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SIGNIFICANT CONSTRUCTION DEFICIENCIES	PREPARED BY: <u>BC Scott</u>			<u>7/24/82</u> DATE
	APPROVED BY: <u>[Signature]</u>			<u>7/24/82</u> DATE

1.0 REFERENCES

- 1-A Title 10, Code of Federal Regulations, Part 50.55(e)
- 1-B CP-QP-3.0, CPSSES Site Quality Assurance/Quality Control Organization

2.0 GENERAL

2.1 PURPOSE AND SCOPE

The purpose of this procedure is to provide a routine method for documenting and evaluating significant product related deficiencies discovered during the construction phase of the Comanche Peak Steam Electric Station (CPSES). The procedure includes measures for recognition and identification of significant deficiencies and a method for evaluating their significance with the objective of providing prompt notification to the Nuclear Regulatory Commission (NRC) as required by Reference 1-A.

2.2 RESPONSIBILITIES

The TUGCO Manager, Quality Assurance, has overall responsibility for Quality Assurance activities on CPSES and is ultimately responsible for evaluating and determining the reportability (to NRC) of significant design and construction deficiencies within the requirements of Reference 1-A. The TUGCO Site QA Supervisor is responsible for recognition and analysis of significant construction deficiencies and normally represents the Manager, Quality Assurance, in verbal notification to the NRC. The principal site QA/QC Staff personnel, as defined in Reference 1-B, are responsible for implementation of this procedure within their functional areas of responsibility.

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2.3 DEFINITIONS

2.3.1 Reportable Deficiency

As described in Reference 1-A, a reportable deficiency is defined as a deficiency found in design or construction, which, were it to have remained uncorrected, could have affected adversely the safety of operation of the Nuclear Power Plant at any time throughout the expected lifetime of the plant, and which represents:

- a. A significant breakdown in any portion of the Quality Assurance Program conducted in accordance with the requirements of Appendix B; or
- b. A significant deficiency in final design as approved and released for construction such that the design does not conform to the criteria and bases stated in the safety analysis report or construction permit; or
- c. A significant deficiency in construction of, or significant damage to, a structure, system or component which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function; or
- d. A significant deviation from performance specifications which will require extensive evaluation, extensive redesign, or extensive repair to establish the adequacy of a structure, system, or component to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function.

2.3.2 Significant Construction Deficiencies

For purposes of this procedure, significant construction deficiencies are "product" nonconformances which may be reportable in accordance with the above definition. This includes, but is not necessarily limited to, the following types of nonconformances:

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- a. Product failures substantially below specified acceptance criteria;
- b. Apparent product deficiencies or damage to safety-related structures, systems or components for which there is no readily obvious routine rework or repair procedure available or specified;
- c. Product deficiencies discovered subsequent to final acceptance by responsible QC personnel;
- d. Construction deficiencies which clearly require engineering analysis for resolution;
- e. Construction deficiencies which will require further testing or evaluation in order to determine the significance of the nonconformance, including inadequate records.

3.0 PROCEDURE

3.1 REPORTING

Each functional QA/QC Manager/Supervisor shall require personnel under his technical direction to promptly verbally report "significant" construction deficiencies as defined herein to his office or in the event of his absence or unavailability, directly to the TUGCO Site QA Supervisor. If the reported construction deficiency is classified "significant" (See Section 2.3.2) it shall be documented immediately on the Design Construction, Significant Deficiency Analysis Report (SDAR) Form, Figure 1, and then promptly hand-carried to the TUGCO Site QA Supervisor. Routing procedures for identification and resolution of nonconformances and deficiencies shall then be implemented.

The TUGCO Site QA Supervisor will complete the Analysis and Conclusion section of the SDAR form although the functional Managers/Supervisors may also participate in this effort. The twenty-four hour clock for notification to the NRC may begin when the principal QA/QC Manager/Supervisor determines that the construction deficiency is "significant" as defined herein. Consequently, it is imperative that the form be processed in an expeditious manner.

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3.2 ANALYSIS AND CONCLUSION

The Analysis section of the SDAR form includes direct quotes from Reference 1-A as well as other items that experience indicates are necessary for consideration to minimize the reporting of trivia to the NRC. By definition, Reference 1-A only requires the reporting of deficiencies which have adverse safety implication and are significant i.e. "yes" answers to parts 1 and 2 of the Analysis section of the SDAR Form. It is normally impossible to make a timely decision relative to safety aspects and thus the decision to report or not report to the NRC is often based on the significance of the deficiency. The questions depicted in subsections (a) through (i) of Part 2 are designed to reach a timely decision on reportability as well as to document the basis for deciding that the deficiency is not reportable per the provisions of Reference 1-A, i.e., a "no" answer to the Conclusion section of the SDAR Form.

3.3 PRELIMINARY NOTIFICATION

A "yes" answer to the Conclusion section of the SDAR Form will normally result in the following sequence of events:

- a. Verbal notification to the TUGCO Manager, Quality Assurance, or his designee, of the nature of the deficiency and the conclusion reached;
- b. Verbal notification to the Principal (Resident) NRC Inspector for CPSES or in his absence or availability directly to the NRC Region IV office in Arlington, Texas (817-465-8100).
- c. Completion of the bottom portion of the SDAR Form and distribution to affected personnel, including the TUGCO Manager, Quality Assurance.

A "no" answer to Parts 1 or 2 of the form reflects the determination that the deficiency is not reportable per Reference 1-A.

To provide adequate records, record the date and time of the decisions and initial or sign the form in the space provided, then distribute and file for future reference.

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3.4 NUMBERING AND FILING

A consecutive log of the SDAR forms submitted to the Site QA Supervisor is maintained by the TUGCO Site QA Secretary. This log reflects the I. D. Number shown in the upper right hand corner of the form, a brief summary of the deficiency, and a notation as to reportability. If reported a unique number is also shown on the log and in the lower right corner of the SDAR form, as follows:

CP-73-7

Unique sequential identifier
Year identified
Comanche Peak

Files, including appropriate backup information, are maintained by the TUGCO Site QA Secretary.

3.5 REVIEW OF NONCONFORMANCES

Each Functional QA/QC Manager/Supervisor shall review Nonconformance Reports (NCR's), in his area of responsibility, upon issuance. This review is designed to recognize and identify significant deficiencies as defined in Paragraph 2.3.

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FIGURE 1

DESIGN/CONSTRUCTION SIGNIFICANT DEFICIENCY ANALYSIS REPORT

DEFICIENCY NO.		DATE		PROJECT		TYPE	
DEFICIENCY DESCRIPTION				CLASSIFICATION			
<p>THESE ITEMS TO BE COMPLETED BY THE FUNCTIONAL (A/C) MANAGER, SUPERVISOR DETAILS REQUIRED:</p>				<p>CLASSIFIED CONSTRUCTION</p>			
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