

SSER

Task: Allegation A-187

Reference No.: 4-84-A-06/82a, b, c.

Characterization: The allegation is that Mercury instrumentation drawings were not correct because field changes were not incorporated into the drawings, many drawings contained red lined changes, and two or three drawings for the same installation were marked differently.

Assessment of Allegation: The implied significance of this allegation is that inadequate control of field changes could result in as-built drawings that do not reflect the actual plant configuration. Multiple red lines on the same drawing may cause confusion that could lead to inadequate inspection of the affected systems.

In assessing this allegation, the NRC staff reviewed the Mercury Company's procedures for red lining drawings and for document control, examined Mercury drawings, and conducted a walkdown of a sample of completed systems, using the as-built drawings. Out of 19 randomly selected instrument lines which were field checked by the NRC, one process tubing deviation from the as-built drawings was identified. This deviation was for an LP&L-installed modification that had not been completed. LP&L had documentation on file reflecting the change and indicating the incomplete status of the field work.

As a result of this review, the NRC staff determined that the Mercury system for red lining drawings was cumbersome. It allowed controlled copies of a drawing and its revision to show different changes. This occurred if nonpressure boundary field changes were made after the pressure boundary portion of the drawing had been completed.

In conclusion, the as-built drawings reflected the actual condition of the installed hardware, and although accurate, this allegation had neither safety significance nor generic implications.

Potential Violations: None.]

Actions Required: None.

References

1. Mercury Procedure SP-667, Rev. 7, August 19, 1983, "Procedure For Red-Lining Drawings",
2. Mercury Procedure PCP-2010, Rev. 9, October 4, 1982, "Document Control Procedure",
3. Ebasco Contract #W3-NY-15, "Special Conditions of Pneumatic and Electronic Instrumentation and Performance of Related Work"

4. Ebasco Instructions, I-C-1, Rev. 1, April 1, 1978. "Instructions for Erection of Instrumentation Systems".

5. Mercury Drawings No. 853-L-100-A, Rev. 3
853-T-011-AE, Rev. 3
153-T-022-A, Rev. 1
*164-L-003-AE, Rev. 3
164-T-007-AE, Rev. 4
853-L-133-AE, Rev. 3
853-T-016-A, Rev. 3
153-L-006-AE, Rev. 3
164-T-006-AE, Rev. 5
164-T-014-AE, Rev. 4
151-L-008C, Rev. 4
151-L-007C, Rev. 3
151-L-012C, Rev. 3
151-L-023C, Rev. 2
151-L-018C, Rev. 2
151-L-014C, Rev. 2
151-L-021C, Rev. 2
167-L-010-A, Rev. 6
167-L-009-A, Rev. 4
167-L-008-8, Rev. 4
167-T-035-A, Rev. 8
167-T-034-A, Rev. 7
167-T-037-A- Sheet 3 Rev. 1
172-T-011-C- Rev. 6
172-T-019-CE- Rev. 7
172-T-026-CE- Rev. 5
172-T-027-CE- Rev. 6

*Modified by Ebasco to: Ebasco Field Vendor Document #V10.19-1001-21, Rev. 3

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Revision :	0	1	2	3
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REVISION 0
05/20/84 (TSK2)

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Potential Violations: None.

Actions Required: None.

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5. Mercury Drawings No.
 - 853-L-100-A, Rev. 3
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 - 153-T-022-A, Rev. 1
 - *164-L-003-AE, Rev. 3
 - 164-T-007-AE, Rev. 4
 - 853-L-133-AE, Rev. 3
 - 853-T-016-A, Rev. 3
 - 153-L-006-AE, Rev. 3
 - 164-T-006-AE, Rev. 5
 - 164-T-014-AE, Rev. 4
 - 151-L-008C, Rev. 4
 - 151-L-007C, Rev. 3
 - 151-L-012C, Rev. 3
 - 151-L-023C, Rev. 2
 - 151-L-018C, Rev. 2
 - 151-L-014C, Rev. 2
 - 151-L-021C, Rev. 2
 - 167-L-010-A, Rev. 6
 - 167-L-009-A, Rev. 4
 - 167-L-008-8, Rev. 4
 - 167-T-035-A, Rev. 8
 - 167-T-034-A, Rev. 7
 - 167-T-037-A- Sheet 3 Rev. 1
 - 172-T-011-C- Rev. 6
 - 172-T-019-CE- Rev. 7
 - 172-T-026-CE- Rev. 5
 - 172-T-027-CE- Rev. 6

*Modified by Ebasco to: Ebasco Field Vendor Document #V10.19-1001-21, Rev. 3

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Document Name:

SSER A-187

FINAL
6.20.84

Requestor's ID:

CONNIE

Author's Name:

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Document Comments:

Document Name:

SSER A-187

FIWAU
6.20.84

Requestor's ID:

CONNIE

Author's Name:

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Document Comments: