Enclosure 15 to ET 07-0022

WCNOC Procedure AP 28-007, "Nonconformance Control"

WOLF CREEK
NUCLEAR OPERATING CORPORATION

AP 28-007

NONCONFORMANCE CONTROL

Responsible Manager

Manager Quality & Performance Improvement

Revision Number	4
Use Category	Reference
Administrative Controls Procedure	Yes
Management Oversight Evolution	No
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1.0 PURPOSE

1.1 This procedure establishes the program requirements for the control of nonconformances. These requirements include the identification, documentation, control, disposition, and correction of nonconforming items utilizing the Wolf Creek work controls program.

2.0 SCOPE

2.1 This procedure applies to all materials, parts and components installed in or removed from the plant as follows:

2.1.1 Safety Related materials, parts and components.

2.1.2 Special Scope materials, parts and components.

2.1.3 Non-Safety Related materials, parts, and components within the 'R' ASME Code program, i.e., ASME Section I, Section IV Boilers, and Section VIII Pressure Vessels.

2.2 This procedure does not apply to Warehouse controlled or released items identified as nonconforming prior to installation in the plant. In these cases, refer to AP 24H-003, COMMODITY DISCREPANCIES.

3.0 REFERENCES AND COMMITMENTS

3.1 References

3.1.1 AP 05-001, CHANGE PACKAGE PLANNING AND IMPLEMENTATION

3.1.2 AP 05-002, DISPOSITIONS AND CHANGE PACKAGES

3.1.3 AP 15A-003, RECORDS

3.1.4 AP 16A-001, 'R' PROGRAM REPAIRS/ALTERATIONS

3.1.5 AP 16A-003, ASME SECTION XI REPAIR/REPLACEMENT PROGRAM

3.1.6 AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS

3.1.7 AP 20G-001, CONTROL OF INSPECTION PLANNING AND INSPECTION ACTIVITIES

3.1.8 AP 22A-001, SCREENING, PRIORITIZATION AND PRE-APPROVAL

3.1.9 AP 22C-002, WORK CONTROLS

3.1.10 AP 24E-001, IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS

3.1.11 AP 24H-003, COMMODITIY DISCREPANCIES

3.1.12 AP 26A-001, REPORTABLE EVENTS - EVALUATION AND DOCUMENTATION

3.1.13 AP 28-001, OPERABILITY EVALUATIONS

3.1.14 AP 28-011, RESOLVING DEFICIENCIES IMPACTING SSCs

3.1.15 AP 28A-001, PERFORMANCE IMPROVEMENT REQUEST

3.1.16 AP 28A-100, CONDITION REPORTS

3.1.17 AI 16C-007, WORK ORDER PLANNING

3.1.18 AI 16C-008, WORK ORDER IMPLEMENTATION

3.1.19 Generic Letter 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability"

3.1.20 USAR, Chapter 17.0, Quality Assurance

3.1.21 ANSI N18.7-1976, Quality Assurance for the Operational Phase of Nuclear Power Plants

3.1.22 ANSI N45.2.10-1973, Quality Assurance Terms and Definitions

3.1.23 ANSI/NB-23, National Boiler Inspection Code, 1998 Edition through 1999 Addenda

3.1.24 Kansas Boiler Safety Act, Kansas Statute No. 44-914

3.2 Commitments

3.2.1 None

4.0 DEFINITIONS

4.1 Deficiency:

4.1.1 As defined in AP 28-011, RESOLVING DEFICIENCIES IMPACTING SSCs, a DEFICIENCY is an all-inclusive term used in reference to any condition or circumstance that reduces the confidence that a structure, system, or component (SSC) will perform satisfactorily in service.

1. This definition encompasses other commonly used terms that also reduce the confidence that a SSC will perform satisfactorily in service, such as: degraded conditions, nonconforming conditions, indeterminate conditions, conditions adverse to quality, concerns, failures, malfunctions, problems, deviations, defective material and equipment, nonconformances, test failures, and test deficiencies.

4.2 In-Process Deficiency:

4.2.1 An unacceptable condition that is not considered a nonconformance providing the following conditions are met:

1. The condition occurs during a work activity.

2. The condition is identified prior to or during final acceptance of the work.

3. The condition can be corrected within the existing scope of work.

4. The condition is not pre-existing.

4.2.2 Examples of in-process deficiencies could include: In-process welding discontinuities, in-process damage to consumable materials (e.g., gaskets), etc.

4.3 Nonconformance:

4.3.1 Per ANSI N45.2.10-1973: A deficiency in a characteristic, documentation, or a procedure, which renders the quality of an item unacceptable or indeterminate. Nonconformances, therefore, include material deficiencies, malfunctioning or inoperative structures, systems, and components, and departures from specified procedural requirements, which impact the quality of an item. Programmatic or procedural deficiencies, which do not impact the quality of an item, are processed in accordance with AP 28A-100, CONDITION REPORTS.

4.3.2 Per NBIC, Section RA-2151.s: A nonconformity is any condition which does not comply with the applicable rules of the National Board Inspection Code, construction code, jurisdictional requirements or the quality system. Nonconformity's must be corrected or eliminated before the repaired or altered component can be considered in compliance with the National Board Inspection Code. This definition is applicable to nonconformances identified during repairs or alteration to ASME Sections I or IV Boilers, and VIII Pressure Vessels.

4.4 Reject:

4.4.1 The process by which a nonconforming item is rejected for use and either scrapped, returned to vendor, or downgraded for use in a Non-Q system.

4.5 Rework:

4.5.1 The process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling or other corrective means.

4.6 Repair:

4.6.1 The process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safely is unimpaired, even though that item still may not conform to the original requirement.

4.7 Use-As-Is:

4.7.1 A disposition which may be imposed for a nonconformance when it can be established that the discrepancy will result in no adverse conditions and that the item under consideration will continue to meet all engineering functional requirements including performance, maintainability, fit and safety.

5.0 RESPONSIBILITIES

5.1 All plant personnel, including contractors, are responsible for identifying actual or potential deficiencies through initiation of a Work Request (WR) in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

5.2 The Shift Manager (SM), Shift Engineer (SE),Superintendent FIN Team (SFT)or designee is responsible for screening potential nonconformance Work Requests in accordance with AP 22A-001, SCREENING, PRIORITIZATION AND PRE-APPROVAL.

5.3 The Responsible Work Group (RWG) planner is responsible for evaluation of nonconformances in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

5.4 Engineering is responsible for providing Repair and Use-As-Is nonconformance dispositions in accordance with AP 05-002, DISPOSITIONS AND CHANGE PACKAGES.

5.5 Quality Control is responsible for the following:

5.5.1 Reviewing Repair and Use-As-Is Engineering dispositions affecting ASME components.

5.5.2 Reviewing ASME Work Orders for the assignment of applicable hold points in accordance with AP 20G-001, CONTROL OF INSPECTION PLANNING AND INSPECTION ACTIVITIES, and AP 16A-003, ASME SECTION XI REPAIR/REPLACEMENT PROGRAM or AP 16A-001, 'R' PROGRAM REPAIRS/ALTERATIONS, as applicable.

5.5.3 When applicable, obtaining ANII/ANI/AI review of ASME Work Orders for assignment of applicable ANII/ANI/AI hold points prior to NCR WO implementation.

5.5.4 When applicable, obtaining ANII/ANI/AI review of Repair and Use-As-Is Engineering dispositions affecting ASME components prior to NCR WO implementation.

5.6 RWG personnel and/or inspection personnel who implement nonconformance dispositions are responsible for performing work and/or inspections in accordance with approved Work Order work instructions and/or procedures.

6.0 PROCEDURE

6.1 Implementing Procedures

6.1.1 All procedures containing administrative controls impacted by this procedure shall conform to the requirements of this procedure to ensure the consistent implementation of nonconformance controls.

6.2 Nonconformance Identification

6.2.1 Deficiencies shall be identified on a Work Request in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

1. IF during the initiation of a WR, a programmatic concern or a need for a hardware failure analysis is identified, THEN a CR shall be initiated in accordance with AP 28A-100, CONDITION REPORTS.

2. IF the initiator determines that the WR identifies a nonconformance, THEN the WR shall be identified as a nonconformance in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

6.2.2 The SM/SE/SFT or designee shall process WR's that identify potential nonconformances in accordance with AP 22A-001, SCREENING, PRIORITIZATION AND PRE-APPROVAL.

1. WR's involving potentially reportable nonconformances shall be screened in accordance AP 22A-001, SCREENING, PRIORITIZATION AND PRE-APPROVAL; and evaluated in accordance with AP 26A-001, REPORTABLE EVENTS - EVALUATION AND DOCUMENTATION.

6.3 Nonconformance Control

6.3.1 Nonconforming items removed from the plant shall be identified and controlled in accordance with AP 24E-001, IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS.

1. For Warehouse controlled or released items identified as nonconforming prior to installation in the plant, refer to AP 24H-003, COMMODITY DISCREPANCIES.

6.3.2 Nonconforming items installed in the plant shall be controlled by identification and location to preclude the inadvertent use of a plant installed nonconforming item, where the use of that item would pose a hazard to personnel or plant equipment.

6.4 Nonconformance Disposition

6.4.1 WO/SWO that identify nonconformances shall be dispositioned as follows:

1. Rework or Reject dispositions shall be processed in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

2. Repair or Use-As-Is disposition requests shall be processed in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS. Engineering shall provide dispositions in accordance with AP 05-002, DISPOSITIONS AND CHANGE PACKAGES.

3. WO/SWO's with Repair or Use-As-Is dispositions affecting ASME components shall be reviewed by Quality Control in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS. When applicable, Quality Control shall provide these types of dispositions to the ANII/ANI/AI for review prior to NCR WO implementation.

4. Concurrent Modifications shall be implemented in accordance with AP 05-001, CHANGE PACKAGE PLANNING AND IMPLEMENTATION, shall be followed.

6.5 Implementation of Nonconformance Dispositions

6.5.1 Nonconformances shall be reworked, repaired, and/or reinspected as detailed in Work Orders planned and approved in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS and AI 16C-007, WORK ORDER PLANNING, and implemented in accordance with AP 16C-008, WORK ORDER IMPLEMENTATION.

6.6 Close in Process

6.6.1 Nonconformance WO/SWO's that are determined not to be required (e.g. written in error or the described condition does not exist) may be closed in process. This shall be performed in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

6.7 Close in Troubleshooting

6.7.1 WHEN troubleshooting for a nonconformance results in the resolution of the identified condition, or it is determined that the condition does not exist, THEN the WO/SWO may be closed in troubleshooting. This shall be performed in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

6.8 Identification of Nonconformances During In-Process Work

6.8.1 Nonconformances identified during in-process work (pre-existing condition) shall be identified on a new WR in accordance with AP 16C-006, MPAC WORK REQUEST/WORK ORDER PROCESS CONTROLS.

1. In-Process Deficiencies, as defined in section 4.0 of this procedure, are not considered nonconformances and do not require initiation of a new WR.

6.9 Closeout and Final Review

6.9.1 Nonconformance WO/SWO's shall be closed out in accordance with AI 16C-008, WORK ORDER IMPLEMENTATION.

7.0 RECORDS

7.1 None

8.0 FORMS

8.1 None

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