

ENCLOSURE 1
Watts Bar Nuclear Plant
QUALITY ASSURANCE RECORDS
CORRECTIVE ACTION PROGRAM PLAN
REVISION 3

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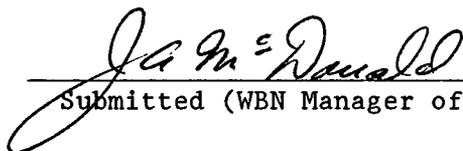
Watts Bar Nuclear Plant

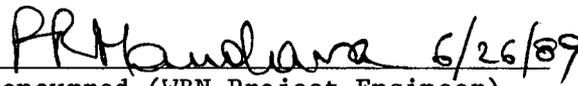
QA RECORDS

CORRECTIVE ACTION PROGRAM PLAN

Revision 3


Prepared (Engineering Programs Manager)

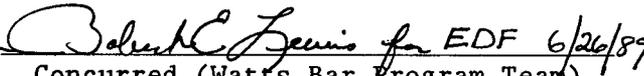

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QUALITY ASSURANCE RECORDS
CORRECTIVE ACTION PROGRAM PLAN

REVISION LOG

<u>Revision Level</u>	<u>Date</u>	<u>Affected Pages</u>	<u>Description of Revision</u>
2	12/21/88	All	Initial issue to NRC
3	06/14/89	All	Revised to resolve NRC comments received during the CAP presentation in Rockville, MD on 02/8/89 as follows; (1) eliminated the term "essential record" and clarified our intent to comply with existing commitments to ANSI N45.2.9, and (2) clarified that current QA program requirements would apply to any reinspections. Also revised to make minor changes to clarify that retrievability is the most common records problem, not necessarily more than half; to clarify that engineering records are not within the scope of this CAP; and that a 01/20/89 cutoff date for open CAQs is being used for the review.

QUALITY ASSURANCE RECORDS
CORRECTIVE ACTION PROGRAM PLAN

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QUALITY ASSURANCE RECORDS
CORRECTIVE ACTION PROGRAM PLAN

1.0 INTRODUCTION

Reviews conducted of Watts Bar Nuclear Plant (WBN) construction and operations records required for licensing support found that some records (1) were not retrievable in a timely manner or were potentially missing, (2) were maintained in improper storage, or (3) had quality problems (e.g., were incomplete, technically/administratively deficient). As used in this plan, the term "operations records" refers to records of operation, maintenance, and modification activities. Examples of records problems have been documented in various reports as shown in Attachment 1.

In 1987, Nuclear Quality Assurance (NQA) performed a review of site records to determine the range of problems that may exist. The review substantiated Quality Assurance (QA) records problems in the areas of retrievability, completeness, and other records attributes. The most common records problems are related to retrievability (potentially missing or misfiled documents). The results of this review are documented in Reference 1.

The root causes for quality and retrievability issues will be determined as a part of this Corrective Action Program (CAP).

Identified engineering records problems are being handled as part of the Design Baseline and Verification Program (DBVP), other engineering CAPs and Special Programs, and TVA's condition adverse to quality (CAQR) program, and will not be addressed in this CAP.

2.0 OBJECTIVES

The following are the objectives of this CAP:

- Ensure adequate storage and retrievability of required construction and operations records onsite.
- Resolve quality problems related to construction and operations records.
- Ensure that programs established to resolve records problems are adequate to prevent recurrence.

Completion of this CAP will provide reasonable assurance that WBN construction and operations QA records satisfy current licensing requirements for record quality, storage, and retrievability.

3.0 SCOPE

This program covers the storage, retrievability, and quality of construction and operations QA records generated and stored onsite as specified in ANSI N45.2.9. There are approximately 3 million unit 1 construction and operations records onsite.

4.0 PROGRAM DESCRIPTION

A QA Records Team (QART) will be established to oversee and manage all activities required by this Corrective Action Program plan. The QART will be chaired by the QA Records Project Manager and will include a representative from Nuclear Construction (NC), Nuclear Engineering (NE), Nuclear Support (NS), Technical Support (TSS), and NQA. Records-related issues open as of January 20, 1989, will be collected by the QART from a review of all open conditions adverse to quality (CAQs) and Employee Concerns Corrective Action Tracking Documents (CATDs). Identified concerns will be addressed by a three-path corrective action approach. The first path represents the steps to resolve identified records storage issues. The second path represents steps to resolve identified records retrievability issues. The third path represents steps to resolve identified quality issues for deficient records. Attachment 2 provides a flowchart of CAP activities.

4.1 Storage Issues

Identified records storage concerns include 1) failure to meet the requirements for a 2-hour fire-rated vault and 2) failure to place records in the records vault or in duplicate storage in accordance with the TVA QA Topical Report (TVA-TR75-1A). These issues will be resolved by the following actions:

- Issues relating to records vault fire-rating deficiencies will be resolved through modifications to the vault by NC.
- QA records generated by construction and operations will be indexed and microfilmed for duplicate storage where appropriate. Nonmicrofilmed QA records will be stored in the site vault in accordance with the requirements of the QA Topical Report. These actions will be implemented by NS.

4.2 Retrievability Issues

Identified records retrievability issues (e.g., inadequate identification and indexing of records and potentially missing or misfiled documents) will be addressed as follows:

- QART will manage the development by NS of an index to catalog the constructions and operations QA records. This index will address the records retrievability needs of user organizations.

- NS will utilize the index when reviewing and microfilming records. The index will be controlled as a quality document in accordance with site procedures.
- A team of personnel experienced in records control and directed by NS will develop and implement a systematic approach to records retrieval. Recent experience in retrieving records for the Vertical Slice Review (VSR) has demonstrated the ability to find records, but has also shown that the process is highly people dependent. The systematic approach will include the preparation of a Record Retrieval Guide for records. This guide will include computer indices, data bases, and manual processes as necessary to ensure timely retrieval of records. These records have been filed in a variety of ways at multiple locations and some components have multiple identifiers.
- A confirmatory review will be conducted by NS to establish confidence that this approach to records retrieval facilitates timely and accurate retrieval of QA records.
- NS will study the feasibility and cost effectiveness of enhancements to automate the records retrieval process to state-of-the-art methodology.

4.3 Quality Issues

Identified quality issues (e.g., incomplete, technically and/or administratively deficient records) associated with WBN construction and operations QA records will be addressed and resolved as discussed below.

4.3.1 Issues Addressed by Other Special Programs/CAPs

Identified QA records related issues will be collected from a review of open CAQs and CATDs and screened to determine which issues will be resolved through actions of another special program or CAP. Records issues addressed by other special programs or CAPs will be closed when it is confirmed that a new or alternative record is on file.

4.3.2 Resolution of Record Quality Issues

Records issues that will not be corrected by other special programs or CAPs will be evaluated to identify a set of

records quality issues. These issues will be evaluated by NE to determine whether confirmation of adequacy of associated plant features can be obtained. Alternative approaches to this evaluation include: (1) reinspection of the plant feature in accordance with the current QA program, (2) retrieval of the information from other source documents which attest to or substantiate the quality of the feature, or (3) use of testing and performance data.

The results of these confirmatory activities will be documented. For those plant features that are confirmed to be adequate as described above, either (1) the associated quality assurance records will be superseded or supplemented to reflect the resolution of the issue or (2) a cross reference will be added to the record index for the appropriate documentation that demonstrates acceptability of the hardware.

Record issues will be considered to be discrepant if the related plant features are not confirmed to be adequate. Quality record discrepancies will be evaluated for the extent and effect of their conditions.

Issues will be considered design-significant if, after an engineering evaluation, they are found to be in nonconformance with appropriate codes, standards, or licensing requirements. Issues determined to be design significant will (1) have a root cause analysis performed, (2) have recurrence controls implemented, and (3) be resolved by corrective actions, such as rework, repair, or commitment revision if technically justified. Documentation of completed corrective actions will replace or supplement the deficient records.

Issues considered to be nondesign-significant will be dispositioned as appropriate in accordance with the WBN CAQ program.

4.4 Trend Analysis

Quality issues addressed by this CAP will be subjected to a trend analysis. This trend analysis will be conducted by NE and will include a review of VSR-identified record issues. Related issues will be reviewed to determine if an extent-of-condition analysis is necessary. Adverse trends will be dispositioned in accordance with the WBN CAQ program.

4.5 Recurrence Control

Recurrence controls for quality issues will be developed upon completion of root cause and trend analysis. The recurrence control for identified retrievability issues is provided by the corrective actions noted in Section 4.2.

4.6 Licensing Assessment

Completion of this CAP will provide reasonable assurance that WBN construction and operations QA records satisfy current licensing requirements. Any changes to licensing commitments will be proposed only when justified.

5.0 PROGRAM INTERFACE

As described in Section 4.3.1, this CAP may make use of new records generated by other CAPs that (1) provide verification of the adequacy of plant features, or (2) supersede existing records.

6.0 PROGRAM IMPLEMENTATION

Interface with site organizations will be coordinated by the QART members with their assigned site organization. Reviews and dispositioning of issues may be implemented by all site organizations. Any engineering evaluations will be conducted by NE. Implementation of the elements of the plan will be handled by NQA, NE, NC, TSS and NS, as described in Section 4.0.

7.0 PROGRAM DOCUMENTATION

This program will be documented through the implementation of procedures. Open CAQs will be tracked in accordance with site implementing procedures. A final report will be issued to summarize activities and conclusions.

8.0 CONCLUSION

This plan will resolve recognized records issues in a controlled program which (1) provides appropriate record storage, (2) allows timely and reliable retrieval of site records commensurate with the importance of the record, (3) resolves WBN construction and operations record deficiencies, and (4) provides recurrence control for ongoing activities.

9.0 REFERENCES

1. WBN QA Records Verification Summary Report, QWB-S-87-0162, dated November 25, 1987.

Attachment 1

BASIS OF CAP
EXAMPLE LISTING OF RECORD CAQs

<u>CAQ NUMBER</u>	<u>ISSUE TYPE</u>	<u>ABBREVIATED DESCRIPTION</u>
WBQ880211	Retrievability	Surveillance reports not retrievable, pump installation and alignment document not retrievable.
WBQ880151	Quality	Field verification data from physical walkdown not of sufficient degree of accuracy.
WBQ880097	Quality	Unused data blanks on verification sheet not filled in, orientation of solenoid valve in degrees not recorded.
WBQ871147	Quality	Modifications records on CSSC equipment reference incorrect document numbers.
WBQ870937	Quality	Review of N-5 TVA 1-61-1/2/3-P9 revealed two serial numbers not listed on the component appurtenances report.
WBQ870712	Quality	Workplan WP-5086 does not have procurement numbers recorded on the "Modifications Material List," Attachment "G", for the material replaced as a result of work performed.
WBQ870698	Quality	Life of Plant document for two <u>Conax</u> electrical penetrations reflects incomplete NDE examinations.
WBP880188	Quality Retrievability	Weld procedure not recorded, weld documentation not found.
WBQ871002	Retrievability Quality	Retrievability Problems - Examples include: Support variance sheets, grout pour cards, aggregate sieve analysis, concrete placement documentation, proof load test for cable tray anchors, cadweld splice crew certification documentation, lift and transport records. Quality Problems - Examples include: Weld map references incorrect tank I.D. number, superseded form 209 not appropriately signed, receipt inspection does not indicate NCR number, receiving report indicates wrong serial number.

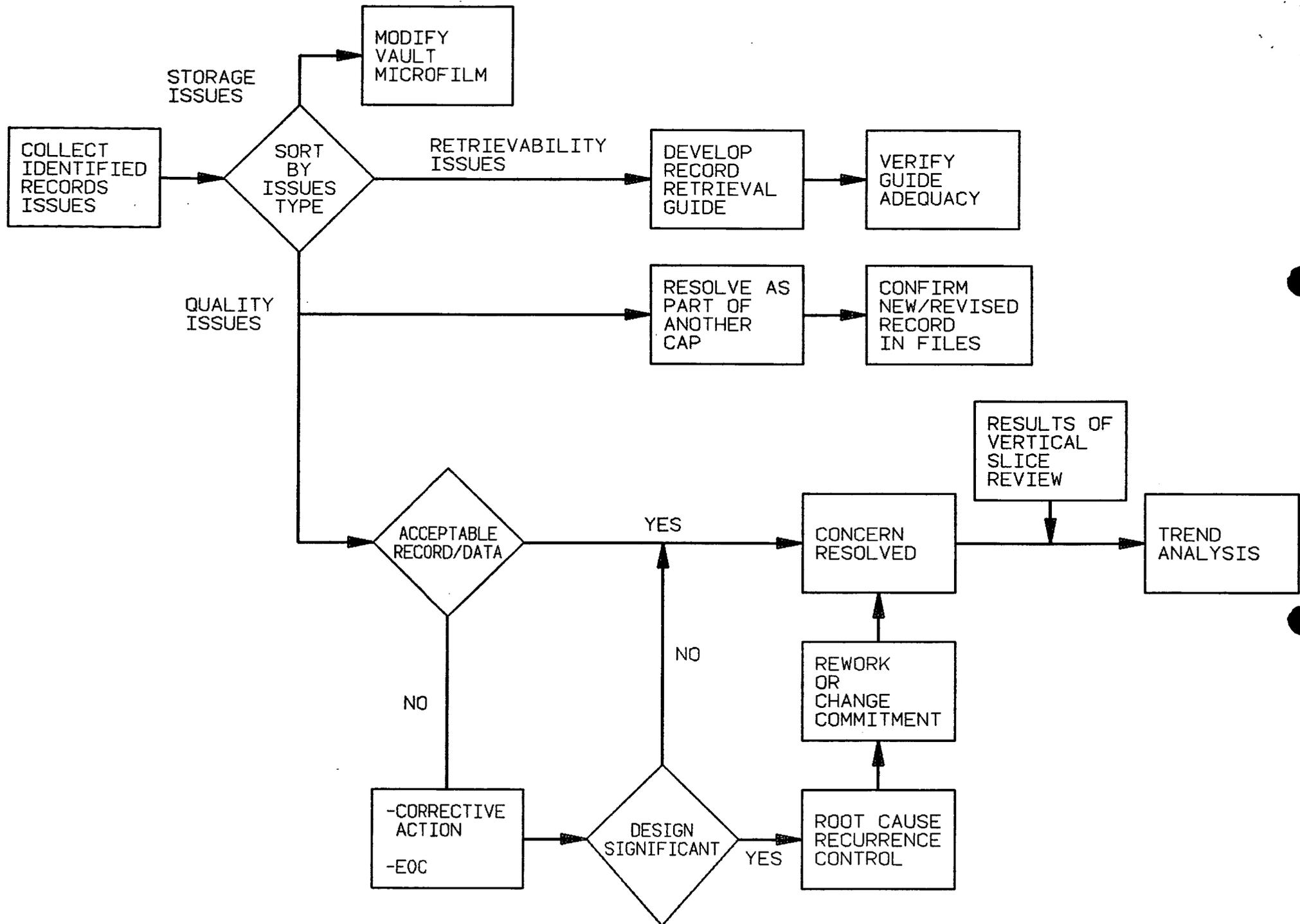
Attachment 1

BASIS OF CAP
EXAMPLE LISTING OF RECORD CAQs

<u>CAQ NUMBER</u>	<u>ISSUE TYPE</u>	<u>ABBREVIATED DESCRIPTION</u>
WBP871000	Retrievability	No documentation could be found in WP-3749 for the Flexibility Verification Data Sheet for the essential control air supplying 1-PCV-3-122 and 1-PCV-132.
WBP870036	Quality Retrievability	Records cannot be located in the vault. Superseded record revisions missing. Two records stored in vault with identical identifiers. Record in vault/no test level indicated. Blanks on records not "N/A." Records have corrections, additions, strikeouts. Illegible records. Test certified by inspector not certified. Revision levels of procedures not entered on record.
W-203-P	Storage	Storage vault does not meet fire rating.

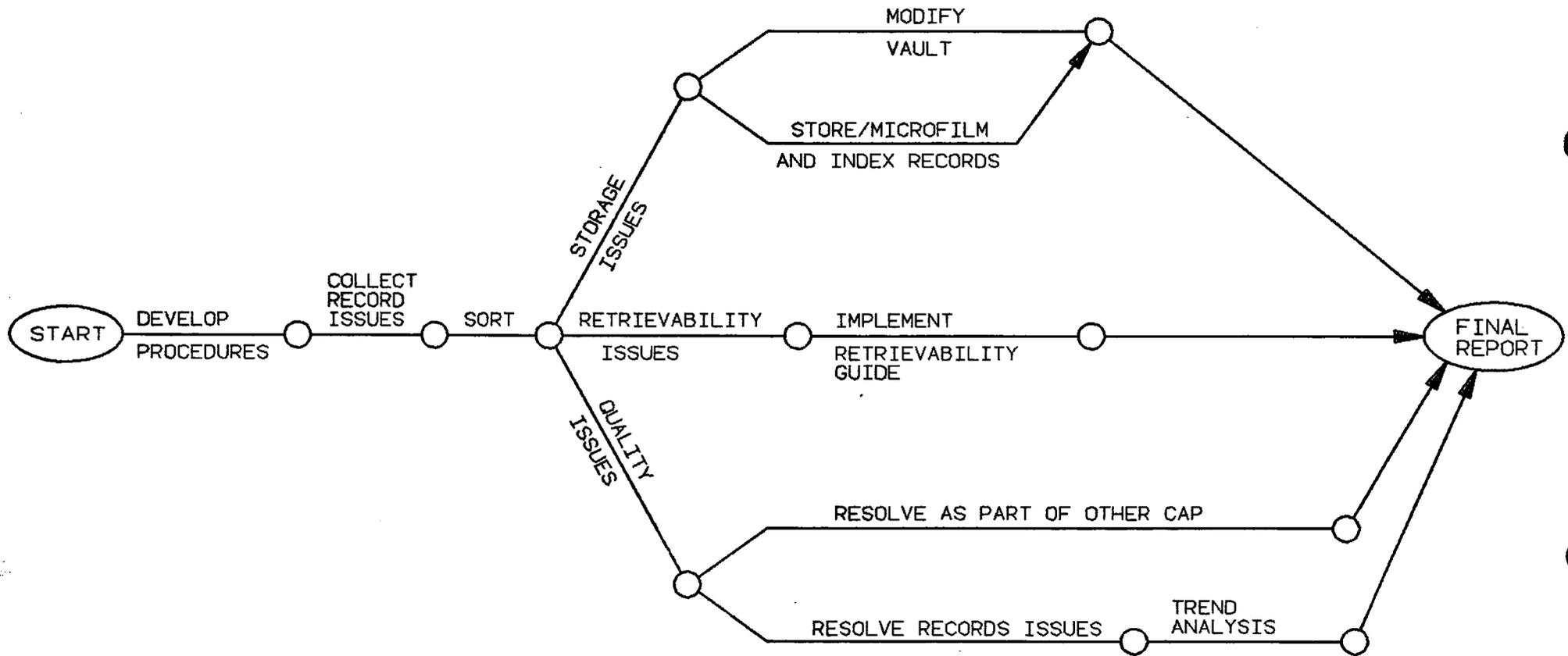
FLOW CHART OF QA RECORDS CAP ACTIVITIES

ATTACHMENT 2



WATTS BAR NUCLEAR PLANT QA RECORDS CAP FRAGNET

ATTACHMENT 3



ENCLOSURE 2

For the Watts Bar Nuclear Plant, TVA commits to the following:

- A quality assurance records team (QART) will be established to oversee and manage all activities required by this corrective action program (CAP) plan.
- Issues relating to records vault fire-rating deficiencies will be resolved through modifications to the vault.
- QA records generated by construction and operations will be indexed and microfilmed for duplicate storage where appropriate. Nonmicrofilmed QA records will be stored in the site vault in accordance with the requirements of the QA Topical Report.
- Identified records retrievability issues (e.g., inadequate identification and indexing of records and potentially missing or misfiled documents) will be addressed.
- Identified quality issues (e.g., incomplete, technically, and/or administratively deficient records) associated with WBN construction and operations QA records will be addressed and resolved.
- Quality issues addressed by this CAP will be subjected to a trend analysis. The trend analysis will be conducted by Nuclear Engineering (NE) and will include a review of vertical slice review (VSR)-identified record issues.
- Recurrence controls for quality issues will be developed upon completion of root cause analysis.
- Identified QA records related issues will be collected from a review of conditions adverse to quality (CAQs) and corrective action tracking documents (CATDs) open as of January 20, 1989, and screened to determine which issues will be resolved through actions of another special program or CAP. Records issues addressed by other special programs or CAPs will be closed when it is confirmed that a new or alternative record is on file.
- Records issues that will not be corrected by other special programs or CAPs will be evaluated to identify a set of records quality issues.
- These issues will be evaluated by NE to determine whether confirmation of adequacy of associated plant features can be obtained. Alternative approaches to this evaluation include: (1) reinspection of the plant feature in accordance with the current QA program, (2) retrieval of the information from other source documents which attest to or substantiate the quality of the feature, or (3) use of testing and performance data. The results of these confirmatory activities will be documented. For those plant features that are confirmed to be adequate as described above, either (1) the associated QA records will be superseded or supplemented to reflect the resolution of the issue or (2) a cross-reference will be added to the record index for the appropriate documentation that demonstrates acceptability of the hardware.