

ILLINOIS POWER COMPANY  
CLINTON POWER STATION  
RECORD VERIFICATION PROGRAM PLAN

REVISION 3

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## TABLE OF CONTENTS

### SECTION

### TITLE

i	TABLE OF CONTENTS
1.0	OBJECTIVE
2.0	SCOPE
3.0	DEFINITIONS
4.0	TASK DESCRIPTION
5.0	RESPONSIBILITIES
6.0	ATTACHMENTS

Attachment 1 - Document Review Group Organization Chart

## 1.0 OBJECTIVE

The purpose of this Illinois Power Company program is to verify the acceptability of QA records applicable to the Clinton Power Station.

## 2.0 SCOPE

The main features (elements) of the QA Records Verification Program are described in this section, while the organization and responsibilities are covered in Section 5.0.

2.1 The Records Verification Program (hereinafter referred to as the "program") will apply to QA records for safety-related, fire protection, and augmented class D systems or structures as follows:

- ° Baldwin Associates' construction/fabrication/installation work documentation packages.
- ° Baldwin Associates' site generated or maintained purchase order documentation packages, including associated receiving inspection and vendor data packages.

2.2 IP QA will conduct audits and surveillances to verify the adequacy of the Records Verification Program.

2.3 Description of the QA Documentation Final Review Program.

2.3.1 Reviews will be scheduled and conducted in time frames to support scheduled hardware turnovers. However, if necessary, reviews and resolutions of deficiencies may proceed beyond the hardware turnover date.

2.3.2 The Startup organization will provide lists of equipment and travelers included in each turnover.

2.3.3 The Manager - DRG will request the documents be transmitted from the BA vault to the DRG for review.

2.3.4 Records will be itemized and logged out of the BA vault for use by the DRG in their work area. While in this area, when not being reviewed, the records will be stored in locked fire-proof file cabinets.

2.3.5 Each record, record package, or traveler will be assigned to an appropriate Quality Assurance Engineer (QAE) for review according to the QAE's area of expertise.

- 2.3.6 Each type of record package, such as purchase order or traveler, will be reviewed using applicable final review checklists.
- 2.3.7 A computer generated record status report will be maintained to reflect the current status of records in the review cycle.
- 2.3.8 Installed equipment will be field checked on a surveillance basis to determine if the equipment is traceable back to the documentation. This may be performed under a separate plan (e.g., IP Overinspection, IPQA Surveillances).
- 2.3.9 Documentation review and the equipment field checks for traceability will be performed by personnel who are trained and qualified in the required specialties.
- 2.3.10 Record deficiencies found during the review process will be documented and routed to the appropriate discipline for action. Records that have been corrected will be routed back to DRG for re-review. Documentation problems that remain unresolved at system turnover will be added to the turnover exception list and tracked as part of the Plant Startup punchlist. The DRG will trend deficiencies utilizing an in-house computerized system. The system will be able to provide a printout of resolved and unresolved items to ensure total accountability.
- 2.3.11 As records are reviewed and found acceptable, they will be stamped accordingly.
- 2.3.12 The final step in the documentation review program is to transfer the records directly to IP Central Files.
- 2.3.13 The DRG may interface with the BA Field Verification Group for field verification.

### 3.0 DEFINITIONS

- 3.1 Acceptability - The records as presented are legible, completely filled out and identifiable to the item involved. Requirements identified in the purchase specification and applicable codes and standards have been met. All documentation discrepancies have been resolved and the records are ready for transfer to Illinois Power Central Files.
- 3.2 Accountability - The process of verifying that documentation required by codes, specifications and procedures is identifiable and retrievable.

- 3.3 Documents - Collective term used to describe all written or pictorial information that provides evidence of what and how an activity was accomplished.
- 3.4 Documents Repository - An area designated for the protective storage (lockable fire-proof cabinets with a rating of 1 hour at 350°) of records while in the QA final review status. The Document Repository shall function as an extension of the BA Vault, and the storage, control of and access to records shall be in accordance with applicable procedures.
- 3.5 Field Verification - The process of verifying documentation against the equipment actually installed in the field.
- 3.6 Final Review Checklists - Detailed lists of requirements used to assist the reviewer to determine the acceptability of the different types of QA records and record packages. The checklists also define the kind of QA records required by applicable procedures, codes, standards, and design specifications for each type of equipment installed in safety related, fire protection and augmented class D systems.
- 3.7 Document Review Group (DRG) - A staff of technically qualified personnel who perform the QA final review of records.
- 3.8 DRG Handbook - A compilation of information to assist the QA final review personnel to perform their assigned tasks.
- 3.9 Quality Assurance (QA) Record - Those completed documents which furnish documentary evidence of the quality of items and of activities affecting quality.
- 3.10 Record Deficiency - Any record which contains a nonconformance or departure of a characteristic from specified requirements.
- 3.11 Surveillance - A scheduled or unscheduled review or observation of an activity, process, or product and associated objective evidence to verify that certain actions have been or are being accomplished in accordance with applicable requirements.
- 3.12 Traveler Packet ("traveler") - A group of documents in packet form containing individual traveler forms, inspection reports and information sheets which document Construction, Quality Control, and Technical Services activities for a defined portion of fabrication and/or installation.

4.0 TASK DEFINITIONS



#### 4.1 The Documentation Final Review Program.

The initial implementation was completed through Baldwin QA procedures and a series of instructions (BQAIs). These instructions, which were described in Revision 1 of this plan, have been incorporated into Baldwin Associates Procedures (BAPs).

##### 4.1.1 Qualification and Certification of QA Documentation Final Review Personnel.

Documentation review personnel will be trained as Level I, II, and III QA Engineers and certified to the requirements of the BA QA Training Manual.

The three levels of qualification for QA Engineers (Final Document Review) are as follows:

###### Level I

- ° A high school graduate (or GED equivalent) and six (6) months of quality-related experience, or
- ° Completion of college level work leading to an Associate Degree in a related discipline plus three months of quality-related experience.

###### Level II

- ° High school graduate (or GED equivalent) plus one (1) year of satisfactory performance as Level I in the examination of documents to applicable codes, standards, and procedures, or
- ° High school graduation (or GED equivalent) plus three (3) years of quality-related experience, or
- ° Completion of college level work leading to an Associate Degree in a related discipline plus one (1) year of quality-related experience, or
- ° Four-year college graduation plus six months of quality-related experience.

###### Level III

- ° High school graduate (or GED equivalent) plus six (6) years of satisfactory performance as Level II in the examination of documents to applicable codes, standards, and procedures, or

- ° High school graduation (or GED equivalent) plus ten (10) years of quality-related experience, or high school graduation plus eight (8) years of quality-related experience, with at least two (2) years as Level II, and with at least two (2) years associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or
- ° Completion of college level work leading to an Associate Degree and seven (7) years of quality-related experience, with at least two (2) years of this experience associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or
- ° Four-year college graduation plus five (5) years of quality-related experience, with at least two (2) years of this experience associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

Qualification of document review personnel will be determined by written examination, and practical demonstration. The examination and practical demonstration will be documented.

Training of document review personnel will consist of periodic and supplemental training conducted by the Lead QAE, on-the-job training, and mandatory reading and will be documented.

General and specific examinations will be administered for certification purposes. A Proficiency and Performance Evaluation Record will be completed prior to Level I and II certifications. DRG personnel will have a performance appraisal and will be re-examined and re-certified biennially.

- 4.1.2 The QA final review will be conducted using checklists derived from applicable procedures, instructions, codes, standards and specifications.

The total number of checklists and categories of checklists may increase or decrease as the needs are better defined.

- 4.1.3 The organizational structure for the DRG is as shown in Attachment 1.

4.1.4 Job descriptions for the DRG positions are as follows:

a. Discipline Supervisor  
Level III

Duties:

- ° Address and evaluate problems and discrepancies outside QAE's range of responsibility or expertise.
- ° Assist and coordinate efforts of methodology of evaluation of travelers and/or documents and establish base line requirements of acceptability.
- ° Interface with other disciplines concerning documentation discrepancies for resolution in a timely and orderly manner.
- ° Perform traveler and/or document review.
- ° Supervise those personnel assigned by the Manager - DRG.
- ° Responsible for the thorough and accurate documentation review performed by those persons under his/her supervision.
- ° Assist Manager - DRG as directed.

Qualification Required:  
Education/Experience Requirements

- ° Must meet applicable standards for certification as defined in BA QA Training Manual, plus prior supervisory experience in a similar work related field.

b. Quality Assurance Engineer  
(Documentation) Level II

Under general supervision of Discipline Supervisor/Level III, responsible for performing final review of safety related documentation for nuclear power plant construction.

QAE will perform reviews of records in accordance with checklists derived from project requirements documents. Results of review will be documented on the document exception list, signed/initialed by the QAE, and incorporated into the document as part of the final record.



The QAE is expected to work independently and must be familiar with documentation requirements for applicable disciplines.

The QAE must meet applicable standards for certification as defined in BA QA Training Manual.

c. Quality Assurance Engineer  
(Documentation) Level I

Under close supervision of QAE, Level II, a Level I QAE will assist in performing final documentation review of safety related records for nuclear power plant construction.

The Level I QAE will review records in accordance with checklists derived from project requirements documents.

A Level I QAE will refer nonconforming conditions or documentation discrepancies to a Level II QAE for interpretation when required. Results of review will be documented on checklists and/or exception reports, signed or initialed by the QAE, and incorporated in the document as part of the final record.

The QAE must meet applicable standards for certification to QAE Level I as defined in the BA QA Training Manual.

d. QA/DRG Technical Assistant

Duties:

Assigned to QA for purpose of providing technical assistance to QA Engineers performing final review of software (documents, records, drawings) prior to turnover to the owner.

Technical assistants are expected to have a working knowledge of applicable regulations and procedures. Duties will include, but are not limited to, the following:

- ° Performs initial review of Travelers and/or documents for readiness to review.
- ° Prepares and inserts review forms.
- ° Evaluates QA Final Review Document Exception List (DEL FORM) for the complete review.

- ° Maintain control over records, including Travelers, and other documents to insure preservation and protection in accordance with applicable procedures and instruction while undergoing final documentation review.

- ° Assists QAFs as directed/required.

Qualifications:

- ° High school graduate or equivalent

e. Manager - DRG

- ° Manager - DRG reports directly to Illinois Power Manager - QA for program direction and operation.

- ° Responsible for development and implementation of final documentation review program.

- ° Train required staff of Quality Assurance Engineers (Document Review), Technical Assistants, and clerical support personnel needed to perform the job.

- ° Develop qualification standard, establish OJT and other training plans and provide for examination and testing of personnel as a prerequisite for certification to perform assigned duties.

- ° Develop necessary procedures to establish the program, and work instructions, including forms, checklists, handbooks, and related matters to accomplish the specific tasks necessary so that the final review process will assure satisfactory results.

- ° Will assure that access to, and correction, or addition to the records is in full compliance with applicable records management and records control procedures.

- ° Supervises Lead QAE and staff of Quality Assurance Engineers (Document Review), Technical Assistants, and clerical personnel; evaluates performance, approves leave and overtime requirements, and adjusts working hours as required.

- ° Responsible for planning, scheduling, and organizing the work; and for coordinating with other organizations.
- ° Identify and report any and all documentation discrepancies, and coordinate with appropriate organizations/disciplines for their resolution.

4.1.5 Manager - DRG will prepare schedules for final review of vaulted and in-process records.

5.0 RESPONSIBILITIES

5.1 The IP Manager Quality Assurance has overall responsibility for the development and implementation of the program.

6.0 ATTACHMENTS

6.1 Attachment 1 - Document Review Group Organization Chart

DOCUMENT REVIEW GROUP

