subsequent revisions shall be noted changing the revision letter to the next higher letter. The applicable QA/QC organization shall initiate the revision when a total rewrite is necessary, which shall require the same processing as original NCRs/DRs. If it is determined that a revision to the NCR/DR disposition is necessary the DOS

shall revise the disposition on the original NCR and request the initiating organization to process the new revision.

- 5.7.2 Each NCR/DR revision shall be complete and will supersede prior revisions. All contents of the superseded NCRs/DRs which are still valid, shall be included in the revised NCR/DR when a complete rewrite is necessary.
- 5.7.3 Changes shall be clearly identified by "clouding" the change. "Clouds" identifying prior revisions may be left on the NCR. Each cloud will be identified with a Delta revision letter next to the cloud.
- 5.7.4 Any non-technical changes to an NCR/DR which correct administrative/ typographical errors (Reference Documents, Keywords) or add information shall be initialed and dated and forwarded to ERM/OG in writing by speed memo. ERM/OG will update CDT accordingly and forward the speed memo to the holder of the original NCR.
- 5.7.5 Any closed NCR or void NCR shall not be reopened or revised. If necessary to change this document a new NCR or DR shall be issued referencing the original NCR/DR.

5.8 Void NCR/DR

- 5.8.1 If it is required to void an NCR/DR, it shall be stamped or marked "VOID". The reason for voiding the NCR/DR shall be stated on the NCR/DR and signed by those authorized persons that have previously reviewed the NCR/DR. The number assigned to a voided NCR/DR shall not be reused. The voided NCR/DR shall be distributed to each person who had previously reviewed the NCR/DR prior to it being Voided. The originating organization QA/QC Manager shall forward a copy of the void NCR/DR to the person that originated the NCR/DR. If the NCR had been dispositioned by Engineering and distributed the NCR shall be revised, marked "VOID" and processed in accordance with the original.

5.9 Work Affecting Hardware Under the Jurisdiction of Start-up

- 5.9.1 Contractor personnel shall not perform work associated with NCR dispositions affecting hardware under the jurisdiction of the STD unless written authorization has been obtained in accordance with TPI-11, Work Requests.
- 5.9.2 The STD shall have the option of performing work on dispositioned NCRs in accordance with TPI-11.

5.10 Revising Affected Documents

5.10.1 Criteria

NCRs/DRs shall list all affected documents, however, only NCRs listing the following "Affected Documents" shall be incorporated on design documents. Incorporation shall be within 60 days from the ERM disposition/approval NCR date. The NCR shall be referenced on the affected document when the change is incorporated.

- Building General Arrangement Drawings showing Equipment Locations.
- Process and Instrumentation Diagrams
- Loop and Logic Diagrams
- Electrical One Line Diagrams
- Specifications (Safety Related Only)
- Electrical Schematics
- CASP
- Set Point Data List
- Computer I/O List
- Standard Instrument Schedule (DWGM 510000)

5.10.2 The CDT System will list all affected documents. See TP-23.

5.10.3 On a quarterly basis, the ERM shall provide to Project Engineering Manager assessment of unincorporated NCR exceeding the 60 day criteria for item in construction process.

6.0 NONCONFORMANCE REVIEW BOARD (NRB)

6.1 The NRB will advise engineering, when requested, in evaluating and dispositioning NCR's.

6.2 The NRB is comprised of representatives from:

- a. UE&C Project Field QC. The Project Field QC Manager serves as chairman.
- b. UE&C Site Engineering - Site Engineer.
- c. UE&C Construction Discipline Superintendent.
- d. Westinghouse Representative - when NSSS items are involved.
- e. YAEC - required for NCR's Classified System Description.
- f. Others - As necessary for technical assistance or upon request.
- g. The Project Management Organization will be given the option to attend meeting.

6.3 Convening the Board

The board chairman will convene the board when:

- a. Requested by a member of the NRB.
- b. Requested by engineering to assist in evaluation of a NCR for

potential Part 21 or 50.55(e).

- c. Requested by engineering for a NCR or DR that is complicated and requires clarification.
- d. Requested by engineering to evaluate recurring nonconformance trends which requires discussion for immediate corrective action to be taken by the contractors.

6.4 The Authorized Nuclear Inspector (ANI) is not a member of the NRB but may participate as an observer at his option. The NRB chairman shall notify the ANI of the date and time of the meeting.

6.5 It is the responsibility of the chairman to maintain the records for the board. This includes, but not limited to the notes of meeting that will clearly reflect the board's recommendation.

7.0 CLOSE OUT OF NCR/DR

7.1 NCRs

- 7.1.1 When the disposition has been implemented the responsible contractor supervisor shall sign and date the original NCR in the Action Completed Block.
- 7.1.2 The QA/QC Group will verify that the work has been completed per the NCR disposition.
- 7.1.3 If the inspection is satisfactory the NCR will be closed by signing and dating in the appropriate block and noted in the NCR log.
- 7.1.4 The QA/QC Group will send a copy to CDT and perform distribution as appropriate.
- 7.1.5 If the verification process results in an unsatisfactory finding the QA/QC Group shall notify the applicable construction designated person of the result of the inspection.
- 7.1.6 The process described in paragraph 7.1.1 and 7.1.2 shall be repeated.
- 7.1.7 If the items fail the inspection for a second time the QA/QC Manager will notify the applicable Project/Construction Manager for resolution.

7.2 DRs

- 7.2.1 When the disposition of the DR has been implemented and verified by construction the Contractor responsible Supervisor shall sign and date the original DR in the Action Completed block.

- 7.2.2 The QA/QC Group shall mark N/A in the reinspection block and noted in the log.
- 7.2.3 A copy of the closed DR shall be forwarded to the CDT.
- 7.2.4 The original DR shall be filed in a "Closed DR" file.

8.0 TRENDING PROGRAM

The Project Quality Trending Program requires input from NCRs. NCRs will be trended in accordance with Procedure No. AQP-1 Trending.

9.0 RECORDS/INFORMATION MANAGEMENT SYSTEM (IMS)

- 9.1 Completed NCRs/DRs including voided NCRs shall be processed in accordance with RM-1, Records Management.

APPENDIX A

UE&C

1. UE&C shall comply with this procedure for all site activities with the exception of the following, which will be implemented as imposed in the applicable portion of Procedure QA-15:
 - a. Rejection of concrete batches.
 - b. Receipt Inspection.
 - c. NCRs dispositioned "Return to Vendor" after Engineering dispositioning.
 - d. UE&C activities for "off site" activities.

Startup Test Department

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APPENDIX B

- 1.0 An item determined to be potentially reportable by STD shall be documented on a Nonconformance Report/Deficiency Report in accordance with this procedure.
- 2.0 Major nonconformances shall be documented on a "Nonconformance Report/Deficiency Report in accordance with this procedure.
- 3.0 Minor nonconformances do not have to be documented on a "Nonconformance Report/Deficiency Report providing one of the following conditions are met:
 - 3.1 The nonconformance may be resolved by complying with Startup Test Department, Test Program Instruction No. 11, Work Requests (TPI-11) and
 - 3.1.1 The item or component can be restored to it's original design configuration using existing procedures, or
 - 3.1.2 The item can be scrapped and replaced with another component of identical type and function, or
 - 3.1.3 The item can be returned to the supplier for replacement of identical type and function under the original purchase order.
 - 3.2 The nonconformance may be resolved using Startup Test Department, Test Program Instruction No. 64, Test Performance (TPI-64) for test failures and inadequate test procedure documentation.
 - 3.3 The nonconformance may be resolved using Startup Test Department, Test Program Instruction No. 63, Field Changes (TPI-63) for deviations from prescribed test procedures.

ATTACHMENT 1

PREPARATION OF NONCONFORMANCE REPORT

The numbers used in these instructions are the same as the numbers shown on the sample form, Attachment 4.3.1.

1. REPORT TYPE/NUMBER

Indicate the type of report being dispositioned (NCR or DR) (Major or Minor). The first two digits (Contractor ID) are the Contractor Discipline Codes which includes UE&C and YAEC. The next five characters are the NCR/DR numbers which are on the Contractor NCRs/DRs. The preparer shall obtain a number upon preparation of the NCR.

2. BUILDING, UNIT AND SYSTEM

Insert Codes. If a change applies to a "Common" item, indicate Units 1 & 2. If the change applies to more systems, list the others as Keywords. Codes shall be identical to those delineated in TP-23.

3. CODE DESIGNATION

Mark the applicable box to show code designation.

4. POTENTIAL SIGNIFICANT DEFICIENCY OR 10CFR PART 21

Check appropriate Box if evaluation results in this finding or if questionable. If either Box is checked, see Flow Chart 2, Attachment 4.3.4.

5. REFERENCE DOCUMENTS*

List Reference Documents.

6. KEYWORDS*

Add Keywords which provide means of retrieving data from DCT. Also, keywords are to be used to identify types of problems dispositioned for use in the NCR Trending Program. Add BLP.

7. NONCONFORMANCE/DEFICIENCY DESCRIPTION

The allowable quantity of letters that can be input into CDT is delineated in this space; therefore, provide a concise description of the nonconformance /deficiency. Identify the part of the structure affected (i.e., "El. 6'-0"). This space shall also be used to provide technical justification. If further description is necessary add the information on a continuation sheet under the heading "Description".

8. REVIEW AND APPROVAL OF NONCONFORMANCE/DEFICIENCY

The applicable Contractors QA organization shall prepare and approve the description of the nonconformance/deficiency.

9. DISPOSITION

Check applicable disposition action. Those Major NCRs dispositioned Return to Vendor, shall include UE&C QA review for inclusion of QA requirements. He shall initial in interdiscipline review block to indicate his review.

10. DISPOSITION SPACE

The disposition to the nonconformance is provided and must be concise, accurate and complete. Technical justification shall be included as applicable. If more space is required, additional sheets shall be added. See Paragraph 5.3.9. Major NCRs dispositioned Return to Vendor (Repair/Replacement) shall list the QA requirements under the Engineer's disposition or as a continuation of the disposition. Also in block marked "Action To Be Completed By", mark in the discipline or group responsible for completing the disposition.

11. AFFECTED DOCUMENTS*

Covering the component specifically modified by the NCR/DR disposition. List all design documents. Both Units 1 and 2 documents shall be listed, if applicable. If an Affected Document is not to be revised, "N" shall be placed to the far right of the document number in the Affected Document Section.

12. INTERDISCIPLINE REVIEW

Interdiscipline review shall be performed by all groups as determined and listed by the DOS. The discipline reviewer shall initial and date the box indicating acceptance of the proposed disposition as it affects his work. Review/Approval may be obtained via telephone, if both parties agree. The initials of the reviewer/approver shall be printed in the space followed by the initials of preparer if telephone approval is obtained. All "Inter-discipline Review" initials must be on form prior to release of the dispositioned NCR/DR to Contractor.

13. REQUIRED SIGNATURES

The Preparer and Checker of the disposition print their names, sign and date for UE&C Engineering. A "UE&C Approver" reviews the design, prints his name, signs and dates the disposition. If Westinghouse, YAEC (for Section XI) review is required, an approval signature and date shall be obtained after required UE&C reviews have been completed. All "Required Signatures" must be on form prior to the release of the dispositioned NCR/DR to the

Responsibilities of UE&C Engineering DOS

a. UE&C Preparer

- 1) Prepares NCR/DR disposition and includes all attachments to comply with requirements of this procedure.
- 2) Inspects specific site location as required to resolve the nonconformance.
- 3) Consults as needed with Contractor/Construction Management and other available sources, both in Field and Home Office to develop solution.
- 4) Reviews or provides technical solution to nonconformance based on a complete investigation of nonconformance. Prepares initial calculations and sketches as required.
- 5) Completes list of Reference Documents.
- 6) Completes list of Affected Documents and Keywords.
- 7) Lists Interdiscipline Reviewers and any other reviewers.

b. UE&C Checker

- 1) Checks the technical adequacy of the solution.

c. UE&C Approver

- 1) Reviews the technical content of the solution.
- 2) Verifies that all data entered on the NCR/DR form and attachments are complete and accurate.
- 3) Determines that sufficient detail work has been completed to support solution and is included as attachment.
- 4) Verifies that the required interdisciplinary and other group reviews are correctly listed on the NCR/DR and have been satisfactorily performed.

14. ACTION COMPLETE

Contractors Construction Supervisor shall sign and date the line to signify the disposition has been completed.

15. INSPECTION

Contractors QA/QC Group shall sign space for reinspection and acceptance block and list Inspection Report No.s.

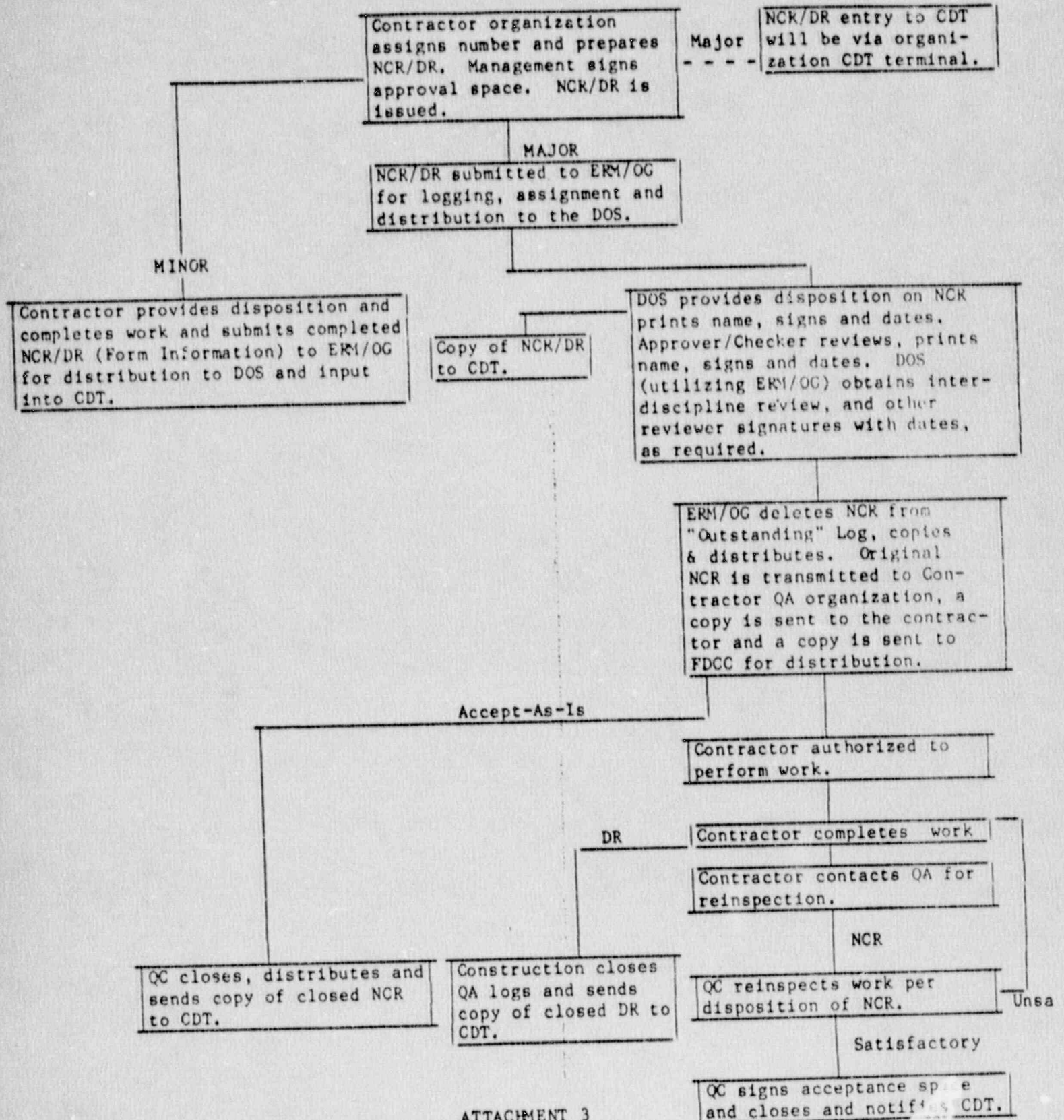
16. LWA

When applicable.

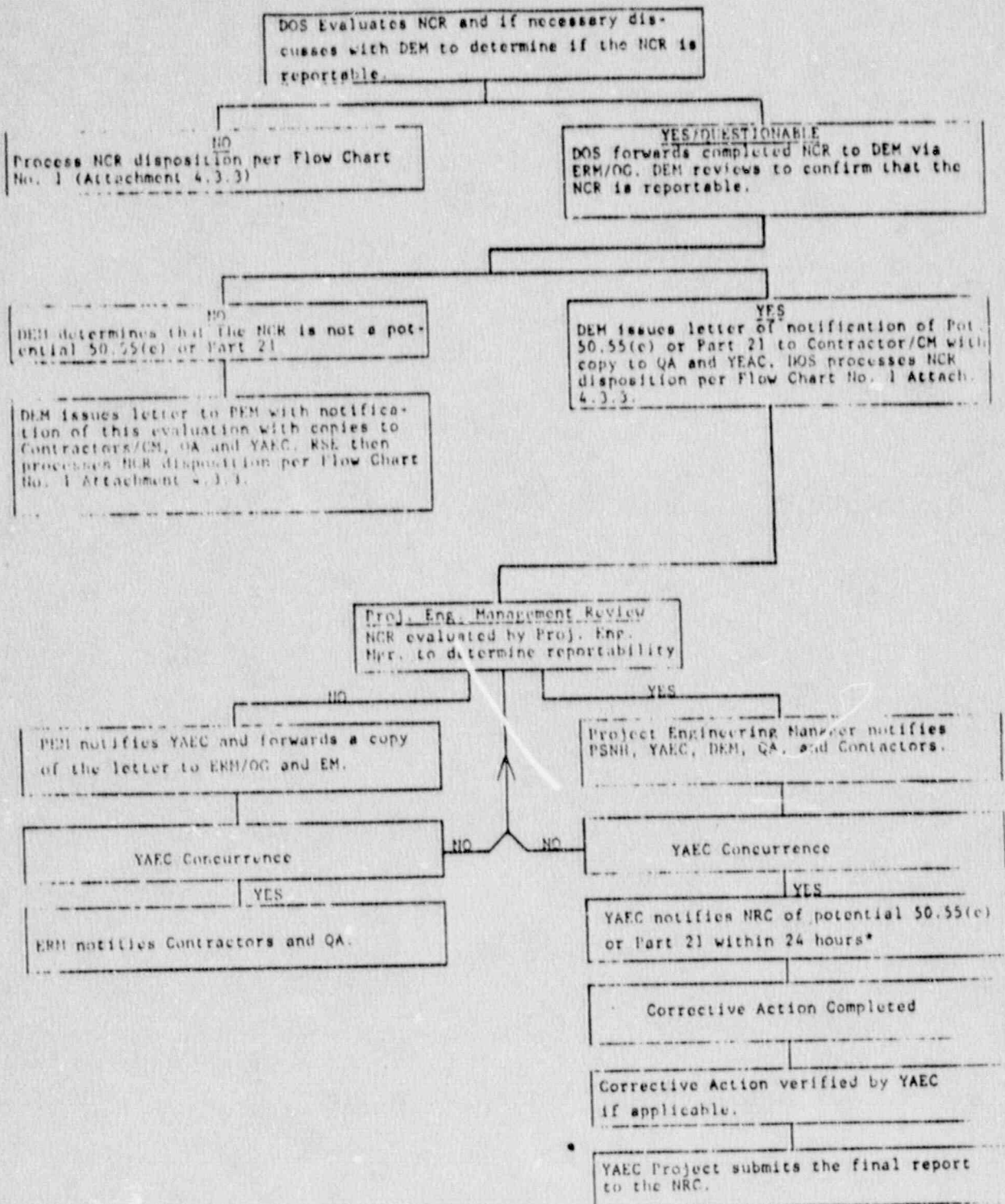
*Any information continued on a "continuation sheet" to the NCR must contain the same number of spaces as for computer input diagrammed on the first page.

FLOW CHART NO. 1

REQUIREMENTS FOR PROVIDING DISPOSITION TO NCR



FLOW CHART NO. 2 - POTENTIAL SIGNIFICANT DEFICIENCY
DETERMINING IF NCR IS REPORTABLE AS POTENTIAL 50.55(e) or PART 21




*This is the point where the 30 day period commences for NE&C Engineering to officially respond to YAEC/NRC and provide further details.

LIMITED WORK AUTHORIZATION REQUEST				① NO. 	Rev.
Related NCR/DR No. ②		⑤			
Spec/Dwg. ③	P.O./Contractor ④				
Reason for LWA request & intended work to be performed:		<div style="border: 1px solid black; height: 40px; width: 100%;"></div>			
⑥					
Requested by: _____ <div style="display: flex; justify-content: space-between; width: 100%;"> Organization Title Signature Date </div>					
Restrictions and/or Precautions: ⑦					
⑧					
Approved by: _____ <div style="display: flex; justify-content: space-between; width: 100%;"> Organization Title Signature Date </div>					
Release for Limited Use: Status of item(s) has been reviewed including all NCR's covering the item(s). Inspection Hold Points shall not be bypassed and work shall not progress beyond the following point to permit accessibility to the item(s): LWA denied for the following reason: <div style="display: flex; justify-content: space-between; width: 100%;"> Organization Title Signature Date </div>					
ACTION COMPLETED ⑨ <div style="display: flex; justify-content: space-between; width: 100%;"> Signature Title Organization Date </div>					
LWA CLOSED by verification of ACTION COMPLETED ⑩ OR NCR CLOSED-NCR # ⑪ <div style="display: flex; justify-content: space-between; width: 100%;"> Signature Title Date </div>					

LWA COMPLETION

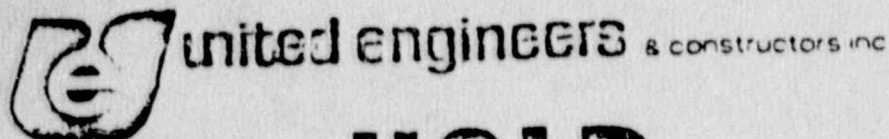
1. QA shall assign the LWA number
2. Initiator shall list the related NCR or DR number(s)
3. The initiator shall list related drawings and specifications
4. The initiator shall fill in the Contractor PO number or discipline, as appropriate
5. The initiator shall fill in the key words
6. The initiator shall fill in the reason for request and the organization requesting the request
7. Initiator for LWA shall have individual responsible for disposition of NCR approve and list the limitations and precautions, as applicable
8. QA/QC Manager shall approve and issue
9. The LWA requestor shall sign ACTION COMPLETE when the work stipulated on the LWA is complete
10. Signature of QA/QC person verifying ACTION COMPLETE
11. If the ACTION COMPLETE block is not signed off prior to NCR closure, the LWA will be closed based on the NCR closure

 United engineers & constructors inc	
LIMITED WORK AUTHORIZATION	
LWA No	① _____
ITEM	② _____
QC	③ _____
SIGNATURE _____ DATE _____	
TO BE ATTACHED OR REMOVED BY QA PERSONNEL ONLY	

Yellow

- 1 LWA Tag No.
- 2 Item identify and limits of activities
- 3 QC Personnel responsible for tag placement

TAGS



NCR
No. _____

HOLD

Red

RIR No. _____ ① TAG No. _____ ③
ITEM _____ ②
P/O No. _____ ④
QC _____ ⑤ DATE _____
SIGNATURE _____

TO BE ATTACHED OR REMOVED BY QA PERSONNEL ONLY

- ① Receiving inspection report or quality inspection report
- ② Item number and/or description of exact NCR condition (condensed)
- ③ Hold Tag number assigned to "Hold"
- ④ P/O No. when used for receiving or location coordinates for use in field
- ⑤ Signature of responsible QC Inspector/Engineer and date

THIS EQUIPMENT
UNDER START UP
JURISDICTION

STD Status Indicator

MAJOR NONCONFORMANCE REPORT DISTRIBUTION

<u>RECIPIENT</u>	<u>INITIAL</u>	<u>AFTER DISPOSITION</u>	<u>NCR SUMMARY</u>
Project Construction QA Manager	X	X	X
Project Turnover Manager	X	X	-
Project Construction Manager	X	X	-
Project Engineering Manager	X	X	X
FS-QA	X	X	X
Authorized Inspection	C	C	-
Westinghouse Representative	A	A	-
Project Document Control Center	X	X	X
Startup	X	X	X
UE&C Engineering Manager	X	X	
Construction Director			X
Assistant Construction Director			X

Distribution Code

X - All NCR's
A - Only NCR's covering ISSS items
C - Only ASME III

ASP-3

7/26/84

Page 28 of 28

CONTRACTOR PROBLEM REPORT

CPR No.

Item Identification:

Location:

She. of

B170

Description of Problem:

Generated By:

Signature

Date _____

Evaluation:

Signature _____

DICE

The following action has been taken:

DISCREPANCIES:

☐ NCR No.

Dr No.

☐ N/A

Approved By:
(QA Manager- NCR's)
(Construction-DR's)

Title

Signature

Date _____

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

Procedure No. ASP-3 - Title: Nonconformances
 Prepared By: Robert E. Guillette Proj. QA Audit/Eng. Manager 9/5/84
 Signature Title Date

Reviewed By:

Paul B. Bohan 9/5/84
 Owners Construction Manager Date
David J. Peepel 9/5/84
 Project Controls Manager Date
W. G. Taylor 9/5/84
 Project Construction Manager Date
Shirley A. Stearns Sept 5, 1984
 Project Services Manager Date
Ray Wilby 9/5/84
 Special Projects Manager Date
James A. Smith 9/5/84
 Comptroller Date
B. H. McElis 9/5/84
 Startup Manager Date
Frank L. Dwyer 9-5-84
 Assistant Construction Director Date

Reviewed/Approved By:

Stewart F. McDonald 9/5/84
 Project Construction QA Manager Date

Reviewed/Approved By:

John L. Vento 9/5/84
 Director of Engineering and Licensing Date

Reviewed/Approved By:

Thomas C. Kravitz 9/5/84
 Construction Director Date

Rev. No.	Description of Revision	Revised By:	Effective Date
N/A	N/A	N/A	<u>9/21/84</u> <u>9/21</u> 10/15/84

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

INTERIM PROCEDURE CHANGE

PROC. NO. ASP-3 REV NO. 0 IPC NO. 1 REV. NO. 0

1. JUSTIFICATION:

The effective date has been changed per memo PMG-11, dated September 14, 1984.

2. AFFECTED PARAGRAPHS:

AFFECTED FORMS:

Title Page, bottom right hand corner, labeled EFFECTIVE DATE

3. EXISTING REQUIREMENTS:

The existing effective date is 9/21/84

4. CHANGE SYNOPSIS:

Change effective date to October 15, 1984

5. INSTRUCTIONS:

Replace Title page with the attached

APPROVALS:

Approved- Construction Director

Date

9/17/84

Approved- Project Const. QA Mgr.

Date

9/14/84

Approved- Engineering Director

Date

9.14.84

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

INTERIM PROCEDURE CHANGE

PROCEDURE
NUMBER ASP-3REVISION
NUMBER 0IPC
NUMBER 2REVISION
NUMBER 0

1. JUSTIFICATION: Revision 1 has been issued for comments
as of 10/10/84

2. AFFECTED PARAGRAPHS:AFFECTED FORMS:

Title page, bottom right hand corner, labeled
EFFECTIVE DATE

3. EXISTING REQUIREMENTS:

The existing effective date is 10/15/84

4. CHANGE SYNOPSIS:

Change effective date

5. INSTRUCTIONS:

Change "effective date" to read "Upon approval
of Revision 1"

Initiated By:

C. E.posito
SignatureProcedures Management
Title Supervisor10/11/84
DateApproved By: Director of Engineering
and LicensingJohn L. Smith
Signature10-11-84
DateApproved By: Project Construction QA
ManagerRichard E. Gullitt
Signature10-11-84
Date

Approved By: Construction Director

R. W. Wilson for G. R. Green
Signature10-12-84
Date

9/28/84