

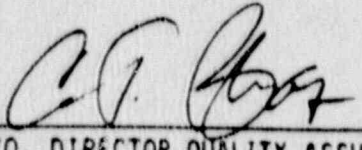
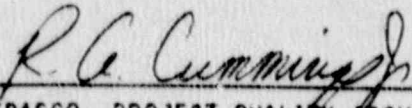
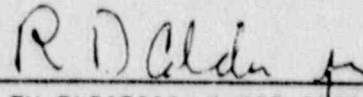
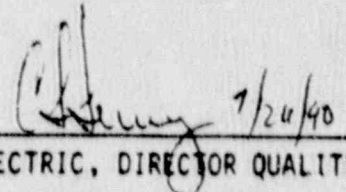

COMANCHE PEAK STEAM ELECTRIC STATION

UNIT 2

EBASCO

**CODE CONTROL PROGRAM
ASME III DIVISION 1**



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PREPARED BY: C. T. Anderson		SUPERSEDES: REVISION: 1
		DATE: 08/13/90
APPROVAL:  EBASCO, DIRECTOR QUALITY ASSURANCE  EBASCO, PROJECT QUALITY ASSURANCE PROGRAM MANAGER		CONCURRENCE:  TU ELECTRIC, CHIEF ENGINEER  TU ELECTRIC, DIRECTOR QUALITY ASSURANCE
THIS SECTION ACCEPTED BY EBASCO AUTHORIZED INSPECTION AGENCY: <div style="display: flex; justify-content: space-between;"> <div>  AUTHORIZED SIGNATURE </div> <div> <u>July 27 '90</u> DATE </div> </div>		

COMANCHE PEAK STEAM ELECTRIC STATION

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1.0 GENERAL

- 1.1 The Project Quality Assurance Program Manager (PQAPM) for Code Control Group (CCG) activities is responsible for overseeing the activities of the various organizations performing Code work at Comanche Peak Steam Electric Station (CPSES) Unit 2, to establish an additional level of assurance of compliance with Project Code commitments. This overview shall include reviews of activities that have been and are currently being performed. The reviews will identify and take credit for those activities which meet the needs of this Program. Overview of these activities will ensure continued satisfaction of the requirements of this Program. The reviews will also identify any activities requiring increased emphasis to assure compliance with Project Code commitments. These reviews shall be documented in accordance with methods described in this Section.
- 1.2 Nonconformance Reports (NCRs), Deficiency Reports (DRs), and TU Evaluation (TUE) Forms are initiated, dispositioned and implemented by various organizations at CPSES in accordance with their Quality Assurance (QA) Programs and implementing procedures. All NCRs, DRs and TUEs are numbered and tracked in accordance with CPSES procedures.
 - 1.2.1 TUEs are used (as NCRs were formerly used) to report and resolve hardware conditions which do not conform with applicable engineering or Code requirements. Stone & Webster Engineering Corp. (SWEC), Westinghouse, Bechtel and Impell provide the engineering dispositions for activities within their respective scopes of work when the TUE or prior existing NCR affects engineering requirements. Brown & Root provides dispositions for TUEs and prior existing NCRs which do not require engineering disposition.
 - 1.2.2 TUEs are used (as DRs were formerly used) to report and resolve procedural and/or programmatic deficiencies. Responsible organizations (as defined in 1.2.1) provide disposition(s) for TUEs and prior existing DRs affecting their activities.
- 1.3 Changes affecting engineering and design requirements shall be overviewed as required by Section 6 of this Manual.

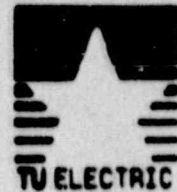
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2.0 COG REVIEWS OF ENGINEERING/DESIGN DISPOSITIONS FOR NONCONFORMANCES

2.1 Code-related TUE and NCR dispositions which affect engineering and design requirements at CPSRS Unit 2 shall be overviewed by the PQAPM to establish confidence that the dispositions contain sufficient information pertaining to the Code, method of testing, inspection, and documentation to establish compliance with the Project Code commitments. TUE and NCR dispositions which do not affect engineering and design requirements shall be subject to COG surveillance in accordance with this Section.

2.2 The PQAPM shall verify that dispositioned TUEs and NCRs have been satisfactorily closed and incorporated (when appropriate) into engineering documents.

3.0 COG SURVEILLANCE OF NONCONFORMANCE AND DEFICIENCY PROCESSING

3.1 The PQAPM shall perform surveillance activities on the TUE, NCR and DR processing activities of the various CPSRS organizations in accordance with Sections 6 and 8 of this Manual, as applicable.

3.2 The surveillance activity will cover those TUEs, NCRs and DRs which do not affect engineering and design requirements to assure:

- Compliance with QA program and implementing procedures of the implementing organization.
- Project Code commitment implementation.
- Engineering and design requirements have not been affected.

3.3 As a part of COG surveillance of nonconformance and deficiency processing activities, the PQAPM may determine that previous CPSRS reviews performed on TUEs, NCRs and DRs which do not affect engineering and design requirements satisfy attributes of this Program.

3.3.1 If previous reviews satisfy the needs of the Program, the PQAPM shall document the decision including a justification to provide evidence that these reviews were sufficient for the purposes of the Program. This documentation shall be maintained in accordance with Section 7 of this Manual.

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3.3.2 If the needs of this Program are not satisfied by previous activities, the PQAPM shall perform additional surveillance.

4.0 OVERVIEW REPORTING

The results of OCG surveillances/overviews conducted in accordance with this Section, including unsatisfactory conditions, shall be documented on a Surveillance Report, Exhibit 15.6 and controlled in accordance with OCG Project Procedures. Unsatisfactory conditions identified by OCG shall be assigned for resolution by the responsible organization in accordance with established CPSES procedures. If at the time of Surveillance Report issuance an unsatisfactory condition is not resolved by the responsible organization in a manner acceptable to the OCG, the OCG shall initiate, as appropriate, a Surveillance Observation Form (SOF), Exhibit 15.6 and/or a TUE in accordance with the applicable OCG Project Procedure.

5.0 CORRECTIVE ACTION REQUEST

If upon reviewing a particular condition, a OCG representative determines that a Corrective Action Request (CAR) is warranted, then a written recommendation that TU Electric initiate a CAR should be developed. This recommendation should provide a detailed discussion of the subject with a technical justification and shall be approved by the PQAPM.

6.0 POTENTIALLY REPORTABLE CONDITIONS

6.1 In conjunction with a recommendation to TU Electric that a CAR should be initiated, the OCG representative shall evaluate the condition for reportability to the Nuclear Regulatory Commission (NRC) using EBASCO Company Procedure N-23.

6.2 If the condition is determined by the OCG representative to be potentially reportable and the PQAPM concurs with this determination, a letter shall be transmitted to TU Electric Quality Assurance identifying the condition as potentially reportable.