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8/13/85

	SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION		<input checked="" type="checkbox"/> WPP	<input checked="" type="checkbox"/> QCI
	JOB NO. 14926		NO. 5.3	REV. 7
	TITLE - REVIEW OF NONCONFORMANCE		PAGE 1	OF 2
	REPORTS FOR DEFICIENCY EVALUATION		ISSUED	3-18-82
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PEM/PMC <i>R. L. Baker</i> 5-22-85	POCE <i>B. Bryan</i> 5/22/85	POAE <i>R. Medina</i> 5-22-85	HL&P N/R	

(THIS IS A COMPLETE REWRITE)

1.0 PURPOSE

1.1 This procedure establishes the Site Engineering and Project Field quality Assurance Engineering review of Nonconforming Reports for deficiency evaluation to the criteria in 10CFR50.55(e) and 10CFR21.

2.0 ABBREVIATIONS & ACRONYMS

DER	Deficiency Evaluation Report
EDP	Engineering Department Procedure
ESI	Ebasco Services Incorporated
HL&P	Houston Lighting & Power
HOE	Home Office Engineering
NCR	Nonconformance Report
PEM	Project Engineering Manager
PMC	Project Manager of Construction
PPM	Project Procedures Manual
POAE	Project Quality Assurance Engineer
POCE	Project Quality Control Engineer
SEM	Site Engineering Manager
SEO	Site Engineering Organization
QA	Quality Assurance
QCAC	Quality Control Administrative Clerk
QCI	Quality Control Instruction
WPP	Work Plan Procedure

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3.0 REFERENCES

- 3.1 WPP/QCI-5.0, Nonconforming Materials, Parts and Components.
- 3.2 WPP/QCI-6.0, Control, Review and Processing of Quality Records.
- 3.3 PPM, Volume I, 2.19, Reporting Substantial Safety Hazard, Defects, and Noncompliance, 10CFR21.
- 3.4 PPM, Volume I, 2.20, Reporting Significant Deficiencies, 10CFR 50.55E.
- 3.5 EDP 4.61 Nonconformance Reports (NCR).
- 3.6 Title 10, Code of Federal Regulations, Parts 21 and 50.55 (e).

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Staff + 144

NUCLEAR REGULATORY COMMISSION

Request No. SS-478-479-CL Official Exh. No. SS4 Ex. 144
in the matter of _____

Staff ☒
Applicant ☒ IDENTIFIED ☒
Interviewer ☒ RECEIVED ☒
Cont'g. City ☒ REJECTED
Contractor _____
Other _____
DATE 8-13-85
Witness _____
Registrar TATE



SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION
JOB NO. 14926

TITLE - REVIEW OF NONCONFORMANCE
REPORTS FOR DEFICIENCY EVALUATION

WPP ☒

QCI ☒

NO. 5.3

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4.0 PROCEDURE

4.1 The QCAC shall forward originals of all NCRs to QA upon validation.

4.2 On a daily basis (Monday through Friday) except Site Holidays, QA/SEO representatives shall screen each NCR using the GUIDELINES FOR REPORTABILITY (Exhibit WPP/QCI-5.3-1) to determine which NCRs require evaluation under the DER procedures (References 3.3 and 3.4). This determination shall occur within seven days of NCR validation.

4.3 NCRs screened and found not to be potentially reportable shall be initialed, dated, and checked "NO" in Block 19a of the NCR.

NOTE: For NCRs on earlier forms, equivalent information may be entered in Block 20.

4.4 The SEO and QA shall supervise the preparation of a DER, Reference 3.3 or 3.4, as applicable, and return the DER to SITE QA for validation for those conditions determined to require further action. The DER number shall be added to Block 19a, along with initials of reviewers and date.

4.5 Further processing of the DER occurs in accordance with references 3.3 or 3.4. The NCR is returned to the QCAC within ten working days for further processing in accordance with reference 3.1.

5.0 ATTACHMENTS

5.1 Exhibit WPP/QCI-5.3-1, "Guidelines for Reportability."

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GUIDELINES FOR REPORTABILITY

PART A (10CFR50.55(e))

1. The condition involves a safety related structure, or component.*
2. The Deficiency:
 - Represents a breakdown in the QA program
 - Is in final design or
 - Is in construction or
 - Is a deviation from performance specifications
3. The condition is significant* in that it could adversely affect the safety of plant* operation at any time during service and accident conditions of operation.*
4. Significance of the condition cannot be determined without extensive evaluation.
5. The condition requires extensive repair.*
6. The condition requires extensive redesign.*
7. When a deficiency can be classified as falling in items 1, 2, and 3 or 1, 2 and also one or more items 4, 5, or 6, the deficiency shall be formally evaluated under a DER.
8. The deficiency represents a:
 - 8.1 Significant breakdown in the QA Program.
 - 8.1.1. Implementing procedures are incomplete.
 - 8.1.2.. Implementing procedures are inadequate.
 - 8.1.3 Implementing procedures are adequate but:
 - 8.1.3.1 Improperly executed.
 - 8.1.3.2 Completely ignored.
 - 8.1.3.3 Incompletely executed.

NOTE: *Refer to Sections 8 through 13 for additional guidance, information and definitions of words and phrases.

GUIDELINES FOR REPORTABILITY

8.1.4 Inadequate records keeping system.

- 8.1.4.1 Compliance with quality related requirements cannot be established.

9. The Deficiency is in:

9.1 Final design approved and released for construction.

- 9.1.1 Design does not conform to criteria and basis stated in the SAR or construction permit.

10. The Deficiency is in:

10.1 Construction of or significant damage to a structure, system or component and will require any of the following;

- 10.1.1 Extensive evaluation.
- 10.1.2 Extensive redesign.
- 10.1.3 Extensive repair.

11. The Deficiency is a:

11.1 Significant deviation from performance specifications which will require any of the following:

- 11.1.1 Extensive evaluation.
- 11.1.2 Extensive redesign.
- 11.1.3 Extensive repair.

12. In addition to the reasons for reportability listed above, a defect reportable under Part 21 may be also reportable under 10CFR50.55(e).

13. The following excerpts were taken from NRC guidance related to the implementation of Regulations 10CFR50.55(e) and 10CFR50, Appendix B, Criterion VII.

13.1 CLARIFICATION OF 50.55(e) PHRASES

- 13.1.1 Could adversely affect

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GUIDELINES FOR REPORTABILITY

13.1.1.1 If a deficiency meets all the criteria and it could adversely affect safe operations of the facility, it is reportable. "Could" does not imply that it would adversely affect safe operations. It implies a probability that safe operations may be adversely affected if the proper conditions existed.

13.1.2 At any time

13.1.2.1 Means that all service and accident conditions of operation must be considered.

13.1.2.2 The fact that a deficiency is obvious and could not possibly go uncorrected and therefore could not adversely affect safe operation does not negate the requirement to formally report the deficiency if it meets the criteria of 50.55(e).

13.1.3 Significance

13.1.3.1 To be reportable under 10CFR50.55(e) a deficiency must be significant. Significant is interpreted as having an effect or likely to have an effect on, or influence the safe operation of the facility in an adverse manner.

13.1.4 Extensive

13.1.4.1 An item is reportable if it requires extensive evaluation to determine if it is adequate to perform its intended safety function or will not impair the accomplishment of a safety function through adverse interaction.

13.1.4.2 Extensive means the expenditure of resources (time, manpower, money) to a degree disproportionate with the original design, test or construction expenditure.

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GUIDELINES FOR REPORTABILITY

PART B (10CFR21)

1. Does the defect exist in a basic component?*
2. Does the defect present a substantial safety hazard?*
3. Has the basic component been offered or delivered to the Client?
4. Has the supplier basic component been delivered to or accepted by Bechtel?

5. DEFINITIONS OF WORDS AND PHRASES

5.1 BASIC COMPONENT

Plant structure, system, and component or part thereof that is necessary to assure:

- o The integrity of the reactor coolant boundary, or
- o The capability to shut down the reactor and maintain it in a safe-shutdown condition, or
- o The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in 10 CFR 100.

5.2 These are safety-related items (identified on the "Q" List and generally the same as Seismic Category I items per Regulatory Guide 1.29), plus certain aspects of the physical security system - specifically:

- o Security system design activity by Bechtel Engineering.
- o Purchase orders for the central security computer system (hardware or software).
- o Contracts/subcontracts for major security system design or design and procurement.

NOTE: In all cases, "basic component" includes design, inspection, testing or consulting services important to safety that are associated with the component hardware, whether these services are performed by the component supplier or others.

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GUIDELINES FOR REPORTABILITY

5.3 SUBSTANTIAL SAFETY HAZARD

"Substantial safety hazard" is defined as the loss of safety function to the extent that there is a major reduction in the degree of protection provided to public health or safety.

- o This includes major degradation of essential safety-related equipment and major deficiencies involving design, construction, inspection, test, or use.

5.4 DELIVERED OR OFFERED FOR ACCEPTANCE

For example, a component is considered delivered when:

- o A design document has been communicated to another party which will use it in design, manufacturing, or in preparing a document for the manufacturing of any basic component.
 - o The purchaser has conducted a receiving inspection and released the component for storage or construction.
 - o After fabrication and shipment to the site, where the fabricator will also perform the erection and has offered the fabrication to the HL&P as completed.
 - o The first time the component is turned over from startup to HL&P.
- OR, be in any portion of a facility offered for acceptance.
- o An offer of acceptance occurs when a supplier has offered control over a portion of a facility subject to Part 50 of the Commission's (NRC) regulations to the purchaser. Thus, where a purchaser is offered the responsibility for a portion of the facility for testing purposes (preoperational), the purchaser would be required to evaluate any deviations in that portion of the facility and report any defect.

5.5 NONCOMPLIANCE

A failure to comply with the Atomic Energy Act of 1954, as amended, on any applicable Commission rule, regulation, order or license.

GUIDELINES FOR REPORTABILITY

5.6 COMMERCIAL-GRADE ITEM

Means an item that (1) is not subject to design or Specification requirements unique to nuclear facilities or activities, (2) is used in applications other than nuclear facilities and activities, and (3) is to be ordered from the manufacturer/supplier on the basis of specifications set forth in the manufacturer's published product description (for example, a catalogue) 10 CFR 21.3(C-1). Additional requirements, which do not affect the normal manufacturing processes other than to verify its quality, do not disqualify the item from commercial-grade status. This would include such matters as material certification, QA/QC program, or prototype tests to prequalify for seismicity, etc.

5.7 EVALUATING A DEFECT FOR REPORTABILITY

Only deviations from the technical requirements in contracts, subcontracts and purchase orders for "basic components" which exist or are discovered after the purchaser has taken delivery of items necessary to assure nuclear safety require evaluation for 10 CFR 21 reportability. These are safety-related items as identified on the "Q" List and in section 3.2 of the FSAR, plus security systems which provide for physical security of the plant after delivery of fuel.

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