

50-498/499 OL

HOUSTON LIGHTING & POWER COMPANY

SOUTH TEXAS PROJECT
PROCEDURE MANUAL

SUMMARY OF REVISIONS

DOCKETED
USNRC5-146
8/13/85

PROC NO. PSQP - A8	SUBJECT TREND ANALYSIS ADMINISTRATION	*85 OCT 17 A9:51
REVISION NUMBER	REVISION DESCRIPTION	
0	Initial Issuance	
1	Total re-write; Effective date: 1-9-81	
2	Revised Documentation Requirements; Effective Date: July 2, 1981	
3	Minor Revisions; No Training Required; The procedure title has been changed to Project Specific Quality Assurance Procedure. Effective date: February 15, 1982	

NUCLEAR REGULATORY COMMISSION

Docket No. 50-498-499-OL Official Ex. No. Staff EX. 146

In the matter of _____

Staff ✓ IDENTIFIED ✓

Applicant _____ RECEIVED ✓

Intervenor _____ REJECTED _____

Cont'g Off'r _____

Contractor _____ DATE 8-13-85

Other _____ Witness _____

Recorder TATE

8510290129 850813
PDR ADOCK 05000498
G PDR

FOR INFORMATION ONLY

REVISION AUTHORIZATION					
REVISION NUMBER	0	1	2	3	
DATE ISSUED	7-14-80	<u>1/5/81</u> 12-23-80	7-2-81	2-15-82	
PREPARED BY	J. Anderson	<u>R. Decker</u>	<u>Dr. Myster</u>	<u>Dr. Walquist</u>	
APPROVED BY	<u>Jordan</u> 7/14/80	<u>Jordan</u> 1/5/81	<u>Jordan</u> 6/30/81	<u>J.W. Estelle</u> 2/15/82	
APPROVED BY					

STP 60 (8.80)

Staff
146

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1.0 PURPOSE

The purpose of this procedure is to provide instruction for the evaluation of the contractor Trend Analysis Data and perform trend analysis of deficiencies identified by HL&P.

2.0 SCOPE

The scope of this procedure includes descriptions and trends identified during procurement, design fabrication, and construction of the STP.

3.0 REFERENCE DOCUMENTS

3.1 Organization & Responsibilities of Project QA/QC Personnel (PSQP-A1).

4.0 RESPONSIBILITIES

Individual responsibilities as related to this procedure are defined in PSQP-A1 and within the text.

5.0 REQUIREMENTS

HL&P Quality Systems/Administration will trend or analyze trends of all objective evidence issued by the contractor and HL&P site organizations which identify discrepancies and nonconforming items.

5.1 Evaluation of contractor Trend Analysis Program

HL&P Quality Systems/Administration will evaluate the contractor Trend Analysis Program by performing an analysis of the following:

- (a) Contractor Monthly Trend Report for effectiveness of data collection and adequacy of classification of discrepancies.
- (b) System for the identification of trends.

HL&P will notify the appropriate contractor Quality Assurance organization by memo of any discrepancies that are detected and provide any recommendations for corrective action. When it is deemed necessary HL&P Quality Systems/Administration will issue a Trend Investigation Request (TIR) as defined in Section 5.3. Quality Systems/Administration will issue a monthly report identifying all significant results. Distribution of the monthly report shall be in accordance with the list established by the Quality Systems/Administration Supervisor.

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5.2 Trending of HL&P Identified Discrepancies and Nonconformances

Trending of HL&P identified discrepancies and nonconforming items will be performed by Quality Systems/Administration as follows:

- (a) Collect, categorize and code the data.
- (b) Perform calculations and prepare graphs in accordance with predetermined guidelines.
- (c) Trend investigation requests and their resolutions.

When it is deemed necessary HL&P Quality Systems/Administration will issue a Trend Investigation Request (TIR) as defined in Section 5.3. Significant results will be identified in the monthly report.

5.3 Initiation of Trend Investigation Requests

Trend Investigation Requests are sent to HL&P Quality Engineering Project QA Supervisor(s) and/or Support Quality Assurance Manager as deemed necessary to investigate the root cause of trends adverse to quality.

- 5.3.1 When it is necessary to issue a TIR, the form shown in Figure 1 will be used. The initiator of the TIR shall provide the following information on the form:

TIR No. - Unique number assigned by Quality Systems/Administration who maintains the status log.

Response Due Date - Date that the written response is required (time period is based on the circumstances involved).

Activity Evaluated - The fabrication, construction, procedure, component, etc. which was evaluated.

Adverse Trend - Details of the concern relating to the trend

Action Requested - What specific action you feel should be initiated, supplemental audit, investigation, etc.

Initiator - Individual requesting the investigation

Approved By - Supervisor Quality Systems/Administration must approve the requests prior to issuance.

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- 5.3.2 The activity responsible for performing the investigation shall compile the following section of Figure 1.:

Action Taken - Details of the investigation, audit, etc. which was taken to determine the root cause of the trend, etc.

Results/Corrective Action - Based on the results of action taken what is or should be done to correct the cause.

Recurrence Control - What should be done to prevent recurrence of the problem in the future.

Submitted By - Responsible person for the action taken.

NCR, CAR, ADR, SDR, DCN - Record the control number of any deficiency document generated as the result of the investigation.

- 5.3.3 If the investigation identified condition(s) adverse to quality, the results of the Corrective Action(s) and recurrence control for these conditions will be trended on the next interval. If the results indicate that the unsatisfactory trend is still apparent, Quality Systems/Administration will request a corporate supplemental audit. If the results are satisfactory, and it has been verified that the trend no longer exists, the TIR shall be closed out by the individual performing the verification. Persistent problems will be presented to the Manager, Project Quality Assurance for resolution.

6.0 DOCUMENTATION REQUIREMENTS

The following documentation is required by this procedure to be controlled as defined in PSQP-A4.

6.1 Reference Documents

- 6.1.1 Monthly Trend Analysis Reports
- 6.1.2 Trend Investigation Requests (TIR)

7.0 ATTACHMENTS

7.1 Trend Investigation Request (TIR)

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ATTACHMENT 1

T.I.R. NO.: _____

DATE: _____

RESPONSE DUE DATE: _____

TREND INVESTIGATION REQUEST

TO:

FM: HLP SUPERVISOR, QUALITY SYSTEM

ACTIVITY EVALUATED:

SUSPECT ADVERSE TREND:

ACTION REQUESTED:

INITIATED BY: _____ DATE _____

APPROVED BY: _____ DATE _____

SQS

RESULTS OF INVESTIGATION

ACTION TAKEN:

RESULTS/CORRECTIVE ACTION:

RECURRENCE CONTROLS:

SUBMITTED BY: _____ DATE _____

FUNCTIONS: _____

 NCR NO(s):
 CAR NO(s):
 ADR NO(s):
 SDR NO(s):
 DCN NO(s):

T.I.R. CLOSED BY: _____ DATE _____

QS PERSONNEL

HOUSTON LIGHTING & POWER COMPANY SOUTH TEXAS PROJECT PROCEDURE MANUAL INTERIM CHANGE NOTICE		ICN No. PSQP-A8-02
DIRECTIVE/PROCEDURE No. PSQP-A8	REV. 3	PAGE 1 OF 2
TITLE Trend Analysis Administration		DATE ISSUED 7-5-83

DESCRIPTION OF CHANGE

- 1) Change Paragraph 5.3 to read:

'Trend Investigation Requests are sent to the BEC Project QA Manager for potential trends related to BEC or ESI responsibilities, or to the appropriate HL&P management personnel for potential trends involving HL&P activities.'
- 2) Change Attachment 1 to the attached form (PQA-061).
- 3) Delete Paragraphs 5.3.1 and 5.3.2. Replace with:
 - 5.3.1 The information contained in Section 1 of the TIR will be documented by the initiator. The Supervisor, QS/A will review and approve the TIR prior to issuance. After approval, QS/A will assign a sequential number to and log the TIR. The TIR will be issued to the responsible party via a cover letter prepared by QS/A and signed by the Project QA Manager (PQAM). A response date of no more than 30 calendar days from the date on the cover letter will be assigned. Written response extension requests may be granted by the PQAM if good cause has been demonstrated.
 - 5.3.2 The responsible party will conduct an investigation to determine whether a trend exists and document the results in Section 2 of the TIR. If no trend was identified, the TIR will be signed and returned to QS/A. If a trend was identified, Section 3 will be completed, the TIR will be signed and returned to QS/A.
- 4) Add Paragraphs 5.3.3 and 5.3.4
 - 5.3.3 QS/A will review the investigation results for adequacy and verify implementation of corrective action/recurrence control, if applicable. The results will be documented in Section 4 of the TIR.

FOR INFORMATION ONLY

INTERIM CHANGE APPROVAL	
EFFECTIVE DATES 7-5-83 to 8-31-83	
SQAM/PQAM <i>H. G. Walker</i>	DATE 7-5-83
MANAGER QA (WHEN APPLICABLE) <i>N/A</i>	DATE

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DESCRIPTION OF CHANGE	
<p>5.3.4 The TIR will be closed by the initiator and approved by the Supervisor, QS/A upon satisfactory verification of the corrective action/recurrence control. If no trend was identified, the TIR will be closed after a review for adequacy of the investigation results.</p> <p>5) Renumber the existing paragraph 5.3.3 to 5.3.5.</p>	
INTERIM CHANGE APPROVAL	
EFFECTIVE DATES 7-5-83 to 8-31-83	
SQAM/PQAM	DATE
MANAGER QA (WHEN APPLICABLE)	DATE

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ATTACHMENT 1

HOUSTON LIGHTING & POWER SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION TREND INVESTIGATION REQUEST			
DATE ISSUED	DATE DUE	RESPONSIBLE PARTY	
SUSPECT TREND AREA			
INITIATOR		DATE	SUPERVISOR APPROVAL
			DATE
ADVERSE TREND IDENTIFIED		YES <input type="checkbox"/> NO <input type="checkbox"/>	IF YES: COMPLETE SECTIONS 2 AND 3. IF NO: COMPLETE SECTION 2 ONLY
INVESTIGATION RESULTS			
ROOT CAUSE			
CORRECTIVE ACTION			
RECURRENCE CONTROL			
SIGNATURE		DATE	EFFECTIVITY DATE
RESPONSE ACCEPTED		YES <input type="checkbox"/> NO <input type="checkbox"/>	INITIATOR
			DATE
VERIFICATION RESULTS			
INITIATOR		DATE	SUPERVISOR APPROVAL
			DATE