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COVER SHEET

DOCUMENT NUMBER: ES-142 | ORIGINAL DATED: 7/31/78 | ATTACHMENTS

TITLE: Nonconformance and Corrective Action

CUSTOMER: Louisiana Power and Light

PROJECT. Waterford SES UNIT: #3

CONTRACT: W3-NY-18

INFORMATION ONLY

SPECIFICATION: N/A

SCOPE OF REVISION:

A. Original Issue this Project.
B. Revised to incorporate customer comments.
C. Revised to incorporate Waterford Site Addenda to the QA Manual
D. Revised to incorporate customer comments.
E. Rewrite
F. Revise Table of Contents. Revise para. 4.1.1, 4.3.1,A,B,C, 4.3.2 A,C, 4.4.2 B,C,D, 4.4.4. Deleted page 14 of 14.

NISCO ENGINEERING CONTROLLED COPY (1) 2 3 4 5 6

ATTACHMENTS

1. Nonconformance Report
2. Hold Tag
3. Receiving Inspection Report
4. NCR Log
5. Corrective Action Report

EBASCO SERVICES INCORPORATED
QUALITY ASSURANCE ENGINEERING

This Document is:

☑ Reviewed Without Comments
☐ Reviewed With Comments as Noted; Incorporate Comments, and Resubmit; Proceed With Order.
☐ Rejected; Revise and Resubmit

NOTE:

Review of this document, with or without comments, is for general conformance with the applicable specifications only and in no way relieves the manufacturer or contractor from full responsibility for delivery of all materials, equipment, services and documentation in strict accordance with purchase order.

By: [signature]
Date: 7/9/81

REVIEW	SIGNATURE	DATE	REV.	INIT. & DATE	REV.	INIT. & DATE
PREPARED BY:	[signature]	6/6/80	F	CVDR 6/30/81		
Q.A. MANAGER	[signature]	6.6.80	F	[signature] 7/2/81		
PROJECT MANAGER	[signature]	6/6/80	F	[signature] 7/3/81		
AUTHORIZED INSPECTION SPECIALIST						

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2. Hold Tag
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1.0 Scope

This procedure describes the measures for identifying, reporting, controlling, and dispositioning discrepancies identified by NISCO. It also describes the measures for obtaining corrective action for significant conditions adverse to quality to preclude recurrence.

2.0 Applicability

Discrepant items discovered by NISCO shall be promptly identified to prevent their continued or inadvertant use.

3.0 Definitions and Abbreviations

3.1 ANI - Authorized Nuclear Inspector

3.2 ANSI N45.2 - Quality Assurance Program Requirements for Nuclear Power Plants.

3.3 ASME Section III - American Society of Mechanical Engineers Boiler and Pressure Vessel Code for Nuclear Power Plant Components.

3.4 CAR - Corrective Action Report (Attachment #5)

3.5 Discrepancies (Nonconformity) - A condition in characteristic, documentation or procedure which renders the quality of an item or service unacceptable or indeterminate. Examples of discrepancies include: physical defects, test failures, incorrect or inadequate documentation, or deviation from prescribed inspection or test procedures.

3.6 Item - Any level of unit assembly, including structure, system, sybsystem, subassembly, component, part or material.

3.7 NCR - Nonconformance Report (Attachment #1) used to report discrepancies.

3.8 Repair - The process by which a discrepant characteristic is restored to a condition such that the capability of an item to function reliably and safely is unimpaired, even though that item still may not conform to the original requirement.

3.9 Rework - The process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling or other corrective means.

4.0 Procedure

4.1 Responsibilities

4.1.1 The Field QA/QC Manager through his QC Inspectors is responsible for identifying discrepancies, preparing NCR's and verifying that the approved disposition is implemented. He shall maintain a status log of NCRs, review applicable NCRs with the ANI and evaluate NCRs for trends and when trends are identified issue a CAR. F

4.1.2 The Lead Engineer is responsible for providing the recommended disposition for NCRs.

4.1.3 The Site Manager is responsible for obtaining documentation which is determined at receiving inspection to be either missing or incorrect.

4.1.4 The Customer is responsible for evaluating and approving NCR disposition.

4.1.5 All NISCO personnel will report any discrepant conditions to the Field QA/QC Manager.

4.2 Identification of discrepancies

4.2.1 When a discrepancy is detected, a "Hold" Tag (Attachment #2) shall be attached to the item , in order to clearly identify its status. The following information shall be recorded on the tag:

A. Individual who attached tag

B. Date

C. Identification/Description of material/component

D. Reason for "Hold" status

E. NCR number

4.2.2. "Hold" tags may only be removed by QA/QC personnel.

4.3 Reporting of Discrepancies

4.3.1 Any nonconformities detected at Receiving Inspection, will be documented on the Receiving Inspection Report (RIR) (Attachment #3), tagged with a Nisco Hold Tag and placed in a Hold area when practical. The RIR will be forwarded to the Site Manager.

A. A copy of the RIR which document discrepancies on Customer furnished items shall be forwarded to the Customer by the Site Manager with a request for resolution. F

B. For NISCO furnished material, the Site Manager shall notify vendor of the deficiency and request the required action needed for resolution. F

C. The Field QA/QC Manager or his designee shall upon completion of the resolution, sign the RIR to signify acceptance. F

4.3.2 Discrepancies discovered during fabrication, installation and testing are documented on NCRs (Attachment #1).

A. The QA/QC Manager or his designee shall assign the NCR number from a log he maintains. The NCR Log Form is shown as Attachment #4. The QA/QC Manager or his designee shall record the NCR number, a description of the discrepancy and the date in the NCR Log. F

B. The following information shall be recorded on the NCR and verified by the Field QA/QC Manager (Note-the numbers listed below correspond to the block numbers shown on the NCR form):

1. Report Number
2. Client or Project (Waterford #3)
3. Drawing No./Spec. No., and Safety Class
4. Supplier, Construction QC or Contractor (NISCO)
5. P.O. Number
6. Description of component, part or system
7. Description of discrepancy
8. Name and signature of person reporting the discrepancy
9. Date

C. The QA/QC Manager or his designee shall review and sign the NCR prior to its issue. The QA/QC Manager or his designee shall record the NCR number on the "Hold" tag and the RIR or the Process Control Sheet, as applicable. F

4.4 Disposition of NCRs.

4.4.1 The Field QA/QC Manager shall forward the NCR to the Lead Engineer for dispositioning.

4.4.2 The Lead Engineer shall provide one of the following recommended dispositions for each NCR:

A. Use-as-is

B. Scrap

C. Return to Vendor

D. Rework

F

4.4.3 The Field QA/QC Manager must review and approve dispositions on all NCRs prior to implementation.

4.4.4 If the recommended disposition is "use-as-is" or "repair" the Field QA/QC Manager shall review ASME related nonconformances with the ANI and obtain the ANI concurrence with the disposition prior to implementation. The ANI shall enter his initials and date and "ANI" in the space marked "Recommended Disposition" to indicate his review and concurrence with the proposed resolution. F

4.4.5 After the disposition has been determined, the Lead Engineer shall record the following information on the NCR (Note-the numbers listed below correspond to the block numbers shown on the NCR form):

10. Recommended disposition.
11. Name and signature of person recommending disposition.
NOTE: The Field QA/QC Manager shall initial and date the signature block (11) to signify concurrence with the disposition.
12. Date

4.4.6 The Site Manager shall transmit dispositioned NCRs to the Customer for evaluation and concurrence with the recommended disposition. The Customer shall document his review and forward the yellow and pink copies back to NISCO. (In those instances where NCRs are dispositioned and corrective action is implemented and verified by organizations other than NISCO, the FIeld QA/QC Manager shall verify acceptance of the item/condition).

4.5 Verification of Disposition.

4.5.1 Upon notification of the approved disposition, the Field QA/QC Manager shall perform the following:

A. Items which are dispositioned "use-as-is" shall be returned to the fabrication process. The QC Engineer shall remove the hold tag and sign off the NCR as described in paragraph 4.5.2.

B. Rework/Repair operations shall be performed in accordance with a supplemental Process Control Sheet which is prepared by the Lead Engineer and approved by the Field QA/QC Manager. The Supplemental PCS shall be submitted to the Customer and the ANI, as applicable, for review and selection of hold points. Rework/Repair operations shall be performed in accordance with this PCS.

C. The supplemental PCS shall be maintained in the same manner as the original PCS and shall be identified by the number of the original PCS followed by a dash and a sequential number, (i.e., PCS 208-1). This PCS number shall be included on the original PCS and adjacent to the NCR number. F

D. Field QA/QC personnel shall verify that "Scrap" items are clearly identified and placed in a designated area or removed.

E. Field QA/QC personnel shall verify that items which have been dispositioned "Return to Vendor" are returned. If material is customer furnished, NISCO shall return the material to the customer who shall be responsible for further action. The Hold Tag shall remain on the item until removal from site or NISCO's control.

4.5.2 Closing of the Nonconformance Report

A. After the disposition has been implemented, the Field QA/QC Manager shall verify that required actions have been completed, and sign and date the NCR form closing the NCR.

B. When completed, the NCR will include a detailed description of the discrepancy, the disposition, review and approval by the Customer, the concurrence of the ANI, when applicable, and verification of completion by Field QA/QC Manager. The report will also identify Corrective Action Reports, when applicable.

C. It is the responsibility of the Field QA/QC Manager to file the completed and signed Nonconformance Report with the official records and enter the completion of the NCR and the date into the NCR Log (Attachemtn #4).

4.6 Corrective Action

4.6.1 The Field QA/QC Manager shall review all NCRs prior to initial issue as described in paragraph 4.3.2.C. If he determines that a significant condition adverse to quality exists, he shall initiate a Corrective Action Report. Conditions which require corrective action, shall include, but not be limited to the following:

A. Insufficient or lack of written instruction/procedures.
B. Continued failure to comply with written instructions/ procedures.
C. Repetitive "human error type" nonconformances.
D. A process out of control; for example, a welding process which repeatedly results in major defects.
E. Repetitive conditions identified during trend analysis (4.1.1).

4.6.2 When corrective action is deemed necessary, the Field QA/QC Manager shall record the following information on the Corrective Action Report (CAR) (Attachment #5).(Note- the numbers listed belowcorrespond to the block numbers shown on the CAR form.)
1. Plant and Unit
2. Project
3. Reference to applicable NCR or Audit Report
4. Responsible Project Representative/Contractor
5. Basis for Corrective Action (Established criteria)
6. Deficiency
7. Signature of the Field QA/QC Manager
8. Date of CAR
9. Date by which corrective action is required

4.6.3 The CAR shall be transmitted to the responsible Project Representative/Contractor with instructions to provide the following information on the CAR:

A. Cause of the condition adverse to quality.
B. Proposed action which will be taken to correct existing condition and the date by which action will be completed.
C. Proposed action which will be taken to preclude recurrence of the condition and the date by which action will be completed.
D. The signature of responsible individual proposing the corrective action.
E. Date of response.

4.6.4 Upon receipt of the response, the Field QA/QC Manager shall evaluate the proposed corrective action for acceptability. If the response is acceptable, the Field QA/QC Manager will indicate his concurrence by signing and dating the CAR Form.

4.6.5 An unsatisfactory response or lack of response within the required time frame shall result in the Field QA/QC Manager contacting the responsible Project Representative/Contractor to require immediate corrective action. Failure to resolve the problem will result in the Field QA/QC Manager referring the condition to the next higher level of management for corrective action.

4.6.6 When it has been verified that corrective action has been satisfactorily implemented, the Field QA/QC Manager shall sign and date the CAR indicating that the CAR is completed.

4.6.7 The Field QA/QC Manager shall maintain a file and status log of active and completed CARs together with any associated documentation.

5.0 References

5.1 ASME Section III, Division 1

5.2 ANSI N42.2

5.3 NISCO Quality Assurance Manual

5.4 10CFR50 Appendix B

5.5 10CFR21

ENGINEERING SPECIFICATION

ATTACHMENT #1

QUALITY ASSURANCE
NONCONFORMANCE REPORT

1

INSTRUCTIONS:

2

4 | 5

6

3

I. DESCRIPTION OF NONCONFORMANCE

7

8 | 9

II. RECOMMENDED DISPOSITION

10

11 | 12

III. EVALUATION OF DISPOSITION BY (NAME), REASON FOR DISPOSITION

IV. CORRECTIVE ACTION ☐ Required ☐ Not Required

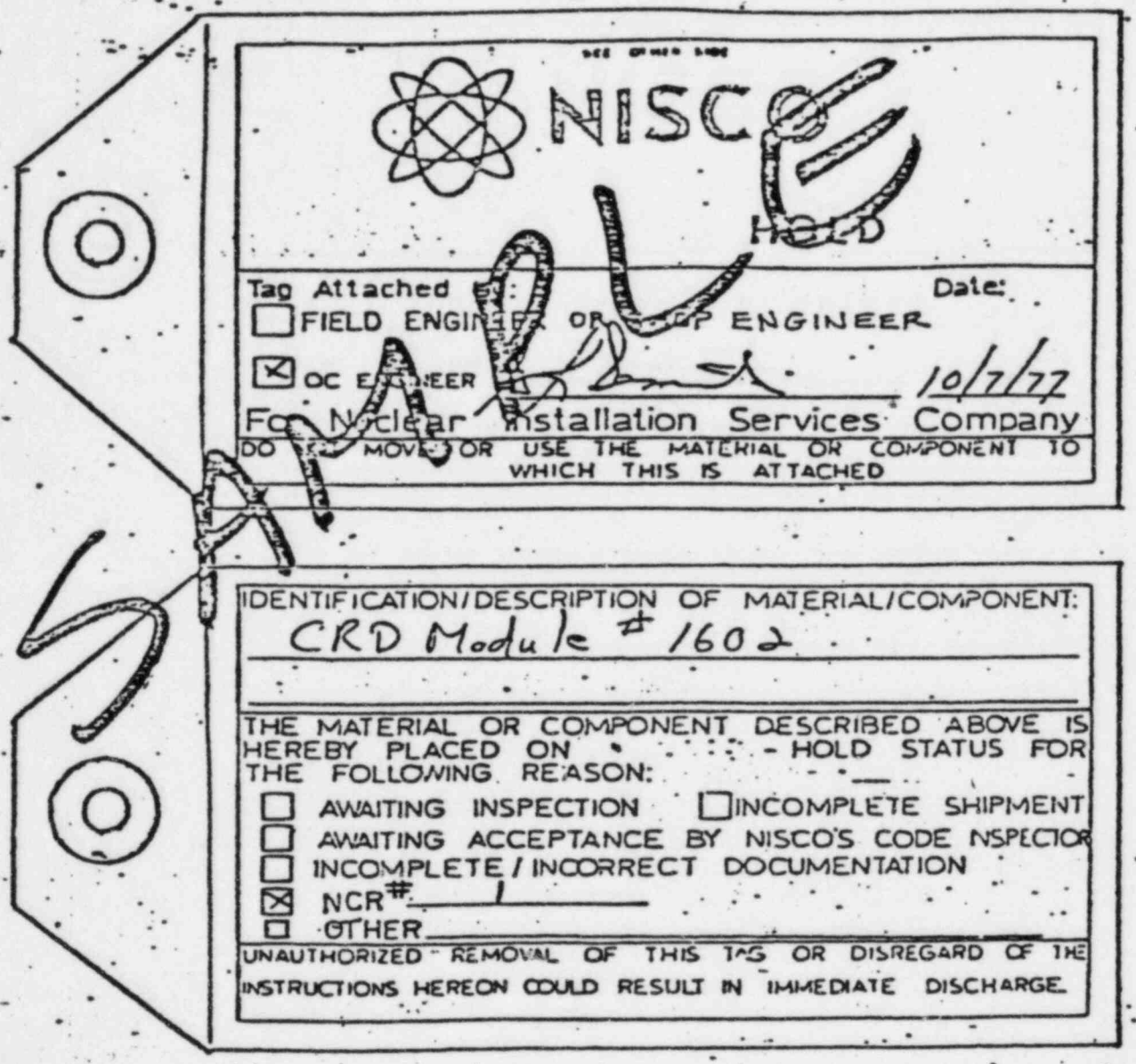
☐ ENGINEERING	☐ QUALITY ASSURANCE	☐ CONSTRUCTION	☐ OTHER
DATE	DATE	DATE	DATE
☐ ACCEPTED ☐ REJECTED ☐ ACCEPTED WITH COMMENTS	☐ ACCEPTED ☐ REJECTED ☐ ACCEPTED WITH COMMENTS	☐ ACCEPTED ☐ REJECTED ☐ ACCEPTED WITH COMMENTS	☐ ACCEPTED ☐ REJECTED ☐ ACCEPTED WITH COMMENTS

VI. VERIFICATION OF DISPOSITION ☐ REQUIRED ☐ NOT REQUIRED

SIGNATURE _____ TITLE _____ DATE _____

ENGINEERING SPECIFICATION

ATTACHMENT #2 - RED



NISCO

HOLD

Tag Attached By: Date:

☐ FIELD ENGINEER OR QC ENGINEER

☒ QC ENGINEER 10/7/77

For Nuclear Installation Services Company

DO NOT MOVE OR USE THE MATERIAL OR COMPONENT TO WHICH THIS IS ATTACHED

IDENTIFICATION/DESCRIPTION OF MATERIAL/COMPONENT:

CRD Module # 1602

THE MATERIAL OR COMPONENT DESCRIBED ABOVE IS HEREBY PLACED ON - HOLD STATUS FOR THE FOLLOWING REASON:

- ☐ AWAITING INSPECTION ☐ INCOMPLETE SHIPMENT
- ☐ AWAITING ACCEPTANCE BY NISCO'S CODE INSPECTOR
- ☐ INCOMPLETE / INCORRECT DOCUMENTATION
- ☒ NCR # 1
- ☐ OTHER

UNAUTHORIZED REMOVAL OF THIS TAG OR DISREGARD OF THE INSTRUCTIONS HEREON COULD RESULT IN IMMEDIATE DISCHARGE

ENGINEERING SPECIFICATION

ATTACHMENT #3

RECEIVING INSPECTION REPORT

NISCO

CUSTOMER:	Purchase Order and Applicable Amendment	Vendor	Purchase Authority ☐ NISCO ☐ OTHER
PLANT:		Manufacturer	
UNIT:			

Date Received: | Sheet of | RIR Number:

PART I

Item Number	Quantity	Item Description	Applicable Spec. or Drawing	Heat & Lot Number or Serial Number or Identification No. From Item

PART II

Characteristics to be Inspected (see code below)	Heat & Lot No. or Serial Number or Identification Verification (Initial & date)	Documentation Verification (Initial & date)	Characteristics Inspection Verification (Initial & date)	Quantity Accepted	Quantity Rejected	Nonconformity Report Number	Remarks	Maint. Surveillance Report Number

Prepared By: _____ Date: _____
Title

Part # Characteristics to be Inspected Code ☐ N/A

(1) _____ (6) _____
(2) _____ (7) _____
(3) _____ (8) _____
(4) _____ (9) _____
(5) _____ (10) _____

Prepared By: _____ Date: _____
Title

PART III ☐ N/A

Maintenance & Surveillance Requirements

Required Service Type	Frequency	Applicable Level

Prepared By: _____ Date: _____
Title

ATTACHMENT #4

NONCONFORMANCE REPORT LOG

Project _____

NCR	NONCONFORMANCE (COMPONENT/SYSTEM AFFECTED	NCR DATE	DISPOSITION	DATE CUSTOMER REVIEW	DATE AI REVIEW	DATE NCR CLOSED	REMARKS

ENGINEERING SPECIFICATION

ATTACHMENT #5

NISCO

CORRECTIVE ACTION REPORT

NUCLEAR INSTALLATION SERVICES COMPANY

1 PLANT & UNIT

2 PROJECT

Sheet No. ___ of ___

Form No. NISCO-10

UNSATISFACTORY CONDITION DOCUMENTED ON: 3 ☐ NISCO NONCONFORMITY REPORT NO. _____

☐ NISCO QA DIVISION AUDIT REPORT NO. _____

4 Responsible Project Representative/Contractor

5 Basis for Corrective Action (Established Criteria):

6 Deficiency:

7 QA/QC Manager 8 Date: Action Required by

Proposed Corrective Action:

9 Proposed by: Date: QA/QC Mgr. Date:

Completed Car Closed QA/QC Mgr. Date: