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BFN

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The evaluation of this concern at BFN identified no specific safety-related deficiencies regarding Target Rock Valves. However, it was reported that the adjustment of the reed switches for these valves had been difficult, and no procedure was found to exist at BFN for the adjustment of these reed switches. Also, it was found that there is no capability at BFN to retrieve maintenance history without specific document numbers and previous maintenance history cannot be searched for trending history. These deficiencies regarding lack of maintenance procedures and inadequate maintenance history retrieval capability were identified to BFN line management in CATD 30303-BFN-01. BFN has responded as follows:

"FSV-84-8A, 8B, 8C, 8D are Target Rock values equipped with magnetic reed switches. The reed switches close to make up a circuit to an indicating light to show whether the value is open or closed.

An Electrical Maintenance (EM) procedure for adjusting the reed switches does not exist. Maintenance is usually performed via a maintenance request (MR) that the unit operator initiates which simply states the position indicator lights for the valve are not working properly. Adjusting the reed switches can be a tedious trial and error process. In the past it was considered to be within the skill of the craftsman, but now it is believed that a written instruction would be advantageous. Therefore, per EM assignment No. 5952, a new procedure will be written for the adjustment of magnetic reed switches on Target Rock valves. The due date for assignment 5952 is March 30, 1987.

The problem with the equipment history is that the MR tracking program has only been in effect about four years. Prior to that, history records were incomplete or non-existent. Equipment history is being maintained now; however, previous history cannot be recreated.

Planning and Scheduling and Document Control are two separate organizations and they each maintain records in the way that meets their respective needs and objectives. When trouble reports (TRs) were used, history records were not properly maintained and trending was not done. At the present time trending is done on a systematic basis by the Preventive Maintenance Section."

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The Target Rock Valves concern was not evaluated at BLN because of the plant's early stages of construction. However, upon receipt and review of this report, BLN plant management should provide preventive measures as appropriate to guard against the occurrence of this concern.

6.1.3 Element 303.04 - Calibration of Ice Condenser Load Cells

CATD 30304-WBN-01 was sent to the DNE Licensing Section notifying them of the discrepancy between the WBN FSAR and Technical Specifications on minimum ice weight. WBN has responded as follows:

"Proposed changes to the WBN FSAR have been prepared by Westinghouse and has been submitted to TVA by WAT D 7136. These changes will bring the FSAR and Tech Spec into agreement. The proposed changes will be issued to Watts Bar Site Licensing by November 28, 1986. This change should be incorporated in the WBN FSAR by June 1, 1987."

6.1.4 Element 303.05 - Reliability, Design, and Maintenance of Radiation Monitoring Equipment

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WBN

CATD 30305-WBN-01 noted that DNC draft procedures for housekeeping at TVA nuclear plants under construction contain no provision for inspecting instrument protective coverings after the instrument installation process is complete. WBN DNC personnel have perponded as follows:

"DNC, Instrumentation Procedure QCF-1,06-9 provides the requirements for the inspection and documentation of instrument installation. The requirement of provide rovers or protective barriers for instruments as stated in instruction QCI 1.36 (since moved to QCI-1.06) is contained on inspection procedure QCP-1.36 (R10, section 7.4.20)

Since QCP-3.06-9 documents a permanent installation, it does not need a reference to the temporary covers required by QCI-1.06 or documented by QCP-1.36. To insure covers are installed in a timely manner, IEU will revise the unit SOP to instruct RE to notify PMU when instruments that require covers are installed."

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The CATD number 30305-WBN-02 was not used.

30305-WBN-03 as apparent violations of the Mon indicating that certain logs were plant arms the violations of the Mon with the plant arms to the p itions were noted records be maintained. Law the management responded as follows -----

"Al 1.8 Revision 11 dated January 16, 1987:

Paragraph 4.2: The performance of housekeeping inspection may vary from section to section but shall not be less than once a month. The supervisor responsible for an area shall ensure that the inspections are done for his entire area of responsibility.

Paragraph 4.5: Records which result from the implementation of this instruction a all be maintained as quality assurance records in accordance with AI-4.1.

AI-4.1 Revision 15 requires housekeeping inspection reports be maintained until superceded and housekeeping log reports be retained 1 year.

The revision to AI-1.8 clarifies inspection frequencies and no further corrective action is required."

SQN

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CATD 30305-SQN-01 was sent to SQN line management requesting status of-revisions to Sis to denote Technical Specification versus non-Technicale Specification reputies monitors SON has responded as Tollows, the LEIL

"SI's associated with radiation monthers all be revised to clearly distinguish between Spec and Tech Spec monitors."

CATD 30305-SQN-02 was issued requesting technical position on upgrading PING monitors to improve accuracy and reliability. SQN has responded as follows

THE PARA COMDIFI "Factory representative from Eberline far monitor will be represented to assist in entrecting merent problem with PING monitor, control room control terminel and also provide IN with class on troubleshooting techniques and system description.

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CATD number 30305-SQN-05 WES CATD 30305-SQN-04 was Served to SQN 1 e management to track the closure of CAQE No. So 0178 Revision O regarding shirlds on Applenol connectors. ---- ---BLN CATD number 30305-BLN-01 was not used. CATD 30305-BLN-02 was issued noting that DNC draft procedures for housekeeping at TVA nuclear plants under construction contain no provision for inspecting instrument protective coverings after the instrument installation process is complete. BLN DNC personnel have responded as follows: "BLN has an effective program for providing protective covers on instrument panels and installed equipment in general. A review of BNP-QCP-1.3 Preventice maintenance, confirms that instrument panels consistently requires protective cover. The site housekeeping protectives bud OCF-10.27, requires the Construction Superintendentis) of matre that: V. V installed equipment is adoquately protected from (8) adjacent construction whities such as welding. cutting; scaffolding, Achiling, or other construction activity to prevent bermanent equipment from being damaged by construction activity. ** 1 (b) special attention is given to the protection of electrical equipment that has wire mesh or other types of openings in the tops for ventilation purposes, and makes provisions to shield these openings while still maintaining proper ventilation. (c) adequate protection is provided for any mechanical equipment exposed to the elements or adjacent construction activities." 6.2 Corrective Action at Subcategory Level A CATD to address the subcategory level finding presented in section 4 was not issued for this report. Response to element-level CATDs seemed to indicate that adequate maintenance trending and maintenance history programs were now either under development or in use at WBN, SQN, and BFN.

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No subcategory level CATD's are being sent to TVA corporate management to address the findings of this subcategory report as presented in Section 5.0 of this report because the NHRG report and Nuclear Performance Plan specifically target these findings.

7.0 ATTACHMENTS

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Attachment A - Subcategory Summary Table

Attachment B - Listing of Concerns by Issue

Attachment C - Checklist for Root Cause Analysis

Attachment D - Summary of Symptoms and Root Causes

Attachment E - Graph of Symptoms versus Root Cause

Attachment F - Bar Charts of Symptoms

Attachment G - Bar Charts of Root Causes

Attachment H - CATDs

Attachment I - List of Evaluators by Element/Plant

30300 Revision 2

ATTACHMENT A

SUBCATEGORY SUMMARY TABLE

1

•		EQUES	JJ-ECPSI	310		EMPLOYEE CON	F NUC	EY AUTHORITY Lear Pomer Program System (ECPS) NCERN INFORMATION	PAGE - 1 RUN TIME - 12 RUN DATE - 10
	CATEGORY OP PL	ANT O	PER. SUF	PORT	SUBCAT			NTATION AND RADIATION MONITORING	
	CONCERN	CAT	SUB	PLT	GENERIC APPL B B S H F L Q B	QTC/NSRS INVESTIGATION REPORT	PSR	CONCERN Description	REFERENCE SECTION CATEGORY - OP SUBCATEGORY - 30: Section/Issue
•	CHL-85-001	OP	303	SQN	N N N N K-Form		NS	WHY ARE THE AIR MONITOR FLOW CONTROL S FOR 2-RE-90-100 NOT LISTED AS EITH ER TECH SPEC OR COMPLIANCE INSTRUMEN TST	3.5 303.05-3
	IN -85-142-006 T50092	OP	303	HBN	N N Y N REPORT	1-85-327-WBN	NS	RHST IN UNIT 1 NARROW RANGE 1-LT-63- 46 & 1-LT-63-49 READING WERE 6× OFF INST ENG (NAME KNOWN) DIRECTED INSTR UMENTATION MECHANIC TO ADJUST TO ZER 0. THIS HOULD MAKE READING MATCH TH E CONTROL ROOM. SIMILIAR ON SIS ACC UMULATORS 1-4, ELEV 716. THO TRANSM ITTERS ON EACH ACCUMULATOR. THIS PR ACTICE CAUSES FALSE READINGS IN CONT ROL ROOM.	3.2 303.02-2
	IN -85-281-003 T50059	OP	303	MBN	N N Y N K-FORM	I-85-208-WBN	SS	THE TWO LEVEL TRANSMITTER ON EACH OF THE COLD-LEG ACCUMULATORS WILL NOT READ THE SAME LEVEL DUE TO DIFFERENC E IN ELEVATION. TRANSMITTERS HAVE B EEN CALIBRATED AS PER SCALING DATA S HEET. WHEN PUT IN SERVICE TRANSMITT ERS WILL READ A 5X DIFFERENCE IN LEV EL. WHEN THE ENGINEERS WERE TOLD AB OUT THE PROBLEM THEY SAID DON'T WORR Y ABOUT IT ADJUST ONE UNTIL BOTH LEV EL INDICATORS READ THE SAME. (UNIT 1)	3.2 303.02-1
•	IN -85-640-002 T50062	OP	303	HBN	N N N N K-FORM		NS	ICE CONDENSER LOAD CELL AND DIGITAL READOUT WERE CALIBRATED TO (PLUS/MIN US) 1 LB. BY VENDOR WITH A 95% CONFI DENCE LEVEL THAT NET ICE WEIGHT RESU LTS ARE (PLUS/MINUS) 1 LB TVA IS UNWILLING TO SPEND THE MONEY REQUIRE D TO RETURN LOAD CELL TO VENDOR FOR CALIBRATION. (NO ADDITIONAL INFORMA TION IS AVAILAON IS AVAILABLE).	3.4 303.04-1

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

	FREQUENCY - R	REQUES				OFFICE O Employee Con List of Employ	CERN	EY AUTHORITY Lear Poher Program System (ECPS) Digern Information	PAGE - RUN TIME - RUN DATE -
•	CATEGORY, OP PL Concern Number	CAT	SUB CAT	PPORT PLT LOC	SUBCATI GENERIC APPL B B S H F L Q B	GORY: 303 INS OTC/NSRS Investigation Report	P S R	CONCERN DESCRIPTION	REFERENCE SECTI Category - O Subcategory - 3
•	IN -85-640-003 T50062	OP	303	HBN	N N N N K-FORM		NS	ICE CONDENSER LOAD CELL TEST MEIGHT IS LABELED 1780 LB. (PLUS/MINUS) .13 (or some decimal). Height was weig Hed Against Load Cell and Results Eq Ualled 1784 LB TVA CENTRAL LAB IS Incapable of Calibrating to less th An (PLUS/MINUS) & LB. Test Weight I S THEREFORE LABELLED INCORRECTLY. (NO ADDITIONAL INFORMATION IS AVAILAB LE)	<u>Section/laque</u> 303.04-2
•	IN -85-802-001 T50071	90	303	HBN	Y N Y Y Report	I-85-286-WBN		BOTH UNITS 1 & 2, PROBLEM EXISTS MIT H TARGET ROCK VALVES INSTALLED IN BO TH SAMPLING SYSTEM AND MAIN STEAM SY STEM. TARGET ROCK VALVES IMPROPERLY ANNUCIATE PART OF THE TIME AND READ SWITCHES ON VALVES REQUIRE CONSTANT ADJUSTMENT. VALVES IN SAMPLING SYS TEM LOCATED IN 3/8" STAINLESS STEEL LINES IN ANNULUS AND PRIMARY CONTAIN MENT AREAS. VALVES IN MAIN STEAM SY STEM LOCATED ON EITHER 2" OR 3" STAI NLESS STEEL LINES IN SOUTH VALVE ROO M. C/I DID NOT SPECIFY LINE NUMBERS OR VALVE SERIAL OR MARK NUMBERS	3,3 303.03-1
•	IN -85-841-001 T50084	OP	303	HBN	Y N Y Y Report		NS	"OLD" PLANT INSTRUMENTATION (PROCURE D 10-12 YEARS AGO) IS OFTEN NO LONGE R MANUFACTURED/SPARE PARTS ARE DIFFI CULT OR NOT POSSIBLE TO OBTAIN. FUR CHASE REQUISITIONS FOR UNOBTAINABLE PARTS ARE CANCELLED, YET COGNIZANT M ANAGEMENT (DEPARTMENT KNOMN) HAVE IN STITUTED NO ALTERNATIVES MEASURES TO OBTAIN SUBSTITUTIONS OF PARTS/REPLA CEMENT ITEMS. THIS HAS THE POTENTIA L TO ADVERSELY IMPACT PLANT DPERATIO NS. CI POSTULATED THIS CONCERN TO B DTH UNITS 1 & 2. MANAGEMENT (NAME K NOWN) IS AMA	3,1 303,01-1

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CONCERNS AFE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

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CATEGORY OP PL	ANT OF	PER. SUP	PORT	SUBCAT	LIST OF EMPLOY EGORY : 303 INT	TRUME	CLEAR POWER Program System (ECPS) DNCERN INFORMATION Entation and Radiation Monitoring	RUN DATE
CONCERN	CAT	SUB CAT	PLT	GENERIC APPL B B S H F L Q B	QTC/NSRS INVESTIGATION REPORT	PSR	CONCERN Description	REFERENCE SE CATEGORY SUBCATEGORY Section/Issue
IN -85-973-001 T50156	οr	303	HBN	N H N Y		NS	STEAM GENERATOR LEVEL INDICATORS DO NOT ACCURATELY SHOW THE FILL LEVEL O F THE STEAM GENERATORS, DURING A FL USH THAT INCLUDED UNIT I STEAM GENER ATORS, THE SHIFT ENOINEER STATED THA T THE STEAM GENERATOR (NUMBER NOT KN OWN)HAS FULL OF WATER. INSTRUMENTS IN ACCUMULATOR ROOM 04 (716' "LEV.) SHOULD THIS NOT BE THE CASE, AND THE LOCAL INSTRUMENT'S ACCURACY WAS CON FIRMED VIA NITROGEN FLOW, IF THE S HIFT ENGINEER'S INSTRUMENTS MAD BEEN OFF THIS MUCH (ESTABLISHED 40' OF W ATER ERROR) DURING OPERATIONS, T	303.03-3
IN -86-079-001 T50117	0P	303	HBN	K-FORM	IN-86-079-001		"OUTDATED" INSTRUMENTATION INSTALLED III BOTH UNITS 1 & 2 CREATES UNNECES SARILY HIGH EXPENDITURES AND DELAYS DUE TO PROBLEMS WITH OBTAINING SPARE PARTS. NEWER MODEL INSTRUMENTATION WOULD BE LESS EXPENSIVE TO MAINTAIN , AND MOULD PERFORM THE REQUIRED FUN CTIONS WITH A GREATER DEGREE OF ACCU RACY AND RELIABILITY. DETAILS KNOWN TO 9TC, MITHELD DUE TO CONFIDENTIAL ITY. NUCLEAR PEWER CONCERN. VARIOU S SYSTEMS; INCLUDING PRESSURE TRANSM ITTERS/FIELD MONITORING. TIME FRAME - CURRENT. CI MAS NO FURTHER I	3.1 303.01-1
IN -86-079-002 TS0117	OP	303	HBN	N N Y Y K-FORM		NS	QUESTIONABLE ADEQUACY OF SAFETY RELA TED EQUIPMENT ACCURACY, AND QUESTION Able Calibration procedures for this equipment. Details known to gtc, m itheld due to comfidentiality. Nucl ear power concern, units 1 & 2, syst em mitheld, time frame - current. C i has no further information no foll onup required.	3,3 303.03-2

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CONCERNS AND DRUGTER FI

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FREQUENCY - F ONP - 1555 - RH	M	TJ-ECPS		SUBCAT	OFFICE EMPLOYEE CO LIST OF EMPLO	DF NUC NCERN YEE CO	EY AUTHORITY Clear Pomer Program System (ECPS) Dicern Information Entation and Radiation Monitoring	RUN TIME - 12 RUN DATE - 10
CONCERN	CAT	SUB	PLT	GENERIC APPL B B S H F L Q B	QTC/NSRS INVESTIGATION REPORT	PSR	CONCERN Description	REFERENCE SECTION CATEGORY - OP SUBCATEGORY - 303
SQP-86-003-N94	OP	303	SQN	N N M N K-FORM		NS	NRC IDENTIFIED THE FOLLOWING CONCERN HHICH PERTAINS TO SQP-86-003-001 FR OM REVIEW OF QTC FILE, "CI STATES M ORE CABLES (IN ADDITION TO THE RADIA TION MONITOR CABLE CITED IN SQP-86-0 03-001) MAY HAVE A SIMILAR PROBLEM I N PENETRATION 023, INTEGRITY OF ALL CONNECTORS AND ASSOCIATED MEAT SHRI NK IS IN QUESTION. THIS CONCERN REF ERS TO CABLES IN ADDITION TO THE RAD IATION MONITOR CABLE CITED IN SOP-86 -003-001.	Section/Issue 303.05-1
59P-86-003-N05	OP	303	SQN	N N N N K-FORM		NS	NRC IDENTIFIED THE FOLLOWING COMCERN FROM REVIEW OF OTC FILE, "SOP-86-0 03-001 IS POTENTIALLY REPORTABLE."	3,5 303.05-1
SQP-86-003-001 T50246	OP	302	SQN	N N N N K-FORM	I-86-205-SQN	55	THE RADIATION MONITOR CABLE IS NOT I NSTALLED PROPERLY. PENETRATION 23, Loher Containment, Unit 02, Modifica Tions. (Names/Details Known to gtc and mithheld to maintain confidentia Lity). No further information may b e released. Nuclear Power Concern. CI has no further information.	3,5 303.05-1
NI -85-039-002 150210	OP	303	MBN	N N N Y K-Form		NS	RADIATION MONITORS AT MATTS BAR HAVE Not been maintained nor mere they o Perable, until middle of 1984. Nucl Ear Pomer Concern. CI has no furthe R information.	3,5 303,05-5
XX -85-044-001 T50153	OP	303	BFN	N N Y N Report	I-85-557-BFN	NS	AT BROWN'S FERRY THERE WAS AN ACCIDE NT OF RADIATION RELEASE ON THE REACT OR REFUEL FLOOR ON 6/26/85, CONCERN IS THAT CONTINUOUS AIR MONITORS (CA. MS) DID NOT FU:CTION PROPERLY AND DI D NOT REGISTER RADIATION LEVELS ACCU RATELY. CAM'S ARE OBSOLETE AND SHOU LD BE REPLACED BY MODERN INSTRUMEN'S SUCH AS PARTICULATE IODINE NOBLE GA S (PING'S). CI HAS NO FURTHER INFOR MATION, NO FOLLOW UP REQUIRED.	3,5 303.05-4

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CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

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FREQUENCY - ONP - 1555 - R	REQUES		31C	SUBCAT	OFFICE O Employee con List of Employ	EE CO	LEY AUTHORITY CLEER POWER PROGRAM SYSTEM (ECPS) DNC ERN INFORMATION ENTATION AND RADIATION MONITORING	RUN DATE - 10
CONCERN NUMBER	CAT	SUB	LOC	GENERIC APPL B B S W F L Q B	QTC/NSRS INVESTIGATION REPORT	PSR	CONCERN Description	REFERENCE SECTION CATEGORY - OP SUBCATEGORY - 303
XX -85-051-001 T50153	OP	303	SQN	N N Y N K≠Form	I-85-613-SQN	55	SEQUOYAN, THE RADIATION MONITOR (1-R M-90-104) HAS NOT BEEN MAINTAINED AN D IS NOT ALWAYS OPERABLE, ANY FURTH ER INFORMATION HOULD COMPROMISE CONF IDENTIALITY, NJC, POWER DEPT, CONCE RN, FOLLOW UP NOT REQUIRED.	Section/Issue 3.3 303.05-2

16 CONCERNS FOR CATEGORY OP SUBCATEGORY 303

CONCERNS ARE GROUPED BY FIRST 3 DIGITS OF SUBCATEGORY NUMBER.

ATTACHMENT B

INSTRUMENTATION AND RADIATION MONITORING

List of Concerns by Element/Issue

The Instrumentation and Radiation Monitoring Subcategory (30300) is comprised of 16 concerns combined into five elements that address a total of 13 issues.

Element 303.01 - Difficulty in Obtaining Obsolete Equipment

Issue 303.01-1 Difficulty in Obtaining Obsolete Equipment

IN-85-841-001 IN-86-C79-001

Element 303.02 - Location of Cold Leg Accumulator (CLA) and Refueling Water Storage Tank (RWST) Level Transmitters

Issue 303.02-1 Inaccuracies in Safety Injection System (SIS) CLA Level Instrumentation at WBN

IN-85-281-003

Issue 303.02-2 Inaccuracies in Narrow Range Level Instruments for WBN Unit 1 RWST

IN-85-142-006

Element 303.03 - Accuracy of Safety-Related Instruments

Issue 303.03-1 Target Rock Valve Reed Switches Inaccurate IN-85-802-001

Issue 303.03-2 Radiation Monitors Inaccurate

IN-86-079-002

Issue 303.03-3 Local and Remote Level Indicators Differ IN-85-973-001

Element 303.04 - Calibration of Ice Condenser Load Cells

Issue 303.04-1 TVA Unable and Unwilling to Calibrate Ice Condenser Load Cell Properly

IN-85-640-002

Issue 303.04-2 Ice Condenser Load Cell Test Weight Incorrectly Labeled IN-85-640-003

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ATTACHMENT B

INSTRUMENTATION AND RADIATION MONITORING

List of Concerns by Element/Issue (CON'T)

Element	303.05	-	Reliability,	Design,	and	Maintenance	of	Radiation	Monitoring
			Equipment						

Issue 303.05-1 Improper Installation of Radiation Monitor Cables

SQP-86-003-001 SQP-86-003-N04 SQP-86-003-N05

Issue 303.05-2 Maintenance and Operability of Radiation Monitor

XX-85-051-001

Issue 303.05-3 Air Monitor Flow Controls Not Listed as Technical Specification or Compliance Instruments

CWL-85-001

- Issue 303.05-4 Improper Operation of Continuous Air Monitors (CAMs) XX-85-044-001
- Issue 303.05-5 Radiation Monitors Not Operable and Not Maintained

WI-85-039-002

Attachment C Checklist for Root Cause Analysis

1. Procedure lacks specifics to perform task. 2. Personnel lack sufficient training in the applicability/use of procedure. 3. Lack of understanding regulatory requirements or commitments. 4. Lack of adequate system, process, or administrative controls to ensure commitments are reflected in procedures or processes. 5. Inadequate communication within functional group. 6. Inadequate communication between functional groups. 7. Management Assumed Risk. 8. Procedures incomplete or failed to incorporate all technical requirements. Error in judgment by qualified individual. 9. 10. Unqualified individual performing the task. 11. Insufficient time to perform task. 12. Inadequate prerequisites defined to ensure satisfactory completion of task. 13. Personnel performed task knowingly in violation of procedure/process. 14. Personnel error in following procedures. 15. Failed to identify root cause of previous deficiencies. 16. Failed to take appropriate action to preclude reoccurrence. 17. Inadequate process to detect adverse trends. 18. Inadequate acceptance criteria defined to ensure satisfactory task completion. 19. Management attentiveness to trends. 20. Lack of accessibility to documentation. 21. Inadequate controls for review of results to ensure compliance with commitments. 22. Timeliness of changes to commitments or changes to licensing/regulatory requirements. 23. Isolated incident. Random error. 24. 25. Other - i.e., equipment related failure.

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ATTACHMENT D

SUMMARY OF SYMPTOMS AND ROOT CAUSES

Element 303.01 was investigated specifically for WBN and generically at SQN and BFN. No specific deficiencies were found in any of these investigations, and no symptoms for root cause analysis were tested.

For Element 303.02, the potential for negative findings at the subcategory level was exhibited by the following symptoms: (a) recurring instrument failure, and (b) lack of QA controls for vendor performance. The first symptom appeared in the evaluation for both WBN and SQN. The second symptom appeared only in the evaluation for WBN. As these symptoms were tested for root cause, the appropriate root causes and applicable plant sites were judged to be as follows:

- a. Inadequate communication between functional groups (ONP, QA at WBN)
- b. Failure to identify root cause of previous deficiencies (WBN, SQN)
- c. Failure to take appropriate action to preclude recurrence (WBN, SQN)
- d. Inadequate process to detect adverse trends (WBN, SQN)
- e. Management attentiveness to trends (WBN, SQN)

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- Inadequate acceptance criteria defined to ensure satisfactory task completion (WBN)
- g. Inadequate controls for review of results to ensure compliance with commitments (WBN)

For Element 303.03 the potential for negative findings at the subcategory level was exhibited by the following symptoms: (a) recurring instrument failure, (b) lack of controls to govern maintenance activities (Target Rock Valves), (c) configuration control inadequate (Target Rock Valves), and (d) maintenance history retrieval inadequate. The first symptom appeared only in the evaluation for WBN. The second symptom appeared in the generic evaluation for both SQN and BFN. The third and fourth symptoms appeared only in the generic evaluation for BFN. As these symptoms were tested for root cause, the appropriate root causes and applicable plant sites were judged to be as follows:

- a. Lack of adequate system, process, or administrative controls to ensure commitments are reflected in procedures and processes (BFN)
- Inadequate communication between functional groups (plant operators, EMS at WBN)
- Procedures incomplete or failed to incorporate all technical requirements (SQN)
- d. Failure to identify root cause of previous deficiencies (WBN)

ATTACHMENT D

SUMMARY OF SYMPTOMS AND ROOT CAUSES (CON'T)

- e. Failure to take appropriate action to preclude recurrence (WBN)
- f. Inadequate process to detect auverse trends (WBN, BFN)
- g. Lack of accessibility to documentation (BFN)

For Element 303.04 the symptom identified was inadequate configuration control of the FSAR with respect to Technical Specifications. The testing of this symptom pointed to the following root causes for WBN:

- a. Lack of understanding regulatory requirements or commitments
- b. Lack of adequate system, process, or administrative controls to ensure commitments are reflected in procedures or processes
- c. Inadequate controls for review of results to ensure compliance with commitments

For Element 303.05 inadequate housekeeping affecting instruments was identified as the symptom. The testing of this symptom revealed the following root causes for WBN:

- a. Lack of understanding regulatory requirements or commitments
- Lack of adequate system, process, or administrative controls to ensure commitments are reflected in procedures or processes

The analysis of the symptoms and root causes for these elements is depicted graphically in Attachments D, E, and F. Attachment D is a plot of each element's symptoms versus the root causes pointed out by the symptom. Root cause numbers on the horizontal axis correspond to the 25 items on the "Checklist for Root Cause Analysis" found in Attachment C.

Attachment E contains bar graphs showing the number of times each of the symptoms identified for the subcategory occurs for the various plants. Symptom numbers on the horizontal axis in this attachment correspond to the symptoms as listed in Attachment D. Attachment F contains bar graphs showing the number of times each root cause appears in the subcategory for the various plants.

Several observations can be made in studying these attachments. First, the "recurring instrument failure" symptom is the only symptom appearing in more than one element. Second, from Attachment E it can be seen that the only two symptoms occurring more than once among the three plants evaluated are: (a) "recurring instrument failure" (three occurrences), and (b) "lack of controls to govern maintenance activities (Target Rock Valves)" (two occurrences). Third, there are two root causes that appear more frequently than the others, as shown in Attachment F. These two root causes and their applicable plant

ATTACHMENT D

SUMMARY OF SYMPTOMS AND ROOT CAUSES (CON'T)

sites are: (a) lack of adequate system, process, or administrative controls to ensure commitments are reflected in procedures or processes (WBN, BFN) and (b) inadequate process to detect adverse trends (WBN, SQN, BFN). The latter root cause was the only one which appeared at least once at each of the three plants evaluated for this subcategory. Also, six other root causes appear more than once among the three plants evaluated. These root causes and their applicable plant sites are as follows:

- a. Lack of understanding regulatory requirements or commitments (WBN)
- b. Inadequate communication between functional groups (WBN)
- c. Failure to identify root cause of previous deficiencies (WBN, SQN)
- d. Failure to take appropriate action to preclude recurrence (WBN, SQN)
- e. Management attentiveness to trends (WBN, SQN)

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 Inadequate controls for review of results to ensure compliance with commitments (WBN)

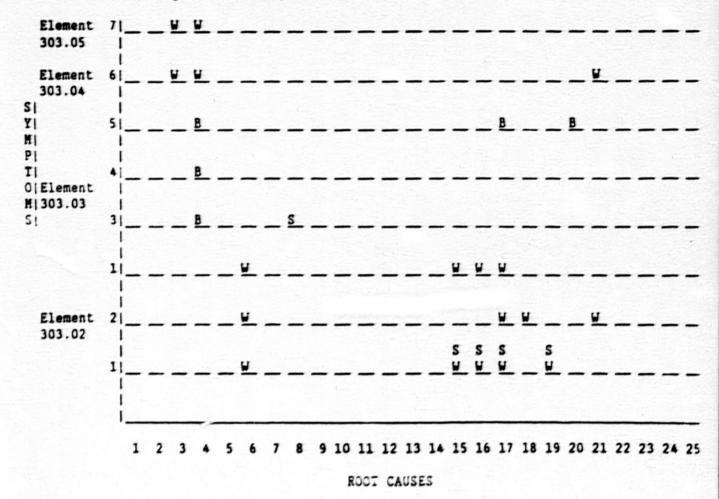
ATTACHMENT E

SYMPTOMS VS ROOT CAUSES

SUBCATEGORY 303

Symptoms

- 1. Recurring Instrument Failure
- 2. Lack of QA for Vendor Performance
- Lack of controls to govern maintenance activities (Target Rock Valves)
- 4. Configuration Control Inadequate (Target Rock Valves)
- 5. Maintenance History Retrieval Inadequate
- 6. Inadequate Configuration Control (FSAR, Tech Specs)
- 7. Inadequate Housekeeping Affecting Instruments

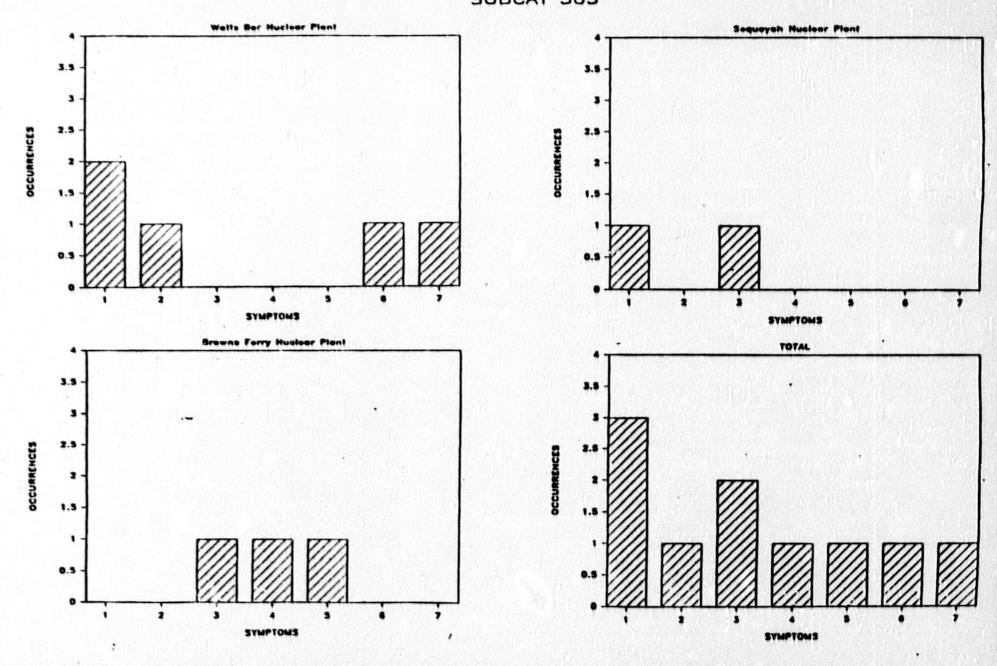


KEY | | W = WBN | | S = SQN | | B = BFN |

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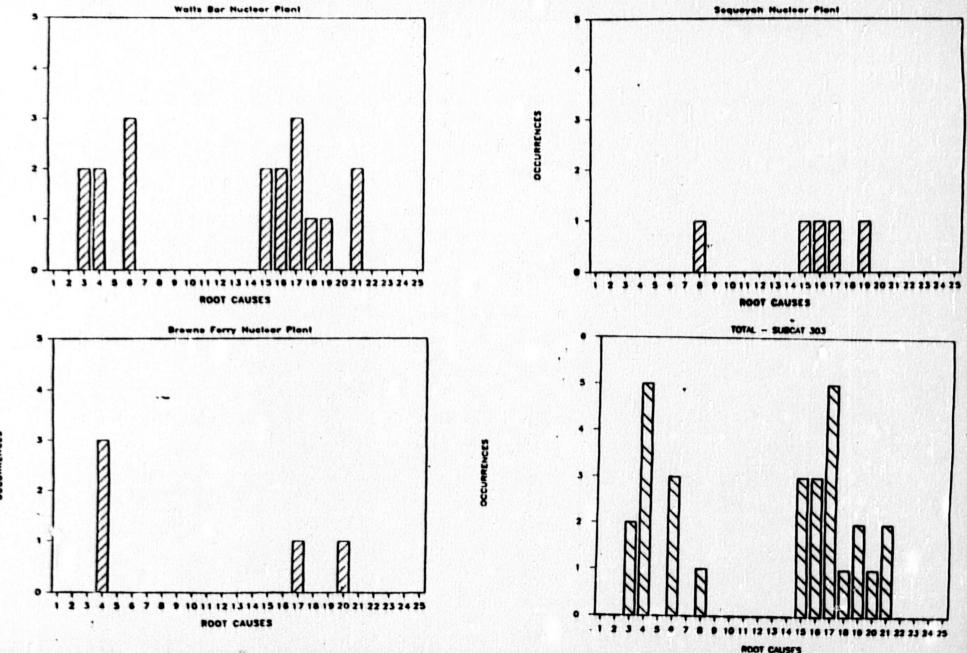
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OCCURRENCES VS SYMPTOMS



ATTACHMENT G OCCURRENCES VS ROOT CAUSES

SUBCAT 303



OCCURRENCES

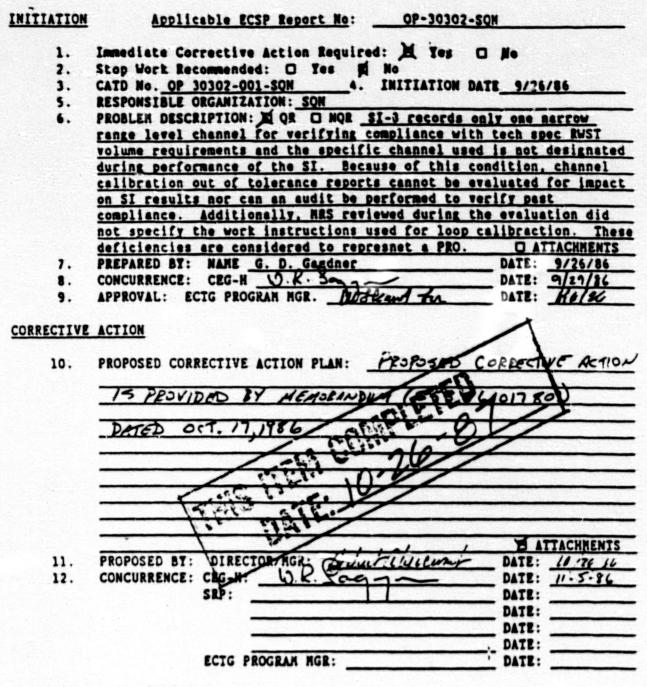
ATTACHMENT H

Corrective Action Tracking Documents (CATDs)

CATD Number	Corrective Action Plan Approved
30302-SQN-01	Tes
30302-SQN-02	Tes
30302-WBN-01	Tracking only
30303-SQN-01	Tes
30303-SQN-02	Tes
30303-WBN-01	Yes
30303-BFN-01	Tes
30304-WBN-01	Yes
30305-SQN-01	Yes
30305-SQN-02	Yes
30305-SQN-03	Number Not Used
30305-SQN-04	Tracking Only
30305-WBN-01	Ies
30305-WBN-02	Number Not Used
30305-WBN-03	Yes
30305-BLN-01	Number Not Used
30305-BLN-02	Yes

ECTG C.3 Attachment A Page 1 of 1 Revision 2

ECSP Corrective Action Tracking Document (CATD)



VERIFICATION AND CLOSEOUT

 Approved corrective actions have been verified as satisfactorily implemented.

SIGNATURE TITLE DATE

Attachment A Page 1 of 1 Revision 2

ECSP Corrective Action Tracking Document (CATD)

INITIATION	Applicable ECSP Report No: 303.02 SQN	Revision 1
1. 2. 3. 5.	Immediate Corrective Action Required: I Tes J Stop Work Recommended: I Tes J No CATD No. 30302 SQN 02 4. INITIATION I RESPONSIBLE ORGANIZATION: Operations SQN	
	PROBLEM DESCRIPTION: M QR D MQR Problems exist function and calibration of level transmitters for water storage tanks.	with the or the refueling
		O ATTACHHENTS
1.	PREPARED BT: NAME T. W. Maite	DATE: 10/14/86
8.	CONCURRENCE: CEG-H DR Sman	DATE: IC/INISE
9.	APPROVAL: ECTG-PROGRAM HGR. 1	DATE:
CORRECTIVE	ACTION	1
10.	PROPOSED CORRECTIVE ACTION PLAN: We accept rour action as presented with the exception of the option The SI-3 problem remains open and is being their 30302 SQN 01.	oblem with \$1-3.
		O ATTACHMENTS
11.	PROPOSED BY: DIRECTOR/NGR: 553 860910 927 CONCURRENCE: CEG-H: D. C. Son	DATE: 10/14/16 DATE: 10/14/11
	SRP:	DATE:
		DATE:
		DATE:
		DATE:
	ECTG PROGRAM NGR:	DATE:
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Action Tracking Document (CATD)

INITIATION	Applicable ECTG Report	10.: 09 303.02 Rev 1	
1. 2. 3. 5. 6.	Immediate Corrective Action Ro Stop Work Recommended: D Ter CATD No. 30302-WBM-01 RESPONSIBLE ORGANIZATION: WB PROBLEM DESCRIPTION: M QR D M cold leg accumulator level to ment of the refueling water in not been implemented. Comple requirement before fuel load	No 4. INITIATION DATE 04 Plant Hanager. VBEP OR DCR 633 for replacement tansmitters and DCR 678 for itorage tank level transmit otion of these modification	t of the replace- ters have
7. 8. 9.	PREPARED BY: NAME CONCURRENCE: CEG-R APPROVAL: ECTG PROGRAM MGR.	JATE: DATE: DATE:	4/2/81
CORRECTIVE	ACTION	P 7	
10.	PROPOSED CORRECTIVE ACTION PL DCR G33 And DC	NN: Tracking Only R 678	of
11. 12.	PROPOSED BT: DIRECTOR/HGR: CONCURRENCE: CEG-R: ECTG PROGRAM MANAGER	Tracking ONLY DATE	
VERIFICAT	ION AND CLOSEOUT		
13.	Approved corrective actions implemented.	have been verified as satis	factorily
	SIGNATURE	TITLE	DATE

ECTG C.3 Attachment A Page 1 of 1 Revision 2

Action Tracking Document (CATD)

INITIATION	Applicable ECSP Report No: 303.03 SQN Revision 1
1. 2. 3. 5. 6.	Immediate Corrective Action Required: Stop Work Recommended: CATD No. 30303-SQN-01 4. INITIATION DATE 11-08-86 RESPONSIBLE ORGANIZATION: Electrical Maintenance PROBLEM DESCRIPTION: QR B NQR Recommendation was made to provide written instructions on setting valve position indicator switches on Target Rock valves.
7. 8. 9.	PREPARED BY: NAME T. W. White DATE: 0 12-08-86 CONCURRENCE: CEG-H D. C. DATE: 10-14-86
CORRECTIVE	1111
10.	PROPOSED CORRECTIVE ACTION PLAN: Commitment has been made to prepare written instructions for setting take position indication switches for Target Bock ranges for be accomplished by 02-01-87.
	DIRECTOR/MCR: S03 860922 804 DATE: 09/25/86 CONCURRENCE: CEG-H: DATE: DATE: DATE: SRP: DATE: DATE: DATE:
	ECIG PROGRAM MGR: DATE:

VERIFICATION AND CLOSEOUT

13. Approved corrective actions have been verified as satisfactorily implemented.

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Attachment A Page 1 of 1 Revision 2

ECSP Corrective Action Tracking Document (CATD)

INITIATION	Applicable ECSP Report No: 303.03 SQN Revision 2
1. 2. 3. 5. 6.	Immediate Corrective Action Required: Tes No Stop Work Recommended: Tes No CATD No. 303.03-SQN-02 4. INITIATION DATE 10-08-86 RESPONSIBLE ORGANIZATION: Operations <
	C ATTACHMENTS
7.	
8.	
9.	APPROVAL: ECTG PROGRAM HGR. R. M. H. DATE: 4/1/47
CORRECTIVE	ACTION
10.	PROPOSED CORRECTIVE ACTION PLAN: <u>Rediction monstor celibration</u> procedures are being reviewed using the SI checklist for guidance. This corrective action is to be completed prior to plant startup and will be tracked at SQN by P2 activity 200011950.
	CAP was received from i sport in icw. This CATO was issued often the trat ton charplatness.
	CATO ipgraded to OR to reflect fronton resident 5.4.11 No CHOR will be registed since VCAP indicates Relater and the bring timbed on PR WEL 5.4.87 DATTACHNENTS
11.	PROPOSED BY: DIRECTOR/HGR: S03 860922 804 DATE: 09/25/86
12.	CONCURRENCE: CEG-H: W.C. Corg DATE: 0/14/16
	DATE:
	DATE:
	ECTG PROGRAM MGR: DATE:
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ECTG C.3 Attachment A Page 1 of 1 Revision 2

Action Trecking Document (CATD)

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and and a second and

INITIATION 1. 2. 3. 5. 6.	Applicable ECSP Report No: Immediate Corrective Action Requi Stop Work Recommended: D Tes CATD No. 30303-VBN-01 RESPONSIBLE ORGANIZATION: VBN P1 PROBLEM DESCRIPTION: D QR JK NQR I-85-286-VBN stated VBH will rev recommendations for Target Rock that a maintenance trending pro- Please provide the status of the	red: D Tes M S. No a. INITIATION D. ant Hanager. Ele The WBH response iew RI-57.30 to valve reed switc run was being de	ATE 10-28-86 ctrical Reistenance to MSRS report include vendor h adjustment and veloped for VBH.
	PREPARED BT: NAME G. D. Gardnes		DATTACHNENTS DATE: 10-28-86
E 1.	CONCURRENCE: CEG-H CEN 1.2.	37-	DATE: 1-10-16
9.	APPROVAL: ECIG PROGRAM NGR.		DATE: 11-10 -86
CORRECTIVE	ACTION		
nie r			
(1 1 Y1.	PROPOSED BY: DIRECTOR/NGR: L	mit	DATE: 1:/2//(
12.	CONCURRENCE:/CEG-H: . Itime.	H.K	DATE: 2/C/FT
	SRP:		DATE:
			_ DATE:
			DATE:
	ECTG PROGRAM HGR:		DATE:
ERIFICAT 13.	ION AND CLOSEOUT Approved corrective actions have	been verified a	_
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Page 1 of 1 Revision 2

Action Tracking Document (CATD)

INITIATICN	Applicable ECSP Report No: OP 303.03			
1.	Immediate Corrective Action Required: D Tes Y No			
2.	Stop Work Recommended: O Tes E No			
	CATD No. OF 30303-001-BFN 4. INITIATION DATE 9/23/86			
	RESPONSIBLE ORGANIZATION: BFN Electrical Haist., Document Control			
	PROBLEM DESCRIPTION: D QR & MQR According to cognisant			
	maintenance personnel at BFN and based on the results of evaluations			
	at other plants, Target Bock valve reed switch adjustment is			
	sensitive and difficult. No procedures exist at BFN for their			
	adjustment. There is an apparent problem with the equipment history			
	archives at BFN. Planning and Scheduling raintains a searchable			
	data base because Document Control could not retrieve maintenance			
	request data without specific document numbers. The previous maint.			
	history cannot be searched for TE history trending. O ATTACHMENTS			
1.	PREPARED BT: NAME G. D. Gardner DATE: 9/23/86			
	CONCUERENCE: CEG-E W. K. Jonan DATE: 9/19/84			
	APPROVAL: ECTG PROGRAM MGR. DATE:			
CORRECTIVE	PROPOSED CORRECTIVE ACTION PLAN:			
CORRECTIVE	• • • • • • • • • • • • • • • • • • •			
CORRECTIVE	PROPOSED CORRECTIVE ACTION PLAN:			
CORRECTIVE	PROPOSED CORRECTIVE ACTION PLAN:			
CORRECTIVE 10.	PROPOSED CORRECTIVE ACTION PLAN:			
<u>CORRECTIVE</u> 10.	PROPOSED CORRECTIVE ACTION PLAN: See. Memorandum R33 86 1128 827 //4 DATTACHMENTS PROPOSED BY: DIRECTOR/NCR: R13 86 1125 927 DATE: 11-22 56 CONCURRENCE: CEG-B: 10000 3 H. th. for 144 DATE: 12.08-E6			
<u>CORRECTIVE</u> 10.	PROPOSED CORRECTIVE ACTION PLAN:			
<u>CORRECTIVE</u> 10.	PROPOSED CORRECTIVE ACTION PLAN:			
<u>CORRECTIVE</u> 10.	PROPOSED CORRECTIVE ACTION PLAN:			
<u>CORRECTIVE</u> 10.	PROPOSED CORRECTIVE ACTION PLAN:			

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	Acti	on Tracking Document	
		(CATD)	
INITIAT	Statesta State	Report No: OP 303.04	
2	Immediate Corrective Act Stop Work Recommended: CATD No. <u>OP 30304-001-4</u> RESPONSIBLE ORGANIZATION PROBLER DESCRIPTION: M C <u>Analysis Report section</u> <u>Specified in the WDN Tec</u> <u>Dreviously identified to</u> <u>which a response has not</u> <u>previous notice</u> .	Lion Required: A Ten Tes A No Tes	ON DATE 9-30-86 ing Section Finel Safety the ice weight
7. B. 9. <u>Correctiv</u>	CONCURRENCE: CEG-H L.C. APPROVAL: ECTG PROGRAM M	. Gardner 	DATE: 9-30-86 DATE: 10-1-86 DATE: 10-1-86
10.			-
	PROPOSED CORRECTIVE ACTION Proposed changes to the W and has been submitted to changes will bring the FS proposed changes will be i November 28, 1986. This c WEN FSAP by June 1, 1986. fra for for for for for for for for	EN FSAR have been pres TVA by WAT D 7136 (But AR and Tech spec (at	These
11.	PROPOSED		
	PROPOSED BY: DIRECTOR/HGR: CONCURRENCE: CEG-H: JA	B20 861119 001	DATE: "/19/86 DATE: "/25/86 DATE: "/25/86 DATE: DATE:
	1070		DATE:
VERTERA	ECTG PROGRAM MO	iR :	DATE:
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13. di	aplemented.	have been verified as	satisfactorily
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			DATE
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Attachment A Page 1 of 1 tevision 2

ECSP Corrective Action Tracking Document (CATD)

INITIATION Applicable ECSP Report No: 30305-SQN Revision 2 1. Immediate Corrective Action Required: [] Tes [] No Stop Work Recommended: [] Ies & No 2. 3. CATD No. 30305 SON 01 4. INITIATION DATE October 9. 1986 RESPONSIBLE ORGANIZATION: Operations 5. PROBLEM DESCRIPTION: C QE M NOR 6. Provide status of revision(s) to SI's to denote technical specification vs montechnical specification required monitors. PREPARED BT: NAME I. W. White 1. D ATTACHMENTS CONCUERENCE: CEG-H W.P Sa 8. DATE: 10-09-86 APPROVAL: ECTG PROGRAM HGE. 9. DATE: 10-13-66 MURIN DATE: 10 -11-86 CORRECTIVE ACTION PROPOSED CORRECTIVE ACTION PLAN: 10. CAP TEANSMITTED BY MEMORANDUM 00 501 1124 SCI 2 PROPOSED BT: DIRECTOR/RGR: - 11. O ATTACHMENTS CONCURRENCE: CEG-R: Think .12. DATE: 11-25-54 DATE: 12/4/96 SRP: DATE: DATE: DATE: ECTG PROGRAM MGR: DATE: . DATE: VERIFICATION AND CLOSEOUT 13. Approved corrective actions have been verified as satisfactorily

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Page 1 of 1 Revision 2

ECSP Corrective Action Tracting Document (CATD)

INITIATI	LITERAL BUSE Repo	<u>rt Io:303.05 s</u>	QN Revision 2
2.	Stop Wort Becompended:	Required: I Tes	8 No
S.	RESPONSTALE ORGANIZATION	4. INITIATIO	DATE 10-09-86
	PROBLEM DESCRIPTION: OF on upgrading PING's to impro		tica/determination Liability.
7. •	PREPARED BY: NAME I. W. WD. CONCURRENCE: CEG-N W.R.		DATE: 10-09-86
9.	ECIG PROGRAM MGE.	TI MURAL	DATE: 10-14-86 DATE: 10-17-86
CORRECTIV			1
10.	PROPOSED CORRECTIVE ACTION PL		AP TEAMEMITED
	BY NEMSCANDUM 35	CALIFZO GOO	503 8 1124 801 3
		1.8.0	
•			
11. 12.	PROPOSED BY: DIRECTOR/NGE: CONCURRENCE: CEG-H:		DATE: 11-25-51 DATE: 12/3/80 DATE: 12/3/80 DATE: DATE:
	1020		DATE:
VERIFICATIO	ECTG PROGRAM MGR:		DATE:
	Approved corrective actions has implemented.	ve been verified as	satisfactorily
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ECTG C.3 Attachment A Page 1 of 1 Revision 2

ECSP Corrective Action Tracking Document (CATD)

INITIATION	Applicable ECSP Report No.: 303.05-SQN-04
1. 2. 3.	Immediate Corrective Action Required: Yes W No Stop Work Recommended: Yes W No CATD No. 30305-SQN-04 4. INITIATION DATE 3/11/87
5.	RESPONSIBLE ORGANIZATION: SQN Modifications
6.	PROBLEM DESCRIPTION: # QR D NQR During preparations for
	installation of amphenol connectors on penetrations involving shielded cable, problems with vendor instructions were noted. CAQR
	No. SQP 870178 Revision 0 was issued. This CATD is for the purpose of tracking the CAQE.
1.	PREPARED BY: NAME B. Heers, Jr. Abut 2/1/87 DATE: 3/11/87 CONCURRENCE: CEG-H Thomas J. Huth, the LAL DATE: 3/12/87
8.	CONCURRENCE: CEG-H Theme F. Hut the CAL DATE: 3/12/87 APPROVAL: ECTG PROGRAM MGR. ARH, Late In DATE: 4/7/07
	ATTROVAL: ECTO FROMANT HOR:
CORRECTIVE	ACTION
10.	PROPOSED CORRECTIVE ACTION PLAN:
11.	PROPOSED BY: DIRECTOR/NGE: TRACKING ONLY DATE: 3/12/87
12.	CONCURRENCE: CEG-H: Thomas F. Hath In LAL DATE: 3/12/87
	SRP: DATE:
	DATE:
	DATE:
	DATE:
	ECTG PROGRAM MGR: DATE:
VERIFICATI	ON AND CLOSEOUT

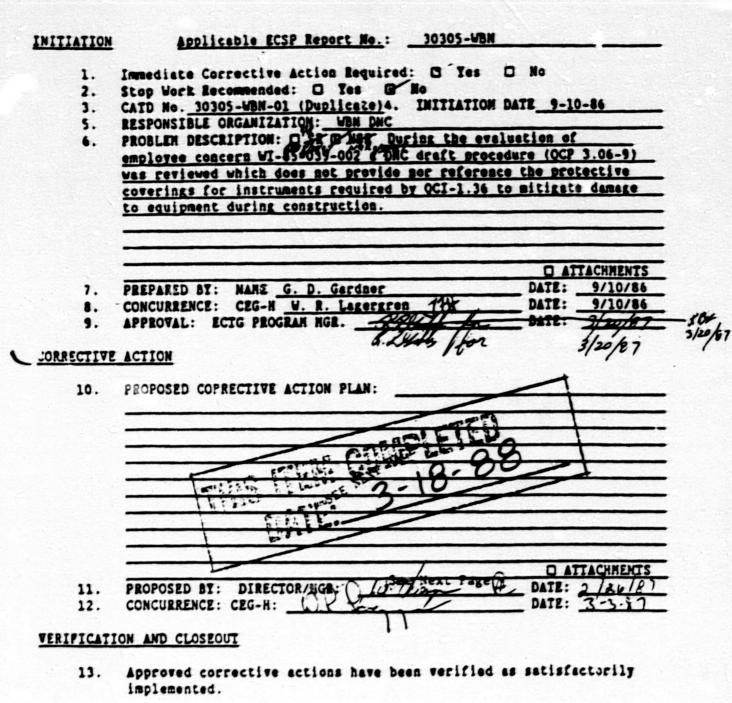
 Approved corrective actions have been verified as satisfactorily implemented.

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ECSP Corrective Action Tracking Document (CATD)



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Action	Tracking	Document
	(CATD)	

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INITIATION	Applicable ECSP Report No: OP 303.05
1.	Immediate Corrective Action Required: A Yes D No
2.	Stop Work Recommended: C Tes C No
3.	CATD No. OP 303.05-003-WEN 4. INITIATION DATE 9-30-86
5.	RESPONSIBLE ORGANIZATION: WBN Electrical Maintenance
6.	PROBLEM DESCRIPTION: C. QR & NQR The NQAM specifies that the
	plant superintendent shall divide the plant into sections and assign
	these sections to individuals responsible for performing inspections
	The frequency of the checks are required to be not less than once a
	month. AI-1.8 specifies that housekeeping inspections be not less
	than twice a month and individual areas, as assigned, shall be in-
	spected quarterly. These requirements are not very clear on what is
	intended. A review of completed Attachment 2 for AI-1.8 was
	conducted on the Instrument Maintenance and Electrical Maintenance
1	Sections for 1985 and 1986. The records obtained from Document
	Control indicate that inspections were conducted once to twice a
	month, but that a specific area was only being inspected about every
	three months. Additionally, not all housekeeping logs were found in
	Document Control. This is an apparent violation of NOAM
	requirements which specify that plant areas be inspected at least
	once per month and that QA records be maintained. The WBN\Site
	Director was informed of this by Immediate Action Notice 14 (0P303
	and has not yet responded. This CATD supervises an previous notice
	REF VET DATURAMENTS
1.	PREPARED BY: NAME G. D. Bardater Person Date: 9-30-86
8.	CONCURRENCE: CEG-H DATE: 10-1-86
9.	APPROVAL: ECTG PROGRAM. HOR : [WERE THE DATE: 112/96
CORRECTIVE	ACTION
	110 RAIL
10.	PROPOSED CORRECTIVE ACRICH PLAN:
	C.C. J ATTACHMENTS
11	PROPOSED BY: DINECTOR/MGR: DATE: DATE:
12.	CONCORBENCE: CEG-N DRIE
	SRP: DATE:
	DATE:
	DATE:
	DATE:
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ECTG C.3 Attachment A Page 1 of 1 Revision 2 - A

ECSP Corrective Action Tracking Document (CATD)

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Applicable ECSP Report NO: INITIATION Immediate Corrective Action Required: M Tes D No. 1. Stop Work Recommended: O Tes B No. 2. CATD No. 08-30305-002 4. INITIATION DATE 9-10-86 RESPONSIBLE ORGANIZATION: ELN DATC 3. 5. PROBLEM DESCRIPTION: CI Q2 E NOR 6. During the evolution of employee Concern WI-85-039-002 (OLP 3.06-9) was reviewed at way a draft acreding regarding the requirements for lastrument installation and raising. This doutt accurate Scarides as exchanged for Diavidia the protection carerias required by the reterancing Haussterein: UCI-136 to mitiate dense durageoutration. The structure des which at Declare Hausekusin O ATTACHMENTS DIE: 9-10-86 PREPARED BY: NAME G . Borter 7. CONCURRENCE: CEG-H W. 8. APPROVAL: ECTG PROGRAM MGR. DATE: 9. CORRECTIVE ACTION WED! FI 10. PROPOSED CORRECTIVE ACTION O ATTACHMENTS PROPOSED BY: DIRECTOR/HGBA Kin DATE: 3/31/87 11. CONCURRENCE: CEG-H: L) ik DATE: 4-6-27 12. SEP: DATE: DATE: DATE: DATE: ECTG PROGRAM MGR: DATE:

VERIFICATION AND CLOSEOUT

 Approved corrective actions have been verified as satisfactorily implemented.

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30300 Revision 2

Attachment I

List of Evaluators by Element/Plant

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Element 303.01		C.	
SQN	WEN	BFN	BLN
Gardner	Gardner	Gardner	N/A
Element 303.02			
SQN	WBN	BFN	BLN
Gardner	Gardner Aycock	N/A	N/A
Element 303.03			
SQN	VBN	BFN	BLN
Gardner	Gariner	Gardner	N/A
Element 303.04			
SQN	WBN	BEN	BLN
N/A	Gerdner	N/A	N/A
Element 303.05			
SQN	WBN	BFN	BLN
Gardner Neers	Gardner	Gardner	N/A