

NP 7.7.10

SAFETY-RELATED AND QA-SCOPE
CLASSIFICATION



Wisconsin
Electric
Power Company

DOCUMENT TYPE: Administrative

REVISION: 0

EFFECTIVE DATE: October 14, 1998

PROCEDURE OWNER: Norm Hoefert

A174

SAFETY-RELATED AND QA-SCOPE CLASSIFICATION

1.0 PURPOSE

1.1 This procedure details the technical determinations, reason, and justifications for functional classification of structures, systems, and components (SSCs) within the Point Beach Nuclear Plant (PBNP) Computerized History and Maintenance Planning (CHAMPS) Q-List. In addition, this procedure provides the necessary details to ensure that all Q-List data sources (i.e., CHAMPS Q-List information, SDRs, Greenline Diagrams) are revised as necessary to ensure the proper classification information is available and properly maintained.

1.2 CHAMPS Q-List data is considered by Wisconsin Electric to be the database of record for the Q-List information. The CHAMPS Q-List is comprised of the following fields of information:

QA-Code
Safety Related
Environmentally Qualified
Seismic Classification
Containment Isolation Valve
Fire Protection

Each of these fields of information are defined within PBNP Procedure AM 6-3 (Ref. 5.8). The Greenline Diagrams provide a pictorial representation of the CHAMPS Q-List data. The Greenline Diagram information is maintained current with Q-List data (Ref 5.6).

1.3 This procedure does not apply to the CHAMPS parts information, CHAMPS Bill of Materials, or purchased spare parts listed in the CHAMPS Database. CHAMPS parts information typically does not appear on station permanent drawings. Please refer to Ref. 5.5 for parts classifications.

1.4 This procedure applies equally to classification upgrades and downgrades as the process is the same. However, additional considerations must be given to classification downgrades to ensure all functions, both safety related and augmented quality, are considered for all component functions.

2.0 DISCUSSION

None

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3.0 RESPONSIBILITIES

- 3.1 Manager - SPES - Responsible as overall manager for the Q-List program, as follows:
- Q-List program development
 - Q-List procedure preparation/ revision
 - Regulatory program compliance
 - Review of Qualification of engineering personnel assigned to Q-List activities
 - Review of major Changes to Q-List via SQRD process
 - Maintenance of Q-List information resident in CHAMPS Database
 - Maintenance of Greenline Diagrams
- 3.2 SPES Engineers - Assigned engineers to the Q-List Project are responsible for component design basis information review, change document preparation, and documentation of CHAMPS Q-List database component information changes.
- 3.3 CHAMPS Database Personnel - Responsible for data entry of Q-List information changes as approved and submitted by the SPES engineers, maintenance of the CHAMPS Database, and overall review of Q-List information at time of entry to ensure the change information is consistent with existing Q-List information.

4.0 PROCEDURE

4.1 Baseline Technical Document Review

- 4.1.1 This procedure details the methods to be followed to correct discrepant CHAMPS Q-List data. If CHAMPS Q-List data is felt to be incorrect or missing with respect to a component's design basis, the discrepancy shall be resolved by using this procedure as the implementing source. Per the definition of design basis in 10 CFR 50.2, discrepant data is considered to be non-supportive design information. As this applies to the Q-List being the classification of design basis information at PBNP, examples of discrepant information would be missing data, data that is misleading to the user, or obviously non-supportive of the system or component function. All CHAMPS database Q-List classifications are made based upon the component's functional requirements in mitigating either plant design basis events, see definition of "safety related"), (Ref. 5 8) or those components that have been elevated to QA-Scope by regulatory mandate or PBNP management directive. (See definition of Augmented Quality). (Ref 5 8)

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NOTE: If the person discovering a CHAMPS Q-List database information error is unsure of the proper resolution or needs additional technical support, they should contact assigned site SPES Q-List personnel for guidance and assistance.

4.1.2 This procedure details the technical reasoning and methods used to effect a Q-List change. In addition to Q-List changes, other Q-List related documents and/or plant technical sources may need revision. For each Q-List change made, the initiator shall review the baseline documents listed as applicable to ensure no additional changes are necessary and the change is supported by design documentation:

- FSAR
- Plant Technical Specifications
- NUREG 0800, Standard Review Plan sections (as applicable, for review only)
- Greenline Diagrams for system QA-Scoping
- Scoping Determination Records, if available
- similarly installed components, on different unit or different train
- Programmatic inputs (i.e., Reg. Guide 1.97, EQ, FPER, SQUG)
- other CHAMPS Database component information or listed references
- Design Basis Documents (DBDs)
- Abnormal Operating Procedures (AOPS)
- Emergency Operating Procedures (EOPS)
- Setpoint Documents
- Industry Bulletins, circulars, etc. (for review only).

4.1.3 The initiator reviews all available plant design documents for information that describes the component's function. From this review the initiator makes the determination that the information supports the Q-List classification, or the reviewed information may also need revision as a result of necessary changes to the Q-List data. If design basis information is found to be discrepant, or some clarification, the initiator performs one of the following:

- a. For changes to Greenline Diagrams and station controlled drawings, this documentation change is performed by completing a Drawing Change Notice (DCN). (Ref. 5.2 or 5.6)
- b. For inconsistencies in plant design basis documentation (document changes needed to any of the above listed plant technical documents), the initiator shall fill out a Condition Report per NP 5.3.1, Condition Reporting System.

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NOTE: It is the responsibility of the Q-List change initiator to ensure adequate reference material is available to support the Q-List classification. Component classification requires a thorough understanding of component functioning and the content within each technical document used. It is important that clear, consistent source information be available to support the Q-List classification. For those components in which supporting design basis documentation does not support the proposed component classification, the classification change shall be placed on hold until the design basis information has been changed to support the classification.

4.2 Q-List Change Processes

4.2.1 Levels of change have been created within the Q-List procedures to economize the resources necessary for CHAMPS Q-List changes. These changes are the SQRD, the SDR and the Rescoping Document. The selection of which process to use is the choice of the initiator as the magnitude of the Q-List change warrants. All of the processes listed require an independent review of the document to satisfy quality assurance requirements (Ref. 5.12) (10 CFR 50, App. B). As a part of the independent review, the reviewer should verify that the proper document selection was made based on the level of approvals necessary for the change.

The SQRD is the highest level of change for the CHAMPS Q-List data. The decision to use this process is made by the evaluator based on the fact the change would have a great impact on the functioning of the station due to major Q-List changes. Major changes to the Q-List necessarily require station MSS approval because the change will have plant wide impact. The evaluation process is detailed in NPBU Procedure NP 7.7.12, Safety Related and QA-Scope Classification Upgrade or Downgrade Process.

NOTE: Attached to the SQRD should be a brief synopsis of technical information sources reviewed for documentation purposes. This information should be in summary format, and provide a detailed summary of the pertinent information. A SQRD technical summary consists of a technical paper, usually 2-5 pages in length.

4.2.2 The Scoping Determination Record [SDR-S, -C] process is a mid-level change for CHAMPS Q-List data. The decision to use this process is made based on the fact the change would have little or no impact on the functioning of the station, or other NPBU work groups, but technical information or justification is required because the change to the Q-List data is not readily obvious. The evaluation process is detailed in NPBU Procedure NP 7.7.12, Safety Related and QA-Scope Classification Upgrade or Downgrade Process.

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NOTE: Included on the SDR sheet is a brief synopsis, usually 2-4 paragraphs in length that documents the technical reasoning for the components functional classification basis.

4.2.3 A Q-List Rescoping Document is the basic change level document used for CHAMPS Q-List changes. This form provides the necessary information, and is used when the change to Q-List information is readily obvious to the reviewer. This form is used as necessary for Q-List component changes from missing, incomplete, or discrepant entries. The initiator enters the baseline information source for the component(s) classification in the Basis/ Reference for Change Section on Form PBF-1551. In this narrative paragraph, the initiator should list supporting information for the component classification. The evaluation process is detailed in NPBU Procedure NP 7.7.12, Safety Related and QA-Scope Classification Upgrade or Downgrade Process.

4.3 Other Considerations, Downgrades and Other Programmatic Impacts

4.3.1 When downgrading a component from QA-Scope safety related to QA-Scope Augmented Quality or non-QA scope, the CHAMPS Parts Bill of Materials should be revised in the NSS review to document the change in QA-Scoping. This will allow for proper part classification, and additional cost savings.

4.3.2 For those components being downgraded from QA-Scope safety related or QA-Scope Augmented Quality to non-QA scoped, consideration shall be given to the role the component might serve with respect to certain Augmented Quality programs. Those AQ programs are:

- Station Blackout (AQ Code 37) (Ref. 5 8)
- Fire Protection (AQ Code 20) (Ref. 5 8)
- ASME Section XI Testing (AQ Code 43) (Ref. 5 8)
- Seismic Classification (i.e., Class I originally, or 2/1) (AQ Code 38) (Ref. 5 8)

4.3.3 For the downgrade to non-QA Scoped to accurately reflect the component classification, any of the above listed Augmented Quality QA Codes may still apply to the component being downgraded. For those components that would fall into these categories, the components would have to be classified as AQ, with the respective code assigned. The proper classification should be reflected on the CHAMPS Rescoping Document prepared for the Q-List change. The downgrade evaluation process is detailed in NPBU Procedure NP 7.7.12, Safety Related and QA-Scope Classification Upgrade or Downgrade Process.

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4.3.4 Embedded within the Q-List data are design basis information sources or programs that may become impacted by the component's classification changes. These are:

- Commitments to Reg Guide 1.97
- Environmental Qualification
- FSAR
- Fire Protection Program
- Station Blackout
- License Renewal
- Seismic Qualification
- Maintenance Rule
- Parts Classification
- Maintenance
- Operations
- Design Basis Document Group
- Station Drawings

AS CHAMPS Q-List changes are made, it is currently the responsibility of the initiator to inform each of the liasons responsible for the programs listed above, with exception of Parts Classification and Maintenance Rule if there is a potential impact to their respective program or discipline. For all changes to design basis documents listed above, it is also the responsibility of the Q-List change initiator to ensure that all programs have altered their respective data, if required.

5.0 REFERENCES

- 5.1 NPBU Procedure NP 7.7.12, Safety Related and QA-Scope Classification Upgrade or Downgrade Process.
- 5.2 NPBU Procedure NP 1.3.1, Document and Record Administration.
- 5.3 NPBU Procedure NP 5.4.1, Open Item Tracking Systems.
- 5.4 NPBU Procedure NP 7.2.1, Modification Requests.
- 5.5 NPBU Procedure NP 9.3.2, Commercial Grade Dedication of New and Replacement Items.
- 5.6 NPBU Procedure NP 7.7.11, Greenline Diagram Preparation and Maintenance.
- 5.7 NPBU Nuclear Quality Assurance Program Manual.
- 5.8 PBNP Procedure AM 6-3, Systems and Design Functions Covered by the Quality Assurance Program.

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- 5.9 DG-G06, Guidelines for System, Component and Part Classification.
 - 5.10 EPRI NP-5652, Commercial Grade Item Dedication.
 - 5.11 EPRI NP-6895, Guidelines for Safety Classification of Systems, Components and Parts Used in Nuclear Power Plant Applications (NCIG-17).
 - 5.12 Code of Federal Regulations, Title 10, Energy, Part 50, Licensing of Production and Utilization Facilities, (including all appendices).
 - 5.13 NRC Generic Letter 83-28, Required Actions Based Upon the Generic Implications of Salem ATWS Events.
 - 5.14 NPSU Procedure NP 7.7.4, Scope and Risk Significant Determination for the Maintenance Rule.
- 6.0 BASES
- None

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ATTACHMENT A

DEFINITIONS

Many of the Q-List specific definitions and terms are defined in PBNP Procedure AM 6-3.
(See Ref. 5 8)

1. QA-Scope - Those components that are within the PBNP Quality Assurance Program as outlined in our commitments to 10 CFR 50, App. A. These commitments of the QA Program are detailed in FSAR, Chap. 1.4, Quality Assurance Program.
2. Classification - The process of defining a component's QA-Scoping, based upon the function the component serves to mitigate the effects of design basis accidents (safety related QA-Scoping), or where additional regulatory or self-imposed QA levels assigned (Augmented Quality QA-Scoping)
3. Upgrade (or Downgrade) - Where a previously classified component classification has to change to a higher level (upgrade), or lower level (downgrade) from the component's originally assigned classification. An example of an upgrade is where a non-safety related, or augmented quality classified component because of it's analyzed accident function needs to be "upgraded" to safety related. A downgrade is the reverse of the stated example.
4. Rescoping - Term used to describe the classification process, or a shortened reference to Form PBF-1551, Rescoping Documentation, (Ref. 5 1) which is the change form used for the classification process.
5. SQRD - Abbreviation for Form PBF-1578, Safety-Related and QA-Scope Reclassification Documentation. Q-List change process that requires a high level of approval (MSS review) for the proposed changes to the CHAMPS Q-List. Q-List changes that require a SQRD are typically the result of a station-level change to a plant system or design basis, a change resulting from a regulatory requirement, or a plant system-wide component classification change that would affect large numbers of component QA classifications.
6. SDR - Abbreviation for "Scoping Determination Record." There are four SDR forms, PBF-1501 through 1504. These forms are: -S (for System), -C (for Component), -T (for Topic), and -P(for Part). The Scoping Determination Record form applicable is completed and, (with exception of the SDR-P, which is handled within the NSS Group), routed for approval through the NES Group, which performs the independent verification. The SDR-P process will be defined within this procedure, but in a different procedure section. Changes as the result of the SDR process are considered to be the "mid-level" change, which does not require MSS approval, but the person performing the classification analysis felt the need to provide for additional description or detail of why the classification was such.

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7. Rescoping Documentation, or Rescope Document - Reference to Form PBF-1551, which is the change document for component classification. Changes to the Q-List utilizing this form alone typically consist of technical errors, omissions or obviously incorrect component classification. In addition, this form is to be used for those component rescoping that stemmed from SQRD or SDR classification change documents.