

QUALITY ASSURANCE PROCEDURE QA - 15

NONCONFORMING MATERIALS, PARTS
OR COMPONENTS

FOR

SEABROOK STATION

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE

FOR CONTROLLED ONLY

J.O. 9763

| REVISION | | | | APPROVAL | | |
|----------|---------|-------------------|--------------|------------------|--------------|----------------|
| No. | Date | Page Nos. Revised | Prepared By | Project Manager | Manager R&QA | Const. Manager |
| 12 | 3/8/85 | All | DM Sipele | inc. inc. KZ/Jan | | |
| 13 | 9/18/85 | All | 8.15.2.2.2.2 | for class | Allegre | |
| 14 | 4/15/86 | See Page 1 | DM Sipele | for class | Allegre | |
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United Engineers Procedure

Quality Assurance Procedure QA-15: Nonconforming Materials, Parts
or Components

advance change notices: 6/4/86, 5/22/86, 5/16/86, 5/5/86
rev 14: 4/15/86
rev 13: 9/18/85*
rev 12: 3/08/85
rev 11: 3/14/82
rev 10: 8/24/82
rev 9: 10/06/80*

* not included

QA/QC PROCEDURE ADVANCE CHANGE NOTICE

PUBLIC SERVICE CO. OF NEW HAMPSHIRE - SEABROOK STATION

PROCEDURE TITLE Nonconforming Materials, Parts or Components

PREPARED BY B.E. O'Connor, FSQC DATE 6/4/86

CHANGE

Para. IV.C.6.c: (Add new sentence as follows):

An LWA tag need not be issued or attached to an item, in cases where no actual new or modified work is performed. Examples are wiring an ID Tag to a valve or equipment; attachment of conduit ID Tags; checking torque on previously installed bolts; replacing a missing cover on a box or panel, or other minor work, which does not change or alter the item, equipment or previous installation.

Para. IV.C.9.b: (Revise as follows):

Partial releases shall be documented on the Nonconformance Partial Release Sheet (Attachment 10). The "Work Completed" section and the "Accepted" section shall be annotated to see the Partial Release form, as required. The NCR will be accepted as complete when the last item is signed off on the Partial Release Sheet. The Field Work Complete box in the Accepted section will be checked at this time.

Para. IV.C.11.a: (2nd Sentence):

The reason for voiding the NCR shall be stated on the NCR in the disposition space and signed by the person voiding the NCR, the PFOCM or his designee and if the NCR has been dispositioned, the approval of the dispositioner or his designee.

Para. IV.C.14.a.1: (1st sentence add):

1st sentence after ...block, add "except as follows": When the NCR is for documentation and it is received prior to Expediting contacting the Vendor to resolve, the "Work Completed" block may be marked N/A and the NCR signed "accepted" by UESC/OAE (R)

REASON FOR CHANGE

Clarify Procedure and bring Procedure into conformance with site practise.

CHG NO. 326
EFFECTIVE DATE 6/11/86
QA 15, Rev. 14
OCP N/A
REV N/A
DATE 4/15/86

| REVIEWED BY PFOCM | DATE | REVIEWED BY PROJECT OAE | DATE | APPROVED PM | DATE | APPROVED MGR P.O.A. | DATE | APPROVED PCM | DATE |
|----------------------|---------------|----------------------------|---------------|--------------------|---------------|------------------------|---------------|--------------------|----------------|
| <i>[Signature]</i> | <i>6/4/86</i> | <i>[Signature]</i> | <i>6/4/86</i> | <i>[Signature]</i> | <i>6/4/86</i> | <i>[Signature]</i> | <i>6/4/86</i> | <i>[Signature]</i> | <i>6/13/86</i> |

PUBLIC SERVICE CO. OF NEW HAMPSHIRE - SEABROOK STATION

PROCEDURE TITLE Nonconforming Materials, Parts, or Components

PREPARED BY R.G. Morrell *R.G. Morrell* DATE 05/22/86

CHANGE

CHG. NO. 323
EFFECTIVE DATE 5/30/86
QA- 15
QCP
REV. 14
DATE 04/15/86

1) Change existing paragraph 111.A.5 to 111.A.6

2) Add new paragraph 111.A.5 to read as follows:

Project Field Quality Assurance Manager (PFOAM) - Shall be responsible for providing dispositions to major NCRs which are assigned to him by the Engineering Administrator.

IPC

3) Revise Section 12.a to read as follows: (See Attached Sheet)

IPC

4) Revise paragraph 12.f to read as follows:

ECAs issued against P&IDs affecting the functioning of the system shall be incorporated and the P&ID shall be listed as an affected document. Changes to P&IDs made by an NCR that are graphic in nature and do not affect the functioning or operability of the system do not require incorporation. For example, the sequence of branch lines from a header when there are no intervening components/valves and the system function/operability is not affected.

REASON FOR CHANGE Procedure aligned with ASP-3, Revision 3, IPC-9.

| REVIEWED BY PFOCM | DATE | REVIEWED BY PROJECT QAE | DATE | APPROVED PM | DATE | APPROVED MGR R.B.G. | DATE | APPROVED PCM | DATE |
|----------------------|----------------|----------------------------|----------------|----------------------|----------------|------------------------|----------------|-------------------|----------------|
| <i>W. Lambert</i> | <i>5/23/86</i> | <i>R.G. Morrell</i> | <i>5/23/86</i> | <i>Sam [unclear]</i> | <i>5/23/86</i> | <i>R.G. Morrell</i> | <i>5/23/86</i> | <i>W. Lambert</i> | <i>5/23/86</i> |

File File

Revise Section ^{QC} 2.2.a to read as follows:

- a) NCRs listing the following affected documents shall be incorporated. The following documents, identified as Operations Critical Drawings, are the first priority. All changes in effect on these documents on May 15, 1986, shall be incorporated prior to core load.

- a. Piping and Instrumentation Diagrams (P&ID)
- b. Air Flow Diagrams
- c. Loop and Logic Diagrams
- d. Electrical One-Line Diagrams
- e. Security One-Line Diagrams
- f. Security Drawings ("Safeguard" only)
- g. Electrical Schematic Drawings
- h. UE&C W Functional Drawings (Total of 16)
- i. UE&C Process Control Block Diagrams (Total of 41)

All NCRs in effect on the following documents 30 days before commercial operation shall be incorporated before commercial operation.

- a. Building General Arrangement Drawings showing Equipment Locations
- b. Specifications (Safety related only)
- c. CASP
- d. Set Point Data List
- e. Computer I/O List
- f. Standard Instrument Schedule (SIS) (Dwg M-510000)
- g. Final Safety Analysis Report (FSAR)
- h. Class 1E Equipment List (Dwg M-505300)

FOR CONTROL

QA/QC PROCEDURE ADVANCE CHANGE NOTICE

PUBLIC SERVICE CO. OF NEW HAMPSHIRE - SEABROOK STATION

PROCEDURE TITLE Nonconforming Materials, Parts, or Components

QA-15

PREPARED BY R.G. Merrell *R.G. Merrell* DATE 05-16-86

CHANGE

Add New Paragraph IV.C.10.a.1 to read as follows:

CHG NO. 312
EFFECTIVE DATE 5-23-86
QA 15
QCP -
REV 14
DATE 04-15-86

The revised NCR will be evaluated by the approver to determine if the revision will adversely affect the continuation of the work. If the work is not adversely affected, the work will continue under the previous revision until the new revision has been dispositioned and issued. If the work is adversely affected, a Hold Tag(s) will be issued under the new NCR revision.

REASON FOR CHANGE Procedure aligned with ASP-3, Revision 3, IPC-7.

*G.J. ... N.H. ...
5/17/86*

| REVIEWED BY PFCM | DATE | REVIEWED BY PROJECT QAE | DATE | APPROVED PM | DATE | APPROVED MGR P&QA | DATE | APPROVED PCM | DATE |
|---------------------|----------------|----------------------------|----------------|-----------------|----------------|----------------------|----------------|------------------|----------------|
| <i>Chambert</i> | <i>5/17/86</i> | <i>R.G. Merrell</i> | <i>5/17/86</i> | <i>R.P. ...</i> | <i>5/17/86</i> | <i>R.G. Merrell</i> | <i>5/17/86</i> | <i>W. Taylor</i> | <i>5/17/86</i> |

File P.H.L.

QA/QC PROCEDURE ADVANCE CHANGE NOTICE

PUBLIC SERVICE CO. OF NEW HAMPSHIRE - SEABROOK STATION

PROCEDURE TITLE NONCONFORMING MATERIALS, PARTS OR COMPONENTS

PREPARED BY D. M. Sipala *D.M. Sipala* DATE 5/5/86

CHANGE 1) Add the following to paragraph II.C.2

Affected Documents:

"For design change documents (i.e., ECAs, NCRs, DCNs) that deviate from design or design basis documents, the design or or design basis documents need not be listed as an affected document if they do not require revision.

2) Para. IV.C.4.a)1) - Add new sentence after (Attachment 7) as follows:

"The Hold tag shall be attached to the nonconforming material/item immediately if work is in progress. In no case shall the tag be attached more than eight (8) working hours after the nonconforming condition has been identified".

REASON FOR CHANGE 1) Clarification of affected documents
2) Resolution of YAEC Audit SA998CS495 (SSCA No. 1744)

CHG. NO. 310
 EFFECTIVE DATE 5/15/86
 QA 15
 QCP -
 REV 14
 DATE 4/15/86

| REVIEWED BY PDCM | DATE | REVIEWED BY PROJECT OAE | DATE | APPROVED PM | DATE | APPROVED MGR RBQA | DATE | APPROVED PCM | DATE |
|---------------------|---------------|----------------------------|---------------|--------------------|---------------|----------------------|---------------|--------------------|---------------|
| <i>[Signature]</i> | <i>5/8/86</i> | <i>[Signature]</i> | <i>5/8/86</i> | <i>[Signature]</i> | <i>5/8/86</i> | <i>[Signature]</i> | <i>5/8/86</i> | <i>[Signature]</i> | <i>5/8/86</i> |

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| Attachment 11 - Contractor Identification |



QUALITY ASSURANCE PROCEDURE QA - 15

NONCONFORMING MATERIALS, PARTS OR COMPONENTS

FOR

SEABROOK STATION

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

J.O. 9763

January 14, 1974

| No. | Date | Prep. By | QA/Rev. | Appr. By |
|-----|----------|--------------------|--------------------|--------------------|
| 1 | 4/10/74 | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 2 | 9/26/74 | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 3 | 12/13/74 | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 4 | 10/24/74 | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |

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| REVISION | | | | APPROVAL | | |
|----------|-----------------|----------------------------------|--------------------|-----------------|--------------------|--------------------|
| No. | Date | Page Nos. Revised | Prepared By | Project Manager | Manager RQA | Constr. Mgr. |
| 5 | Reissue 7/30/76 | ALL | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |
| 6 | 11/29/76 | 1, 11, 4, 5, 6 | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |
| 7 | 8/8/78 | 1, 11, 1-6, ATT. 1-3 | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |
| 8 | 12/7/79 | 2, 3, 5, 7, 8, Att 1 thru 3 | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |
| 9 | 10/6/80 | 1 thru 9 & Table 1 | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |
| 10 | 8/24/82 | All but pg. 8, Fig. 1 and Ann. 1 | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |
| 11 | 3/14/84 | All | <i>[Signature]</i> | | <i>[Signature]</i> | <i>[Signature]</i> |

(Cont'd. on Page 2)

QA PROCEDURE QA-15
IDENTIFICATION OF CHANGES
for Revision 14

| <u>Section</u> | <u>Page</u> | <u>Reason</u> |
|-----------------------|-------------|--|
| II.B.18 | 2 | Added TP-37 (ACN 298) |
| II.C.14.a | 4 | Incorporated ACN 299 |
| II.C.14.a.4) | 5 | Incorporated ACNs 299, 306 & 308 |
| II.E.5.f | 10 | Added item f per ACN 308 |
| III.A.3 | 10 | Title change per ACN 306 |
| IV.C.2.a & d | 16,17 | Incorporated ACN 294 |
| IV.C.2.e | 17 | Incorporated ACNs 294 & 298 |
| IV.C.2.g | 17,18 | Added section per ACN 299 which superseded ACN 294 |
| IV.C.3.d & e | 18 | Incorporated ACN 299 which superseded ACN 294 |
| IV.C.5.a | 21,22 | Title changes per ACN 306 |
| IV.C.5.a.10) | 24,25 | Updated chart for mandatory reviewers for major NCRs & notes per ACN 299 which superseded ACNs 294 & 298 |
| IV.C.12.f | 30 | Incorporated ACN 294 |
| IV.C.15 | 33 | Incorporated ACN 299 |
| IV.D.6 | 34 | Incorporated ACN 298 |
| IV.F.2 | 35 | Incorporated ACN 298 |
| Attachment 1 | | Revised NCR form (ACN 294) |
| Attachment 2, item 18 | | Incorporated ACN 294 |
| Attachment 3 & 4 | | Incorporated ACN 306 |
| Attachment 8 | | Revised CPR form (ACN 294) |
| Attachment 9 | | Revised form (ACN 306) |



& constructors inc

PUBLIC SERVICE CO. OF NEW HAMPSHIRE-SEABROOK STATION

SUBJECT:

NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

REV: 14

DATE: 4/15/86

PAGE 1 of 36

I. SCOPE

- A. This procedure applies to UE&C's activities associated with the identification, documentation, disposition and control of nonconforming:
1. Safety Related items or services classified Seismic Category I, and IE, Safety Class 1, 2, 3, Section VIII, or upgrade B31.1.
 2. Non-Safety Related items supplied on the Purchase Orders listed in QA-7-2, Appendix B.
 3. Westinghouse NSSS items at Receiving Inspection or in Site Storage - Handling activities.
- B. This procedure provides the site method for initiating, dispositioning, controlling and closing both Major and Minor Nonconformance Reports (NCRs).
- C. Non-safety related nonconforming items are controlled in accordance with ASP-3.

II. GENERALA. Purpose

1. To impose the applicable portions of Standard XV in the Quality Assurance Manual - Corporate Standards on the project.
2. To assure that conditions not conforming with design requirements such as failures, malfunctions, deficiencies, deviations and defective material and equipment are identified, evaluated, segregated, dispositioned, processed and closed in a controlled and expeditious manner. The dispositioned nonconforming condition shall result in a document that provides all the required design verified technical information necessary for implementation.

B. Referenced Documents

1. QA-4 - Procurement Document Control
2. QA-7-1 - Control of Purchased Material - Vendor Evaluation & Selection
3. QA-7-2 - Control of Purchased Material - Vendor Surveillance

4. QA-16-1 - Corrective Action
5. QA-16-2 - Stop Work
6. AP-41 - F/SAR Deviations Procedure
7. QCP-17-1 - Records Review
8. FGCP-2 - Drawing, Specification and Document Control
9. FGCP-3 - Receiving, Inspection and Storage of Nuclear and Safety Related Equipment and Material
10. GEDP-0046 - Response to Potential Significant Deficiencies
11. 9763-RM-1 - Instruction for Site Records Management System
12. FPP-12 - ASME N-Stamped Components Section XI Repair/Replacement
13. AP-48 - Home Office Review and Issue of Significant Deficiencies (10CFR50.55(e))
14. ASP-3 - Nonconformances
15. TPI-11 - Work Requests
16. TP-23 - Project Reference Manual
17. AP-4 - Control of UE&C Issued Drawings
18. TP-37 - Papscott Freeze Level Program

C. Definitions

1. Accept-As-Is - A 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.
2. Affected Documents - Design documents covering the component specifically modified by the NCR disposition.
3. Change Document Tracking (CDT) System - CDT is a computerized system for tracking the status of design changes. For further details see TP-23, Project Reference Manual.
4. Contractors - Includes Startup Test Department (STD), UE&C, YAEC and all other site Contractors.
5. Contractor Problem Report (CPR)
 - a. Nonconforming/Deficient Conditions suspected in another discipline area.
 - b. Damage to a work item which is the responsibility of another contractor or discipline.

- c. A vehicle for non-quality (non QA/QC) construction personnel to report a nonconforming condition to the applicable quality organization.
6. Deficiency Report (DR) - A document which identifies a discrepant condition involving non-safety related materials, parts, services, component or activities.
 7. Design Documents - Drawings, specifications, vendor foreign prints, calculations and related documents (e.g., NCR, ECA) pertaining to the permanent plant design.
 8. Field Work Complete - This is a computer status which indicates that the work required by the disposition of the NCR is complete, and that the responsible QA/QC personnel have verified and accepted the completed work for those NCRs requiring QC acceptance. This status is to track when all field work is accomplished and accepted, making the NCR condition "Field Complete".
 9. 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.
 10. Hold Tag - A status tag (See Attachment 7) attached to items that are nonconforming and documented on an NCR beyond which no work shall be performed unless otherwise permitted by this procedure.
 11. Item Identity - Method used to identify items such as cable reel number, instrument, valve and equipment numbers, pipe spool and pipe line numbers or heat code numbers.
 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 or to perform the work required per the NCR disposition.
 13. 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 1: Unsatisfactory items and conditions which can be corrected at the time of inspection or during subsequent in-process activities in accordance with approved procedures are not required to be documented on an NCR. When an approved procedure is not available, the nonconformance shall be documented on an NCR form for disposition. All nonconformances identified after final acceptance inspection shall be documented on an NCR form.

Note 2: An inspection of a completed portion of an item or activity that is not procedurally required to be inspected again shall be considered to be a final acceptance inspection. General inspection of an entire system, item or equipment, i.e., walkdown inspections and other so-called final inspections do not qualify as a final acceptance inspection within the context of this procedure.

14. Nonconformance Report (NCR) - A document which identifies a Seismic Category I, Safety Class 1, 2, 3, IE, Section VIII, and/or upgrade B31.1 discrepant condition involving a material, part, component, service or activity. A nonconformance shall be classified either Major or Minor.

a. 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.

Note: A deficiency that is found during in-process inspection or final acceptance inspection that can be corrected in accordance with an approved procedure shall be documented on an inspection report. With exception of the correction or specific surface conditions permitted by project specifications, documents or procedures, discrepant conditions identified on ASME Section III Code stamped components shall be documented as a major NCR. A deficiency that is found after final acceptance inspection that can be repaired by an approved procedure shall be documented on an NCR form.

1) Restoration

2) Scrap (Return to UE&C warehouse)

- 3) Return to supplier (Contractor supplied material only)
- 4) Documentation deficiencies, regardless of disposition:
 - a) AWS related Welding Inspection Report deficiencies will be processed by the following:
 - (1) Determine if the welder's and inspector's symbol(s)/mark(s) are shown in the area of welding. If both symbol(s) and mark(s) are present, the welds shall be considered accept-as-is, which is based on the fact that all welders are qualified in accordance with code requirements and that the welding filler materials used on site meet all applicable code requirements
 - (2) If only the inspector's mark(s) is shown in the area of welding, the welds would also be considered accept-as-is and is based on the fact that an inspector had visually examined the welds and the welder's qualification record and found them acceptable.
 - (3) If no inspector symbol(s)/mark(s) are present, the paint or coatings shall be removed (if necessary) in the area of interest for at least 1/2" on either side of the welds and reexamined. Repair weld if necessary and reexamine. Accept the welds if visually acceptable. If fit-up and tack is not signed off on the inspection checklist, Q.C. shall perform a visual examination of the field weld to determine the fit-up gap. If the fit-up gap has been recorded for the field weld on the opposite side of the structural member, then accept the same for the field weld in question. If the opposite side of the field weld has been welded and there is no way to determine fit-up gap(s), the fillet weld size shall be

increased by 3/16" above the weld size shown on the applicable drawing.

- (4) Missing welding electrode heat/lot number-accept-as-is. Technical justification being that only qualified electrodes are ordered for the site and only qualified welders can requisition electrodes to be used with qualified welding procedure specifications.
 - (5) Documentation shall be prepared as required by the applicable engineering specification(s) and the above disposition.
- b) The following documentation deficiencies must be reported on a Major NCR:
- (1) Owner-supplied material/items, and
 - (2) Missing inspection records required by specification and/or code(s) which cannot be regenerated by reinspection, i.e., missing process sheets on which in-process inspections required by the ASME Code were documented but attributes requiring inspection are no longer accessible.

b. Major Nonconformances - The following shall be considered Major nonconformances:

- 1) Nonconformances which do not meet the minor nonconformance criteria.
- 2) Major repairs (as defined in NQAM Glossary)
- 3) Documentation deficiencies which require technical evaluation.
- 4) Repair of work which does not utilize an approved repair/rework procedure.
- 5) Section XI repairs and replacements.
- 6) Any nonconformances which require DE&C Engineering evaluation.

- 7) Nonconformances which are dispositioned "Accept-As-Is".
 - 8) Repairs or additional work performed on vendor supplied welds.
- 15. Nonconformance Review Board (NRB) - An advisory board to assist Engineering in evaluating and dispositioning NCRs as requested.
 - 16. Potential Significant Deficiency (10CFR50.55(e)) - Deficiency found in design and/or 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. For additional details, see Attachment 4.
 - 17. Project Quality Trending Program - A single, project-wide trending program which includes NCR input.
 - 18. Reference Documents - Related documents which are not modified by the NCR.
 - 19. Reject - A disposition used when a nonconforming item is unsuitable for its intended purpose and when it is not economically or physically capable of being reworked or repaired.
 - 20. Repair - A disposition which permits the reprocessing of a nonconforming item to bring it into an acceptable condition in conformance with the applicable codes but which still departs from original requirements. Complete repair instructions including post-repair acceptance criteria must be provided on or attached to and referenced on the NCR. Repairs utilizing ASME Section XI shall be in accordance with FPP-12.
 - 21. Rework (Restoration) - The process by which an item is restored to an acceptable condition to conform to original requirements by completion of, remachining, or reassembly. Replacements using ASME Section XI shall be in accordance with FPP-12.
 - 22. Return to Supplier/Vendor - A disposition indicating that the item is to be returned to the Supplier for repair or replacement.

D. Attachments

- 1. Attachment 1 - Nonconformance Report (NCR) Form and Continuation Sheet (3 sheets)

2. Attachment 2 - Preparation of Nonconformance Report Form (5 sheets)
3. Attachment 3 - Flow Chart No. 1, Requirements for Providing Disposition to NCR
4. Attachment 4 - Flow Chart No. 2, Processing Potential Significant Deficiencies (2 sheets)
5. Attachment 5 - Limited Work Authorization (LWA)
6. Attachment 6 - LWA Completion and LWA Tag
7. Attachment 7 - Hold Tag and Instructions and Release Tag.
8. Attachment 8 - Contractor Problem Report
9. Attachment 9 - Design Change Document Modification Sheet
10. Attachment 10 - Nonconformance Report Partial Release Sheet
11. Attachment 11 - Contractor Identification

E. Requirements

1. The requirements for the identification, disposition and control of nonconforming items shall be established in UE&C Procurement Documents in accordance with applicable codes, standards, and regulations.
2. The requirements of this procedure shall be imposed upon individual suppliers and contractors through the Quality Assurance Section of the specification or through Standard Quality Assurance Specification attachments in accordance with Procedure QA-4.
3. When specified by the Procurement Documents, the supplier or contractor shall submit his quality assurance plan to UE&C for review and approval in accordance with Procedure QA-7-1.
4. Contractors shall promptly report Significant Deficiencies (SD's) as defined in 10CFR50, paragraph 50.55(e) to the YNSD Project Manager via UE&C. (Attachment 4)
5. Nonconformance reports need not be processed for certain nonconforming items or conditions as follows:

- a. Rejection of concrete batches.
- b. Nonconforming items and conditions corrected during the course of an inspection or surveillance.
- c. Standard repairs, such as weld repairs, made in compliance with the original weld procedures.
- d. Reinforcing steel (R/S), received on site with missing shipping, metal storage and/or heat number tags, as long as traceability to the Mill Test Reports and Bar Shop List can be maintained. The R/S shall be processed as follows:
 - 1) The R/S shall be placed in a Hold status by the QAE, and the vendor, notified of missing tag(s) by the use of Figure 1 by the Expediter. The notification shall be recorded in the Reinforcing Steel/Structural Steel Log.
 - 2) Tags not received within fifteen (15) working days, shall be documented on an NCR per this procedure.
 - 3) R/S received with no tags shall immediately be processed on a Nonconformance Report.
- e. Structural Steel received with missing or incorrect mark numbers, will be processed as follows:
 - 1) The steel shall be placed in a Hold status by the QAE.
 - 2) The Vendor (on-site representative or shop) shall be contacted to determine the correct mark number. The notification shall be recorded in the Reinforcing Steel/Structural Steel Log.
 - 3) The Vendor shall advise the QAE in writing of the correct mark number and the steel shall be marked.
 - 4) Correct identification not received within fifteen (15) working days shall be documented on an NCR.
 - 5) Items with missing and/or illegible documentation, shall be processed in accordance with QCP-17-1.

- f. Deviations in pipe support gaps detected during the as-constructed/IE Bulletin No. 79-14 walkdown. Such deviations shall be evaluated during the PAPSCOTT reconciliation effort and dispositioned via ECA.
6. On ASME Code items, an "Accept-As-Is", "Rework (Restoration)," or "Repair" disposition shall be acceptable only if the corrective action will restore the item to an acceptable condition in conformance with the code. All records and documentation supplemental to NCR dispositions and corrective actions shall be made available to the ANI.

III. RESPONSIBILITIES

Any organization or person may report a nonconforming condition by initiating a Contractor Problem Report (CPR) for discrepant conditions in another discipline or when another Contractor is responsible. Personnel performing quality functions (QA, QC, Field Engineers, etc.) shall initiate NCRs. Personnel performing non-quality functions may report safety-related deficiencies on a CPR. Construction personnel shall initiate DRs. (Titles shown below are positions or applicable designees).

1. The Engineer (UE&C) shall be responsible for completing, reviewing and approving the disposition of Major nonconformances on the Nonconformance Report/Deficiency Report Form (Attachment 1) and shall provide all design information necessary to implement the disposition. The Engineer shall also assure that Major NCRs received for disposition are controlled and resolved in a timely manner and justify "Accept-As-Is" or "Repair" dispositions.
1. Senior Project Engineering Manager (SPEM) - shall have overall responsibility for personnel providing dispositions for Major NCRs including responses for Potential Significant Deficiencies.
2. Assistant Project Engineering Manager - shall be responsible for the overall quality of dispositions of Major NCRs provided by his discipline, including evaluating and responding to Potential Significant Deficiencies.
3. Supervising Discipline Engineer (SDE) - shall be responsible for assignment of qualified personnel for their respective disciplines to disposition Major NCRs in a timely manner and the overall technical and administrative quality of these dispositions.
4. Engineering Administrator - Office Group (EA/OG)/Field Group (EA/FG) - shall be responsible for receiving, logging, tracking, status monitoring and distributing (for disposition) Major NCRs within the Engineering organization. The group shall

also be responsible for entering the disposition status from Major NCRs into the Change Document Tracking System. They shall transmit the dispositioned original Major NCR as described in paragraph IV.C.7.a.

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ment Group - (RMG) shall be responsible for distribution of Major NCRs after dispositioning and files of all NCRs including revisions.

- B. Reliability Assurance shall review and approve the supplier contractor nonconformance programs meeting the requirements of this procedure and shall assure the implementation of the approved programs of suppliers through Vendor and Site Surveillance actions. R&QA shall establish and implement a UE&C Nonconformance Program in the receiving, handling, storage and UE&C Construction activities meeting the requirements of this procedure.
- C. UE&C Construction and QA/QC
1. The UE&C QA/QC organization shall be responsible for preparing and approving the description of the nonconformance, processing and closing NCRs.
 2. The UE&C Construction group shall be responsible for performing the required action in accordance with the approved disposition of the NCR.
 3. For UE&C initiated minor NCRs, the Responsible Discipline QC Supervisor will provide the disposition prior to transmitting to the QA Supervisor-Deficiency Systems (QAS-DS).
- D. Westinghouse - The Westinghouse site representative (working with the DOS/DFS) shall review and disposition those NCRs which affect Westinghouse equipment. The Westinghouse representative shall provide any special instructions on the NCR.
- E. Suppliers and Contractors when required by contract, shall submit to UE&C for review and approval a procedure for identification, documentation, disposition and control of nonconforming items meeting the requirements of this procedure. These UE&C approved procedures shall be implemented by the suppliers and contractors.
- F. UE&C Material Department shall arrange for the segregation of nonconforming items in the Receiving-Storage areas and for their preparation and return to the supplier when so dispositioned.

- G. Central Data Entry Group (CDEG) - The CDE operators are responsible for entering bulk data and modification sheets into the CDT system.

IV. PROCEDURE

A. Supplier Nonconformance

1. Suppliers shall implement their UE&C approved nonconformance procedures meeting the requirements of this procedure.
2. The UE&C Vendor Surveillance representative shall assure that the supplier is implementing his nonconformance procedure by observing that out of tolerance conditions noted during his review of records and/or witness of inspection of hardware under his cognizance have been resolved by nonconformance reports. In the event of repetitive failure or refusal of the supplier to follow his nonconformance procedure the Vendor Surveillance representative shall notify the Supervising Engineer-Vendor Surveillance (SE-VS). The SE-VS will contact the Project QAE who will initiate a Corrective Action Request (CAR) in accordance with QA-16-1.
3. Suppliers shall submit reports of nonconformance with procurement documents to UE&C for review and approval as required by their UE&C approved procedures.
4. For non-safety related items identified in Appendix B of QA-7-2, an NCR shall be initiated in accordance with paragraph IV.C.1.a at receiving inspection and shall be processed and closed in accordance with this procedure. After release to construction, any additional nonconformances shall be processed in accordance with ASP-3.

B. Site Contractor Nonconformance

1. Contractors shall implement their UE&C approved nonconformance procedures meeting the requirements of this procedure and ASP-3.
2. Contractor Major Nonconformance Reports are forwarded to UE&C Project Engineering for evaluation and disposition as required by their UE&C approved procedures.

C. UE&C Nonconformances

1. Initiating NCRs

- a. When a potential nonconforming condition is identified, it shall be evaluated to determine if an NCR is applicable. When the deficiency is identified as requiring an NCR, it shall be evaluated to determine the classification, Major or Minor, as defined in this procedure, and for reportability under 10CFR50.55(e).

Note 1: The reporting of an item under 10CFR50.55(e) does not impose a further requirement to report under 10CFR21 or vice versa. 10CFR21 reporting is for items (defects) involving a "substantial safety hazard". If further guidance is needed refer to NUREG-0302, Rev. 1.

Note 2: If the preparer uses the Reference Document section, the information must be entered as delineated in TP-23.

- b. The applicable QA/QC personnel shall prepare an NCR by completing the form (Attachment 1) in accordance with Attachment 2.

c. NCR Number Assignment

- 1) NCR numbers shall be controlled and issued by UE&C QA. The activity shall be called NCR Numbers Controls. The personnel issuing the NCR numbers shall be called the NCR Numbers Controller.
 - a) UE&C PFQCM will assign and train an adequate number of personnel to assure personnel assigned to NCR Numbers Control will be available at all times. However, the number of personnel authorized as NCR number controllers will be as limited as possible.
- 2) The NCR numbers shall sequentially consist of:
 - a) first two digits-contractor ID;
 - b) a sequential number - per contractor ID;
(justify to right, do not precede with 0).

- c) The last digit shall be a capital alpha to denote the revision. The initial issue shall be alpha Character "A".

NOTE:

| Contractor ID | Sequential Number from Log | Indicates Initial Issue (Revision) |
|------------------|-------------------------------|---|
| 45 | 123 | A |

- 3) The controllers shall maintain an NCR log for each discipline designation. The log shall have columns for each of the following:

- a) NCR numbers
- b) initiator's initials
- c) BIP
- d) building
- e) unit
- f) system
- g) description
- h) major/minor
- i) date field work complete
- j) controller's initials - the controller shall enter his/her initials after initial input and field work complete input.
- k) issue date
- l) disposition

- 4) In order for the initiator to obtain an NCR number, the following information shall be given to the controller:

- a) initiator's group code:
- b) type - NCR;
- c) major or minor;
- d) initiator's initials:
- e) BIP
- f) building
- g) unit;
- h) system;
- i) description.

Following logging the information, the controller will issue the NCR number.

Note: TP-23 contains a list of standard abbreviations to use in the preparation of NCRs/DRs. Information regarding boundary identification packages (BIPs) may be obtained from the Test and Start-up Group. This information must be used in all phases of processing NCRs and DRs. CDT will not accept abbreviations which deviate from TP-23 or the Master BIP List.

- 5) The person requiring a revision to an existing NCR will contact the NCR Number Controller and provide the number of the existing NCR. The controller will enter the next revision level and the date of revision into the "Field Complete" column of the log adjacent to the initial entry, which indicates that the initial NCR has been revised. The Controller shall then enter the revised NCR into the log in accordance with Paragraph IV.C.1.c.3). The initial issued NCR will be stamped or marked "Superseded" and processed in the same manner as a void NCR. The revised NCR shall be processed in the same manner as the original issue.

d. NCR

- 1) The discrepant condition shall be described on the NCR with sufficient information to permit evaluation of the condition by the group providing the disposition.
- 2) The original NCR form for a Major nonconformance shall be submitted to the applicable discipline EA/OG or EA/FG for processing. He may provide a recommended solution for a major discrepant condition on a continuation sheet (Page 2 of Attachment 1). Any discrepancy identified as a potential 10CFR50.55(e) violation shall be promptly forwarded to Engineering Administration for processing per Flow Chart 2. Attachment 4.

- 3) Minor NCRs shall be processed in accordance with paragraph IV.C.5.b.
- 4) Each QA/QC Discipline shall obtain NCR numbers from the applicable NCR Numbers Control Group. The Numbers Control Group shall maintain a log that will control and monitor the status of individual NCRs from inception through field completion. When the NCR is initiated, the NCR Number Coordinator shall input into CDT. If a terminal is not available or is not operable, a copy of the NCR/DR will be sent to CDEG for inputting to CDT.

2. Cause for Use of the Contractor Problem Report (CPR)

- a. Damage to items (nonconforming condition) which is the responsibility of another contractor or if a contractor discovers a suspected nonconformance discrepancy in another discipline area of responsibility, he shall report it to the applicable contractor's or discipline organization via CPR (Attachment 8) for evaluation. All safety related CPRs shall be transmitted to the applicable QA/QC Contractor organization. All non-safety related CPRs shall be sent to the contractor/discipline.
- b. Non-quality personnel (see paragraph III) shall report nonconforming conditions to the applicable organization via CPR.
- c. Nonconforming conditions for equipment which has been turned over to STD but has not been "N" stamped shall be handled as follows:
 - 1) Nonconformance reports shall be issued by the "N" and "NA" Certificate Holders for the ASME System until they are "N" stamped.
 - 2) At the time of initiation of an NCR on "Turned-Over" ASME System, the initiator shall notify the Startup Manager/Designee of the NCR's origination. This notification may be by telephone, with the notifier documenting the telecon in the description section of the NCR. The telecon must denote the authorized STD representative's name and the date of notification.

- 3) Prior to placement of a Hold Tag on the nonconforming condition, a STD Status Indicator must be placed on the Hold Tag by either the STD or the applicable QA/QC Organization. The status indicator will be considered STD's acknowledgement that they have been notified.
- d. The issuing group shall establish a log that is adequate to verify that the CPR was closed by the applicable contractor. This verification shall take place upon the return of the original closed CPR.
- e. The UE&C QA/QC organization shall control each CPR received. QA/QC shall maintain a working file of the item through completion/closure and forward the original closed CPR to the initiator. The recipient of the CPR shall inform the initiator of the CPR status every 15 working days. The objective is to close the CPR within 30 working days.
- f. Nonconforming conditions for equipment which does not require "N" stamping and has been turned over to STD shall be handled as follows:
 - 1) The person that discovers a nonconformance shall report it to Startup Quality Control via a CPR (see Attachment 8).
 - 2) Startup Quality Control shall sequence and control each CPR received. SQC shall maintain a working file of the item through completion/closure and forward a copy of each closed CPR to the initiator.
- g. Reporting Items Under Station Staff Jurisdiction:
 - 1) Nonconforming conditions identified within the scope boundary of a Work Request/IIL item may be reported on a Contractor NCR. The Rad Waste & Utility Superintendent will be notified and the IIL number shall be identified on the NCR.
 - 2) Conditions requiring field rework which fall outside the boundary of the Work Request/IIL shall be documented on a CPR by the person identifying the condition.

- 3) Conditions discovered during implementation of a Work Request or IIL item which do not require an NCR may be reported via the Contractor's in-process inspection report; however, no field work will take place without the issuance of a Work Request.
- 4) The SQC will process CPRs in accordance with ASP-3.

3. Work Affecting Hardware Under the Jurisdiction of Start-up

- a. UE&C 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.
- b. Nonconforming conditions, identified under the STD program, may be returned to UE&C for required rework and/or repair on a Work Request. The Work Request is UE&C's authorization to perform the activity and does not require that a UE&C NCR be generated.
- c. If, during the performance of work authorized by the Work Request, a nonconformance is found within the scope of the work authorization, UE&C shall document the condition in accordance with their approved procedures including QA-15. For nonconformances outside the scope of the Work Request, they shall be documented in accordance with IV.C.2 on a CPR.
- d. After BIP Turnover:
 - 1) Nonconforming conditions identified within the scope boundary of a Work Request or IIL item will be reported on a Contractor NCR, Startup will be notified and the IIL number shall be identified on the NCR.
 - 2) Conditions discovered during implementation of a Work Request or IIL item which do not require an NCR may be reported via the contractor's inprocess inspection report; however, no field work will take place without the issuance of a Work Request.
 - 3) Conditions requiring field rework which fall outside the boundary of the Work Request/IIL shall

be documented on a CPR by the person identifying the condition.

- e. Work to be performed on nonconforming hardware which has been turned over to STD, but has not been "N" stamped will be returned to be controlled in accordance with the Nuclear QA Program.

4. Maintaining Status of Nonconforming Items (NCRs)

a) Tagging & Segregation

- ACN 310
- 1) Nonconforming conditions shall be tagged by UE&C QA/QC with a Hold tag (Attachment 7). The Hold tag shall only be removed by UE&C QA/QC organization.

NOTE: Hold tags are applicable to both Major and Minor NCRs.

- 2) When practical, nonconforming items shall be stored in a segregated area to prevent their inadvertent use of 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 its inadvertent use.

b. Limited Work Authorization

Limited Work Authorization (LWA) Requests (Attachment 5) are initiated by construction to perform controlled limited activities on a nonconforming item.

- 1) Nonconforming items requested to be moved out of the Receiving Storage areas while on "Hold" status, reworked or repaired to comply with an NCR disposition, or conditions which have not yet been dispositioned and items on "Hold" which require work other than that specified on the NCR disposition, shall be tagged with a LWA tag, adjacent to the Hold tag, before the item or condition is otherwise processed on a controlled limited basis. Prior to tagging, a "Limited Work Authorization Request (Attachment 5) shall be initiated by the UE&C department desiring the LWA, except as noted in para. IV.C.6.c.

- 2) The initiator shall obtain a LWA number from the LWA log maintained by the QAS-DS. This log shall list the LWA No. (sequential), the item name/identity, date of request, related NCR No. and LWA status.
- 3) The initiator shall complete the LWA as indicated in Attachment 6 and forward the form to the PFQCM for his review and approval. An LWA can be issued to cover more than one NCR.
- 4) The PFQCM shall review the LWA request and:
 - o Approve the LWA as written, or
 - o Approve the LWA with modifications, or
 - o Deny the LWA giving reason for denial
 - o Establish inspection hold points, as required.
- 5) For ASME items, the PFQCM informs the ANI of the intended LWA action for establishing ANI Hold Points on the LWA. The ANI signs and dates the LWA form adjacent to the signoff of the PFQCM. The PFQCM denotes a UE&C Hold Point and any ANI Hold Points on the LWA form beyond which the LWA condition does not apply.
- 6) If the LWA is approved and the items involved are for use by Contractors other than UE&C Construction, the PFQCM shall obtain the dated signature of the Project Construction QA Manager indicating his concurrence with the LWA. If the LWA is denied, the PFQCM shall return the LWA to the initiator for his consideration and possible modification for resubmittal.
- 7) The PFQCM shall distribute all approved LWAs to:
 - a) Project Construction QA Manager
 - b) LWA Initiator
 - c) Department or Contractor who will perform rework or repair (if applicable)
 - d) Project Construction Manager
 - e) Material Department
 - f) Project Engineering Manager
 - g) QAS-R&S
 - h) Site QA files

- 8) The PFQCM directs the FQCE or FQAE to complete and attach the LWA Tag to the applicable item(s) covered by the LWA. The item(s) is released to the Installer via the LWA and controlled under his approved program. The HOLD tag will remain on the item until the NCR has been dispositioned and the item reinspected and accepted by the FQCE or FQAE.
- 9) C.. LWAs covering rework or repair performed in the receiving-storage areas or LWAs releasing items to UE&C Construction, the UE&C Field QC group shall follow and close the LWA.
- 10) On LWAs covering the release of items in all other areas, the Project QA Special Projects Manager shall perform surveillance of work performed as performed by his program. The UE&C Field QC Group shall verify and close the LWA upon notification from the PCM that work is complete.
- 11) The LWA initiator shall sign "ACTION COMPLETED" when the work authorized on the LWA is complete. The FQCE or FQAE shall verify completion of work and close the LWA. If "ACTION COMPLETED" is not signed off prior to NCR field completion, the LWA will be closed based on the NCR field completion. When LWAs are closed, the LWA tag shall be removed by UE&C FQCE or FQAE.
- 12) When LWAs are closed, the LWA tag shall be removed by the FQCE or FQAE. Should the LWA satisfy the required disposition of an NCR and the items are reinspected and accepted by FQCE or FQAE, then the NCR can be closed and the HOLD tag removed and replaced by a RELEASE tag.
- 13) The PFQCM shall distribute the completed LWAs as per paragraph IV.C.4.b.7). The QAS-DS shall enter the date in the closed column on the LWA log as LWAs are completed. He shall review the log monthly to assure that all open LWAs are active and still required.

5. Providing Dispositions to NCRs (see Flow Chart No. 1 Attachment 3)

a. Major NCRs

- 1) Engineering Administrator, Office Group or Field Group, shall upon receipt of a Major NCR from the responsible organization, log, assign and distribute it to the SDE for evaluation. The EA/OG or EA/FG shall maintain copies of all unanswered Major NCRs.
- 2) Upon receipt of a Major NCR, the SDE shall evaluate the discrepant condition for potential 10CFR 50.55(e) in accordance with instructions provided in Attachment 4, Flow Chart No. 2.
- 3) The SDE shall provide dispositions to NCRs which are specific to the problem to assure compatibility with design requirements. The disposition shall not be generic. The SDE shall evaluate the NCR for generic implications and retrofit requirements.
- 4) The SDE will determine when interface with vendor/supplier (such as Westinghouse) is required for NCR dispositions and shall obtain any required approvals.
- 5) For repairs or additional work performed on Vendor supplied ASME III welds (i.e. piping spools, supports, structural members, etc.), the UE&C welding group shall be responsible for determining the weld repair cycle and heat treat status for each affected weld and shall provide necessary information including the next repair cycle number (R-1, R-2, etc.) to the discipline/contractor performing the repair. This repair cycle number shall be shown on required documentation.
- 6) The SDE will interface with the other engineering disciplines/groups, and 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.
- 7) For ASME Section XI repairs and replacements, the requirements of FPP-12 shall be implemented. The DEM shall notify YAEC Engineering of development of a repair program as described in FPP-12.

- 8) The SDE shall attach to the NCR any sketches, letters, telephone conversation memos, or written information. Calculations shall be referenced, as design justification, etc., when they are a necessary part of the disposition. As pages are added to the NCR, each sheet shall be identified to reflect the correct sequential page number, starting, with Attachment 1 numbered as page 1 of _____. The total quantity of included pages shall be the second number. As pages are added by different groups in processing the NCR, the total quantity of "included pages" will be changed to reflect the "new" total number of pages. Each page shall additionally be identified with NCR report type and number.
- 9) NCRs shall not be used to relocate ASME Class 1 components or supports.
- 10) Reviewers for Major NCRs - The preparer shall determine and list the necessary interdisciplinary reviewers on the NCR. All reviews shall occur prior to NCR issuance to Contractors with the exception of the ANI (see note 1 below). Mandatory reviewers for NCRs shall be determined by using the chart below. Some of the reviewers are already listed in text and included therein for convenience. Other reviewers of NCRs shall be limited to those required to provide supplemental data to or have interfacing responsibilities with the proposed disposition.

MANDATORY REVIEWERS FOR MAJOR NCRs

| Work Described on NCR | Civ/ Str. | Pipg | Elec Sys. | I&C Sys. | Mech Sys. | PAP- SCOTT | QA | W | STD | SSMS | YNSD | ANI |
|--|--|------|--------------|-------------|--------------|---------------|----|---|----------|------|------|-----|
| Core Boring (Embedded Items) | X | X | X | | X | | | | | | | |
| Class 1E Equipment—I&C Impact | | | | X (2) | | | | | | | | |
| Class 1E Equipment-Elec Impact | | | X (2) | | | | | | | | | |
| Changes/exceptions to safety related/seismic specifications and project standard documents related to specifications. | | | | | | | X | | | | X | |
| Changes affecting basic system design including the following: General arrangement drawings Piping & Instrumentation diagrams (except when only vents & drains are added) Logic diagrams/schematics Electrical one line diagrams (functional change) | All interfacing UE&C Disciplines affected by change. | | | | | | | | | | X | |
| ASME Sec. III Div. 1 & 2 Code cases adopted into UE&C design specifications | | | | | | | X | | | | X | (.) |
| Modifications to Westinghouse (W) documents or UE&C design documents affecting (W). | | | | | | | | X | | | | |
| All NCRs with BIPs turned over (either partially or completely) from construction | | | | | | | | | X (4) | | | |
| Only those piping and pipe support NCRs with affected documents complying with Freeze Level 1, 2 or 3 criteria as stated in TP-37. | | | | | | X (3) | | | | | | |
| All piping and pipe support NCRs/DRs with affected documents complying with Freeze Level 4 and 5 criteria as stated in TP-37. | | | | | | X | | | | | | |
| All piping and pipe support NCRs with affected documents having Freeze Suffix "A" or "P" following Freeze Level 1, 2 or 3 criteria per TP-37. | | | | | | X | | | | | | |
| "95" Series NCRs for items under Station Staff jurisdiction. | | | | | | | | | | | X | |
| All NCRs affecting I&C ASME III installations | | | | X (5) | | | | | | | | |

- NOTES:
1. The Authorized Nuclear Inspector shall indicate concurrence with ASME III NCR dispositions by signing the NCR form after the NCR has been issued. It is the responsibility of the installing contractor (ASME Certificate Holder) to obtain ANI concurrence for repair/restoration dispositions which require process sheets. ANI Concurrence shall be obtained either prior to or at the time the ANI signs the process sheets. The ANI concurrence for other dispositions may be obtained at any time prior to code stamping.
 2. Review to verify that equipment requirements for 15.a.9, Attachment 2, have been satisfied.
 3. Enter PAPSCOTT into Interdiscipline review block under "Group". If criteria in TP-37 shows that PAPSCOTT does not need to review the NCR, show "N/A" in "Print Name and Sign Initials" block; otherwise, the printed name and signed initials of the PAPSCOTT reviewer and date shall be shown.
 4. EXCEPTION: The following item does not require STD review: 9763-248-43, Appendix G with no field work involved.
 5. The I&C Engineer responsible for ASME reconciliation shall review for impact on N-5 Data Reports.

b. Minor NCRs

- 1) UE&C QA/QC Discipline Supervisor or QCEs shall prepare the disposition of a Minor NCR utilizing the definitions in Paragraph II.C.14.a. PFQCM/Designee shall approve the disposition.
- 2) Upon completion and approval of the disposition, a copy of the NCR shall be sent to the appropriate supervisor for implementation.

6. FQCE/FQAE personnel will reinspect, or otherwise verify as required, items dispositioned and attach proper tag as follows:

- a. Items noted "Accepted As Is", replace the HOLD Tag on the item with a RELEASE Tag (see Attachment 7). Release tags need not be attached to installed items, only items in storage.
- b. Items noted "Reject", retain the HOLD TAG on the item and arrange for segregation or removal from area for return to the vendor/contractor or scrap.
- c. For "Rework" (Restoration) or "Repair" items, add the LWA tag to the item referencing the NCR number prior to start of work. A Limited Work Authorization Request is not required.

d. After completion of work and acceptance following reinspection, remove the LWA tag and either:

- 1) Retain the HOLD tag if the work performed does not totally resolve the original nonconformance.
- 2) If the work resolved the original nonconformance, remove the HOLD tag and attach a RELEASE tag to the item.

7. Distribution of Dispositioned NCRs

a. Major NCRs

- 1) EA/OG or EA/FG will transmit dispositioned original Major NCRs to the applicable Contractor's QA/QC

organization. One copy of the NCR shall be forwarded to the Contractor/discipline responsible for the implementation of the disposition, one copy to the Central Data Entry Group and one copy to the Records Management Group. For items turned over to STD, the Contractor copy will be sent to STD.

- 2) The Records Management Group shall distribute Major NCRs after dispositioning. RMG shall distribute initial NCRs on a request basis only.

b. Minor NCRs

- 1) Minor NCRs shall be distributed by UE&C QA/QC after disposition. This distribution shall include, as a minimum, a copy to CDEG for entry into CDT (or input by UE&C QA/QC), UE&C Engineering and UE&C Construction.
- 2) Upon closure of the minor NCR, a copy shall be distributed by QA/QC to CDEG for entry into CDT (or input by UE&C QA/QC), Engineering and Construction.

8. Construction and QA/QC Organization

- a. UE&C Construction, upon receipt of dispositioned NCRs, shall implement the disposition in accordance with applicable site procedures. Work will not proceed beyond the hold tag until the UE&C QA/QC personnel have affixed an LWA Tag to the nonconforming item. Construction shall place a copy of the dispositioned NCR at the work location.
- b. Upon receipt of the dispositioned NCR, the UE&C PFQCM will immediately review the NCR disposition in detail. Conditions requiring corrective action shall be handled in accordance with QA-16-1. If significant problems are found that violate code or quality requirements he shall issue a Stop Work Order (SWO) in accordance with QA-16-2. The SWO will not be lifted until the issue(s) are resolved. Minor problems will be resolved by interfacing with the applicable parties.

9. Partial Releases on NCRs

- a. Those NCRs which list multiple nonconforming conditions/deficiencies may require a partial signoff to release the corrected items for which field work has been completed and accepted.

Example: Twenty six (26) valves put on hold due to several deficiencies. Some of the valves may require rework and some may be "accept-as-is". Those valves which were dispositioned "accept-as-is" could be released by QA to avoid construction delays.

- ACN 326 b. Partial releases shall be documented on the Nonconformance Partial Release Sheet (Attachment 10) until the entire NCR can be signed off and accepted as complete.

10. NCR Revisions

- ACN 312 a. Technical changes shall be made by revising the NCR, using a capital letter next to the number (see paragraph IV.C.1.c.2). Subsequent revisions shall be noted by changing the revision letter to the next higher letter. "Field Complete" or "Voided" NCRs shall not be reopened or revised. If changes are necessary, a new NCR shall be issued which references the original NCR number.
- b. When revision to the NCR disposition is necessary, the SDE shall request the initiating organization to process the new revision using the same controls as used on the previous issue. The initiating organization may initiate a revision of the NCR when deemed necessary.
- c. Each NCR revision shall be complete and will supersede prior revisions. All contents of the superseded NCR which are still valid, shall be included in the revised NCR. All affected documents shall be carried forward.

NOTE: Information considered "still valid" shall include:

- o Description of work completed
- o Description of work to be performed
- o "Accept-as-is" dispositions and supporting information

- d. Affected documents which are brought forward and are not applicable to the revision shall be identified by placing a "D" for delete in the far right hand block of the affected document section. If the previous revision was incorporated, it is not necessary to indicate the status.
- e. Changes shall be clearly identified by a vertical line to the right of the change and/or by "clouding" the change. Vertical lines and clouds identifying prior revisions may be left on the NCR. Each vertical line and cloud will be identified with a Delta revision letter next to the cloud.
- f. Any non-technical changes to a NCR which correct administrative/typographical errors including adding or deleting Reference Documents, Affected Documents and Keywords or add information shall be documented on a Design Change Document modification Sheet (Attachment 9) and forwarded to the Centralized Data Entry Group (CDEG) for entry into CDT. Typographical errors which do not affect CDT or design intent will not be modified. CDEG will forward the original Design Change Document Modification Sheet to the originating organization for attachment to the original NCR and a copy to RMG for distribution if required. Changes made in this manner shall not be considered as a formal revision to the NCR. The preparer of subsequent revisions to dispositions of an NCR shall include all applicable modifications.

NOTE 1: Affected documents which change the turnover, ASME, seismic or safety related status may not be addressed on a modification sheet (i.e., non-ASME to ASME, non-safety to safety, etc.).

NOTE 2: In lieu of using the Design Change Document Modification Sheet, the dispositioner may make minor corrections to information on the original NCR during the disposition cycle by lining through the incorrect entry, entering the correct information and initialing and dating adjacent to the correction.

If the correction requires extensive changes to the NCR disposition, the NCR shall be returned

to the initiator along with a statement of the problem that is signed and dated by the dispositioner.

11. Void NCR

- ACN 326
- a. If it is required to void an NCR, it shall be stamped or marked "VOID" in large bold letters across the page. The reason for voiding the NCR shall be stated on the NCR in the disposition space and signed by the person voiding the NCR (block 6 of Att. 1) approver of NCR (block 7 of Att. 1), and approver of disposition (block 15 of Att. 1) (sign off by preparer and checker of disposition is not required). The number assigned to a voided NCR shall not be reused. The originating organization QA/QC Manager may change the status of CDT or may forward a copy to CDEG to update CDT and forward a copy of the void NCR to the person that originated the NCR. If the NCR had been dispositioned by Engineering and distributed, the NCR shall be revised, marked "Void" and processed in the same manner as the previous issue. The "Disposition Date" must be filled in. The NCR log will be updated to reflect that the NCR is void.

12. Revising Affected Documents

- ACN 323
- a. NCRs shall list all affected documents, however, only NCRs listing the following "Affected Documents" shall be incorporated on design documents. However, affected documents identified on NCRs which are not listed below may be incorporated at the discretion of the discipline lead. Incorporation shall be completed no later than 90 days before fuel load.

- 1) Building General Arrangement Drawings showing Equipment Locations
- 2) Process and Instrumentation Diagrams
- 3) Loop and Logic Diagrams
- 4) Electrical One Line Diagrams
- 5) Specifications (safety related only)
- 6) Electrical Schematics
- 7) CASP
- 8) Set Point Data List (DWG M-500376)
- 9) Computer I/O List (Dwg M-510004)
- 10) Standard Instrument Schedule (Dwg M-510000)
- 11) FSAR
- 12) Class 1E Equipment List (Dwg M-505300)

- b. If the FSAR is affected by an NCR the change shall be processed in accordance with Seabrook Administrative Procedure, AP-41, "FSAR Deviations Procedure".
- c. NCRs shall be referenced and/or incorporated on the affected document in accordance with AP-4. The CDEC will be notified of incorporation as specified in AP-4 and will update CDT accordingly.
- d. The CDT System will list all affected documents (See TP-23).
- e. On a monthly basis, UE&C Senior Project Engineering Manager (SPEM) shall provide to the Director of Engineering and Licensing an assessment of the status of unincorporated design change documents.
- f. ECAs issued against P&IDs affecting the functioning of the system shall be incorporated and the P&ID shall be listed as an affected document. Changes to P&IDs made by an NCR that are graphic in nature and do not affect the functioning or operability of the system do not require incorporation. In this latter case, the P&ID should be listed as a reference drawing, for example, the sequence of branch lines from a header when there are no intervening components/valves and the system function/operability is not affected.

ACN
323

13. Nonconformance Review Board (NRB)

- a. The NRB will assist Engineering, when requested, in evaluating and dispositioning NCRs.
- b. The NRB is comprised of representatives from:
- 1) UE&C Project Field QC. The Project Field QC Manager serves as chairman.
 - 2) UE&C Site Engineering - Site Engineer.
 - 3) UE&C Construction Discipline Superintendent.
 - 4) Westinghouse Representative - when NSSS items are involved.
 - 5) YAEC - Field QA.
 - 6) Others - As necessary for technical assistance or upon request.
 - 7) The Project Owner's Construction Management Organization will be given the option to attend meeting.

c. Convening the Board

The board chairman will convene the board when:

- 1) Requested by a member of the NRB.
- 2) Requested by Engineering to assist in evaluation of an NCR for potential 10CFR50.55(a).
- 3) Requested by Engineering for a NCR that is complicated and requires clarification.
- 4) Requested by Engineering to evaluate recurring nonconformance trends which requires discussion for immediate corrective action to be taken by the Contractors.

d. 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.

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

14. Field Completion of NCR

a. NCRs

ACN 326

- 1) When the disposition has been implemented the responsible Construction Supervisor shall sign and date the original NCR in the "Work Completed" block.
- 2) The QA/QC Organization will verify that the work has been completed per the NCR disposition.
- 3) If the inspection is satisfactory, the QA/QC shall document acceptance of the NCR by signing and dating in the "Accepted" block, checking the "Field Work Complete" block and noting it in the NCR Log. QA/QC acceptance of NCRs that have been dispositioned "Accept As Is" shall be documented in the same manner, except that no reinspection is required.
- 4) As an alternate, a controlled copy of the NCR may be signed and dated by Construction and QA/QC which

shall be attached to the original NCR. A notation shall be made on the original NCR in the "Work Completed" and "Accepted" blocks to "see the attached copy".

- 5) The QA/QC Organization will send a copy to CDEG for entry into CDT.
 - 6) If the verification process results in an unsatisfactory finding, the QA/QC Organization shall notify the applicable construction-designated person of the results of the inspection. If applicable, the NCR shall be revised to reflect new conditions that require a new disposition.
 - 7) The process described in Paragraphs IV.C.14.a.1) and IV.C.14.a.2) shall be repeated.
 - 8) If the items fail the inspection for a second time, the QA/QC Manager will notify the Construction Manager for resolution.
 - 9) Field Complete original NCRs shall be processed per Paragraph IV.G.
- b. The applicable Numbers Controller shall be responsible for logging the Field Complete status into their manual log.

15. Processing of Open NCRs/NRFs

Effective February 1, 1986, processing of those open NCRs/NRFs generated prior to the effective date of this procedure's implementation (1-21-85) shall be as follows:

- a. The use of NRFs will be discontinued. If it is necessary to revise an NRF, the applicable NCR will be translated onto the ASP-3 NCR form. The new NCR will retain the same NCR number with the appropriate numeric revision number.
- b. Open NCRs that are being worked will be completed. If a revision is required, it shall be processed per paragraph IV.C.15.a.

D. Return of UE&C Purchased Nonconforming Items to Supplier

1. When necessary to return items to vendors, for rework (restoration) or repair, the PFQCM in conjunction with the QCE determines the documentation and purchase order requirements and coordinates with Procurement.
2. The Home Office Procurement Department shall obtain the following from the Supplier: Name - Title - Department and Address to which the item(s) shall be returned, return material tags if used by supplier, method of shipment desired, any special preparation required, packaging requirements, disposition (e.g. scrap at site), etc.
3. The information received from the Supplier shall be transmitted by Change to the Purchase Order to the Project QAE, the PFQCM, the QAS-DS and the Material Department.
 - a. For field purchased material dispositioned "Return to Supplier", the information for return (as received from the Vendor) shall be transmitted from Field Procurement to the PFQCM, QAS-DS and the Material Department via memo, return authorization (FGCP-3) or specific instruction from the Vendor. If the Vendor's return authorization is available, it shall be forwarded with the above.
4. The Material Department shall arrange for the proper preparation of the item(s) to be returned and the packaging of the item(s) in the same or similar manner to that received unless special preparation packaging requirements are specified by the supplier.
5. The Material Department shall issue a "Material Returned or Transferred" form and shall arrange for shipping the item(s), including a copy of the NCR and instructions, to the supplier per FGCP-3.
6. The Supervising Engineer-Vendor Surveillance shall arrange for resurveillance of the item(s) in accordance with QA-7-2.
7. Items returned to the site shall be subject to Receiving Inspection, FGCP-3. A copy of the NCR shall be inserted into the purchase order file. This will alert QAE-R/S that repair/rework has been performed on the item.

E. Nonconformances - UE&C Purchased Items on Contractor's NCR's

1. UE&C requisitioned material, documented on a Contractor Nonconformance Report, and dispositioned "Return to Vendor" shall be controlled by UE&C Field QA as follows:
 - a. A copy of the Material Returned or Transferred Form shall be sent to the PFQCM in accordance with FGCP-3.
 - b. A UE&C "HOLD" tag, which references the contractors NCR number, shall be attached to the item.
 - c. A copy of the contractors dispositioned NCR will be obtained and maintained by QAS-DS until the item has been returned to the vendor.
 - d. The contractor's NCR number shall be recorded in the log titled "Contractor Non-Conforming Items Dispositioned Return to Vendor" by the QAS-DS. The log shall be used as a method of tracking item(s) returned to Vendors. Periodic checks of the log will be made to verify the return of the item(s) as dispositioned.
2. Should UE&C Construction and/or Engineering choose to "rework/repair" any item(s), after the contractor has returned the item(s) as specified in IV.E.1. a UE&C NCR shall be initiated and processed, in accordance with para IV.C. The UE&C Nonconformance Report shall reference the Contractor NCR number. The UE&C "HOLD" tag, placed on the item(s), in accordance with IV.E.1.b, shall be replaced with a new UE&C "HOLD" tag, which references only the newly initiated UE&C NCR number.

F. Trend Analysis of Nonconformance Reports

1. On a monthly, quarterly and annual basis, the PFQAM shall review the NCRs issued by UE&C and evaluate them for quality trends and conditions. The Computerized report generated by YAEC, Trend Analysis Input Sheet, (Appendix A), shall be used as an aid in defining major Quality problem areas and establishing quality trends.
2. A summary of NCRs shall be published monthly by the PFQCM. This summary shall list status of all open NCRs, a brief description of the deficiency, the responsible parties, and the disposition. Copies of this report shall be distributed in accordance with Table 1 - Nonconformance Report Distribution.

3. The monthly summary shall also include in the cover letter, the number of notifications to the vendor per par. 11.E.5 and the number of Rebar Releases involved.
4. When the PFQCM determines that corrective action is warranted to preclude recurrence, based on NCR conditions, he initiates the required actions identified in procedure QA-7.6-1.

G. Records/Information Management System (IMS)

"Field Complete" NCRs, including voided NCRs, shall be processed by the initiating organization in accordance with RM-1, "Instructions for Site Records Management System."

H. Authorized Nuclear Inspector (ANI)

The ANI shall indicate concurrence with ASME III NCR dispositions by signing the NCR form. It is the responsibility of the installing Contractor (ASME Certificate Holder) to obtain ANI concurrence for repair/restoration dispositions which require process sheets. ANI concurrence shall be obtained either prior to or at the time the ANI signs the process sheets. The ANI concurrence for other dispositions may be obtained at any time prior to code stamping.

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TABLE 1
NONCONFORMANCE REPORT DISTRIBUTION

| <u>RECIPIENT</u> | <u>AFTER DISPOSITION</u> | <u>ON COMPLETION</u> | <u>NCR SUMMARY</u> |
|--|------------------------------|--------------------------|------------------------|
| YNSD PROJECT MANAGER | X | X | X |
| YNSD PROJECT CONSTRUCTION QA MANAGER | X | X | X |
| PROJECT MANAGER | X | X | X |
| PROJECT CONSTRUCTION MGR. | X | X | X |
| PFQCM | X | X | X |
| MANAGER-PROJECT QA | X | X | X |
| EXPEDITER | X | X | X |
| RECORDS MANAGEMENT GROUP | X | X | X |
| PFQAM | X | X | X |
| APPLICABLE ENGINEERING ADMINISTRATOR | X | X | X |
| CENTRAL DATA ENTRY GROUP | X | X | X |
| AUTHORIZED NUCLEAR INSPECTOR | C | C | X |
| WESTINGHOUSE REPRESENTATIVE | A | A | -- |
| SITE QA FILES | X | X | X |
| PROJECT DOCUMENT CONTROL CENTER | X | X | X |
| VENDORS | B | - | - |
| ASME FIELD DATA COMPLETION GROUP SUPV. <u>DISTRIBUTION CODE</u> | D | - | - |

- X. ALL NCR's
A. Only NCR's Covering NSSS Items.
B. Only NCR's Coded Return to Vendor
C. Only ASME III NCRs
D. Only NCR's concerning ASME III, NNS-1 and NNS-1A Piping and Pipe Supports

RELEASE NO

SHOP LOCATION

[illegible]

Figure 1

☐ NONCONFORMANCE REPORT (NCR)

Sheet ____ of ____

☐ DEFICIENCY REPORT (DR)Major ☐ Minor ☐ NumberBldg. 1 Unit

System

Turnover

☐ Seismic I☐ ANSI B31.1

Poten. Sign. Del.

Y N

☐ Safety Related☐ Other

CAR RECD

10CFR50.55(e)

Y N

Y N

☐ ASME Sec. CI

Description

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ATTACHMENT 1

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Prepared by

Date

Approved by

Issue

Date

Title

Org

Name

Title

Name

Disposition

☐ Accept-as-is☐ Restoration☐ Repair pere☐ Reject☐ Other See below

Action to be taken by

KEYWORDS

B I P

REFERENCE DOCUMENTS

TYPE

NUMBER

REV

AFFECTED DOCUMENTS

INTERDISCIPLINE REVIEW

TYPE

NUMBER

SHEET

REV

GROUP

PRINT NAME AND SIGN INITIALS

DATE

Required approvals prior to implementation of disposition
WESTINGHOUSE

YAEC

DISPOSITION DATE

WORK COMPLETED

LWA NUMBER

PREPARED BY

CHECKED BY

APPROVED BY

ANI
REVIEW

ACCEPTED

☐ Field Work Complete

WHITE - QA/QC

GREEN - RMG

YELLOW - Contractor

PINK - CDEG

GOLD - Engineering

NONCONFORMANCE REPORT CONTINUATION SHEET NCR/DR # _____

| KEYWORDS | | | | | | | | | | | | | | | | | | | | | | | | |
|----------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
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| REFERENCE DOCUMENTS | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------|--|--|--|--|--------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|-----|--|--|--|--|
| TYPE | | | | | NUMBER | | | | | | | | | | | | | | | REV | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | |

| AFFECTED DOCUMENTS | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------------|--|--|--|--|--------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|-------|--|--|--|--|
| TYPE | | | | | NUMBER | | | | | | | | | | | | | | | SHEET | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | |
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Description: (This information will not be fed into the CDT system. This space is only to further clarify the condition)

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Disposition Continued: (This information will not be fed into the CDT system. This space is only to further clarify the condition)

NCR No. _____

This image shows a handwriting practice sheet for the letter 'o'. It consists of two columns of horizontal lines. Each line is marked with vertical tick marks at regular intervals. The letter 'o' is written on each line in the first column, and the second column is left blank for practice.

[illegible][illegible]

PREPARATION OF NONCONFORMANCE REPORT

The number used in these instructions are the same as the number shown on the sample form, Attachment 1.

1. REPORT TYPE/NUMBER

Indicate the type of report being dispositioned (NCR (Major or Minor). The first two digits (Contractor ID) are the Contractor Discipline Codes. The next six characters are the NCR numbers which are assigned by the NCR number controller. The last position is alpha for revision level. The initial issue shall be "A". The preparer shall obtain a number from the applicable NCR Numbers Control Group upon preparation of the NCR.

Block indicated "Contractor Use" is reserved for use by the initiating contractor.

2. BUILDING, UNIT AND SYSTEM

Check 1 or 2. If an NCR/DR applies to a "common" item, check Unit 1 only. If the NCR/DR applies to additional systems, list the others as Keywords. Codes shall be identical to those delineated in TP-23. Indicate whether the NCR/DR has been turned over to STD (Yes or No).

3. CODE DESIGNATION

Mark the applicable box to show code designation.

4. POTENTIAL SIGNIFICANT DEFICIENCY 50.55(e)

- a. The NCR preparer shall check the "yes" block only if he is certain the item meets the requirements of a potential or actual 10CFR50.55(e) as delineated in Engineering Memo, SBE-85-101, dated March 20, 1985. Engineering has the final responsibility to evaluate an NCR for a Potential Significant Deficiency. The "no" block is reserved for Engineering use in their evaluation. If the "yes" block is checked by the NCR preparer or the evaluating Engineer, Engineering will follow the instructions delineated.
- b. Each NCR shall be evaluated by the initiating QA/QC organization for significant conditions which require corrective action. When

such conditions exist, the "CAR REQD" box on the NCR form will be checked, and a CAR will be issued.

5. NONCONFORMANCE 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. Identify the part of the structure affected (i.e., "El. 6'-0"). If further description is necessary, add the information on a continuation sheet under the heading "Description".

Additionally provide item identity in this area. If there is not enough space, provide the identity on the NCR continuation sheet.

6. PREPARED BY

The preparer shall sign name, show title and print name and date.

7. REVIEW AND APPROVAL OF NONCONFORMANCE

The UE&C QA/QC organization shall prepare and approve the description of the nonconformance. The approver shall sign name, show title and print name and date.

8. DISPOSITION

Check applicable disposition action. Those Major NCRs dispositioned "Return to Vendor" shall include UE&C QA review for inclusion of QA requirements. QA shall initial in "interdiscipline review" block to indicate review. Include more than one Contractor when applicable in the "Action to be Taken by" block.

9. ACTION TO BE TAKEN BY:

It is the dispositioner's responsibility to assign the responsible Discipline/Contractor for implementation of the disposition. When the Contractor is UE&C, only the discipline within UE&C shall be given, using the standard abbreviations in Attachment 11. When the disposition is "accept as is" on NCRs for UE&C, "UQC" shall be used. When the disposition is "accept as is" on DRs for UE&C, the discipline abbreviation shall be used. Standard abbreviations shall be used for all other contractors. Include more than one contractor, when applicable, in the "action to be taken by" block.

10. DISPOSITION SPACE

The corrective action to the nonconformance shall be provided and shall be specific for the application. The disposition shall not be generic and must be concise, accurate and complete. Technical justification shall be included as applicable and be complete. The NCR/DR disposition shall be reviewed for generic implications and retrofit requirements and if there are any, suitable actions shall be taken for resolution by the lead discipline. If more space is required, additional sheets shall be added. (See Paragraph IV.C.5.a.8). 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.

11. KEYWORDS

Add Keywords which provide means of retrieving data from CDT. Also, keywords are to be used to identify types of problems dispositioned for use in the NCR Trending Program. BIP(s) and room identification shall be included in the Keywords section per TP-23.

12. REFERENCE DOCUMENTS

List Reference Documents and latest revision number as specified in TP-23 to provide background information which is related to the design change. Reference Documents shall not require change as a result of the disposition. For format requirements, refer to TP-23.

13. AFFECTED DOCUMENTS

List all design documents covering the component specifically modified by the NCR/DR disposition. Both Units 1 and 2 documents shall be listed, if applicable.

Reviewers of NCRs/DRs shall determine whether any documents in their discipline are affected by the NCR/DR and if so, they shall assure a design change document is prepared to cover the change required.

All affected documents from previous revisions shall be included. If an affected document shown on a previous revision was listed in error or the document is not applicable to the revision, "D" for delete shall be placed in the far right column.

For format requirements, refer to TP-23. Please note that only those affected document types listed may be used. Design documents listed as

affected documents on an NCR/DR should not be listed as reference documents.

14. INTERDISCIPLINE REVIEW

Interdiscipline review shall be performed by all groups listed. The discipline reviewer shall print and sign his/her initials 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 "Interdiscipline Review" initials must be on the form prior to release of the dispositioned NCR to the Contractor.

15. REQUIRED SIGNATURES

Major NCRs

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 or NHY (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 to the Contractor.

Minor NCRs

The QA/QC Discipline Supervisor shall print name and date and sign the disposition of Minor NCRs as described in Para. IV.C.5.b.1).

Responsibilities of UE&C Engineering

The following personnel working under the supervision of DOS/DFS shall complete dispositions for Major NCRs.

a. UE&C Preparer

- 1) Prepares NCR disposition and includes all attachments to comply with requirements of this procedure. Assures that NCR and attachments are legible and reproducible.
- 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 and technical justification to nonconformance based on a complete investigation of nonconformance. Prepares calculations and sketches as required.
- 5) Reviews the NCR for generic implications and retrofit requirements.
- 6) Completes list of Reference Documents.
- 7) Completes list of Affected Documents and Keywords.
- 8) Lists Interdiscipline Reviewers and any other reviewers.
- 9) Assures that the proposed change will not affect the operation and environmental conditions and equipment qualifications under which the installed components/equipment was specified, purchased and certified.

b. UE&C Checker

- 1) Determines that sufficient detail work has been completed to support solution and is included as attachment to the NCR/DR.
- 2) The checker provides the independent design verification and confirms the technical adequacy of the solution and justification. This includes review of any associated calculations, and verification that all data entered on the NCR form and attachments are complete and accurate in accordance with ANSI N45.2.11.
- 3) Reviews the NCR for generic implications and retrofit requirements.
- 4) Verifies that the required interdisciplinary and other group reviews are correctly listed on the NCR and have been satisfactorily performed.
- 5) Verifies that the NCR/DR and attachments are legible and reproducible.
- 6) Verifies that no white-out or tape has been used to make corrections. The only acceptable method for making corrections is by lining through, initialling and dating.

c. UE&C Approver

- 1) Reviews the technical content of the solution.
- 2) Satisfies himself that disposition is in accordance with good engineering practices.
- 3) Satisfies himself that preparer and checker have been correctly selected to perform the engineering work.

- 4) Determines that work is necessary and that project schedule is not unduly affected.
- 5) Determines that solution is generally consistent with that provided for similar types of questions.

16. DISPOSITION DATE

Show date NCR issued for working disposition.

17. WORK COMPLETED

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

18. INSPECTION

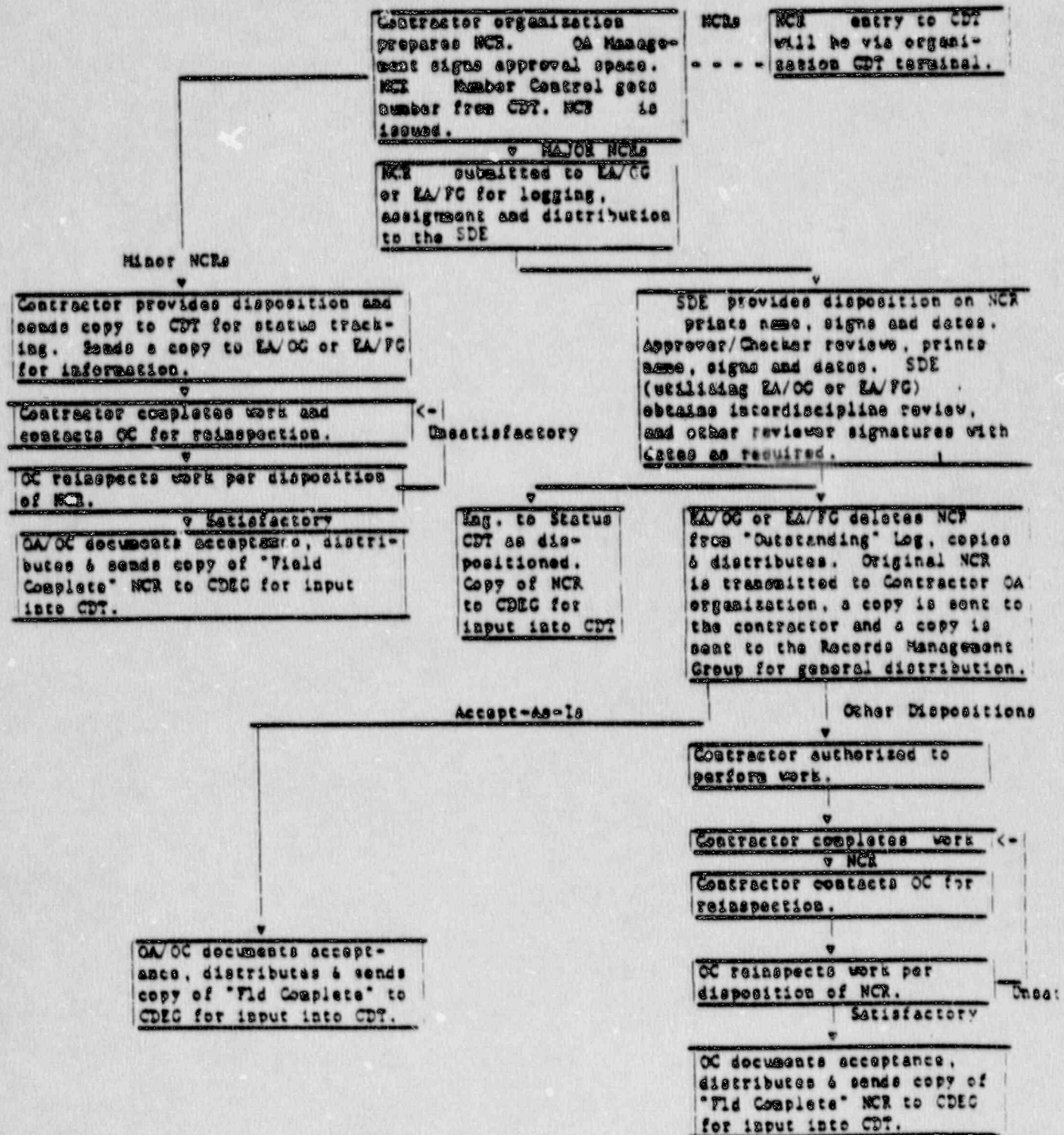
NCR's

QA/QC Group shall sign the space for reinspection and acceptance block. Once an acceptable inspection has been verified and signed off by the QA/QC group, the inspector shall check off the "Field Work Complete" block. QA/QC acceptance of NCRs that have been dispositioned "Accept As Is" shall be documented in the same manner.

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Attachment 3

FLOW CHART NO. 1

REQUIREMENTS FOR PROVIDING DISPOSITION TO NCR



FLOW CHART NO. 2

PROCESSING POTENTIAL SIGNIFICANT DEFICIENCIES - 10CFR50.55(e)

Initiator of NCR identifies
Potential 10CFR50.55(e)
Transmits copy to UE&C EA-OG/
EA-FG

EA-OG/FG logs in & transmits to
SDE for evaluation. Also provides
NHY CQA Staff Engineer with a
copy of NCR (Note 1).

SDE performs 10 CFR50.55(e) evaluation,
discusses with H.O. Engineering Staff as
required, establishes position and obtains
concurrence from APEM or PEM

NO

YES or 10 DAYS

SDE notifies UE&C SPEM and Y&EC
Project Office by memorandum
(NOTE 3)
SDE processed NCR per Flow Chart 1

SDE prepares letter of notification
of Potential 10 CFR 50.55(e) for SPEM
signature. Transmits letter to YNSD
Project Manager with copies to PCM, QA
and Contractor.

SDE processes NCR per Flow Chart 1

NO

Obtains Y&EC Concurrence
(3 Work Days)

YES

YNSD Project Office notifies
NRC, UE&C H.O. and YNSD CQA
Staff Engineer of Potential
10 CFR 50.55(e) within 24
hours of concurrence

UE&C H.O. Engineering Review
Board performs final evalua-
tion per UE&C AP-48
(NOTE 2)

Transmits copy of final
Report to UE&C SPEM, SDE
and YNSD Project Manager

YNSD transmits final Report
to NRC

SDE transmits copy of
NCR and associated
correspondence to UE&C
H.O. Engineering.
UE&C H.O. Review Board
will make final evalua-
tion after receiving
YNSD Project Office
notification (see Note 2)

FLOW CHART NO. 2

NOTES

- NOTE 1: Upon receipt of an NCR which has been identified as a potential 10 CFR 50.55(e) the EA-OG/FG shall log in and transmit the NCR to the SDE for evaluation and disposition. Also provide NNY CQA Staff Engineer with a copy of the NCR. A ten (10) day evaluation period shall commence from the date of log in by the EA-OG/FG. When the evaluating discipline does not have sufficient information to fully respond within ten days, an interim response must be provided within the ten day period stating that the deficiency should be considered to be potentially significant until sufficient data has been collected to fully resolve the condition. This action triggers a thirty day period in which a formal report must be submitted to the Client by letter. If the problem cannot be fully resolved within thirty days, another letter must be submitted before the thirty days has expired, describing the plan to collect necessary data and providing a schedule for the investigation and for submittal of the final report to the Client.
- NOTE 2: Home Office Engineering Review Board shall, within twenty-five (25) days from the date that the potential 50.55(e) items are reported by YNSD to the NCR, conduct a follow-up review and when the item is resolved a Final Report shall be written by the Review Board for transmittal to YNSD, SPEM and SDE.
- NOTE 3: The SDE prepares a memorandum for review and approval by SPEM to the Director of Engineering and Licensing (DEL) stating the technical justification rationale used in the non-reportability determination.

LIMITED WORK AUTHORIZATION REQUEST

RD.

Rev.

Related NCR No. Rev. No.

Reason for LWA request & intended work to be performed:

| Item Identity | Dis Affected |
|---------------|--------------|
| | |
| | |
| | |
| | |

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Attachment 5

| Requested by: | Organization | Title | Signature | Date |
|---------------|--------------|-------|-----------|------|
| | | | | |

Restrictions and/or Precautions:

| Approved by: | Organization | Title | Signature | Date |
|--------------|--------------|-------|-----------|------|
| | | | | |

Release for Limited Use:

Status of item(s) has been reviewed including all NCRs 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):

| Organization | Title | Signature | Date |
|--------------|-------|-----------|------|
| | | | |

LWA denied for the following reasons:

| Organization | Title | Signature | Date |
|--------------|-------|-----------|------|
| | | | |

ACTION COMPLETED

| Signature | Title | Organization | Date |
|-----------|-------|--------------|------|
| | | | |

LWA CLOSED by verification of ACTION COMPLETED
OR NCR CLOSED-NCR #


| Signature | Title | Date |
|-----------|-------|------|
| | | |

LWA COMPLETION

1. UE&C OA/OC shall assign the LWA number
2. Initiator shall list the related NCR
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 approval of the corresponding NCR approve and list the limitations and precautions, as applicable
8. PFOCM shall approve and issue
9. The LWA requester shall sign ACTION COMPLETE when the work stipulated on the LWA is complete
10. Signature of OA/OC person verifying ACTION COMPLETE
11. If the ACTION COMPLETE block is not signed off prior to NCR field completion, the LWA will be closed based on the NCR field completion

LWA TAG

YELLOW

| | | | |
|--|---|--|--|
| FORM 8484 |  | United engineers & constructors inc | |
| | LIMITED WORK AUTHORIZATION | | |
| | LWA NO. _____ | | |
| | ITEM _____ (Identify Item and Limits of Activity) | | |
| OC _____ | | DATE _____ | |
| SIGNATURE | | | |
| TO BE ATTACHED OR REMOVED BY QA/QC personnel only. | | | |

TAGS

RED



united engineers & constructors inc.

NCR

No. _____

HOLD

RIR No. 1 TAG No. 1

ITEM 2

P/O No. 4

QC 5 DATE _____

SIGNATURE

TO BE ATTACHED OR REMOVED BY QA/QC 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 UE&C QC Inspector/Engineer and date

GREEN



united engineers & constructors inc.

RELEASE

RIR No. 1

ITEM 2

P/O No. 4

QC 5 DATE _____

SIGNATURE

TO BE ATTACHED OR REMOVED BY QA/QC personnel only.

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ATTACHMENT 3

CONTRACTOR PROBLEM REPORT

| | | | | |
|---|--|--|------------------|-------------|
| Designer's Organization LSC Model/Mission: | | CPE No. | Issued To: | Control No. |
| | | Location: | Int. of SLP # | |
| Description of Problem: | | | | |
| | | | | |
| Generated By: | | | | |
| | | Title | Signature | Date |
| Evaluated: | | | | |
| | | | | |
| | | Title | Signature | Date |
| DISCREPANCIES: | | The following action has been taken: | | |
| <input type="checkbox"/> WCB Number <input type="checkbox"/> DB Number <input type="checkbox"/> S/A | | | | |
| Approved By: | | | | |
| | | Title | Signature | Date |

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ATTACHMENT 9

DESIGN CHANGE MODIFICATION SHEET

| 1. CHANGE DOCUMENT TO BE MODIFIED: | | | | |
|------------------------------------|-------|--------|-----|--|
| TYPE | GROUP | NUMBER | REV | |
| | | | | |

2. SECTION I. FILL IN ONLY THOSE FIELDS THAT ARE AFFECTED

| | | | | |
|----------------|---------|--------------|---------|--|
| INITIATOR | | | | |
| DATE INITIATED | | | | |
| SLIP NUMBER | | | | |
| BUILDING | UNIT | SYSTEM | | |
| RESP. CONTR. | ADD/DEL | RESP. CONTR. | ADD/DEL | |
| | | | | |
| | | | | |

3. SECTION II KEYWORDS, MULTIPLE SLIPS, SYSTEMS OR BUILDINGS

| ACTION | | ACTION | | ACTION | |
|--------|---------|--------|------|--------|--|
| A/D | SYSTEMS | A/D | BLDG | A/D | |
| | | | | | |
| | | | | | |

4. SECTION III REFERENCE DOCUMENTS (DRAWINGS, DESIGN CHANGE DOCUMENTS, ETC.)

| TYPE | NUMBER | SHEET | AFF REV | ACTION (A.R.D) | NEW AFF REV |
|------|--------|-------|---------|----------------|-------------|
| | | | | | |
| | | | | | |

5. SECTION IV AFFECTED DOCUMENTS

| TYPE | NUMBER | SHEET | INC REV | STATUS | ACTION (A.R.D) | AFF REV | REV AFF REV |
|------|--------|-------|---------|--------|----------------|---------|-------------|
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

PREPARE SIGNATURE

DATE

SUPERVISOR SIGNATURE

DATE

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Attachment 10

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REC 1

END •

NONCONFORMANCE REPORT

PARTIAL RELEASE SHEET # _____

[illegible]

CONTRACTOR IDENTIFICATION

CONTRACTOR
CODE NUMBER
FOR
NCR/DR NUMBER

CODES TO BE USED TO
DESIGNATE
"ACTION TO BE TAKEN BY"
ORGANIZATION

| | | |
|----|-------------------------------------|-----|
| 20 | BISCO | BIS |
| 22 | Pullman Construction Industries | PCI |
| 40 | Cooling Tower - UE&C - Lump Sum | ULS |
| 41 | Diesel Bldg - UE&C - Lump Sum | ULS |
| 42 | Fuel Storage - UE&C - Lump Sum | ULS |
| 43 | Turbine Bldg - UE&C - Lump Sum | ULS |
| 44 | Chlorination Bldg - UE&C - Lump Sum | ULS |
| 45 | Waste Process A - UE&C - Lump Sum | ULS |
| 46 | Waste Process B - UE&C - Lump Sum | ULS |
| 52 | Mechanical - UE&C | MEC |
| 54 | Electrical - UE&C | ELE |
| 59 | Civil/Structural - UE&C | CIV |
| 72 | Pittsburg Testing Laboratory | PTL |
| 73 | Pullman-Motors | P-H |
| 74 | Receiving - Storage - UE&C | QRS |
| 77 | Westinghouse | WST |
| 82 | Start-Up QC | SQC |
| 83 | Grinnell Fire Protection | GFP |
| 84 | In-Service Inspection Group | ISI |
| 92 | AC&S | ACS |
| 93 | Instrumentation & Circuitry - UE&C | I&C |
| 94 | B31.1 Upgrade Piping - UE&C | UEB |
| 99 | Start-up Test Department | STD |
| * | Expediting/Purchasing | EXP |
| * | UE&C Gauge Facility | UGF |
| * | UE&C Preventive Maintenance | UPM |
| * | UE&C Work Package Group | WPG |
| * | UE&C QA/QC | UQC |
| * | UE&C Engineering | UEC |
| * | UE&C Systems Completion | UEC |

* - Designates Contractors who may be required to take action, but who do not normally issue NCRs/DRs.

NOTE 1 - Items, i.e., numerical, alpha, codes and Contractor identification not listed herein can be found in TP-23.