

TEXAS UTILITIES GENERATING CO CPSES	PROCEDURE NUMBER	REVISION	ISSUE DATE	PAGE
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NONCONFORMANCES	PREPARED BY: <u>[Signature]</u>			DATE: <u>6/27/84</u>
	APPROVED BY: <u>[Signature]</u>			DATE: <u>6/28/84</u>

1.0 REFERENCES

1-A CP-QP-15.0, "Tagging System"

1-B CP-QP-17.0, "Corrective Action"

2.0 GENERAL

2.1 PURPOSE AND SCOPE

The purpose of this procedure is to establish a method of documenting the identification, resolution, and closeout of nonconformances as defined in Paragraph 2.2. It is the responsibility of all site employees to report items of nonconformance to their supervisor or to the TUGCO Site QA Supervisor. The requirements contained herein are applicable to nonconformances identified for materials, services or items associated with safety-related structures, systems and components not under the jurisdiction of the ASME Code, Section III, Division 1.

NOTE:

When nonconformances are detected by inspection and testing, they shall be reported in accordance with quality procedures/instructions describing the inspection or testing functions. Where specific guidelines are not given in quality procedure/instructions, the provisions of this procedure shall govern. When a specific person is assigned responsibility for an activity his/her designee may act in his/her place.

2.2 DEFINITION

2.2.1 Nonconformance

A deficiency in characteristic, documentation, or procedure which renders the quality of an item unacceptable or indeterminate.

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PDR FOIA
GARDEB5-59 PDR

TUGCO QA

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3.0 PROCEDURE

3.1 NONCONFORMANCE IDENTIFICATION

3.1.1 Field Identification

When a nonconforming condition as defined in Paragraph 2.2.1 is identified, the individual shall immediately apply a Hold Tag, when practical, (Reference 1-A) and note his name and telephone extension on the tag. He shall return and note on the Hold Tag the appropriate NCR number when obtained from the TUGCO NCR Coordinator.

NOTE: For electrical activities, the inspector may use his judgement to apply a Hold Tag to a nonconforming internal component. For example, the inspector may apply a Hold Tag to a broken/damaged terminal strip and note on the Hold Tag wording such as "Applied to Terminal Strip Only." On the NCR the statement would be "Applied to Terminal Strip Only - other unrelated activities may proceed."

3.1.2 Reporting

Nonconforming conditions shall be reported on the NCR form (Attachment 1). Supporting documentation, e.g., Inspection Reports, NDE reports, drawings shall also be attached to or referenced on the NCR where appropriate. The location of the nonconforming condition (structure, room number, elevation and area code) and the system/subsystem number shall be recorded on the NCR form.

NOTE: The system/subsystem number is not required for discrepancies relating to conduit, cable trays, protective coatings, cable tray hangers or anchor bolt locations provided that the structure is identified.

3.1.3 Numbering the NCR

Before sending the NCR to the appropriate Package Flow Group (PFG) the individual reporting the nonconformance shall obtain a number from the TUGCO NCR Coordinator. This number shall be noted on the NCR and on the Hold Tag per Reference 1-A that is applied to the nonconforming item/equipment.

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3.2.2.1 NCR's may be voided at any time if it is determined that nonconforming conditions do not exist, the nonconformance was previously reported on another NCR or other similar conditions exist. In the event that an NCR is determined to be invalid, "Void" shall be entered in bold letters in the disposition block with the reason and justification for voiding the NCR. Any pertinent supporting documentation shall be attached to the NCR and referenced in the reason and justification statements. Voiding of NCR's shall be approved by the QE Supervisor or his designee. The original voided NCR will be forwarded to the (PFG) NCR Coordinator.

3.2.2.2 If the NCR is determined to be valid, the reviewer assigns an "Action Addressee" and signs and forwards the draft NCR to the (PFG) NCR Coordinator.

3.2.3 NCR Issue

The PFG NCR Coordinator enters the date issued in the NCR Log, maintains a copy and forwards the original NCR to the "Action Addressee".

3.2.4 Disposition

3.2.4.1 Final Disposition (Rework, Repair, Scrap, Use-as-is)

The "Action Addressee" shall evaluate each reported nonconforming condition and determine an appropriate disposition to correct and/or resolve the nonconformance. The disposition shall be clearly and concisely recorded in the "Disposition" space on each NCR according to the following:

- a. The respective disposition block(s) shall be checked (i.e., Rework, Repair, Use-As-Is and/or Scrap).
- b. Rework Dispositions shall specify the rework actions required to correct the nonconforming conditions and bring the affected items into compliance with the specified requirements.

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- c. Repair Dispositions shall specify the repair actions required to bring the nonconforming characteristic(s) to a condition such that the capability of the affected item to function reliably and safely is unimpaired, even though the item still may not conform to specified requirements. Repair dispositions shall also include appropriate Engineering technical justification for acceptance of the item with characteristics that do not comply with specified design requirements.
- d. Use-As-Is Dispositions shall include sufficient Engineering technical justification to establish that the nonconforming characteristic will result in no adverse conditions and that the affected item will continue to meet all Engineering functional requirements, including performance, maintainability, fit and safety.
- e. Scrap Dispositions shall be made when it is determined that an item is unsuitable for its intended purpose and cannot be feasibly or economically reworked or repaired.

3.2.4.2 Temporary Waiver

For those nonconforming items which Construction/Engineering desires to continue to process on a "risk removal" basis, authorization shall be requested in the NCR disposition. In order to receive this authorization to continue the process, the following conditions must be satisfied:

- a. The NCR disposition shall include sufficient information and direction for accomplishing the work. Detail shall be provided to permit adequate evaluation of potential impact to affected parties (i.e., construction, engineering, QA/QC, records, start-up and operations);
- b. Engineering Review/Approval shall be by the Engineering Group Supervisor or above;
- c. Quality Engineering Review/Approval shall be by the Discipline Level III QE or above.

After approval of the disposition a Blue Temporary Waiver Tag, per Reference 1-A, shall be affixed to the item. The NCR number shall be noted on the Temporary Waiver Tag.

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3.2.9 Verification/Closure

The appropriate QC Supervisor shall ensure that the NCR disposition work items are verified and/or witnessed by QC. QC shall document their inspections (via inspection reports, checklists, travelers, etc. as required). The QC Supervisor shall ensure that all documents required for closure shall be either attached to or referenced on the NCR and forward the NCR to the QE for closure.

The QE, shall close the NCR by signing the "Verification" block of the original.

The closed NCR will then be transmitted by the PFG NCR Coordinator to the Permanent Plant Records Vault (Unit 1 and common) or when the data package is complete, to the Interim Records Vault (Unit 2) and the date entered in the NCR log. Copies of closed NCR's are transmitted to the TUGCO NCR coordinator for closure of the TUGCO NCR log.

3.3 CORRECTIVE ACTION

Copies of NCR's shall be transmitted daily to the QA Supervisor for evaluation of the need for corrective action.

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3.2.5 Action Addressee Review/Approval

Only the authorized representative of the Action Addressee may sign the Engineering Review/Approval block.

3.2.6 Quality Assurance Review

The NCR disposition shall be reviewed by the Discipline Level III Quality Engineer for adequacy and conformance to applicable specifications, code requirements and current drawing/design change.

If the disposition is satisfactory the PFG NCR Coordinator enters the date on the NCR log and puts the NCR into the data package. If the disposition is not satisfactory, the Quality Engineer shall resolve all comments with the Engineer who dispositioned the NCR.

Upon Quality Engineering approval of the disposition, and prior to beginning any rework/repair, QC shall remove the red hold tag and blue waiver tag (if applicable).

3.2.7 Revision of Nonconformance Reports

When changes are required to the nonconforming condition or disposition, the NCR shall be revised. This revision shall be denoted on the NCR number and the reason(s) for revision included in the comments section. The necessary approvals shall be obtained in accordance with this procedure for the portion affected by revision.

3.2.8 Implementation of the Disposition

NCR's shall be sent by the PFG NCR Coordinator to the appropriate department responsible for implementation of the disposition.

For NCR's identified with an "S" after the NCR number, an information copy will also be sent to TUGCO Startup.

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ATTACHMENT 1

TEXAS UTILITIES
GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No.

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	R/R NO.
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NONCONFORMING CONDITION

TYPICAL

REPORTING PERSONNEL

REFERENCE DOCUMENT: _____ REV _____ PARA _____

REPORTED BY: _____ DATE: / /

QE

QE REVIEW/APPROVAL: _____ DATE: / /

ACTION ADDRESSEE _____ DEPARTMENT _____

ACTION ADDRESSEE

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS _____ SCRAP _____

ENG. REVIEW/APPROVAL _____ DATE: / /

QE

QE REVIEW APPROVAL: _____ DATE: / /

DISPOSITION VERIFICATION & CLOSURE: _____ DATE: / /

COMMENTS:

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TEXAS UTILITIES
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COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No.

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
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NONCONFORMING CONDITION

TYPICAL

REPORTING PERSONNEL

REFERENCE DOCUMENT: _____ REV _____ PARA _____
REPORTED BY: _____ DATE: / /

OE

OE REVIEW/APPROVAL: _____ DATE: / /
ACTION ADDRESSEE _____ DEPARTMENT _____

ACTION ADDRESSEE

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS _____ SCRAP _____

OE

ENG. REVIEW/APPROVAL _____ DATE: / /
OE REVIEW APPROVAL: _____ DATE: / /
DISPOSITION VERIFICATION & CLOSURE: _____ DATE: / /

COMMENTS:

TUGCO OA

