

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 1 of 24

- 1.0 Describe the function of the PROTECTIVE COATINGS EXEMPT LOG.
 - 1.1 Identify the CPSES procedure providing the requirements for the EXEMPT LOG.
 - 1.2 Track the revision history of the procedure, noting substantial revision items. *3
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 2 of 24

- 2.0 Verify that the method by which nonconforming coatings are identified, dispositioned, and entered into the EXEMPT LOG corresponds to the requirements of the procedure. *3 @VI
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 3 of 24

3.0 Describe the input of each CPSES organizational unit to the
process of evaluating items for inclusion in the EXEMPT LOG.
*3

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 4 of 24

- 4.0 Verify that the basis for the inclusion of each item which appears in the EXEMPT LOG is provided by the CPSES specification or procedures. *3 @IV
- 4.1 Verify that the basis for the inclusion of each item which appears in the EXEMPT LOG is is identified in the EXEMPT LOG entry. *3
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 5 of 24

- 5.0 Verify the functioning of the system by which coatings applied to equipment or components off-site are evaluated for conformance to coating specification requirements and either accepted for the specified service, designated for rework, or identified for inclusion in the EXEMPT LOG, as appropriate. *3 @II
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 6 of 24

- 6.0 Attach a copy of the EXEMPT LOG for each unit. For each unit, list the sum of entries for:
- a) concrete
 - b) liner plate
 - c) all other steel *3
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 7 of 24

- 7.0 Verify that an entry (or entries) has been made to the EXEMPT LOG for Imperial coatings applied to containment concrete in combinations and/or sequences which have not been specifically DBA qualified. *1

Note: Specific coatings previously identified are those applied in the sequence 11S/1201/11S/1201 or in the sequence 11S/1201/11/1201. @II

- 7.1 Record or attach copies of the EXEMPT LOG entry number(s), the item or area description(s), and area of coatings affected.
- 7.2 Identify the DCA, NCR, or other document which generated the entry. *1
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 8 of 24

- 8.0 If an entry has not been made to the EXEMPT LOG for the 11S/1201/11S/1201 or 11S/1201/11/1201 coated areas: Record the basis for any decision to exclude these areas from the EXEMPT LOG.
- 8.1 Identify documentation recording the basis of this decision.
- 8.2 Check whether this analysis evaluated the area of coatings affected.
- 8.3 Verify whether an entry is planned or presently in process.
- 8.4 Record the scheduled date of completion for any projected entry.
- 8.5 Summarize status of interim actions taken to date. *1
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 9 of 24

- 9.0 Verify the accuracy of the basis for determination of area used in any of the above conclusions; examine inspection records, drawings, NCR's, DCA's, or other documents as appropriate to establish the basis for area determination.
- 9.1 Identify extrapolations used to arrive at final computation of area values. *1
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 10 of 24

- 10.0 The EXEMPT LOG includes an entry for Carboline CZ-11 primer / Imperial 1201 topcoat applied to Richmond Inserts; see entry #30.
- 10.1 Verify the accuracy of area value; establish that there is objective evidence providing verification of the accuracy of the area value listed.
- 10.2 Alternatively, verify by examination of inspection records, drawings, NCR's, DCA's, or other documents as appropriate to establish the basis used for area determination. *4
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 11 of 24

11.0 Verify that an entry has been made (or is scheduled) in the EXEMPT LOG for Imperial Nutech #11S applied over foreign matter (e.g. nails, wood, rebar chairs, bolts) embedding in concrete.

11.1 Evaluate the basis for calculation of area. *6

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 12 of 24

- 12.0 Verify that an entry has been made (or is scheduled) in the EXEMPT LOG for coatings applied over hand or power tool cleaned steel for which there are no inspection records which establish the adequacy of surface preparation.
- 12.1 Establish the accuracy of area calculation.
- 12.2 Identify the document which generated the entry. *10
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 13 of 24

- 13.0 Verify that an entry has been made (or is scheduled) in the
EXEMPT LOG for coatings applied over hand or power tool
cleaned steel for which DBA evaluation is not available.
- 13.1 Establish the accuracy of area calculation.
- 13.2 Identify the document which generated the entry. *10 @II
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 14 of 24

- 14.0 Verify that an analysis has been performed to identify areas at which 11S/1201/11S/1201 has been applied at thicknesses over the nominal designed thickness of the system and up to 102 mils in thickness.
- 14.1 Examine and evaluate the basis used to determine the size of the areas involved.
- 14.2 Verify the documentation of this analysis by NCR or DCA.
- 14.3 Verify that the affected areas have been (or are scheduled to be) entered in the EXEMPT LOG. *12
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 15 of 24

- 15.0 A Request for Information or Clarification, (RFIC), dated October 20, 1983, provides that an inorganic zinc coating could overlap approximately one inch over the surrounding epoxy (organic) coating at a repair spot. A previous RFIC, dated January 7, 1983, does not permit inorganic zinc applied over epoxy. Examine and evaluate the engineering justification for this change of requirements.
- 15.1 Verify that any appropriate entries have been made to the EXEMPT LOG.
- 15.2 Examine and evaluate the basis for determination of the affected area.
- 15.3 Verify the document(s) which generated the EXEMPT LOG entry.
*15 @II
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 16 of 24

- 16.0 List the DCA's (and affected areas) which modify construction design requirements for a component or area from specification AS-30 to specification AS-31.
- 16.1 Determine if each affected area has been entered into the EXEMPT LOG. *30
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 17 of 24

- 17.0 Identify DCA's which have the effect of modifying surface preparation requirements for a component or area to an SP-6 criteria.
- 17.1 Verify that each item has been entered into the EXEMPT LOG (or in the NOT-COATED LOG.*31
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 18 of 24

18.0 Verify that the area affected by each DCA which has the
affect of accepting unsatisfactory coating conditions (such
as thickness, finish, surface preparation) has been entered
to the EXEMPT LOG. *55

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 19 of 24

- 19.0 Verify that there are suitable records identifying the location of limited access or inaccessible areas.
- 19.1 Establish the surface area of each limited access or inaccessible area.
- 19.2 Verify that each area has been entered into the EXEMPT LOG.
- *31
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 20 of 24

- 20.0 Identify the level of supervision authorized to designate prior to or upon completion of coating work that an area (or class of areas) is a limited access or inaccessible area. *31
- 20.1 Identify the level of supervision authorized to determine in the field that an area is a limited access or inaccessible area. *31
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 21 of 24

- 21.0 Verify that there is an entry in the EXEMPT LOG for coatings applied at expansion joints.
- 21.1 Review and verify the accuracy of area calculations. *48
@IV
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 22 of 24

- 22.0 Verify that an analysis has been conducted which identifies the area of coatings applied for repair or top-coating in sequences not described by procedure.
- 22.1 Corroborate the determination of the affected areas.
- 22.2 Verify any NCR's or DCA's generated in response to the analysis, and inclusion of the affected areas in the EXEMPT LOG as appropriate. *2 @II @IV
-

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 23 of 24

23.0 Verify the basis given in DCA 18,489, Rev 1 for entries to
the EXEMPT LOG for areas at which primer was applied at .5 mils.
*11

July 31, 1984 Draft of
BROOKHAVEN NATIONAL LAB CPSES TRT
AUDIT PLAN for AREA VII
EXEMPTIONS
Page 24 of 24

24.0 Review and verify the area calculated for entry #41 (reactor cavity) to the EXEMPT LOG. *13
