

NRC INSPECTION MANUAL

DQASIP

INSPECTION PROCEDURE 50075

SAFETY RELATED COMPONENTS - RECORDS REVIEW

PROGRAM APPLICABILITY: 2512

50075-01 INSPECTION OBJECTIVES

To review a representative sample of safety-related component records during the construction phase to determine whether:

01.01 The licensee's system for preparing, reviewing, and maintaining records is functioning properly;

01.02 There is reasonable assurance that the records reflect work accomplishment consistent with NRC requirements and SAR commitments; and

01.03 The records indicate any potentially generic problems, management control inadequacies, or other weaknesses that could have safety significance.

Inspection Schedule

<u>Inspection</u>	<u>May Be Started</u>	<u>Must Be Started</u>	<u>Must Be Completed</u>
First	After work is 20% complete	Before work is 30% complete	Before work is 40% complete
Second	After work is 60% complete	Before work is 70% complete	Before work is 90% complete

50075-02 INSPECTION REQUIREMENTS

02.01 Review the licensee/contractor requirements covering the span of records for safety-related components. Determine the initiation point for each major group of records and those responsible for ensuring that the recorded information meets the requirements. (Reference findings from IP 50071, Paragraph -022g.)

02.02 Review the records of the two most recent QA audits associated with safety-related components and determine whether requirements were met in the following areas:

- a. The content of the audit reports clearly define the scope of the audits and the results. (Reference finding from IP 50071, Paragraph -023.)

- b. The audits were conducted by trained personnel not having direct responsibility in the areas being audited.
- c. Frequency of audits conformed with established requirements.
- d. Appropriate followup actions to resolve identified deficiencies or weaknesses (including reaudit, if necessary) either have been taken, are currently in progress, or have been initiated.
- e. The audited organization's response to the audit findings are in writing, are timely, and adequately address the findings.

02.03 Review the pertinent quality-related (work and QC inspection) records relative to the components selected in IP 50073, or a similar selection of components if more appropriate. Determine whether these records conform with established procedures and whether they reflect work accomplishment consistent with requirements in the following areas:

a. Receipt Inspection and Material Certification

- 1. Records confirm that required material characteristics, performance tests, nondestructive test, environmental qualification tests, and other specification requirements are met.
- 2. Receipt inspection and storage records indicate that, where appropriate, defective or incorrect components, parts, and materials are controlled and prevented from installation and possible use.

b. Nonconformance/Deviation Reports

- 1. Do the reports adequately document current status of nonconformances and deviations? Review approximately 15 nonconformance/deviation reports to sample system effectiveness.
- 2. Determine if the above sample of records is legible and complete.
- 3. Determine if the nonconformance reports include the status of corrective action and resolution.
- 4. Determine if these records are completely processed through established channels for resolution of the immediate problem, analysis for generic implications, and trend analysis.
- 5. Determine if records in general are being properly identified, stored, and can be retrieved in a reasonable time.

c. Storage Inspection

- 1. Have the licensee/contractor inspections of stored components been performed at required frequency?
- 2. Have special requirements during storage been adhered to, such as: rotation of motors and pumps, lubrication, tests on insulation (electrical), and maintenance of cover gas?

d. Installation Inspections

1. Do the records adequately document the status of installation for those components selected?
2. Do the records indicate that the required installation inspections were performed as required by procedures?

02.04 To determine whether qualified licensee/contractor, craft and inspection personnel are being employed on safety-related component installation work, review a sampling (4-6, but no more than 10 records total) covering several different disciplines of personnel qualification records as follows:

- a. Determine whether a system of personnel qualification records meeting stated requirements exists and is being maintained in current status.
- b. Determine if the records are sufficient to reasonably support qualification in terms of certification, experience, proficiency, training, testing, etc., as applicable.
- c. Review the actions taken by responsible licensee/contractor organizations to independently authenticate the validity of critical qualification statements.

02.05 If inspection findings warrant, expand the record sample size to include additional safety-related components. Conduct portions of the record reviews required by Paragraph 02.03 above.

50075-03 INSPECTION GUIDANCE

General Guidance

- a. Pertinent portions of the SAR should have been reviewed under IP 50071 to determine documentation requirements before reviewing records in this area. Portions, or all, of this inspection effort may be conducted in conjunction with the performance of IP 50073.
- b. If the same inspector(s) performing this procedure was (were) not responsible for inspections under IP 50071 and IP 50073 (at the same facility) it is necessary, as a minimum, that previous inspection findings in this area be reviewed; if possible, there should be adequate coordination between the inspector performing IP 50075 and those involved with IP 50071 and IP 50073.
- c. The inspector's judgment is important in sample selection for the various areas of record review. The inspector should attempt, through the selected sample, to determine whether the majority of records important to safety-related components are being maintained in a reasonably acceptable manner. In some instances, since the NRC's sample covers such a small portion of the total, it may be necessary to expand the sample size to gain added assurance or to confirm an existing problem. Commensurate with the above is the realization that substantive errors or departure from documentation requirements in such a limited sample raises the issue of whether the licensee is adequately controlling the construction process.
- d. In view of the above, and since component installation and inspection takes place, to some extent, over much of the construction phase, this procedure should be scheduled for performance at least twice.

03.01 Specific Guidance. (NOTE: The numbering of the guidance paragraph below refer to specific subsections of 02 above.)

- 02.02 The licensee may have delegated the audit function to others for execution (the licensee must retain overall responsibility for program effectiveness) or the audits may be performed directly by the licensee organization. In either case, if this inspection item identifies significant deficiencies or other problems that indicate a serious lack of licensee management involvement in the control of plant quality, the region should strongly consider performing IP 35060 (Section on Audits) at the corporate office.
- 02.03a Sufficient records should be reviewed so that the inspector can determine whether important requirements have been met in this area. The extent of review will be determined, in part, by the components involved and the results of the initial sample of records selected for review.
- 02.03b Review available nonconformance reports in detail for the component selected. Specifically determine whether the corrective action initiated appears likely to preclude repetition. The reviewer should be particularly watchful for nonconformance reports signed off without adequate explanation or reports that have been closed before being fully processed in accordance with procedures. Also, if components with reported nonconforming conditions are permitted to be installed, NRC inspectors should confirm that the licensee's control system effectively tracks the condition until resolved.
- 02.03c Review enough records in detail to determine whether required inspections and specified maintenance activities were made at the frequency established.

03.02 Prevalent Errors/Concerns. This section is included to provide background for inspectors on past problems of a generic nature that should be scrutinized to give NRC early information.

- a. Falsification of records to indicate completion of inspections and work accomplishments that were not actually performed.
- b. Documentation not kept current, causing speculation and concern that records coming out of a catchup effort may be incorrect or invalid.
- c. Inspection documentation signed off by persons other than the inspector actually responsible for the recorded information.
- d. Nonconformance report system deficient in that reports could be destroyed, filed away, or otherwise signed off without proper resolution or accountability of action taken.
- e. Qualification files for NDE inspectors found to contain various irregularities in fulfillment of critical requirements.
- f. Licensee audit reports indicated that audits were not planned or carried out in accordance with ANSI 45.2.12.
- g. Auditors found not fully qualified in assigned areas.
- h. Licensee audit reports containing adverse findings and recommendations were filed away without appropriate followup and resolution.

50075-04 REFERENCES

SAR, Chapters 3, 5, 6, 9, and 17, including pertinent codes and standards referenced in these chapters.

Regulatory Guide 1.26, Quality Group Classifications and Standards.

Regulatory Guide 1.28, Quality Assurance Program Requirements (Design and Construction).

Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants.

Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel.

Regulatory Guide 1.88, Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records.

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