EBASCO SERVICES INCORPORATED

WATERFORD STEAM ELECTRIC STATION - UNIT NO 3

PROCEDURE FOR:	PROCEDURE NUMBER:
SITE CONTROL AND PROCESSING OF DEFECTS/NON-COMPLIANCE CONDITIONS TO LP&L	ASP-IV-122

ISSUE SUMMARY

ISSUE/DATE	PREPARED	APPROVED	REMARKS
"A" Draft 11-22-82	J. Gutierrez		
"A" Issue 2-23-83	J. R. Pertuit	R. J. Milhiser	New
"B" Draft 3/22/83	J. R. Pertuit		
"B" Issue 3-23-83	J. R. Pertuit	R. J. Milhiser	

INFORMATION ONLY

Out For Revision

To [illegible]

Date 7-11-83

1.0 PURPOSE

To provide direction and guidance to Waterford Project personnel in the implementation of Ebasco company procedure N-23, Reporting a Defect/Non-compliance to the NRC, for assuring prompt notification and timely submittal of information to LP&L regarding significant deficiencies found during design and construction at the Waterford Steam Electric Station - Unit No. 3 and to delineate the interface and lines of communication between the applicable Ebasco department, LP&L Construction Q.A. and LP&L Licensing.

2.0 SCOPE

This procedure applies to Waterford Project Ebasco Site personnel as delineated herein and is intended to complement company procedure N-23 by addressing the overall coordination effort associated with:

a) Identification and Reporting of Defect(s)/Noncompliance Condition(s)

b) Evaluation requirements

c) Preparation of Reports

d) Corrective Action and Follow-Up

This procedure shall be used in conjunction with the references listed below.

3.0 REFERENCES

3.1 Guidance - 10CFR50.55(e), Construction Deficiency Reporting, Issue date: 4/1/80

3.2 10CFR21 - Reporting of Defects and Noncompliance

3.3 Ebasco Company Procedure N-23, Reporting a Defect/Noncompliance to the NRC

3.4 ASP-III-7, Processing of Nonconformances and Audits

3.5 ASP-IV-36, Control of Technical Bulletins

4.0 DEFINITIONS

4.1 Defect or Noncompliance - A defect is a deviation in a delivered or installed safety-related item which, upon evaluation, could create a substantial safety hazard. Noncompliance means failure to comply with the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order or license of the Commission which could create a substantial safety hazard.

4.2 Deviation - A departure from the technical requirements of a procurement and/or design document or SAR design bases and criteria for a safety-related item as released for final design and construction or as a delivered item or service. The term "deviation" is meant to encompass "deficiency" as used in 10CFR50.55(e). Note that revisions to drawings already released for construction are not to be automatically considered as deviations since changes of this nature are part of the normal design evolution process.

4.3 Delivered - Acceptance of a safety-related item by the purchaser at the point of delivery. If a safety-related item is rejected during any receipt inspection and returned, the item is not considered delivered. Conditional acceptance clauses, i.e., acceptance of a safety-related item dependent upon satisfactory performance for a specified period of time, are not applicable when determining whether or not a item is considered delivered.

4.4 Interim Report - A report where sufficient information is not available for a final report.

4.5 Final Report - A report whose content will permit the Nuclear Regulatory Commission (NRC) to evaluate the defect or noncompliance and corrective action taken.

4.6 Safety-Related Item - A plant structure, system, component or part thereof necessary to assure (1) the integrity of the reactor coolant pressure boundary, (2) the capability to shut down the reactor and maintain it in a safe shutdown condition; or (3) the capability to prevent or mitigate the consequences of accidents which could result in significant off-site radiation exposures. As used in this procedure only, safety-related items are also defined to include services such as design, manufacture, fabrication, placement, erection, installation, modification, inspection, testing, analyses or other consulting services supplied for a nuclear power plant.

4.7 Substantial Safety Hazard - A loss of a safety function to the extent that there is a major reduction in the degree of protection provided to public health and safety when considered in the content of the plant safety analyses and design basis. Additional criteria include:

a) Moderate exposure to, or release of, licensed material (radiologically this results in doses of 25 rem to the thyroid and 0.5 rem to the whole body to persons in unrestricted areas).

b) Major degradation of essential safety-related equipment.

c) Major deficiencies involving design, construction, inspection, test or use.

5.0 RESPONSIBILITIES

5.1 The Quality Program Site Manager is responsible for monitoring compliance to Company Procedure N-23 and assuring the completion of deviation evaluations and finalizing reports which result from discovery/reporting of a defect/noncompliance which are a result of construction activities.

5.2 Ebasco Site Support Engineering (ESSE)
The Engineering Discipline Supervisors or their designees are responsible for determining whether a deviation is or is not significant and to provide substantiation thereto, as well as for providing engineering analyses which are necessary to allow the Project Licensing Engineer (PLE) to perform a safety evaluation. The Engineering Discipline Supervisors or their designees are responsible for gathering information and preparing a draft of the report for design-related deviations and corrective action(s) taken.

5.3 Construction
The Senior Resident Engineer or his designee(s) is responsible for gathering information and preparing a draft of the report for construction-related deviations and corrective action(s) taken.

5.4 Licensing
The PLE, based on analyses performed by engineering disciplines as required, shall perform a documented safety evaluation to determine if a substantial safety hazard exists. He shall then notify the Q.A. Site Supervisor via telecon within 24 hours from the time a request is made for a licensing evaluation by the Q.A.S.S. or his designees. In addition, the PLE shall forward to the Q.A. Site Supervisor a copy of the safety evaluation.

6.0 PROCEDURE

General -

A nonconformance or condition that requires evaluation as to reportability under 10CFR50.55(e) requirements may be identified by either Ebasco (Engineering or Construction), LP&L, or an outside supplier.

Overall responsibility for assuring compliance, implementation and maintenance of this procedure rests with the Quality Program Site Manager Implementation and coordination of the activities delineated herein is accomplished through the organizational Matrix structure depicted in (Attachment 7.1).

6.1 Criteria for Identification and Reporting of "Deficiencies" by Ebasco

6.1.1 Any Ebasco employee obtaining information that a deviation exists in a safety-related item, and which meets or could conceivable meet the reporting requirements of 10CFR50.55(e), shall immediately report it to his supervisor. This supervisor shall review the information, determine concurrence and thereupon immediately inform the Q.A. Site Supervisor, following it up by a memo or by filing a nonconformance report (NCR) in accordance with procedure ASP-III-7.

6.1.2 A nonconformance or condition that requires evaluation as to reportability under 10CFR50.55(e) requirements may be identified as a result of:

A) Quality Assurance and/or Engineering Review of NCR's, observation of a condition or activity, be it Design, Construction, Inspection or Testing, not conducted in accordance with procedural requirements.

B) A formal submittal (letter) by a vendor supplying material, components, and/or services and any organization involved in the design, construction, evaluations, or inspection of the Waterford facility.

Employees should be alert for project documents be they: material reports, test reports, inspection reports, drawings. (i.e., info bulletins) which may reflect data or information in noncompliance with project requirements. Conflicting requirements as may be reflected in procedures and specifications which result in re-evaluation or rework shall be brought to the attention of the Q.A. Site Supervisor.

C) An informal report, or allegation, by any organization or person having knowledge of project requirements and activities.

Significant non-safety items are to be included if the structure, system or component involved could cause or contribute to degradation or integral plant safety as a result of an adverse interaction with safety related structures, systems or components.

6.1.3 The QASS or designee(s) shall review nonconformance reports and notifications received, applying the guidance of Company Procedure No. N-23 and the requirements of 10CFR50.55 (e) or 10CFR21, as appropriate and shall initiate Form 1352 (Attachment 7.2) if there exists sufficient documented evidence to determine potential reportability with respect to a breakdown in the Quality Assurance Program requirments.

6.1.4 When such a determination cannot be reached by Quality Assurance, additional input shall be obtained from ESSE, and Licensing as described in par 6.1.5.

6.1.5 In instances where information is required for determining whether the deviation is significiant with respect to final design, construction or performance criteria requirements. the QASS shall obtain required technical information from the applicable ESSE engineer. Evidence shall be provided by ESSE supporting their determination of significance (i.e. function of item, consequences of failure, etc).

When ESSE determines an item is significant, Licensing is required to perform a safety evaluation of the condition identified. If Licensing's review determines the condition identified to constitute a substantial safety hazard, the QASS shall be notified within 24 hrs. The QASS shall then proceed with reporting the incident in accordance with par. 6.1.6.

6.1.6 If this initial review determines that the reported condition meets the criteria established in 10CFR50.55(e), the LP&L Project Licensing Engineer shall be notified via (Attachment 7.3) and the deficiency classified as Potentially Reportable Incident (PRI) or Significant Construction Deficiency (SCD) as appropriate.

Assignment of numbers shall be by Ebasco Quality Assurance, Quality Analysis Group. This action "starts the clock" on the 21 calendar day report submission date to LP&L.

6.1.7 If within the subsequent 14 calendar day period the evaluation confirms acceptability (non-reportability) of the deficiency/condition, Q.A. shall submit these results to file and notify LP&L that the deficiency was determined not to be significant based on the results of further analysis or investigation. Conversely, if reportability is established, LP&L shall again be notified via Attachment 7.3 and the deficiency upgraded to Reportable.

6.2 Identification of "Deficiencies" by LP&L

When LP&L discovers a condition related to Design or Construction and which requires evaluation in accordance with 10CFR50.55(e), written notification shall be submitted to Ebasco Quality Assurance with the following information provided for processing as delineated above:

A) When the condition was detected
B) Where it was detected or suspected
C) Items, components, structures or systems affected
D) How it was detected
E) Nature of the condition rendering the item(s) unacceptable or suspect.

Ebasco shall be given the information above to the extent known prior to the initial notification to the NRC.

Conditions identified by LP&L will be evaluated and processed by LP&L in accordance with NAP-117, unless otherwise requested. Ebasco will be notified verbally and by memo of conditions identified by LP&L that will require Ebasco input/assistance in accordance with the N-23 procedure.

Assignment of all numbers shall be through Ebasco Quality Assurance.

All information and correspondence relating to significant deficiencies shall be communicated/transmitted between the following, as a minimum:

Quality Program Site Manager
Q. A. Site Supervisor
Project Site Manager
Project Superintendent
Senior Resident Engineer
Project Engineer (ESSE)
Licensing
Project Q. A. Engineer
LP&L, Project Q. A. Engineer
LP&L, Licensing Engineer
Ebasco Planning & Scheduling Department

6.3 Evaluation

6.3.1 Personnel/Departments assigned responsibility for providing an evaluation shall allocate all necessary resources and time to assure that a prompt and complete analysis of the deficiency identified is submitted to the Q. A. Site Supervisor within the time frame stipulated.

6.3.2 The evaluation shall be conducted and significance of the deficiency established through application of the criteria presented in regulation 50.55(e) and company procedure N-23.

6.3.3 The test of significance includes, but is not limited to, safety-related items/activities.

The 50.55(e) requirement applies to any structure, system or component (SSC's) if it contains a deficiency which, were it to have remained uncorrected, could have adversely affected the safety of operation of the facility. This includes those SSCs that, even if not classified as safety related, could cause or contribute to the degradation of integral plant safety as a result of an adverse interaction with safety related SSCs. Primary examples of this are undesirable conditions or failures in a non-safety system, structure, or component which could impact or degrade safety systems or a safety function.

6.3.4 Evaluations pertaining to a Potentially Reportable incident (PRI) shall as a minimum address the following:

a) The potential problem and indicate manner of notification/identification

b) Approach to resolution of the problem

c) Status of proposed resolution

d) Reasons why a final evaluation will be delayed (when applicable)

e) Analysis of safety implications

f) Projected completion of corrective action and submittal date of the complete evaluation.

6.3.5 A complete and final evaluation shall contain:

a) description of the deficiency

b) analysis of the safety implications. This should include an identification of interfacing systems and possible interactions.

c) corrective actions taken. Corrective actions should be sufficient to correct the deficiency and prevent future identical or similar occurrences. To prevent future occurrences the causes of the deficiency must be fully explored and identified.

d) sufficient information to permit analysis and evaluation of the deficiency and of the corrective action.

6.3.6 The cognizant engineer responsible for the evaluation shall forward his signed and dated evaluation to the Q. A. Site Supervisor. Concurrent with this, a copy of the evaluation shall be submitted to the assigned Project Licensing Engineer via telecon and telecopy.

The Licensing Engineer after receiving Engineering's evaluation from the Q.A.S.S. or his designee shall, within a 24 hour period, provide the Q.A. Site Supervisor with a Safety Analysis Report via telecon with follow-up through telecopy.

If the evaluation is considered reportable this starts the 21 day clock for Ebasco's interim report to LP&L.

Upon receipt of all necessary information, Form 1352 (Attachment 7.2) shall be completed by QASS.

6.4 Preparation of Reports

6.4.1 It is the assigned responsibility of the Senior Resident Engineer or his designee to prepare and submit evaluations in the form of a draft initial Interim Report, Interim Status Report and a Final Report to the Q. A. Site Supervisor within the requested time period for deficiencies related to Construction activities.

6.4.2 The Project Engineer (ESSE) shall prepare and submit similar reports on evaluations pertaining to design deficiencies to the Q.A. Site Supervisor within the time frame requested.

6.4.3 Format and content of the reports shall be in accordance with the guidelines provided on attachment 7.3.

6.4.4 The Q. A. Site Supervisor or designee will compile the official report(s) utilizing the information submitted by Engineering and Construction, as appropriate, along with Licensing's evaluation.

6.4.5 Planning and Scheduling will maintain, update and revise schedules, as well as the issuance of new schedules whenever a new problem report is opened.

6.5 Corrective Action Follow-Up and Completion

6.5.1 It is encumbent upon Construction, Engineering and/or Quality Assurance, as appropriate, to accomplish corrective action a outlined in the reports.

6.5.2 Coordination and follow-up shall be accomplished through the collective participation of individuals assigned to the Matrix organization group depicted on attachment 7.1.

6.5.3 The Senior Resident Engineer will issue semi-monthly, and submit to the Site Manager with a copy to Quality Assurance, a report with the status of progress and identification of hard spots, if any, in closing out action items.

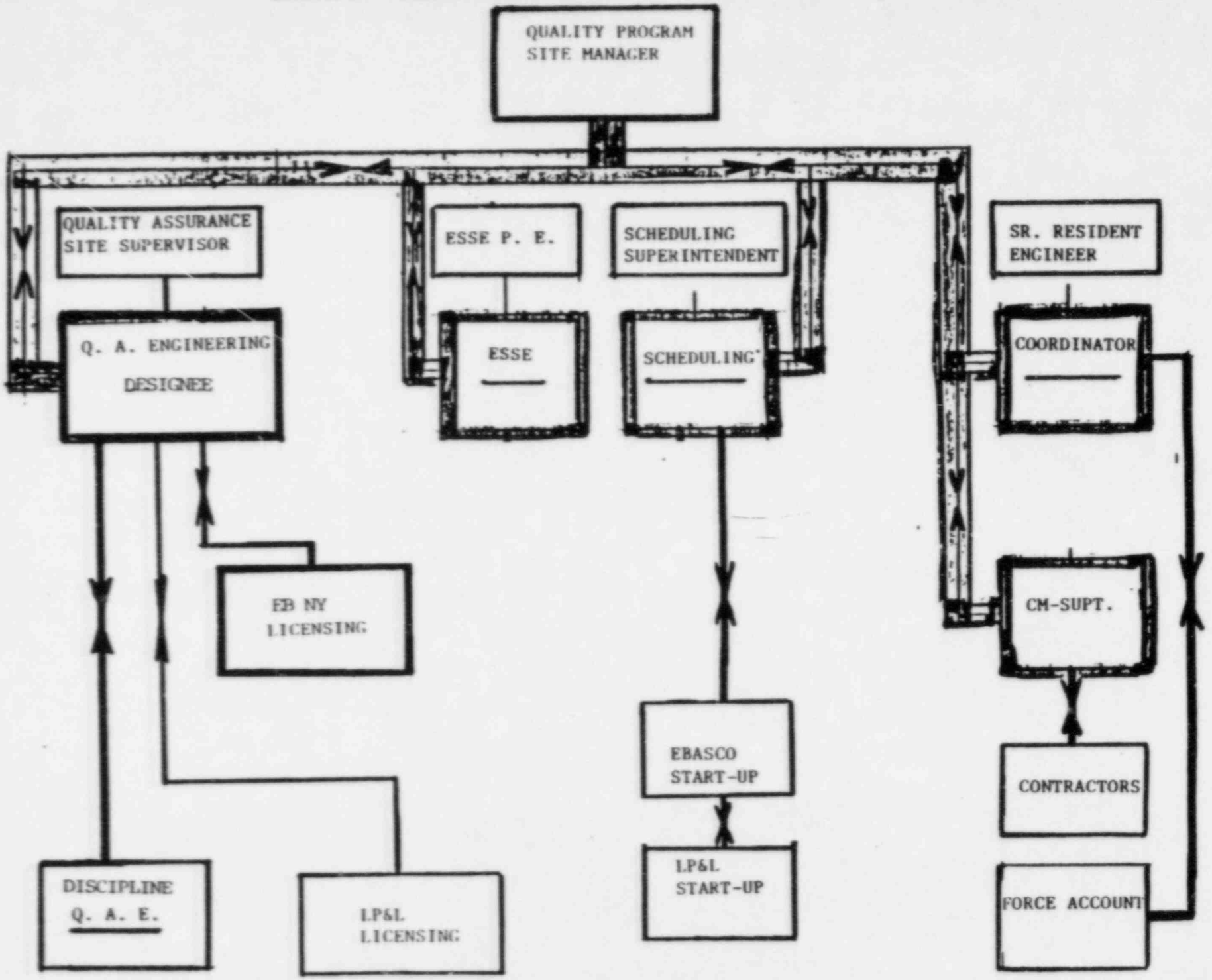
7.0 ATTACHMENTS

7.1 Flow Matrix.

7.2 Form 1352.

7.3 Significant Report Form.

QUALITY ANALYSIS PRI/SCDJ



2-2-83

Attachment 7.1

EBASCO SERVICES INCORPORATED

FORM 1352

EBASCO

DEVIATION/NONCOMPLIANCE EVALUATION

ATTACHMENT 7.2

Report No. _____

Date _____

Instructions: To Be Completed By QA Engineer

NERAL:

Client _____ Project _____

Deviation Title _____

Date of Discovery _____ Date of Occurrence _____

DEVIATION EVALUATION:

(Check (√) column headed 10CFR50.55(e) OR 10CFR21)

☐ 10CFR50.55(e)	Yes	No
DEVIATION REPRESENTS A SIGNIFICANT:		
Breakdown of QA Program	☐	☐
or		
Deficiency in Final Design	☐	☐
or		
Deficiency in Construction	☐	☐
or		
↑ficiency in Performance Reqts	☐	☐
and		
Adversely Affects Safety of Plant if Left Uncorrected	☐	☐
Reportable	☐	☐

☐ 10CFR21	Yes	No
Affects Safety-Related Item or Part Thereof	☐	☐
and		
Item is Delivered	☐	☐
and		
Could Create a Substantial S. ety Hazard	☐	☐
Reportable	☐	☐
Has Been Evaluated for Appli..ability with Respect to Other Ebasco Cli nts.	☐	☐
Report Required	☐	☐

NOTIFICATION:

1. Client Notified on: _____
2. Report Due Client by: _____
3. Report Due NRC
   Interim by: _____
   Final by: _____

PQAE/QPSM _____
SIGNATURE

4. VP-CQP Notified on: _____
5. Client Notified on: _____
6. NRC Notified on: _____
7. Report Due NRC by: _____

PQAE/QPSM _____
SIGNATURE

COMMENTS: _____

Attachment 7.3

G U I D E

SIGNIFICANT CONSTRUCTION DEFICIENCY REPORT OUTLINE

INTRODUCTION:

(1) This report is submitted pursuant to 10CFR50.55(é).

(2) One or two sentence problem description. Identification of the facility, the activity or the safety-related component supplied for such facility or such activity which fails to comply or contains a defect.

(3) This problem is considered (reportable/potentially reportable/non-reportable) under the requirements of 10CFR50.55(e)

(4) This problem has been identified to the Nuclear Regulatory Commission by _____ under 10CFR21 (or) to the best of our knowledge, this problem has not been identified to the Nuclear Regulatory Commission pursuant to 10CFR21.

DESCRIPTION:

(1) The date on which the information of such defect or failure to comply was obtained and how the deficiency was detected.

(2) Nature of defect or failure to comply.

(3) Organization responsible for defect or program deficiency.

(4) The number, location, and identification of all safety-related components, systems affected by the defect.

(5) General status of the installation containing the defect.

SAFETY IMPLICATIONS:

(1) An evaluation of the safety hazard which is created or could be created by such defect or failure to comply. (By N.Y. Licensing)

CORRECTIVE ACTION:

(1) The corrective action which has been, is being, or will be taken.

(2) The name of the organization responsible for the action.

(3) The length of time that has been or will be taken to complete the action including the corrective action completion date.

(4) Include a delineation of the testing methods which will be utilized to ensure that repairs have been, or will be, properly conducted.

(5) Specify any actions taken to prevent recurrence of the incident to the extent feasible.

(6) If necessary or applicable, any followup actions or advice related to the defect or failure to comply about the facility, activity, or safety-related component that has been, is being, or will be given to vendors, contractors, purchasers, or licensees.

UNCONTROLLED COPY

DEPARTMENT/CATEGORY		PAGE 1 OF 24
QUALITY ASSURANCE	COMPANY PROCEDURE NO. N-23	
TITLE	LEGEND R-INDICATES REVISION	DATE
REPORTING A DEFECT/NONCOMPLIANCE TO THE NRC		June 20, 1983
APPROVED BY R J Christesen		REPLACES ISSUE OF March 20, 1983

TABLE OF CONTENTS

RJN
2028q