

QUALITY ASSURANCE PROCEDURE QA - 15

NONCONFORMING MATERIALS, PARTS
OR COMPONENTS

FOR

SEABROOK STATION

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE

J.O. 9763

REVISION			APPROVAL			
No.	Date	Page Nos. Revised	Prepared By	Project Manager	Manager R&QA	Const. Manager
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January 14, 1974

No.	Date	Prep. By	QA/Rev.	Appr. By
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2	9/26/74	[Signature]	[Signature]	622-
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No.	Date	Page Nos. Revised	Prepared By	Project Manager	Manager	Constr. Mgr.
5	Issue 7/30/76	ALL	D. Mann	[Signature]	[Signature]	[Signature]
6	11/29/76	1, 11, 4, 5, 6	D. Mann	[Signature]	[Signature]	[Signature]
7	8/8/78	1, 11, 1-6, ATT. 1-3	D. Mann	[Signature]	[Signature]	[Signature]
8	12/7/79	2, 3, 5, 7, 8, Att 1 thru 3	[Signature]	[Signature]	[Signature]	[Signature]
9	10/6/80	1 thru 9 & Table 1	[Signature]	[Signature]	[Signature]	[Signature]
10	8/24/82	All but pg. 8, Fig. 1 and App. A	[Signature]	[Signature]	[Signature]	[Signature]
11	3/14/84	All	[Signature]	[Signature]	[Signature]	[Signature]

(Cont'd. on Page 2)

3/8/85

QA-15

IDENTIFICATION OF CHANGES
For REVISION 12

This procedure has been revised in its entirety.

Title changes have been made throughout to reflect the current organization.

ACN's incorporated in this revision:

165, 174, 213, 229, 231, 232, and 279

Note: ACN No. 279 added Appendix B to QA-15 which extracted the essential elements from New Hampshire Yankee Procedure ASP-3, to reflect UE&C's method of handling NCRs.

To provide clarification and continuity, QA-15 was rewritten to combine Appendix B with the existing procedure.

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Figure 1

Appendix A - Trend Analysis Input Sheet

Attachment 1 - NCR Form

Attachment 2 - Preparation of Nonconformance Report

Attachment 3 - Flow Chart for providing disposition to NCR

Attachment 4 - Flow Chart for Processing Significant
Deficiencies

Attachment 5 - Limited Work Authorization Request

Attachment 6 - LWA Completion - LWA Tag

Attachment 7 - Hold & Release Tags

Attachment 8 - Contractor Problem Report

Attachment 9 - Nonconformance Report Partial Release
Sheet



& constructors inc

PUBLIC SERVICE CO. OF NEW HAMPSHIRE-SEABROOK STATION

SUBJECT:

NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

REV: 12

DATE: 3/8/85

PAGE 1 of 28

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. QCP-7-1 - Receiving Inspection of UE&C Purchased Items
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

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 ~~a. Affected~~ 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, Y&EC 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.
 - 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.
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 discrepancy which can be resolved by UE&C 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 (as described in Paragraph II.C.13, Notes 1 and 2) 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 ~~as~~ ASME Section III Code stamped components shall be documented as a Major NCR.

- 1) Restoration
- 2) Scrap (Return to UE&C warehouse)
- 3) Return to supplier (Contractor supplied material only)
- 4) Documented deficiencies, except the following which must be documented on a Major NCR:

- a) Owner-supplied material/items, and
 - b) 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.
5. A deficiency that is found after final acceptance inspection that can be repaired by an approved procedure shall be documented on an NCR form.
- 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 or rework which does not utilize an approved repair/rework procedure.
 - 5) Section XI repairs and replacements.
 - 6) Any nonconformances which require UE&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 incapable 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 (2 sheets)
2. Attachment 2 - Preparation of Nonconformance Report Form (4 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

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 QCP-7-1.
 - 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.
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). Personnel performing

quality functions (QA, QC, Field Engineers, etc.) shall initiate NCRs. (Titles shown below are positions or applicable designees).

- A. 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. Project Engineering Manager (PEM) - shall have overall responsibility for personnel providing dispositions for Major NCRs including responses for Potential Significant Deficiencies.
 2. Discipline Engineering Manager (DEM) - 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. Discipline Office Supervisor (DOS) and/or Discipline Field Supervisor (DFS) - 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/G)/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
 5. Records Management Group - (RMG) shall be responsible for standard distribution of Major NCRs after dispositioning and to maintain files of all NCRs including revisions.
- B. Reliability & Quality Assurance shall review and approve the supplier and 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/Documentation Review (QAS-DS/DR).

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 Section 4.0 of this procedure, and for reportability under 10CFR50.55(e).

Note: 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.

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;
- 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 name
- 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 in this space after input into CDT.
- 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 name;
 - e) BIP
 - f) building;
 - g) unit;
 - h) system;
 - i) description.

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

- 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 "Revised" 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.

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 in another discipline area of responsibility, he shall report it to the applicable Contractor's QA/QC organization via CPR for evaluation.
- b. 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.

- c. 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 closed CPR.
 - d. 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 a copy of each closed CPR to the initiator.
 - e. 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).
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.
4. Maintaining Status of Nonconforming Items (NCRs)
- a) Tagging & Segregation
 - 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/DR. 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 resubmital.
- 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) On 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/DR 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

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 DOS or DFS for evaluation. The EA/OG or EA/FG shall maintain copies of all unanswered Major NCRs.
- 2) Upon receipt of a Major NCR, the Discipline Office Supervisor (DOS)/Discipline Field Supervisor (DFS) 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 DOS/DFS shall provide dispositions to NCRs to assure compatibility with design requirements. The DOS/DFS shall evaluate the NCR for generic implications and retrofit requirements.
- 4) The DOS/DFS 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 DOS/DFS 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 DOS/DFS 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 NC, 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.

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 will transmit the dispositioned original Major NCRs to the applicable Contractor's QA/QC organization and one copy of the NCR to the applicable Contractor, Central Data Entry Group and the Records Management Group.
 - 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, 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, 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.

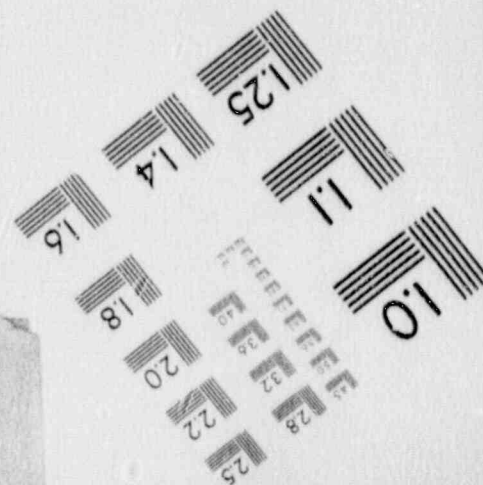
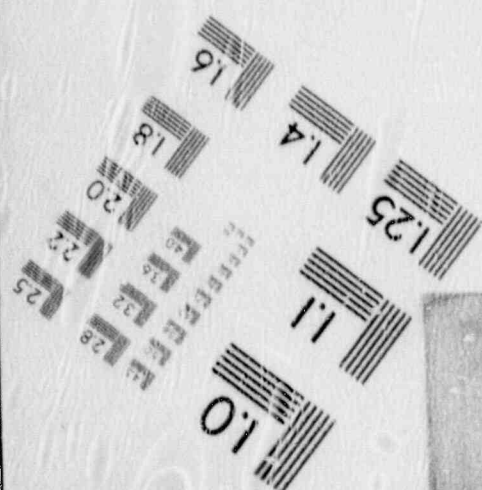
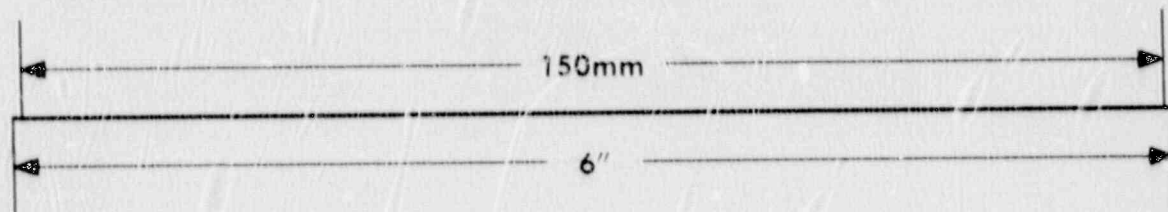
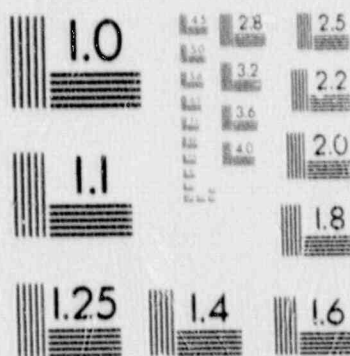
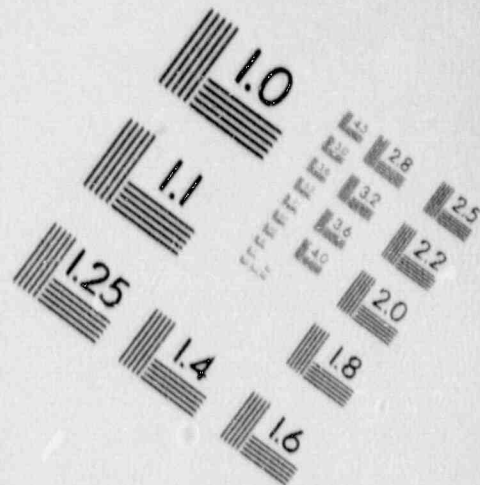
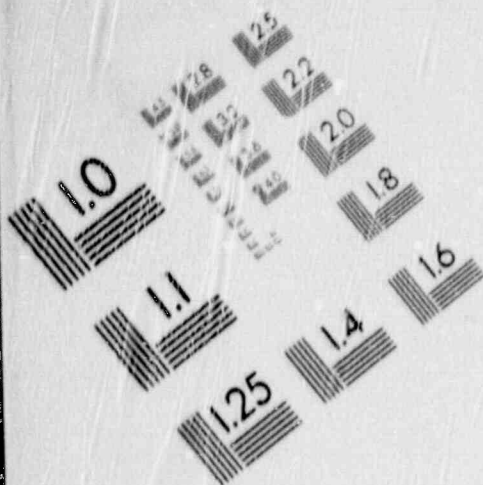
- b. Partial releases shall be documented on the Nonconformance Partial Release Sheet (Attachment 10) until the entire NCR can be signed off and accepted as complete.

10. NCR Revisions

- 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"

1

IMAGE EVALUATION
TEST TARGET (MT-3)



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 DOS/DFS shall revise the disposition of the previous issue of the NCR and 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.

NOTE: Information considered "still valid" shall include:

- Description of work completed
 - Description of work to be performed
 - "Accept-as-is" dispositions and supporting information
- d. Changes shall be clearly identified by "clouding" the change. "Clouds" identifying prior revisions may be left on the NCR. Each cloud will be identified with a Delta revision letter next to the cloud.
 - e. Any non-technical changes to an NCR which correct administrative/typographical errors (Referene Documents, Keywords) or added 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. CDEG will forward the Design Change Document Modification Sheet to the holder of the original NCR for attachment to the original NCR.

Distribution of the Design Change Document Modification Sheet is not required. Changes made in this manner shall not be considered as a formal revision to the NCR.

NOTE 1: The Design Change Document Modification Sheet shall not be used for changes to the Affected Documents section of the NCR.

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

- a. If it is required to void an NCR, it shall be stamped or marked "VOID". The reason for voiding the NCR shall be stated on the NCR and signed by preparer of 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 shall forward a copy to CDEG to update CDT and forward a copy of the void NCR to the person that originated the NCR.

12. Revising Affected Documents

a. Criteria

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

- 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

- b. The CDT System will list all affected documents (See TP-23).
- c. On a quarterly basis, the PEM shall provide to the Director of Engineering and Licensing an assessment of unincorporated NCRs exceeding the 60 day criteria.

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(e).
 - 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 NCR

- a. NCRs
 - 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.
- 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 Generated Prior to January 21, 1985

NCRs (including NRFs) generated prior to January 21, 1985 shall continue to be processed in accordance with the last revision of Engineering and Construction procedures that were in effect. However, if it should become necessary to revise one of these previously generated NCRs after January 21, 1985, the revision shall

be initiated and processed in accordance with the provisions of this Procedure. The previous NCR number will be retained and the NCR shall be elevated to the next higher revision.

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/DR 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/DR 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-2.
6. The Supervising Engineer-Vendor Surveillance shall arrange for resurveillance of the item(s) upon notification from the supplier via the Procurement Department.

7. Items returned to the site shall be subject to Receiving Inspection per QCP-7-1. 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/DR 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/DR. 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. Each month, the PFQAM shall review the NCRs issued by UE&C for the previous four months, as a minimum, and evaluate them for quality trends and conditions. The Computerized report generated by YAEK, 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, the estimated date of closing the NCR, and the disposition. Copies of this report shall be distributed in accordance with Table 1 - Nonconformance Report Summary.
3. The monthly summary shall also include in the cover letter, the number of notifications to the vendor per par. II.E.5 and the number of Rebar Releases involve.
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-16-1.

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.

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
PROJECT QA MANAGER	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	-	-

DISTRIBUTION CODE

- X. ALL NCR's
- A. Only NCR's Covering NSSS Items.
- B. Only NCR's Coded Return to Vendor
- C. Only ASME III NCRs

RELEASE NO.

SHOP LOCATION

[illegible]

Figure 1

REPORT NO. TREND ANALYSIS INPUT SHEET
(1 per nonconforming condition)DATE: CRAFT ID: CONTRACTOR NO.

TYPE OF REPORT (1)

1. NCR (Major and Minor)
2. Surveillance/Quality Activity Report
3. Inspection Report
4. Audit (YAEC)
5. Audit (Other)
6. NRC Report
7. Work Request
8. Startup Notification Report
9. INPO Report
10. Engineering Notification Report
11. Deficiency Reports (Non-Safety)
12. Other

(Print)

AREA OF RESPONSIBILITY (2)

1. Maintenance
2. Engineering
3. Piping
4. Supports
5. Construction
6. Supervision/Management
7. Contractor
8. Purchasing
9. Training
10. Records Management
11. Document Control
12. QA/QC
13. Startup
14. Vestinghouse
15. Other:

(Print)

QA CRITERIA (1)

1. Organization
2. QA Program
3. Design
4. Procurement/Receipt Inspection
5. Instructions, Procedures and Drawings
6. Document Control
7. Control of Purchased Material, Equipment, and Services
8. Identification and Control of Material, Parts, and Components
9. Control of Special Processes/WDE/Welding
10. Inspection
11. Test Control
12. Control of Measuring and Test Equipment
13. Handling, Storage and Shipping
14. Inspection, Test, and Operating Status
15. Nonconforming Material, Parts, or Components
16. Corrective Action
17. Records
18. Audits
19. Other:

PROBLEM DESCRIPTION (3)

1. QA Program Implementation Failure
2. Violation of Hold Points
3. Procedural Violation-Failure to Follow
4. Procedural Violation-Incomplete/Lack
5. Personal Error
6. Design Status-Drawings/ECA, etc.
7. Documentation Discrepancy/Inadequate
8. Equipment Failure
9. Inadequate Instruction and Training
10. Design Discrepancy
11. Hardware
12. Other(s):

(Print)

DISCIPLINE (1)

1. Electrical
2. Mechanical
3. Structural/Civil
4. HVAC
5. Instrumentation
6. Startup
7. Insulation
8. Preventive Maintenance
9. UP&C Turnover
10. Painting and Coating
11. Nuclear
12. Mechanical Services
13. Other:

(Print)

COMMENTS:

(Print)

☐ NONCONFORMANCE REPORT (NCR)

Sheet ____ of ____

CONTRACTOR USE

☐ DEFICIENCY REPORT (DR)

Major ☐

Minor ☐

(1)

Number

Blkg (2) Unit

System

Turnover

☐ Seismic 1

☐ ANSI B 31.1

(4)

☐ Poten Sig Def
10CFR50.55(e)

0 1 2

Y N

(3)

☐ ASME Sec ____ Cl ____

☐ Other

Description

(5)

SEABROOK
QA-15
Revision 12
3/8/85
Attachment 1
Sheet 1 of 2

Prepared by

(6)

Approved by

(7)

Title

Org

Name

Date

Title

Name

Date

Disposition

☐ Accept-as-is

☐ Restoration

☐ Repair per

(8)

☐ Reject

☐ Other. See below

Action to be taken by

(9)

(10)

KEYWORDS (11)

REFERENCE DOCUMENTS (12)

TYPE

NUMBER

REV

AFFECTED DOCUMENTS (13)

INTERDISCIPLINE REVIEW (14)

TYPE

NUMBER

SHEET

REV

GROUP

INITIAL

DATE

Required approvals prior to implementation to disposition:

WESTINGHOUSE

(15)

Title Signature Date

YAEC

Title Signature Date

ISSUE DATE (16)

WORK COMPLETED

(17)

Title Signature Date

PREPARED BY:

(15)

CHECKED BY:

APPROVED BY:

REJECTED

1st Time ☐

(18)

ACCEPTED

2nd Time ☐

Initials
OCE

Initials
OCE

☐ Field Work Complete

WHITE - QA/QC

GREEN - RMG

YELLOW - Contractor

PINK - CDEG

GOLD - Engineering

NONCONFORMANCE REPORT CONTINUATION SHEET NCR/DR # _____

KEYWORDS																									

REFERENCE DOCUMENTS																									
TYPE		NUMBER																				REV			
AFFECTED DOCUMENTS																									
TYPE		NUMBER																				SHEET		REV	

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

SEABROOK
QA-15
Revision 12
3/8/85
Attachment 1
Sheet 2 of 2

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

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 CDT. 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

Insert Codes (Unit 1 or 2). If an NCR applies to a both Units 1 and 2, indicate Unit 0. If the non-conformance applies to both units, check block 0. If the change applies to additional systems, list the others as Keywords. Codes shall be identical to those delineated in TP-23. Indicate whether the NCR 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)

Check box if evaluation results in this finding or if questionable. If box is checked, see Flow Chart 2, Attachment 4. If box is not checked the NCR has been evaluated and a "significant deficiency" was not identified.

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 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 Engineer's responsibility to assign the responsible Discipline/ Contractor for implementation of the Disposition.

10. DISPOSITION SPACE

The disposition to the nonconformance shall be provided and must be concise, accurate, and complete. Technical justification shall be included as applicable. The NCR disposition shall be reviewed for generic implications and retrofit requirements. 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. Add BIP(s). (See TP-23.)

12. REFERENCE DOCUMENTS

List Reference Documents and latest revision number.

13. AFFECTED DOCUMENTS

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

14. INTERDISCIPLINE REVIEW

Interdiscipline review shall be performed by all groups and listed. The discipline reviewer shall initial and date the box indicating acceptance of the proposed disposition as it affects his work. Review/Approval may be obtained via telephone if both parties agree. The initials of the reviewer/approver shall be printed in the space followed by the initials of preparer if telephone approval is obtained. All "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.
- 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.

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 the technical adequacy of the solution and justification. This includes any associated calculations, and verifies 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.

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. ISSUE 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.

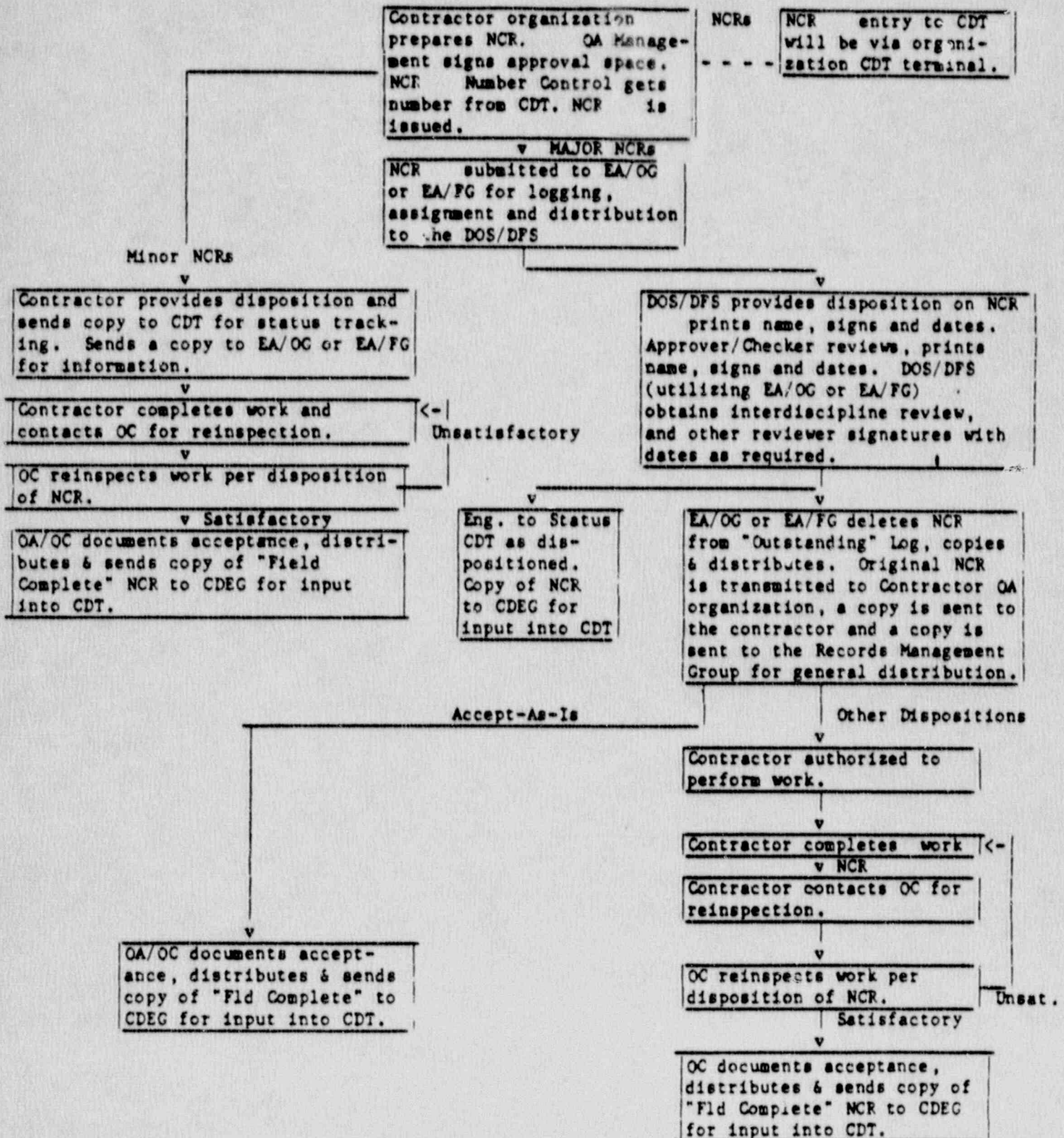
18. INSPECTION

NCR's

QA/QC Group shall sign the space for reinspection and acceptance block and list Inspection Report Numbers (see Paragraphs IV.C.14.a.6 thru IV.C.14.a.8 for unacceptable inspections). 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 except that no inspection report numbers shall be noted.

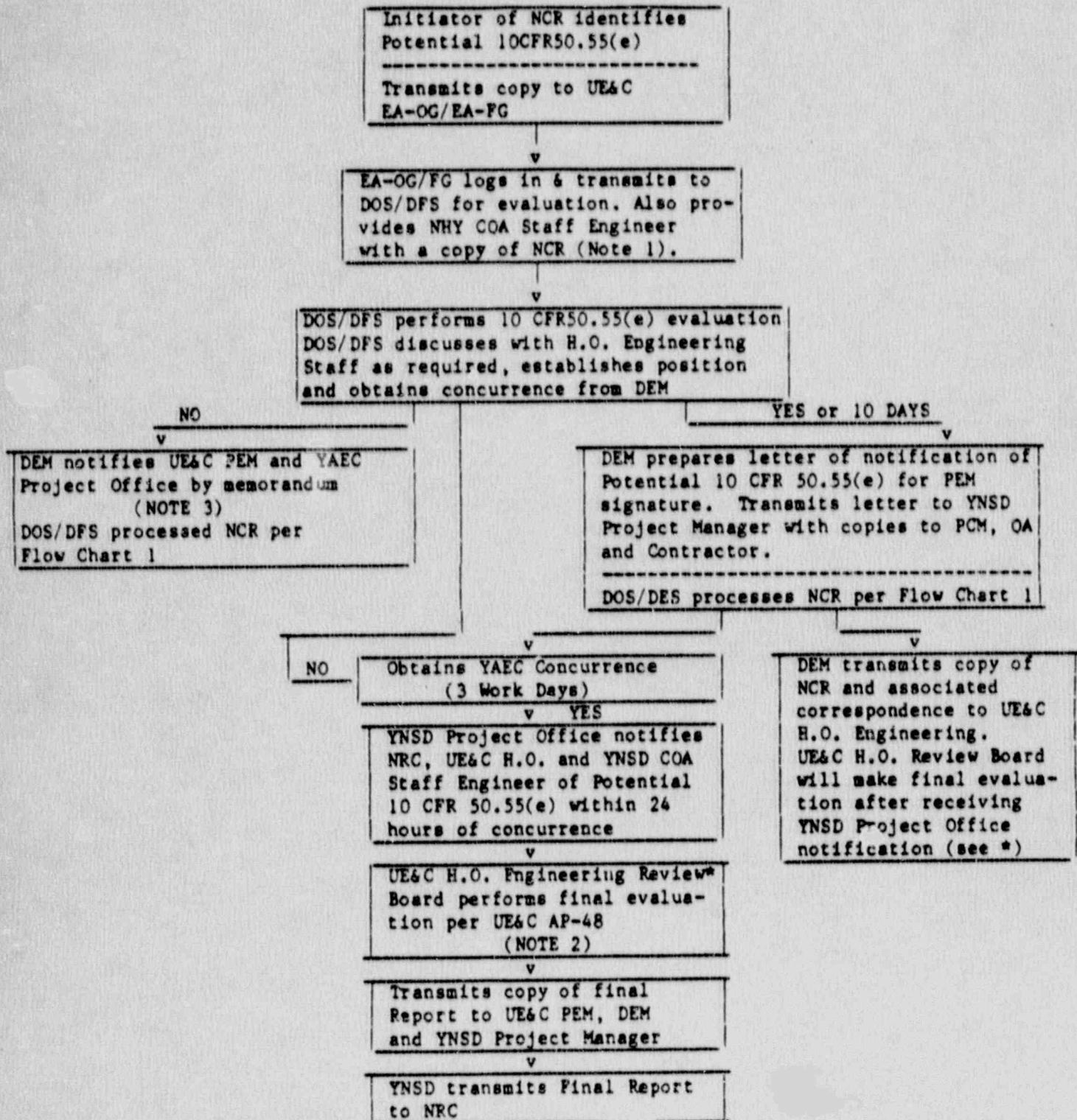
FLOW CHART NO. 1

REQUIREMENTS FOR PROVIDING DISPOSITION TO NCR



FLOW CHART NO. 2

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



FLOW CHART NO. 2

NOTES

- NOTE 1: Upon receipt of NCRs which have been identified as either potential 10 CFR 50.55(e) the EA-OG-FG shall log-in and transmit the NCR to DOS/DFS for evaluation and disposition. Also provide NHY COA Staff Engineer with copy of NCR. A ten (10) day evaluation period shall commence from the date of log-in by the EA-OG/FG. If the evaluation can not be completed within ten (10) calendar days from the date of log-in by the EA-OG/FG, the NCR must be reported as a potential 10 CFR 50.55(e) item to the YAEC Project Manager.
- 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, PEM and DEM.
- NOTE 3: The DEM prepares a memorandum for review and approval by PEM to the Director of Engineering and Licensing (DEL) stating the technical justification rationale used in the non-reportability determination.

No. [] Rev. []

[illegible][illegible]

DOI: 10.1002/for

Restrictions and/or Precautions:

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):

LWA denied for the following reasons:

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/QC 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 requestor shall sign ACTION COMPLETE when the work stipulated on the LWA is complete
10. Signature of OA/QC 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

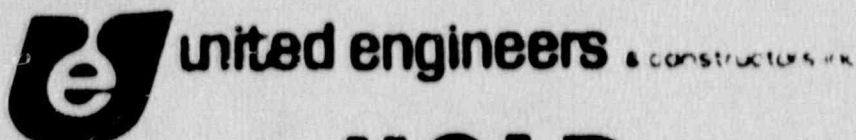
YELLOW

FORM 648a LWA TAG 11/2/85		United engineers & constructors inc
	LIMITED WORK AUTHORIZATION	
	LWA NO. _____	
	ITEM _____ (Identify Item and Limits of Activity)	

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

TAGS

RED



NCR
No. _____

HOLD

RIR No. 1 TAG No. 3

ITEM 2

P/O No. 4

QC 5 DATE _____

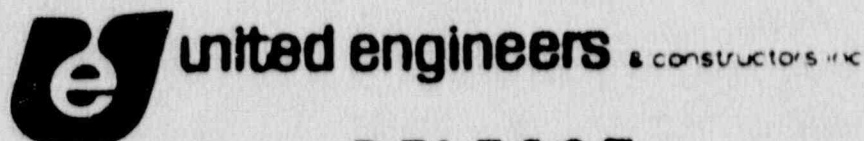
SIGNATURE

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

FORM 4683

- 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



RELEASE

RIR No. 1

ITEM 2

P/O No. 4

QC 5 DATE _____

SIGNATURE

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

FORM 4682

SEABROOK
OA-15
Revision 12
3/8/85
Attachment 8

CONTRACTOR PROBLEM REPORT		CPR No. _____	
Item Identification:	Location:	Sht. _____ of _____	BIP # _____
Description of Problem:			
Generated By: _____		Signature	Date
Evaluation:			
_____		Signature	Date
The following action has been taken:			
DISCREPANCIES:			
<div style="display: flex; justify-content: space-between;"><div style="width: 30%;"><input type="checkbox"/> NCP No. <input type="checkbox"/> Dr No. <input type="checkbox"/> N/A</div><div style="width: 70%; text-align: center;"><div>Approved By: (OA Manager- NCP's) (Construction-DR's)</div><div style="display: flex; justify-content: space-between; margin-top: 10px;"><div>_____</div><div>Signature</div><div>Date</div></div></div></div>			

DESIGN CHANGE DOCUMENT MODIFICATION SHEET

CHANGE DOCUMENT TO BE MODIFIED:

TYPE	GROUP	NUMBER	REV

SECTION I. (TRANSACTION "MDCD")

FILL IN ONLY THOSE FIELDS THAT ARE AFFECTED

INITIATOR

DATE INITIATED _____ DATE REQUIRED _____

BIP NUMBER _____

BUILDING _____ UNIT _____ SYSTEM _____

RESP. CONTR.	ADD/DEL	RESP. CONTR.	ADD/DEL

SECTION II (TRANSACTIONS "AMULTS" AND/OR "DMULTS")
 MULTIPLE BIPS, SYSTEMS OR BUILDINGS

BIPS	A/D	SYSTEMS	A/D	BLDGs	A/D

SECTION III (TRANSACTIONS "AREF AND/OR "WREF")
 REFERENCE DOCUMENTS (DRAWINGS, ETC.)

TYPE	NUMBER	SHEET	AFF REV	ACTION (A.M.D.)	NEW AFF REV

DESIGN CHANGE DOCUMENTS

TYPE	NUMBER	ACTION (A.D.)

Page _____ of _____
NCR # _____
DR # _____

PARTIAL RELEASE SHEET # _____

[illegible]