

August 05, 2009

United States Nuclear Regulatory Commission Washington, DC 20555-0001

Attention: Document Control Desk

Reference: Docket Number 99901334 NRC Inspection Report No. 99901334/2009-201

Subject: Reply to Notice of Violation Reply to Notice of Nonconformance

To Whom It May Concern:

This letter is in response to the referenced NRC Inspection Report, dated July 8, 2009, signed by Mr. Patrick L. Hiland. The report pertains to an inspection performed by the NRC from May 19 through 22, 2009, at the Charlotte, NC office of the The Steam Generating Team, LLC (SGT).

The report identified two (2) Notices of Violation and three (3) Notices of Nonconformance. Each of these is addressed in individual supplements within this letter. Additional supporting information is also included as separate attachments, as listed on page 2 of this letter.

SGT is serious about addressing the issues identified in the NRC inspection report and improving our program. We also appreciate the thoroughness and professionalism demonstrated by the NRC inspectors during their visit to our offices.

Please contact me at 704-805-2885 if you have any questions.

Sincerely,

land B. Wilkenon

Richard B. Wilkerson President SGT, LLC

cc: United States Nuclear Regulatory Commission, Director, Division of Engineering, Office of Nuclear Reactor Regulation

Paul Helton, SGT Quality Assurance Director Michael Gilman, Vice President Quality Assurance, URS Washington Division Steve K. Hamilton, Vice President, SDCI & Quality, AREVA NP Inc.



M-09-0050 Page 2 of 13 Docket Number 99901334

Supplements: Supplement 1 – SGT Reply to Violation 99901334/2009-201-01 Supplement 2 – SGT Reply to Violation 99901334/2009-201-02 Supplement 3 – SGT Reply to Nonconformance 99901334/2009-201-03 Supplement 4 – SGT Reply to Nonconformance 99901334/2009-201-04 Supplement 5 – SGT Reply to Nonconformance 99901334/2009-201-05

### Attachments: <u>SGT Procedures</u>

CQP 01.01, Rev 6, 03-Aug-09, Reporting of Defects and Noncompliance

CQP 01.01-1, Rev 5, 03-Aug-09, *Determination Checklist for 10 CFR Part 21 Applicability* (Form)

CQP 18.01, Rev 4, 03-Aug-09, Corrective Action Requests

CQP 18.01-1, Rev 3, 03-Aug-09, Corrective Action Request (Form)

QEP 12.02, Rev 4, 03-Aug-09, Conduct and Control of Inspection and Surveillance Activities

QEP 12.02-2, Rev 1E3, 03-Aug-09, Deficiency Report (Form)

QEP 15.01, Rev 5, 03-Aug-09, Identification and Control of Deviations

QEP 18.01, Rev 5, 03-Aug-09, Quality Assurance Audits

QEP 18.01-2, Rev 2, 03-Aug-09, Audit Finding Report (Form)

QEP 18.01-4, Rev 1E1, 03-Aug-09, Corrective Action Request (Form)

Attachment 1 – Printout of e-mails from November 05, 2008 through November 07, 2008 (2 pages)

Attachment 2 – Memo 38241-PM-08-0042, dated November 6, 2008 (151 pages)

Attachment 3 – Memo 38241-PM-08-0044, dated November 21, 2008 (16 pages) Attachment 4 – Memo 38241-PM-08-0045, dated November 21, 2008 (13 pages) Attachment 5 – Memo 38241-PM-08-0046, dated December 2, 2008 (5 pages)



A URS-Washington Division / AREVA NP Company

M-09-0050 Page 3 of 13 Docket Number 99901334

# Supplement 1 SGT Reply to Violation 99901334/2009-201-01

### NRC Statement of Violation

SGT's 10 CFR Part 21 Corporate Quality Procedure (CQP), CQP 01.01, "Reporting of Defects and Noncompliance," Revision 5, dated April 21, 2009, was not an appropriate procedure to evaluate deviations within 60 days of discovery. Specifically, the procedure allowed for 37 working days plus 60 calendar days from the point of discovery for an evaluation to be completed.

### Reason for the Violation

SGT agrees that this is a violation of NRC requirements.

The reason for the Violation was an incorrect interpretation of the 10CFR21 requirements regarding the "discovery" date.

### Corrective Steps that have been Taken and the Results Achieved

We have revised our CQP 01.01 (*Reporting of Defects and Noncompliance*) to define the "discovery date" as the "Date Issued" on our Nonconformance Report (NCR) form, Audit Finding Report (AFR) form, and Corrective Action Request (CAR) form. We have further specified that the value entered into this "Date Issued" block on the forms (which would be the time allowed to complete "the documentation first identifying the existence of a deviation") can be no more than five (5) working days from the date the deviation was identified for an NCR or CAR, or the date of the audit exit meeting for an AFR. The Screening, Review, and Evaluation phases of our procedure must now all be completed within 60 calendar days from the Date Issued on the initiating form. CQP 01.01 has been further revised to require an expanded distribution to upper management of deviation reports that have been screened as a 10CFR21 "Possible Potential" item.

Companion changes to our QEP 12.02 (*Conduct and Control of Inspection and Surveillance Activities*), QEP 15.01 (*Identification and Control of Deviations*), QEP 18.01 (*Quality Assurance Audits*), and CQP 18.01 (*Corrective Action Requests*) have also been made to synchronize with CQP 01.01.

These procedure revisions have just recently been issued, and some have to be approved by our utility Clients before they are implemented at their respective projects. Because we are between outages and have very limited field work, there has been little opportunity to determine the results of these actions.

### **Corrective Steps that will be Taken to Avoid Further Violations**

We believe the changes already made to the procedures noted above will prevent a future "inappropriate procedure" violation regarding 10CFR21 reporting requirements.



M-09-0050 Page 4 of 13 Docket Number 99901334

# Supplement 1 (Continued) SGT Reply to Violation 99901334/2009-201-01

### Date When Full Compliance will be Achieved

Our Standard procedures have already been revised and issued. These revised procedures are in the process of being submitted to our current Clients in accordance with each project's procedures. Full implementation at the projects will depend on the review/approval times taken by our Clients, but should be within four (4) to eight (8) weeks.



A URS-Washington Division / AREVA NP Company

M-09-0050 Page 5 of 13 Docket Number 99901334

# Supplement 2-SGT Reply to Violation 99901334/2009-201-02

### NRC Statement of Violation

SGT failed to perform a Part 21 evaluation for Nonconformance Report (NCR) 0084, dated November 3, 2009, despite being identified by the Project Quality Manager as potentially associated with the requirements of 10 CFR Part 21.

### **Reason for the Violation**

SGT agrees that this is a violation of NRC requirements in that we did not follow our procedure for review of NCRs where the 10CFR21 "Possible Potential" box was checked.

This NCR 2-084 was generated as a result of the investigation supporting Deficiency Report (DR)-034 and Audit Finding Report (AFR)-02 of Diablo Canyon internal project audit 38421-P-08-02. The Project Quality Manager (PQM) checked the 10CFR21 "Possible Potential" box on the NCR form, in part because this box had been checked on the previously issued AFR-02 form.

The overall issue of these three (3) report forms relates to use of unapproved NDE service providers to radiograph welder performance qualification coupon welds. NCR 2-084 was issued to address two (2) specific cases, identified during the DR/AFR investigation, where the original test coupons could not be reradiographed because they could not be located.

Following our procedure CQP 01.01 (*Reporting of Defects and Noncompliance*), the Quality Assurance Director (QAD) documented a review of the AFR-02 10CFR21 "Possible Potential" condition. This review, issued under memo IO-QAD-08-014, included DR-034. The determination was that a 10CFR21 reportable condition did <u>not</u> exist. The following is the sequence of the various documents:

DR-034 – Issued 24-Sep-08, closed 21-Nov-08 AFR-02 – Issued 07-Oct-08, closed 04-Dec-08 Memo IO-QAD-08-014 – Issued 27-Oct-08 NCR 2-084 – Issued 03-Nov-08, closed 25-Nov-08 (Engineering disposition of "Use-As-Is completed 04-Nov-08)

Documentation of the Part 21 review of NCR 2-084 was inadvertently missed by the QAD in November, 2008. The QAD believes that the reason for the omission was that he knew the NCR was related to the same issue as the AFR and thought it was already adequately addressed by his memo issued a week before the NCR.



M-09-0050 Page 6 of 13 Docket Number 99901334

# Supplement 2 (Continued) SGT Reply to Violation 99901334/2009-201-02

### Corrective Steps that have been Taken and the Results Achieved

A form CQP-01.01-1 (*Determination Checklist for 10 CFR Part 21 Applicability*) has been generated by the QAD to address NCR 2-084. The determination is that this condition was not reportable. The NCR 2-084 package is now on file in our Charlotte office with the package from AFR-02 / DR-034.

As noted in the NRC Inspection Report, adequate corrective actions regarding the actual conditions identified on the subject DR, AFR, and NCR had already been taken at the project in a timely manner.

### Corrective Steps that will be Taken to Avoid Further Violations

This violation is an isolated case. We believe the procedure changes discussed in Supplement 1 will result in increased visibility of deviations that are screened as 10CFR 21 "Possible Potential" conditions with an increased awareness of the need to complete and document resulting reviews and evaluations.

### Date When Full Compliance will be Achieved

Our Standard procedures have already been revised and issued. These revised procedures are in the process of being submitted to our current Clients in accordance with each project's procedures. Full implementation at the projects will depend on the review/approval times taken by our Clients, but should be within four (4) to eight (8) weeks.



M-09-0050 Page 7 of 13 Docket Number 99901334

# Supplement 3 SGT Reply to Nonconformance 99901334/2009-201-03

### NRC Statement of Nonconformance

SGT Quality Execution Procedure (QEP), 12.02, "Conduct and Control of Inspection and Surveillance Activities," dated August 23, 2005, for the Diablo Canyon Nuclear Power Plant Steam Generator Replacement Project failed to adequately indicate where independent verifications of inspections or checks should be performed by specified personnel other than those performing the work. As a result, SGT failed to provide sufficient independence for multiple Deficiency Reports (DRs). Of 30 DRs sampled:

- 1. The SGT Project Quality Manager (PQM) or Quality Assurance (QA) Supervisor signed both the "Quality Verified" and "Reviewed By" sections for 23 DRs.
- 2. The PQM initiated and approved the DR, approved the response, including corrective and preventative actions, and verified and reviewed the corrective action follow-up for 11 DRs.
- 3. The PQM completed all actions and reviews for three DRs
- 4. An individual who did not have adequate signature authority reviewed and signed off on one DR for the PQM.

### Reason for the Nonconformance

Regarding Items 1 through 3 above:

SGT does not agree that the stated conditions are a violation of the requirements of our Quality Assurance Manual.

SGT Deficiency Reports (DRs) address programmatic issues, not inspection of hardware items. As such, a strict requirement for "independent verifications of inspections or checks by specified personnel other than those performing the work" does not apply. We do, however, agree that having the same person sign for multiple "approved", "verified", and "reviewed" activities is not good practice.

We have done a complete review of all of the Deficiency Reports generated at our Diablo Canyon project and arrive at slightly different counts than indicated above.

There were 57 DRs generated over the project. Two (2) of those were voided. Of the remaining 55, we identify only 19 that fall in your item 1 above, 15 that fall in Item 2, and concur with 3 in Item 3. It should be noted that all 3 of the Item 3 DRs are included in the Item 2 DR count, and all 15 of the Item 2 DRs are included in the Item 1 DR count. It should also be noted that 18 of the 19 "problem" DRs involve the same person. That individual was the SGT Project Quality Manager (PQM) at the time, which was during the Unit 2 steam generator replacement.



M-09-0050 Page 8 of 13 Docket Number 99901334

# Supplement 3 (Continued) SGT Reply to Nonconformance 99901334/2009-201-03

# Regarding Item 4 above:

SGT agrees that the stated condition does not comply with the requirements of our Quality Assurance Manual.

The individual involved on this one (1) DR advises that he knew at the time that he did not have PQM signature authority and signed the "Reviewed By" block thinking that it was a broader "Quality" review block that he was authorized to sign. The individual did not refer to the procedure at that time to determine if there were any limitations regarding which Quality positions were permitted to sign this block. This is an isolated incident. This individual did have PQM signature authority on five (5) of the six (6) previous SGT projects he had worked and is well qualified to perform the final DR review.

# Corrective Steps that have been Taken and the Results Achieved

No action will be taken to reopen any of the 19 DRs that are the subject of this Nonconformance. The Diablo Canyon project is completed.

### Regarding <u>Items 1 through 3</u> above:

Our QEP 12.02 (*Conduct and Control of Inspection and Surveillance Activities*) has been revised to include guidance regarding which signature blocks on the DR form can not be signed by the same individual.

### Regarding <u>Item 4</u> above:

The DR form (QEP 12.02-2) has been revised to change the existing "Approved By" and "Reviewed By" descriptions to "Approved By PQM" and "Reviewed By PQM", respectively. This will highlight the fact that only the one position is authorized to sign these blocks. In addition, procedures QEP 12.02 (*Conduct and Control of Inspection and Surveillance Activities*), QEP 15.01 (*Identification and Control of Deviations*), and QEP 18.01 (*Quality Assurance Audits*), have been revised to include the following requirement under the "Responsibilities" section: "Personnel signing the various signature blocks on the report forms referenced by this QEP shall confirm that they have the proper signature authority."

### Corrective Steps that will be Taken to Avoid Further Nonconformances

We believe the changes already made to the procedures noted above will prevent a future noncompliance.

# Date When Corrective Action will be Completed

Our Standard procedures have already been revised and issued. These revised procedures are in the process of being submitted to our current Clients in accordance with each project's procedures. Full implementation at the projects will depend on the review/approval times taken by our Clients, but should be within four (4) to eight (8) weeks.



M-09-0050 Page 9 of 13 Docket Number 99901334

# Supplement 4 SGT Reply to Nonconformance 99901334/2009-201-04

### **NRC Statement of Nonconformance**

SGT failed to determine the cause of the repetitive procurement issues and preclude repetition of a significant condition adverse to quality. Specifically, SGT failed to initiate a CAR after repeatedly purchasing safety-related services from unapproved suppliers for the Diablo Canyon Nuclear Power Plant Steam Generator Replacement Project.

### **Reason for the Nonconformance**

SGT agrees that the stated conditions did not comply with the requirements of our Quality Assurance Manual.

The NRC inspection report identifies the following documents in support of this Nonconformance:

DR-034 – Issued 24-Sep-08, closed 21-Nov-08 NCR 2-084 – Issued 03-Nov-08, closed 25-Nov-08

DR-042 – Issued 19-Jan-09, closed 25-Feb-09 NCR 2-086 – Issued 22-Jan-09, closed 26-Jan-09

DR-043 – issued 28-Jan-09, closed 25-Feb-09

SGT2009-01 – Issued 29-Jan-09 (Prompted by AFR-02)

DR-057 - Issued 08-Apr-09, closed 16-Apr-09

The Diablo Canyon Steam Generator Replacement Project was divided into two phases: the Unit 2 portion (approximately May, 2004 through June, 2008 – outage dates 03-Feb-08 through 12-Apr-08) and the Unit 1 portion (approximately July, 2008 through May, 2009 – outage dates 25-Jan-09 through 24-Mar-09).

Although all of the above documents were issued during the Unit 1 portion of the project, the reported conditions all occurred during the earlier Unit 2 portion of the project. SGT does agree that these could be categorized as "repetitive" conditions, but they were not seen as such as they were being discovered by the Unit 1 Quality personnel. No similar issues occurred during the Unit 1 part of the project.

The decision to not issue a CAR was a judgment call by the Unit 1 Project Quality Manager. Although the conditions were seen as repetitive, they were not deemed as <u>significant</u> conditions adverse to quality. In hindsight, SGT agrees that it would have been prudent to issue a CAR in January, 2009.



# Supplement 4 (Continued) SGT Reply to Nonconformance 99901334/2009-201-04

## Corrective Steps that have been Taken and the Results Achieved

As noted in the NRC inspection report, SGT did perform a review of all Diablo Canyon Unit 2 safety related and/or permanent plant purchase orders and service agreements. Corrective actions for all of the documents identified above were taken and documented prior to the completion of the Unit 1 outage on 24-Mar-09. No action will be taken to reopen any of these items. The Diablo Canyon project is completed.

### **Corrective Steps that will be Taken to Avoid Further Nonconformances**

After further consideration, SGT Management has decided to issue a Corrective Action Request (CAR 09-01) to do a more global review of safety related procurement issues. The CAR will address currently active projects (TMI Unit 1 SGRP and Waterford 3 SG/RVCH RP) and other recently completed projects (St. Lucie 2 CRP and Salem 2 SGRP).

### Date When Corrective Action will be Completed

The initial response due date for CAR 09-01 is 18-Aug-09. Further actions and completion dates will depend on the results of the CAR investigation.



# Supplement 5 SGT Reply to Nonconformance 99901334/2009-201-05

### NRC Statement of Nonconformance

- 1. SGT failed to complete follow-up action for multiple audit findings and observations for the Diablo Canyon Nuclear Power Plant Steam Generator Replacement Project.
- 2. SGT failed to notify the responsible organization of overdue audit findings and observations for multiple audits.
- 3. SGT failed to initiate a CAR for four audit findings from Audit Report 38241-P-08-02, dated October 7, 2008, which were over 20 days overdue.

# **Reason for the Nonconformance**

SGT does not agree with the magnitude and severity of the conditions stated in the Nonconformance. This is partially based on additional documentation that we have recovered which was not available during the NRC inspection.

We have done a complete review of all of the Audit Finding Reports (AFRs) and Audit Observation Reports (AORs) generated at our Diablo Canyon project and have determined that there was only one (1) audit that had a problem of overdue responses. A summary of our review is shown on page 13 of this letter.

### Regarding Items 1 and 2 above:

Four (4) quality audits were conducted over the course of the Diablo Canyon project. One (P-06-01) had no Findings or Major Observations.

Audit P-08-01, the "problem" audit, resulted in no Findings and 5 Major Observations. These Observations were issued 18-Jan-08 with a response due date of 17-Feb-08. This was just prior to the start of the Unit 2 replacement outage. For reasons we cannot explain, there is no documentation of any near-term follow-up work on these observations. This condition was discovered by the Unit 1 Project Quality Manager and documented on Deficiency Report (DR)-032, dated 03-Sep-08. The 5 Major Observations were reassigned to individuals currently working the project, with a new due date of 01-Oct-08. As can be seen on the page 13 summary, these Observations were then resolved in a timely manner.

### Regarding Items 3 above:

We have recovered additional documentation that shows that requests for due date extensions were made, granted, and documented. This additional documentation includes the following:

- 1) Printout of e-mails from November 05, 2008 through November 07, 2008 (2 pages)
- 2) Memo 38241-PM-08-0042, dated November 6, 2008 (151 pages)
- 3) Memo 38241-PM-08-0044, dated November 21, 2008 (16 pages)
- 4) Memo 38241-PM-08-0045, dated November 21, 2008 (13 pages)
- 5) Memo 38241-PM-08-0046, dated December 2, 2008 (5 pages)



M-09-0050 Page 12 of 13 Docket Number 99901334

# Supplement 5 (Continued) SGT Reply to Nonconformance 99901334/2009-201-05

Memos -0042, -0044, and -0045 were referenced in various other memos in the audit file, but were not themselves included in the file reviewed by and provided to the NRC during its inspection. The e-mails and memo -0046 are not mentioned in that audit file. A copy of each of these is included as separate attachments, as listed on page 2 of this letter.

### Corrective Steps that have been Taken and the Results Achieved

Our QEP 18.01 (*Quality Assurance Audits*) has been revised to require that any overdue notifications and/or extensions of due dates shall be documented and included in the audit file. This should ensure that we will have all of the documentation needed to demonstrate that we complied with our procedures.

Regarding the situation where follow-up on the Audit P-08-01 Observations was apparently forgotten, this is an isolated case due to individual personnel error.

### **Corrective Steps that will be Taken to Avoid Further Nonconformances**

We believe the changes already made to the procedures noted above will prevent a future noncompliance.

### Date When Corrective Action will be Completed

Our Standard procedures have already been revised and issued. These revised procedures are in the process of being submitted to our current Clients in accordance with each project's procedures. Full implementation at the projects will depend on the review/approval times taken by our Clients, but should be within four (4) to eight (8) weeks.



# Supplement 5 (Continued) SGT Reply to Nonconformance 99901334/2009-201-05

### SGT DIABLO CANYON STEAM GENERATOR REPLACEMENT PROJECT AUDIT FINDINGS AND MAJOR OBSERVATIONS

Audit No	Date Issued	Response Due	Response Letter No	Response Letter Date	CA Completion	PA Completion	Evaluation Complete	Verification (Closed)	Days Overdue
P-08-02									
AFR-01	07-Oct-08	06-Nov-08	0042	06-Nov-08	31-Oct-08	31-Oct-08	26-Nov-08	04-Dec-08	0
AFR-02	07-Oct-08	06-Nov-08	0042	06-Nov-08	15-Dec-08	15-Dec-08	26-Nov-08	04-Dec-08	0
AFR-03	07-Oct-08	06-Nov-08	0042	06-Nov-08	30-Oct-08	19-Nov-08	26-Nov-08	04-Dec-08	0
AFR-04	07-Oct-08	06-Nov-08							
Extensio	on on 06-Nov-08	20-Nov-08	0044	21-Nov-08	14-Nov-08	14-Nov-08	26-Nov-08	04-Dec-08	1
AFR-05	07-Oct-08	06-Nov-08							
Extensio	on on 06-Nov-08	20-Nov-08	0044	21-Nov-08	03-Dec-08	03-Dec-08	04-Dec-08	04-Dec-08	1
AFR-06	07-Oct-08	06-Nov-08							
Extensio	on on 06-Nov-08	20-Nov-08	0044	21-Nov-08	14-Nov-08	14-Nov-08	26-Nov-08	26-Nov-08	1
AFR-07	07-Oct-08	06-Nov-08	0042	06-Nov-08	28-Oct-08	19-Nov-08	26-Nov-08	04-Dec-08	0
AFR-08	07-Oct-08	07-Nov-08	0042	06-Nov-08	28-Oct-08	19-Nov-08	02-Dec-08	02-Dec-08	-1
AFR-09	07-Oct-08	07-Nov-08	0042	06-Nov-08	28-Oct-08	19-Nov-08	26-Nov-08	26-Nov-08	-1
AFR-10	07-Oct-08	06-Nov-08	0042	06-Nov-08	28-Oct-08	19-Nov-08	26-Nov-08	04-Dec-08	0
AFR-11	07-Oct-08	06-Nov-08	0042	06-Nov-08	28-Oct-08	19-Nov-08	26-Nov-08	10-Dec-08	0
AFR-12	07-Oct-08	06-Nov-08						1	
Extensio	n on 06-Nov-08	20-Nov-08	0044	21-Nov-08	11-Nov-08	19-Nov-08	26-Nov-08	10-Dec-08	1
AFR-13	07-Oct-08	06-Nov-08	0042	06-Nov-08	28-Oct-08	28-Oct-08	02-Dec-08	10-Dec-08	0
AFR-14	07-Oct-08	06-Nov-08	0042	06-Nov-08	06-Nov-08	Minor - N/A	27-Nov-08	04-Dec-08	0
AFR-15	07-Oct-08	06-Nov-08	0042	06-Nov-08	04-Nov-08	04-Nov-08	26-Nov-08	26-Nov-08	0
AFR-16	07-Oct-08	06-Nov-08							
	on on 06-Nov-08	20-Nov-08	0044	21-Nov-08	11-Nov-08	Minor - N/A	26-Nov-08	04-Dec-08	
AFR-17	07-Oct-08	06-Nov-08							
	n on 06-Nov-08	20-Nov-08	0044	21-Nov-08	11-Nov-08	Minor - N/A	02-Dec-08	02-Dec-08	1
AFR-18	07-Oct-08	06-Nov-08							
Extensio	n on 06-Nov-08	20-Nov-08	0046	02-Dec-08	19-Dec-08	02-Dec-08	04-Dec-08	09-Dec-08	12
AOR-01	07-Oct-08	06-Nov-08	0042	06-Nov-08	28-Oct-08	N/A	N/A	16-Dec-08	0
8					1	<b>.</b>			
P-08-01					Actual				
AOR-01	18-Jan-08	17-Feb-08							
Reassigne	d on 03-Sep-08	01-Oct-08	None	09-Oct-08	09-Oct-08	N/A	N/A	N/A	8
AOR-02	18-Jan-08	17-Feb-08						I	
Reassigne	d on 03-Sep-08	01-0ct-08			15-Sep-08	N/A	N/A	N/A	-16
AOR-03	18-Jan-08	17-Feb-08							
Reassigne	d on 03-Sep-08	01-0ct-08	None	09-Oct-08	09-Oct-08	N/A	N/A	N/A	8
AOR-04	18-Jan-08	17-Feb-08							
Reassigne	d on 03-Sep-08	01-Qct-08			15-Sep-08	N/A	N/A	N/A	-16
AOR-06	18-Jan-08	17-Feb-08							
Reassigne	d on 03-Sep-08	01-@ct-08			09-Oct-08	N/A	N/A	N/A	8
	_			1					
P-07-01									
AFR-01	30-Apr-07	30-May-07	E-Mail	31-May-07	01-Jul-07	01-Jul-07	31-May-07	01-Aug-07	1
AFR-02	30-Apr-07	30-May-07	E-Mail	31-May-07	20-Aug-07	20-Aug-07	20-Aug-07	21-Aug-07	1
AFR-03	30-Apr-07	30-May-07	E-Mail	31-May-07	22-Jun-07	01-Jul-07	31-May-07	01-Aug-07	1
AFR-04	30-Apr-07	30-May-07	E-Mail	31-May-07	01-Jul-07	01-Jul-07	31-May-07	01-Aug-07	1
AFR-05	30-Apr-07	30-May-07	E-Mail	31-May-07	31-May-07	Minor - N/A	31-May-07	01-Aug-07	1
AOR-01	30-Apr-07	30-May-07	E-Mail	31-May-07	01-Jul-09	N/A	N/A	31-May-07	1
AOR-02	30-Apr-07	30-May-07	E-Mail	31-May-07	DR-004	N/A	N/A	20-Aug-07	1



ſ

	Corporate Office	Procedure Type	CISCILLUPAR	/\Pending\CQP_0101_R6_AFU
	Charlotte, NC	CORPO	ORATE QUALITY P	ROCEDURE
		· · · · · · · · · · · · · · · · · · ·	Revision No / Status 6 / AFU	Procedure No. CQP 01.01
N	G OF DEFECTS AND NONCOMPLIA	ANCE	Revision Date 03-Aug-09	Page <b>1</b> of <b>9</b>
ΡE				
ra	<u>I</u>			
ati	rporate Quality Procedure (CQP) des on, and reporting of defects and nonc ral Regulations (10 CFR) Part 21 "Re	compliance in	accordance with Ti	tle 10 of the Cod
ca	bility			
ate i	orporate Quality Procedure applies ed commercial grade, that has been s s licensed or otherwise regulated p ed, or the Energy Reorganization Act	supplied by SO pursuant to th	GT, LLC (SGT), to a	a facility or activit
0	NSIBILITIES			
or	nsible Officer (RO)			
s ol	oonsible Officer" for SGT has been de of this designation appear in th nsible Officer" is responsible for utiliz ory Commission (NRC) as required b	e applicable zing the suppl	Quality Program ied information to	manuals. Th
ty	Assurance Director (QAD)			
cti on roj th	ality Assurance Director is responsive Action Requests generated at the QAD is responsible for reviewing the QAD is responsible for reviewing whether on the condition is determined to be reponsible Officer and the NRC, as desponsible of the transformation of transformation of the transformation of transformat	the Corporate ng all potentia r not a reporta portable, the G	level for Part 21 Ily reportable cond able Part 21 condit quality Assurance D	applicability. I litions identified a tion exists. In th Director shall notif
<u>A</u>	uditor (LA)			
Co qu	Auditor is responsible for screening orporate level audit to determine if an uirements of 10 CFR Part 21. The L aditions considered potentially associa	ny could be co ead Auditor is	onsidered potential responsible for no	ly associated wit
<u>ct</u>	Quality Manager (PQM)			
ig al	oject Quality Manager is responsible Reports, and Corrective Action Re- pility. The PQM is responsible for ally associated with Part 21.	quests genera	ated at the Project	level for Part 2
	•	r	r notifying the	r notifying the QAD of any cond

.

C:\SGT\CQP\AFU\Pending\CQP\_0101\_R6\_AFU.doc

'\

.

,

.

C:\SGT\CQP\AFU\Pending\CQP	0101	R6	AFU.doc

		•	C:\SGT\CQP\AFL	NPending\CQP_0101_R6_AFU.c
	Corporate Office	Procedure Type		
	Charlotte, NC	CORPC	DRATE QUALITY PF	ROCEDURE
Procedure T	itle		Revision No / Status 6 / AFU	Procedure No. CQP 01.01
R	EPORTING OF DEFECTS AND NONCOMPL	LIANCE	Revision Date 03-Aug-09	Page <b>2</b> of <b>9</b>
3.0	DEFINITIONS			
	Definitions for key words or phrases appli Deviation, Discovery, Evaluation, Noncor Officer, etc.) are found in 10 CFR Part 21, F	npliance, Subst	antial Safety Haz	ard, Responsible
4.0	PROCEDURE			
	The 10CFR21 review and reporting proces on page 8 of this CQP.	s is shown grap	hically in the Attac	hment 1 flowchar
4,1	General			
4.1.1	10CFR21 specifies that an evaluation must a deviation. For SGT reporting forms, this '			
	a. For Nonconformance Reports (NCRs), must be within five (5) working days of			
	b. For Audit Finding Reports (AFRs), the be no later than the completion date of the final audit report has not been issue	the related audi		
	c. For Corrective Action Requests (CARs This date must be within five (5) work decision to issue a CAR.			· · · · · · · · · · · · · · · · · · ·
4.1.2	Although the QAD has primary responsibi described in this procedure, such actions provided by individual Project Engineering	will rely on tec	hnical information	and justifications
4.2	Initial Screening of Deviations			
4.2.1	Identified deviations are initially screened to the criteria for being potentially associa Deviations identified at the Project level are during a Corporate level audit are initially identified at the Corporate level are initially take place within five (5) working days above.	ated with the r initially screene screened by t screened by th	equirements of 1 ed by the PQM. De he Lead Auditor. e QAD. This scree	0 CFR Part 21 eviations identified Other deviations ening process will
4.2.1.1	For cases where a deviation report is writt will indicate such on the applicable deviation screening.			
4.2.1.2	For all other cases, the following criteria sh	all be used wher	n performing this in	itial screening.

- 4.2.1.2 For all other cases, the following criteria shall be used when performing this initial screening.
  - a. Does the deviation relate to a basic component? A basic component includes:

SG		Corporate Office Charlotte, NC	Procedure Type	C:ISGTICQPIAFU	NPending\CQP_0101_R6_AFL
Procedure Tit	tle	· · · · · · · · · · · · · · · · · · ·	1	Revision No / Status 6 / AFU	Procedure No. CQP 01.01
R	EPOR	TING OF DEFECTS AND NONCOMPI		Revision Date 03-Aug-09	Page <b>3</b> of <b>9</b>
	(	1) a safety-related structure, system,	or component, c	or part thereof, and/	'or,
	(	2) safety-related design, analysis, ins consulting services that are assoc services are performed by the com	ciated with the	component hardwa	•
		Has the item or activity been turned ove licensee, or is the item currently in the p		•	•
4.2.2		e answer to either of these questions is ening process is complete.	NO, the conditi	on does not relate	to Part 21 and th
4.2.3		e answer to both of these questions is uirements of 10 CFR Part 21.	YES, the condi	tion is potentially as	ssociated with th

**4.2.3.1** For deviations identified at the Corporate level, the process starting at Section 4.3 of this CQP shall be followed.

4.2.3.2 For deviations identified at the Project level or during a Corporate level audit, the PQM will forward a document package consisting of a copy of the deviation report and any supporting documentation to the QAD within two (2) working days for further review in accordance with Section 4.3 of this CQP. The PQM shall also forward to the QAD any pertinent followup information and Engineering input as it becomes available.

# 4.3 **Review of Potential Part 21-Related Conditions**

- 4.3.1 For any deviation screened as a "Possible Potential" Part 21 condition, the QAD shall notify the President, Vice President Engineering, Vice President Operations, the applicable Project Manager, and the applicable Project Engineering Manager.
- 4.3.2 **\*Possible Potential**" Part 21 conditions are then further reviewed by the QAD to determine the need to perform an evaluation. The following additional factors are considered during this review:
  - a. Is the item Commercial Grade, and, if so, who performed the dedication? and,
  - b. Has the condition already been reported to the NRC by another organization? and,
  - c. Could the supplied facility, activity, or component contain a defect? A defect would include the following if they could create a substantial safety hazard:
    - (1) a deviation in a delivered component, or,
    - (2) installation, use, or operation of a defective component, or,
    - (3) a deviation in a portion of a facility offered for acceptance, or,
    - (4) a condition of a basic component that could contribute to the exceeding of a safety limit.

	Proc	edure Type	C:\SGT\CQP\AFL	J\Pending\CQP_0101_R6_AFU.c		
55	Corporate Office Charlotte, NC		UALITY PF	ROCEDURE		
Procedure Titl	-	6	No / Status <b>/ AFU</b>	Procedure No. CQP 01.01		
RE	EPORTING OF DEFECTS AND NONCOMPLIAN		Date Aug-09	Page <b>4</b> of <b>9</b>		
4.3.3	The review should be completed <b>within s</b> e documentation package was submitted to the Q Form CQP 01.01-1, <i>Determination Checklist for</i>	AD. This review is	document			
4.3.4	Upon completion of Section B of the checklist, CFR Part 21:	the QAD determine	es if the re	equirements of 10		
	a. Do apply; b. Do not apply; or, c. Might possibly apply.					
4.3.4.2	If it is determined that the requirements of 10 0 appropriate box, signs in the appropriate space 17.01, <i>Quality Records</i> . If applicable, the QAD PQM for the Project records.	, and files the origin	nal in acco	ordance with CQP		
4.3.4.3	If it is determined that the requirements of 10 CFR Part 21 do or might possibly apply, the QAD signs and dates the checklist and continues with Section 4.4 of this CQP					
4.4	Evaluation					
4.4.1	For situations where the QAD believes that SC the QAD shall:	GT is <u>not</u> capable o	f performir	ng the evaluation,		
	a. Indicate such by checking "Yes" in part C1 c	of the checklist and s	signing it;			
	b. Assemble a documentation package consistoring original deviation report, and any supporting			list, a copy of the		
	c. Within 5 calendar days of the not capa package to the purchaser or licensee w reportable condition.					
4.4.2	If the QAD believes that SGT is capable of dedicating entity of a commercial grade item or as follows:					
	a. The QAD shall assure that the evaluation is completed as soon as practicable. In all cases, the evaluation shall be completed within 60 calendar days of the "Discovery Date", or an interim report shall be generated in accordance with the following paragraph.					

		Corporate Office	Procedure Type		
		Charlotte, NC	CORPO	ORATE QUALITY P	ROCEDURE
Procedure <sup>-</sup>	Title		I	Revision No / Status 6 / AFU	Procedure No. CQP 01.01
F	REPO	RTING OF DEFECTS AND NONCOMPL		Revision Date 03-Aug-09	Page <b>5</b> of <b>9</b>
	N	also provide a date when the evaluation			econolate en )
		evaluation, the purchaser or licen 4.4.1 of this CQP.			•
4.4.3	Ur	evaluation, the purchaser or licen	see shall be no		•
4.4.3	•	evaluation, the purchaser or licen 4.4.1 of this CQP.	see shall be no wing apply: C3, and C4 of th cks the "does r st in the approp	otified as indicated ne checklist is "No", not exist" block in	d in paragraph , then no defect o Section C of the

b. If the answer to any of the three evaluation criteria in Section C of the checklist is "Yes", the QAD shall notify the Responsible Officer within five (5) working days after completion of the evaluation. At this time, the Quality Assurance Director shall also notify all purchasers or licensees thought to be affected by the Part 21 condition being reported to the NRC.

NOTE: The date that the QAD signs Section C of the checklist is the date that the evaluation is considered complete.

4.4.4 Upon notification that a defect or noncompliance exists, the Responsible Officer shall do one of the following:

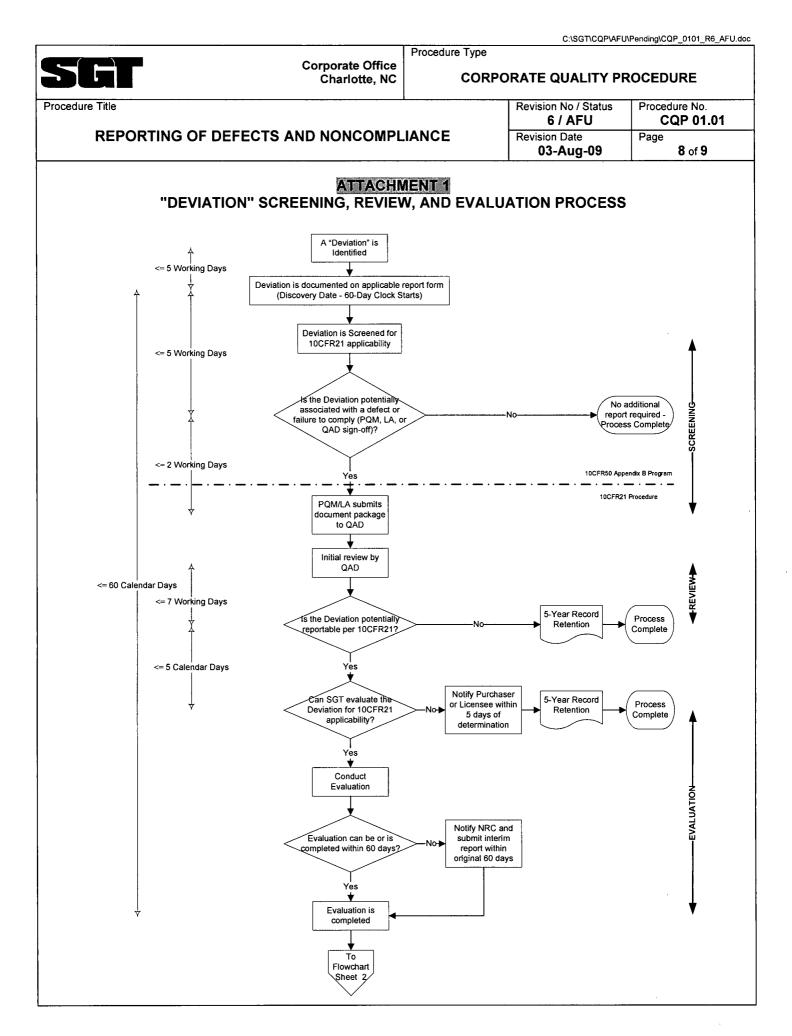
a. If the Responsible Officer has actual knowledge that the NRC has been notified in writing of the defect or failure to comply, NRC notification is not required. The checklist is completed and processed in accordance with CQP 17.01, *Quality Records*; or,

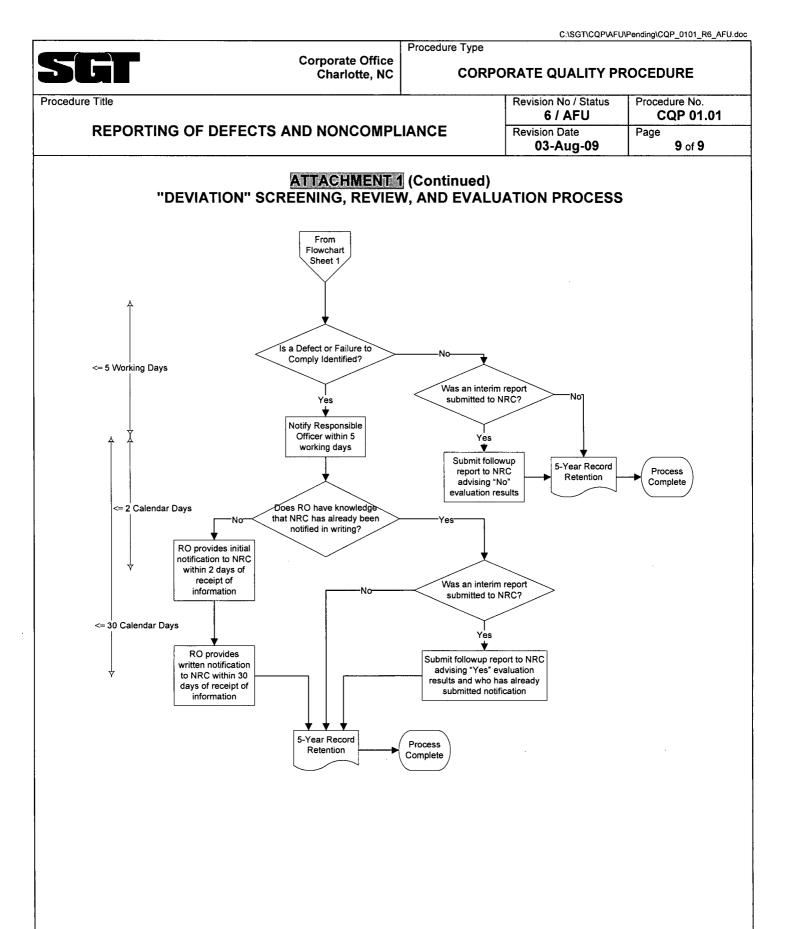
- b. The Responsible Officer shall notify the NRC Operations Center by facsimile at (301) 816-5151 or by phone at (301) 816-5100. This notification shall be made within two (2) calendar days of receipt of information. When notification is made by facsimile, the Responsible Officer shall verify receipt by phoning the Operations Center at the number shown.
- 4.4.5 The Responsible Officer shall, **within 30 calendar days** of receipt of information, submit a written report to the NRC on the identification of the defect or failure to comply.
- 4.4.5.1 This report shall be prepared in accordance with 10 CFR Part 21.21(d)(4).
- 4.4.5.2 The report should address whether the condition is generic to work performed by SGT and could affect other SGT projects.

REPORTING OF DEFECTS AND NONCOMPLIANCE         Revelor Date 03-Aug-09         Page 6 of 9           4.5         Additional Requirements for items Reaching the Review Stage (Section 4.3)           4.5.1         A copy of the initial deviation report that identified the defect or failure to comply, along with supporting documentation, shall be attached to the checklist for record purposes.           4.5.2         Copies of any closure paperwork shall be provided to the President Vice Press Engineering Wice President Operations, the applicable Project Manager, and the applic Project Engineering Wice President Operations, the applicable Project Manager, and the applic Project Engineering Manager.           4.6         Procurement Documents           The Project Quality Manager is responsible for assuring that each procurement or subcor document generated invokes the requirements of 10 CFR Part 21 when applicable.           4.7         Posting           The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 ap a. 10 CFR Part 21; b. Section 206 of the Energy Reorganization Act of 1974; and, c. notification of the existence of this CQP and any applicable site-specific procedure.           4.8         Records           4.8.1         Records           4.8.1         Records           4.8.1         Records           4.8.1         Records           4.8.1         Records           4.8.1         Records <th></th> <th></th> <th>Procedure Type</th> <th>C:\SGT\CQP\AFU</th> <th>\Pending\CQP_0101_R6_AFU.</th>			Procedure Type	C:\SGT\CQP\AFU	\Pending\CQP_0101_R6_AFU.
REPORTING OF DEFECTS AND NONCOMPLIANCE         6 / FU Revision Date 03-Aug-09         CQP 01. Revision Date 03-Aug-09           4.5         Additional Requirements for items Reaching the Review Stage (Section 4.3)           4.5.1         A copy of the initial deviation report that identified the defect or failure to comply, along with supporting documentation, shall be attached to the checklist for record purposes.           4.5.2         Copies of any closure paperwork shall be provided to the President Vice President Project Engineering Managet.           4.6         Procurement Documents The Project Quality Manager is responsible for assuring that each procurement or subcord document generated invokes the requirements of 10 CFR Part 21 when applicable.           4.7         Posting The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 ap a. 10 CFR Part 21; b. Section 206 of the Energy Reorganization Act of 1974; and, c. notification of the existence of this CQP and any applicable site-specific procedure.           4.8         Records           4.8.1         Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, Quality Records. Records to be retained include: a. A copy of any notification submitted to a purchaser or affected licensee; b. A copy of any notification submitted to a purchaser or affected licensee; c. A copy of all Determination Checklist for 10 CFR Part 21 Applicability (Form CQP 01.1 forms with supporting documentation, whether or not a report was made to the NRC; at d. A record of SGT clients / projects for which the requirements of 10CFR21 are applica	5			-	
4.5 Additional Requirements for items Reaching the Review Stage (Section 4.3)     4.5 Acopy of the initial deviation report that identified the defect or failure to comply, along with supporting documentation, shall be attached to the checklist for record purposes.     4.5.2 Copies of any closure paperwork shall be provided to the President. Vice Press Engineering Vice President Operations, the applicable Project Manager, and the applicable Project Engineering Vice President operations the applicable Project Manager, and the applicable Project Quality Manager is responsible for assuring that each procurement or subcord document generated invokes the requirements of 10 CFR Part 21 when applicable.     4.7 Posting     The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 applicable.     4.8 Records     4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i> . Records to be retained include: <ul> <li>A copy of any notification submitted to a purchaser or affected licensee;</li> <li>A copy of any notification submitted to a purchaser or affected licensee;</li> <li>A copy of all Determination Checklist for 10 CFR Part 21 Applicability (Form CQP 01.1 forms with supporting documentation, whether or not a report was made to the NRC; and A record of SGT clients / projects for which the requirements of 10 CFR21 are applicable</li> </ul>	Procedure	Title			Procedure No. CQP 01.01
<ul> <li>4.5.1 A copy of the initial deviation report that identified the defect or failure to comply, along with supporting documentation, shall be attached to the checklist for record purposes.</li> <li>4.5.2 Copies of any closure paperwork shall be provided to the President. Vice President Operations, the applicable Project Manager, and the apple Project Engineering Manager.</li> <li>4.6 Procurement Documents <ul> <li>The Project Quality Manager is responsible for assuring that each procurement or subcord document generated invokes the requirements of 10 CFR Part 21 when applicable.</li> </ul> </li> <li>4.7 Posting <ul> <li>The following documents are to be posted and maintained in a conspicuous place within SGT corporate offices and at project locations where the regulations of 10 CFR Part 21 ap <ul> <li>a. 10 CFR Part 21;</li> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> </ul> </li> <li>4.8 Records <ul> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; at d. A record of SGT clients / projects for which the requirements of 10 CFR21 are applicable</li> </ul> </li> </ul></li></ul></li></ul>		REPORTING OF DEFECTS AND NONCOMP	LIANCE		•
<ul> <li>supporting documentation, shall be attached to the checklist for record purposes.</li> <li>4.5.2 Copies of any closure paperwork shall be provided to the President. Vice Pressengineering, Vice President Operations, the applicable Project Manager, and the applic project Engineering Manager.</li> <li>4.6 Procurement Documents <ul> <li>The Project Quality Manager is responsible for assuring that each procurement or subcord document generated invokes the requirements of 10 CFR Part 21 when applicable.</li> </ul> </li> <li>4.7 Posting <ul> <li>The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 applicable.</li> <li>4.7 Posting <ul> <li>The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 applicable.</li> <li>a. 10 CFR Part 21;</li> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> </ul> </li> <li>4.8 Records <ul> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include:         <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; at d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done thr</li> </ul> </li> </ul></li></ul>	4.5	Additional Requirements for Items Read	hing the Review	w Stage (Section 4	.3)
<ul> <li>Engineering. Vice President Operations the applicable Project Manager, and the applic Project Engineering Manager.</li> <li>4.6 Procurement Documents The Project Quality Manager is responsible for assuring that each procurement or subcord document generated invokes the requirements of 10 CFR Part 21 when applicable. </li> <li>4.7 Posting The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 applies are to the posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 applies are to the project locations where the regulations of 10 CFR Part 21 applies are to the existence of this CQP and any applicable site-specific procedure. 4.8 Records 4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; at d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable </li> </ul></li></ul>	4.5.1			•	
<ul> <li>The Project Quality Manager is responsible for assuring that each procurement or subcordocument generated invokes the requirements of 10 CFR Part 21 when applicable.</li> <li>4.7 Posting <ul> <li>The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 ap <ul> <li>a. 10 CFR Part 21;</li> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> </ul> </li> <li>4.8 Records <ul> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.4 forms with supporting documentation, whether or not a report was made to the NRC; at d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicability.</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three.</li> </ul> </li> </ul></li></ul>	4.5.2	Engineering, Vice President Operations,			
<ul> <li>document generated invokes the requirements of 10 CFR Part 21 when applicable.</li> <li>4.7 Posting The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 ap  <ul> <li>a. 10 CFR Part 21;</li> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> </ul> 4.8 Records 4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; ard <ul> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> 4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three.</li></ul></li></ul>	4.6	Procurement Documents			
<ul> <li>The following documents are to be posted and maintained in a conspicuous place within SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 ap <ul> <li>a. 10 CFR Part 21;</li> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> </ul> </li> <li>4.8 Records <ul> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and</li> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three is the supervalue of the supervalue or not reportable. If not already done three is the supervalue or not reportable.</li> </ul></li></ul>					
<ul> <li>SGT Corporate offices and at project locations where the regulations of 10 CFR Part 21 ap <ul> <li>a. 10 CFR Part 21;</li> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> </ul> </li> <li>4.8 <u>Records</u> <ul> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and</li> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three determination is that the item is reportable or not reportable. If not already done three determination is that the item is reportable or not reportable.</li> </ul></li></ul>	4.7	Posting			
<ul> <li>b. Section 206 of the Energy Reorganization Act of 1974; and,</li> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> <li>4.8 Records</li> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three.</li> </ul>				-	•
<ul> <li>c. notification of the existence of this CQP and any applicable site-specific procedure.</li> <li>4.8 Records</li> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three determination is that the item is reportable or not reportable.</li> </ul>		a. 10 CFR Part 21;			
<ul> <li>4.8 <u>Records</u></li> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include: <ul> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> </ul> </li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three determination is that the item is reportable or not reportable.</li> </ul>		b. Section 206 of the Energy Reorganizat	tion Act of 1974;	and,	
<ul> <li>4.8.1 Records generated as a result of implementation of this CQP are controlled in accordance CQP 17.01, <i>Quality Records</i>. Records to be retained include:</li> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done through the support of the</li></ul>		c. notification of the existence of this CQI	<sup>&gt;</sup> and any applica	able site-specific pr	ocedure.
<ul> <li>CQP 17.01, <i>Quality Records</i>. Records to be retained include:</li> <li>a. A copy of any notification submitted to the NRC;</li> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and</li> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done through the second secon</li></ul>	4.8	<u>Records</u>			
<ul> <li>b. A copy of any notification submitted to a purchaser or affected licensee;</li> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.6 forms with supporting documentation, whether or not a report was made to the NRC; and</li> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three the second second</li></ul>	4.8.1				n accordance with
<ul> <li>c. A copy of all <i>Determination Checklist for 10 CFR Part 21 Applicability</i> (Form CQP 01.0 forms with supporting documentation, whether or not a report was made to the NRC; and</li> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three the second s</li></ul>		a. A copy of any notification submitted to	the NRC;		
<ul> <li>forms with supporting documentation, whether or not a report was made to the NRC; and</li> <li>d. A record of SGT clients / projects for which the requirements of 10CFR21 are applicable</li> <li>4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three the second s</li></ul>		b. A copy of any notification submitted to	a purchaser or a	ffected licensee;	
4.8.2 The applicable Client(s) shall be notified of SGT's reportability determination, whether determination is that the item is reportable or not reportable. If not already done three the structure of the stru		· ·		••••••	
determination is that the item is reportable or not reportable. If not already done thr		d. A record of SGT clients / projects for w	hich the requirer	nents of 10CFR21	are applicable.
normal project reporting channels, this notification shall be made by the QAD within 30 da the determination.	4.8.2	determination is that the item is reportal normal project reporting channels, this not	ble or not repor	table. If not alrea	dy done through
5.0 <b>REFERENCED FORMS</b>	5.0	REFERENCED FORMS			
a. CQP 01.01-1 – Determination Checklist for 10 CFR Part 21 Applicability	-		list for 10 CFR Pa	art 21 Applicability	

C:\SGT\CQP\AFU\Pending\CQP	0101	<b>R</b> 6	AF11 doc
	_0101	_1.0	A 0.000

51	Corporate Office Charlotte, NC	Procedure Type	ORATE QUALITY P	ROCEDURE
Procedure			Revision No / Status 6 / AFU	Procedure No. CQP 01.01
	REPORTING OF DEFECTS AND NONCOMPL		Revision Date 03-Aug-09	Page <b>7</b> of <b>9</b>
6.0	REFERENCES			
	None			
7.0	ATTACHMENTS			
	a. Attachment 1 – "Deviation" Screening,	Review, and E	valuation Process	





		Form Source						
	Corporate Office Charlotte, NC	CORPO	DRATE QUALIT	Y PROC	EDURE			
Fo		OR	Revision No / Sta <b>5 / AFU</b>		orm No. CQP 01.01-1			
	10 CFR PART 21 APPLICABILI		Form Revision Da 03-Aug-09		orm Page 1 of 1			
A.	DESCRIPTION OF DEVIATION OR NONCOMPLIANCE	(Deviation Repor	t Number:		)			
В.	REVIEW PHASE		Discov	ery Date	):			
	<ol> <li>The facility, activity, or component:         <ul> <li><u>Is</u> Safety Related (is or relates to a Basic Component).</li> <li><u>Has</u> been turned over to or is in the possession of</li> <li>If either "No" option above is checked, 10 CFR Part 2 checked, proceed with Item 2 of the Review Phase.</li> </ul> </li> </ol>	the Purchaser / Lie			'Yes" options are			
	<ul><li>2. a. If the item or service is Commercial Grade, was it of b. The condition has NOT already been reported to the organization?</li><li>c. Does the supplied facility, activity, or component or might cause a substantial safety hazard?</li></ul>	ne NRC by anothe	r 🗌 Yes	□ No	Unknown by SGT			
	If B2c is checked "No", 10CFR21 does not apply. Proceed to Section C only if "Yes" or "Unknown" is checked in B2a, B2b, or B2c. In such instances, further research may be required to answer the questions in Section C.							
	INITIAL REVIEW OF PART 21 REPORTABILITY:							
	10 CFR 21: does not, or does, or Comments:	might possibly	арріу.					
	Quality Assurance Director		Date					
C.	EVALUATION							
	1. SGT does not have the capability to conduct the evaluation	uation.	🗌 Yes	🗌 No				
	<ol> <li>A deviation exists in a facility, activity, or basic compo Part 21 regulations and, on the basis of evaluation, co safety hazard and therefore is considered a "defect" on Atomic Energy Act of 1954 as amended.</li> </ol>	ould create a subst	tantial	🗌 No	Unknown by SGT			
	3. The facility, activity, or basic component containing a delivered by SGT for use by the Purchaser/Licensee.	"defect" has been	🗌 Yes	🗌 No	Unknown by SGT			
	<ol> <li>The deviation involves a "basic component" and the d to the exceeding of a safety limit.</li> </ol>	eviation could con	tribute 🗌 Yes	🗌 No	Unknown by SGT			
	FINAL EVALUATION OF PART 21 REPORTABILITY:							
	Condition turned over to Purchaser/Licensee for fu	irther evaluation;						
	OR, a 10 CFR 21 reportable condition:   does no Comments:	t, or 🗌 does	exist.					
	Evaluated by:Quality Assurance Director		Date					
1	•							

١

C:\SGT\CQP\AFU\Pending\CQP\_0101F1\_R5\_AFU.doc

		~ .	
C:\SGT\CQP\AFU\Pending\CQP	1801	_R4	_AFU.doc

		Procedure Type
SGT	Corporate Office Charlotte, NC	CORPORATE QUALITY PROCEDURE
Procedure Title		Revision No / Status Procedure No

Procedure T	itle
-------------	------

	4 / AFU	CQP 18.01
CORRECTIVE ACTION REQUESTS	Revision Date	Page
	03-Aug-09	1 of 5

#### 1.0 SCOPE

This Corporate Quality Procedure (CQP) defines measures for identifying and documenting significant conditions adverse to quality that are identified at the corporate level. This CQP provides instructions for reviewing dispositions for Corrective Action Requests (CARs) and for verifying and documenting corrective actions. Significant conditions adverse to quality that are identified at a project level are processed in accordance with project procedures.

#### 2.0 RESPONSIBILITIES

#### 2.1 Quality Assurance Director (QAD)

The Quality Assurance Director is responsible for:

- a. Preparing and issuing CARs generated at the Corporate level;
- b. Accepting the disposition of CARs generated at the Corporate level;
- c. Screening of CARs generated at the Corporate level for 10CFR Part 21 applicability, in accordance with Section 4.3 of this CQP;
- d. Verifying completion of the corrective action for CARs generated at the Corporate level; and.
- e. Assuring that CARs are closed out in a timely manner.

#### 2.2 **Quality Engineer**

The Quality Engineer is responsible for issuing CAR numbers, maintaining a log of CARs, and maintaining CAR records.

#### 2.3 **Responsible Manager**

The Responsible Manager is responsible for dispositioning a CAR, or obtaining a disposition for a CAR, and for assuring implementation of the disposition.

NOTE: Personnel signing the various signature blocks on the report form referenced by this CQP shall confirm that they have the proper signature authority.

#### 3.0 DEFINITIONS

#### 3.1 Corrective Action Request (CAR)

A Corrective Action Request is a document issued by the SGT Quality organization to report, initiate action on, and track a significant condition adverse to quality.

#### 3.2 Significant Condition Adverse to Quality

A condition adverse to quality is an all-inclusive term used in reference to any of the following: failures, malfunctions, deficiencies, defective items, and nonconformances. A Significant Condition Adverse to Quality is one which, if uncorrected, could have serious effect on safety or operability.

SC	Corporate Office Charlotte, NC	Procedure Type	ORATE QUALITY PF	ROCEDURE
Procedure Ti	tle		Revision No / Status <b>4 / AFU</b>	Procedure No. CQP 18.01
	CORRECTIVE ACTION REQUESTS		Revision Date 03-Aug-09	Page <b>2</b> of <b>5</b>
3.3	Responsible Manager			
4.0	The Responsible Manager is the Project Ma other management individual responsible for form and for implementation of corrective act QAD on the CAR form. <b>PROCEDURE</b>	completion of	f the "Disposition" p	ortion of the CAR
4.1	Identifying Significant Conditions Adverse	e to Quality		
4.1.1	The following may be considered significant		verse to quality:	
	<ul> <li>a. Recurring quality problems;</li> <li>b. Procedures which are found to be inadec</li> <li>c. Conflicts between Quality Program docur</li> <li>d. Failure to correct deficiencies documented timely manner.</li> </ul>	ments; or,	•	audit reports in a
4.1.2	Conditions adverse to quality can be identific means:	ed by any wor	rker and through ar	ny of the following

- a. During quality inspections;
- b. During quality surveillance;
- c. During quality audits;
- d. During design or design related activities;
- e. During installation activities;
- f. Through Client identified concerns; or,
- g. Through other methods, such as an Employee Concern Report.

# 4.2 Corrective Action Request Preparation

- 4.2.1 Quality Assurance personnel who identify a condition that they believe to be adverse to quality shall discuss the adverse condition with the QAD, who shall determine if a CAR is to be issued.
- 4.2.2 The QAD shall prepare a CAR (Form CQP 18.01-5), being careful to accurately identify the condition which is adverse to quality; and to state the specific regulation, code, standard, specification, drawing, or procedure to which the item or activity does not conform.
- 4.2.2.1 A CAR number shall be obtained from the Quality Engineer and indicated on the CAR form.
- 4.2.2.2 A Responsible Manager and a response due date shall be determined and shall also be indicated on the CAR. The response due date shall not exceed (10) ten working days following notification of issuance of the CAR.
- 4.2.2.3 The QAD shall sign and date the CAR.
- 4.2.3 The QAD shall notify the President and Project Manager.

5	

Charlotte, NC

Pr

### **CORPORATE QUALITY PROCEDURE**

Procedure Title	Revision No / Status 4 / AFU	Procedure No. CQP 18.01
CORRECTIVE ACTION REQUEST	Revision Date 03-Aug-09	Page <b>3</b> of <b>5</b>

Procedure Type

- 4.2.4 The Quality Engineer shall assure that the CAR information is logged into the tracking system.
- 4.2.5 The QAD shall distribute the CAR to the Responsible Manager and, as applicable, the President, Vice President Operations, Vice President Engineering, Project Manager, Project Quality Manager, Charlotte Quality Engineer, and Client representative.

#### 4.3 Screening of CARs for 10CFR Part 21 Applicability

4.3.1 Identified deviations documented on CARs are initially screened by the QAD to determine whether or not the condition might meet the criteria for being potentially associated with the requirements of 10CFR Part 21.

4.3.1.1 This screening shall take place within five (5) working days of the "Discovery Date", which is the "Date Issued" at the top portion of the CAR form. This date must be within five (5) working days of the identification of the problem or the decision to issue a CAR.

4.3.1.2 The following criteria shall be used when performing this initial screening:

- a. Does the deviation relate to a basic component? A basic component includes:
  - (1) a safety-related structure, system, or component, or part thereof, and/or,
  - (2) safety-related design, analysis, inspection, testing, fabrication, replacement of parts, or consulting services that are associated with the component hardware whether these services are performed by the component supplier or others.
- b. Has the item or activity been turned over to or submitted for acceptance to the purchaser or licensee, or is the item currently in the possession of the purchaser or licensee?
- 4.3.2 If the answer to either of the questions is "No", the condition does not relate to Part 21 and the screening process is complete.
- 4.3.3 If the answer to both of these questions is "Yes", the condition is potentially associated with the requirements of 10 CFR Part 21. The QAD shall further review the condition in accordance with CQP 01.01, Reporting of Defects and Noncompliance.

#### 4.4 **Corrective Action Request Dispositions**

- 4.4.1 The Responsible Manager, as applicable, shall disposition or obtain a disposition for the CAR. The person or organization preparing the CAR disposition shall address the cause of the condition, proposed action to correct the condition, the action to prevent recurrence, and shall provide an anticipated completion date for the disposition.
- 4.4.2 Upon receipt of a dispositioned CAR, the QAD shall review the response to assure that:
  - a. A cause of the condition adverse to quality is identified;
  - b. Proposed corrective actions to prevent recurrence address the identified cause of the condition:
  - c. Proposed corrective actions comply with applicable codes, regulations, standards, drawings, and procedures, and adequately address the deficiency; and,
  - d. The anticipated completion date is reasonable and timely.

SGT	Corporate Office Charlotte, NC	Procedure Type CORPORATE QUALITY PROCEDURE
Procedure Title	<u> </u>	Revision No / Status Procedure No.

	4 / AFU	CQP 18.01	
CORRECTIVE ACTION REQUESTS	Revision Date 03-Aug-09	Page <b>4</b> of <b>5</b>	

- 4.4.3 If the CAR disposition is found to be acceptable, the QAD shall sign the CAR and notify the Responsible Manager to proceed with the corrective action.
- 4.4.3.1 Copies of the dispositioned CAR shall be distributed to the same individuals from paragraph 4.2.5 who received the original notification.
- 4.4.3.2 The Quality Engineer shall note approval of the disposition in the CAR tracking log.
- 4.4.4 Unaccepted proposed corrective actions shall be documented on the CAR, and the CAR shall be returned for re-disposition. When a CAR disposition is returned, the reason for rejection shall be documented and sent to the individual(s) proposing the disposition. Extension of the response date may be granted at the discretion of the QAD. The revised disposition and acceptance of it shall be documented on the CAR or a continuation sheet.
- 4.4.5 If responses are not received by the due date, the QAD notifies the responsible organization that responses are overdue. If responses are not forthcoming, the QAD shall elevate overdue notifications to higher levels of SGT and/or supplier management. Any overdue notifications and/or extensions of due dates shall be documented and included in the CAR file.

### 4.5 Verification of Corrective Action Implementation

- 4.5.1 The corrective action, as stated in the CAR, shall be implemented by the responsible individual(s).
- 4.5.2 When the corrective action has been completed, the individual(s) responsible for the action shall notify the QAD of the completion and shall document the completion of action on the CAR.
- 4.5.3 The QAD shall follow up to assure the corrective actions have been implemented and have achieved the desired results. The follow up shall occur within 30 days of the schedule implementation date.
- 4.5.4 When it is verified that the corrective action is complete and acceptable, the QAD shall sign and date the CAR, signifying satisfactory completion of the disposition and closure of the CAR. If the corrective action is not acceptable, a notation shall be made on the CAR. When the unacceptable corrective action is made acceptable, the verification shall be documented on the CAR or on a continuation sheet.
- 4.5.4.1 Copies of the closed CAR shall be distributed to the same individuals from paragraph 4.2.5 who received the original notification.
- 4.5.4.2 The Quality Engineer shall note closure of the disposition in the CAR tracking log.

		C:\SGT\CQP\AF	U\Pending\CQP_1801_R4_
	· · ·	Procedure Type	
SGI	Corporate Office Charlotte, NC	CORPORATE QUALITY P	ROCEDURE
Procedure Title		Revision No / Status	Procedure No

Procedure Title	Revision No / Status <b>4 / AFU</b>	Procedure No. CQP 18.01
CORRECTIVE ACTION REQUESTS	Revision Date 03-Aug-09	Page <b>5</b> of <b>5</b>

AFU.doc

# 4.6 **Revision or Cancellation of a CAR**

- 4.6.1 A CAR may be revised due to additional review or investigation of the condition adverse to quality. When a CAR is revised, the record copy of the superseded CAR shall be marked "Superseded by Revision No.\_\_\_\_" and signed by the QAD. The revised CAR shall retain the same CAR number as the superseded CAR. Revision levels shall be numbered sequentially starting with zero on the original CAR. The superseded CAR shall be retained in the file.
- 4.6.2 A CAR may be cancelled by the QAD if the CAR was written in error. In such cases, the record copy of the CAR shall be marked "cancelled" and signed and dated by the QAD.

# 4.7 <u>Records</u>

- 4.7.1 CARs shall be retained by the Quality Engineer in accordance with CQP 17.01, *Quality Records*, for the duration indicated in CQP Appendix 1, *Quality Assurance Records Index*.
- 4.7.2 Copies of CARs issued to a supplier shall be placed in the Project purchase order file.

# 5.0 **REFERENCED FORMS**

a. CQP 18.01-5, Corrective Action Request

# 6.0 **REFERENCES**

None

# 7.0 ATTACHMENTS

None

						C:\SGT\CQP\AFU\Per	nding\CQP_1801F5_R3_AFU.doc
SF			Corporate Of	ffice		TY EXECUTION PRO	
			Charlotte,	, NC	QUALI	IT EXECUTION PRO	JUEDUKE
Form Title			3	I		Revision No / Status 3 / AFU	Form No. CQP 18.01-5
	CORRECT	IVE AC	TION REQ	UEST		Form Revision Date 03-Aug-09	Form Page <b>1</b> of <b>1</b>
i i i i i i i i i i i i i i i i i i i		DR. Maria	GENERA		ATION		
	ction Request Number:		Contract Number:	Project N	lame:		
Issued to:	<b>AR</b> -	0		Depa	rtment:		Sheet 1 of
Condition D	opprintion						
					RES	PONSE DUE DATE:	
INITIATED BY:	Signature:		1	itle:			Date Issued:
Results of	QAD screening for	potential	No Poten	tial	Signature:		Date:
	with 10CFR21:						
a de la compañía		DIS	POSITION OF CO	RRECTIVE	ACTION REQU	EST	
Extent of Co	ondition						
Descentation	e Action Taken to Elimi						
		indie Vause		ANT	ICIPATED C	OMPLETION DATE:	
PREPARED	Signature:		r	Title:			Date:
BY:				ACTION			
ACCEPTED BY:	Signature:			ACTION AC Title:	JUER I ANCE		Date:
BT:			ECTIVE			NW-LIP	
ACTION COMPLETE:	Signature:			Fitle:	VIN-AINU RUEL		Date:
VERIFIED BY:	Signature:		۲	litle:			Date:
L	1						1

.



Standard Procedures Engineering and Construction Projects Procedure Type

### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status	Procedure No.
CONDUCT AND CONTROL OF INSPECTION	<b>4 / AFU</b>	QEP 12.02
SURVEILLANCE ACTIVITIES	Revision Date 03-Aug-09	Page <b>1</b> of <b>13</b>

### 1.0 **SCOPE**

This Quality Execution Procedure (QEP) establishes a standard method for conducting and reporting the results of inspections that are performed in support of project requirements. This QEP applies to all in-process and final inspections conducted by SGT. This QEP also addresses surveillance of both SGT and supplier quality affecting activities conducted at the project site.

### 2.0 **RESPONSIBILITIES**

**2.1.1** The following individuals have duties and responsibilities in the implementation of this procedure:

- a. Project Quality Manager (PQM)
- b. Quality Assurance Supervisor (QAS)
- c. Quality Control Supervisor (QCS)
- d. Quality Engineer (QE)
- e. Quality Control Inspector (QCI)
- f. Quality Records Center (QRC)

2.1.2 Personnel signing the various signature blocks on the report forms referenced by this QEP shall confirm that they have the proper signature authority.

### 3.0 **CONDUCT OF INSPECTIONS**

### 3.1 <u>Personnel Requirements</u>

- 3.1.1 Quality Control Inspectors are qualified and certified in accordance with QEP 04.03, *Qualification and Certification of Quality Personnel*, or QEP 04.04, *Qualification and Certification of NDE Personnel*, as applicable. The QAS/QCS shall ensure that Quality Control Inspectors are certified to perform the inspections assigned to them.
- 3.1.2 Quality Control Inspectors are responsible for ensuring they are adequately prepared to perform inspections. This involves:
  - a. Continually monitoring work in progress to remain aware of current work status, upcoming Hold/Witness Points, surveillances, and outstanding deviations or open items;
  - b. Being aware of the current inspection and acceptance criteria;
  - c. Verifying that their qualification and certification is appropriate and current;
  - d. Verifying that the equipment needed to perform these inspections is ready for use (current calibration, required accuracy, etc.);
  - e. Verifying that any necessary documentation is available and that any prerequisites have been satisfied; and,



### **QUALITY EXECUTION PROCEDURE**

Procedure Title	Revision No / Status	Procedure No.
CONDUCT AND CONTROL OF INSPECTION	4 / AFU	QEP 12.02
SURVEILLANCE ACTIVITIES	Revision Date 03-Aug-09	Page <b>2</b> of <b>13</b>

f. Being continuously aware of the current QEP requirements that may apply to the inspections that have to be performed.

# 3.2 General

- 3.2.1 There are three (3) basic types of Inspection, as follows:
  - a. **In-process (I):** The inspection of ongoing Process Control Document (PCD) activities. Such inspections are performed to assure the quality of the operation or final product.
  - b. **Partial (P):** An inspection that is not complete enough for acceptance or release of a Hold Point.
  - c. Final (F): An inspection that results in acceptance of an operation or product.
- 3.2.2 Required inspections will be indicated and described at the various instruction steps in the applicable Work Package (WP) or other Process Control Document (PCD).
- 3.2.3 Completed items shall be inspected for completeness, markings, calibration, adjustments, protection from damage, or other characteristics, as required, to verify the quality and conformance of the item to the specified requirements.
- 3.2.4 Inspection results shall be promptly evaluated against the applicable acceptance criteria. Final inspections shall include a review of the results and resolution of any deviations identified by prior inspections.

# 3.3 Quality Hold Points / Witness Points

3.3.1 Hold Points and Witness Points are established during the development/review and approval cycle of the applicable PCD and Work Packages.

NOTE: A Hold Point is a point in a work process where work stops until the inspection, examination, or test specified has been completed and signed off, or waived, by the designating party. A Hold Point would be considered "Bypassed" if subsequent operations preclude the ability to verify the activity required by the Hold Point.

A Witness Point requires notification that an activity (e.g., inspection, examination, or test) is about to be performed, but work does not need to stop pending arrival of the designating party.

- 3.3.2 When an external Hold or Witness Point (Client Quality (CQ), ANII, or ANI) is coming up, the QCS or QAS shall notify the responsible party.
- 3.3.2.1 For Hold Points, the QCI shall not release the related SGT Quality (QC) Hold Point until the applicable parties are present, or the QCI has been notified by the QCS or QAS that the Hold Point has been waived.
  - a. External Hold Point waivers may initially be verbal and, if such, are first documented on form QEP 12.02-3, *Quality Hold Point Waiver Log*, by SGT Quality.



Standard Procedures Engineering and Construction Projects Procedure Type

## **QUALITY EXECUTION PROCEDURE**

Procedure Title CONDUCT AND CONTROL OF INSPECTION AN	Revision No / Si 4 / AFU	
SURVEILLANCE ACTIVITIES	Revision Date 03-Aug-(	Page 09 3 of 13

- b. The Quality Hold Point Waiver Log entry is not closed until the responsible party (i.e., Client Quality, ANII, or ANI) provides written documentation of the waiver at the applicable step on the PCD.
- c. Waivers of SGT QC Hold Points are also documented at the applicable step on the PCD.

NOTE: The QCS and QAS have delegated authority from the PQM to document Hold Point waivers by other parties and to waive SGT QC Hold Points.

3.3.2.2 For Witness Points, the QCI shall provide sufficient advance notice to allow the Client representative reasonable opportunity to be present at the start of the operation. The QCI shall document the notification (date, time, and person notified) at the applicable step on the PCD. At this point, the related SGT Quality (QC) Hold Point may be released.

# 3.4 **Documenting Inspections**

- 3.4.1 All inspections are documented on the Work Package step or on the PCD, when applicable, and on the QCI's Form QEP 12.02-1, *Daily Inspection Log* (DIL). The DIL is used to collect inspection information for the purpose of updating the SGT inspection tracking database. Additional instructions for completing the DIL are found in Attachment 1 of this QEP. The DIL is turned in daily to the QAS/QCS.
- 3.4.2 Other QEPs may provide forms to document the details involved with a given inspection. When completed, such forms are processed with the DIL. The number of additional sheets associated with a given inspection is to be listed in the "Page Count" (Pg. Ct.) column of the DIL.
- 3.4.3 When more than one QCI participates in an inspection, the inspection is documented on the "lead" QCI's DIL. The "lead" QCI shall list the initials of all QCIs involved in the inspection in the "Remarks" block.
- 3.4.4 The Control Number of Measuring and Test Equipment (M&TE) and Calibration Due Date used to perform an inspection shall be indicated in the allotted block of the DIL for that particular inspection.
- 3.4.5 When performing weld inspections, the QCI shall verify that the welders are qualified to perform the work they are assigned. When this is done, the QCI shall verify that the welder's I.D. symbol is indicated in the allotted block of the Weld Card and DIL.
- 3.4.6 When performing installed material verifications, the QCI shall enter the Material ID (MID) portion of the SGT ID Number for the item/material actually used in the allotted block of the Material Data Sheet (MDS) or Weld Card, or confirm information that may already be entered.
- 3.4.7 "Inspection Code" numbers are also assigned to facilitate inspection result analysis. These codes are listed in QEP Appendix 3, *Inspection Codes*.

;



Standard Procedures Engineering and Construction Projects Procedure Type

## QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status	Procedure No.
CONDUCT AND CONTROL OF INSPECTION AND	<b>4 / AFU</b>	QEP 12.02
SURVEILLANCE ACTIVITIES	Revision Date 03-Aug-09	Page <b>4</b> of <b>13</b>

- 3.4.8 For <u>acceptable</u> inspections, an "A" is listed in the "A/R" column of the DIL. For Quality Hold Point inspections, inspection results are also documented on the PCD. When listing inspection results on a PCD, the following information shall be entered into provided spaces or in the "Releases Others" column of the Work Package:
  - a. QCI's initials, date, and the sequential "No." assigned from the QCI's DIL (Example: FBC/02-24-01/05);
  - b. "Control No." and "Cal. Due Date" of any M&TE used to record data; and,
  - c. If not already listed in the PCD, acceptance criteria and the source thereof, including the revision level of the source (Example: QEP 12.04 Rev. 1 Attachment 2).

# 3.5 **Processing Rejectable Inspections**

- 3.5.1 For <u>rejectable</u> inspections, an "R" or "N" is listed in the "A/R" column of the DIL, depending on whether a Form QEP 15.01-1, *Nonconformance Report*, is issued as described in QEP 15.01, *Identification and Control of Deviations*. In addition, a "Reject No." or "NCR No." and the applicable "Const Seq" code listed in QEP Appendix 4, *Trend Codes*, shall be entered in the "Reject Information" area of the DIL.
- 3.5.2 If the deviation requires issuance of an NCR, an NCR No. is obtained from the SGT Quality Records Center (QRC) and Form QEP 15.01-1, *Nonconformance Report*, shall be prepared and issued.
- 3.5.3 The DIL No. and Reject No./NCR No. are also indicated at the applicable step of the PCD. When an NCR is written, a hold tag shall be applied to the affected item when practical. Rejects and Nonconformances are tracked and processed in accordance with QEP 15.01, *Identification and Control of Deviations*.

# 4.0 CONDUCT OF SURVEILLANCES

# 4.1 General

- 4.1.1 A **Surveillance (S)** is a method of observation and review designed to evaluate adherence to established procedures in the field. QEP 12.01, *Inspection and Surveillance Planning*, provides a list of typical types of surveillance and the recommended frequencies.
- 4.1.2 On-site surveillances are planned in accordance with QEP 12.01, *Inspection and Surveillance Planning*. Unplanned surveillances shall supplement scheduled surveillances.

# 4.2 <u>Personnel Requirements</u>

4.2.1 Surveillance personnel shall be qualified in accordance with QEP 04.02, *Qualification and Certification of Audit Personnel*, QEP 04.03, *Qualification and Certification of Quality Personnel*, or QEP 04.04, *Qualification and Certification of NDE Personnel*. Alternatively, individuals meeting the URS-WD or AREVA Quality Engineer or Quality Specialist job descriptions may be designated by the PQM as surveillance personnel. Such designations shall be documented. Both the QAS and QCS are responsible for assigning Quality Department personnel to perform surveillances.



Standard Procedures Engineering and Construction Projects Procedure Type

# **QUALITY EXECUTION PROCEDURE**

Procedure Title
CONDUCT AND CONTROL OF INSPECTION AND
SURVEILLANCE ACTIVITIES
Revision Date
22 Auge 20

ision No / Status 4 / AFU ision Date 03-Aug-09 Procedure No. QEP 12.02 Page 5 of 13

- 4.2.2 Surveillance personnel are responsible for ensuring that they are adequately prepared to perform assigned surveillances. This involves:
  - a. Continually monitoring work in progress to remain aware of current work status, upcoming Hold/Witness Points, surveillances, and outstanding deviations or open items;
  - b. Being aware of the current inspection and acceptance criteria;
  - c. Verifying that their qualification and certification is appropriate and current;
  - d. Being continuously aware of the current QEP requirements that may apply to the surveillances that have to be performed.

# 4.3 Documenting Surveillance Results

- 4.3.1 All surveillances are documented on Form QEP 12.02-1, *Daily Inspection Log.* Instructions for completing the DIL are found in Attachment 1 of this QEP. The DIL is turned in daily to the QAS or QCS.
- 4.3.2 Surveillance checklists are normally used to identify those activities or items that should be checked during the course of a surveillance. "N/A" is entered for any checklist items not verified.
- 4.3.3 If a number of Work Package specific operations are being surveyed, only one (1) checklist is to be generated. Each Work Package Number shall be listed on the same DIL entry. Acceptable surveillances are not documented on PCDs.
- 4.3.4 For <u>acceptable</u> surveillances, an "A" is listed in the "A/R" column of the DIL.

# 4.4 Processing Rejectable Surveillances

- 4.4.1 For <u>rejectable</u> surveillances, the DIL entry depends on the following:
  - a. For hardware-related items, an "R" or "N" is listed in the "A/R" column of the DIL, depending on whether a Form QEP 15.01-1, *Nonconformance Report*, is issued as described in QEP 15.01, *Identification and Control of Deviations*, and the results are processed as described in Section 3.5, with the exception that these results are not documented on the PCD unless the surveillance identifies a deviation related to an item at a specific PCD step.
  - b. For non-hardware-related items, an "R" is listed in the "A/R" column of the DIL and the item is tracked until corrected and verified to be closed by a subsequent surveillance.
  - c. For deficient conditions that require a longer term follow-up and for programmatic deviations, as determined by the QAS or QCS, a "DR" is listed in the "A/R" column of the DIL and a Form QEP 12.02-2, *Deficiency Report* (DR), is generated in accordance with Section 4.5 of this QEP. Instructions for completing the DR are found in Attachment 2 of this QEP.



Standard Procedures Engineering and Construction Projects .

Procedure Type

QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status	Procedure No.
CONDUCT AND CONTROL OF INSPECTION AND	4 / AFU	QEP 12.02
SURVEILLANCE ACTIVITIES	Revision Date	Page <b>6</b> of <b>13</b>

### 4.5 **Deficiency Reports**

- 4.5.1 For surveillances documented on a Form QEP 12.02-2, *Deficiency Report*, in accordance with paragraph 4.4.1c, or for DRs generated in conjunction with a Nonconformance Report, the originator of the report shall contact QRC for the next sequential DR number. The DR number and the applicable "Const Seq" code listed in QEP Appendix 4, *Trend Codes*, shall be entered in the "Reject Information" area of the DIL.
- 4.5.2 All Deficiency Reports are reviewed by the PQM. Upon acceptable review, the PQM shall sign the "Approved By" block of the "Condition Description." and assign a "Reply Due Date". This date is normally within thirty days of date of the DR, depending on the phase of the project (e.g., it will be much shorter during the outage).
  - a. The PQM forwards the original Deficiency Report to the individual responsible for providing the corrective action. Copies may be distributed to additional individuals, as determined by the PQM.
  - b. At this time, copies are forwarded to QRC where an open suspense file is maintained until such time that acceptable corrective action has been implemented and verification has occurred.
- 4.5.3 The responsible individual shall complete the response section of the Deficiency Report and sign and date the "Response By" block of the form. The response shall also take into consideration the extent of condition of the deficiency. The completed report is then returned to the PQM.
- 4.5.4 The PQM shall review the response provided and if acceptable sign the "Approved By" block of the form. The PQM shall resolve any discrepancies in the response with the responsible individual. The PQM then forwards the approved report to the QA/QC Supervisor for follow up verification.
- 4.5.5 Upon completion of corrective actions, either a Quality Engineer or Quality Control Inspector performs a "Corrective Action Follow-up" to verify adequate implementation of the corrective actions. Upon acceptable verification, the Quality Personnel responsible for verifying the implementation signs the "Verified By" block of the form and forwards the form to the PQM. A DIL entry is made referencing the Deficiency Report number and the Deficiency Report is closed. If verification is unacceptable, the Deficiency Report remains open until all corrective actions are acceptable.
- 4.5.6 The PQM shall evaluate the completed Deficiency Report and if acceptable signs and dates the "Reviewed By" block of the form. The PQM shall resolve any discrepancies with the QA/QC Supervisor. The completed report is then forwarded to QRC for retention and the "suspense" copy is deleted.



Standard Procedures

Procedure Type

	Engineering and Construction Projects Q	UALITY EXECUTION PR	OCEDURE	
Procedure T		Revision No / Status 4 / AFU	Procedure No. QEP 12.02	
	CONDUCT AND CONTROL OF INSPECTION AND SURVEILLANCE ACTIVITIES	Revision Date 03-Aug-09	Page <b>7</b> of <b>13</b>	
5.0	ADDITIONAL REQUIREMENTS		,	
5.1	Processing Inspection and Surveillance Results			
5.1.1	For DILs that close out a previously unaccepted DIL, to the DIL entry, indicating the original DIL number ( sequential number), the type of deviation, and any perti	(Inspector's initials, da		
5.1.1.1	The QCS, QAS, or QE shall confirm that a Cause co Deviation Impact code, as listed in QEP Appendix 4, <i>T</i> original DIL entry, or shall make such assignments if th	rend Codes, have bee		
5.1.2	The assembled "Daily Inspection Log" package, which reports/checklists generated as the result of individu submitted to the QCS/QAS on a daily basis.			
5.1.3	The QCS/QAS shall review the DIL to ensure that it p QEP. When the QCS/QAS finds the DIL to be accept last entry on the DIL.			
5.1.4	The DIL, and any attached documentation, is then sent	to QRC.		
5.1.5	QRC updates the SGT inspection tracking database.			
5.1.6	QRC processes DILs in accordance with QEP 17.01, <i>Quality Assurance Records</i> , and QEP Appendix 1, <i>Index of Quality Documents</i> .			
5.2	<u>Records</u>			
5.2.1	The following documents generated by use of this procedure shall be processed in accordan with QEP 17.01, <i>Quality Assurance Records</i> , and QEP Appendix 1, <i>Index of Qual Documents:</i>			
	<ul> <li>a. Daily Inspection Log (DIL) (includes any Surveilland</li> <li>b. Deficiency Report (DR)</li> <li>c. Quality Hold Point Waiver Log</li> </ul>	ce Checklists)		
6.0	REFERENCED FORMS			
	a. QEP 12.02-1, <i>Daily Inspection Log</i> b. QEP 12.02-2, <i>Deficiency Report</i>			

- c. QEP 12.02-3, *Quality Hold Point Waiver Log* d. QEP 15.01-1, *Nonconformance Report*

	(	`	
1			

Procedure Type

#### **QUALITY EXECUTION PROCEDURE**

Procedure Title	Revision No / Status	Procedure No.
CONDUCT AND CONTROL OF INSPECTION AND	4 / AFU	QEP 12.02
SURVEILLANCE ACTIVITIES	Revision Date	Page
SURVEILLANCE ACTIVITIES	03-Aug-09	8 of 13

### 7.0**REFERENCES**

### 7.1 References Subject to Impact Review

None

### 7.2 References Not Subject to Impact Review

None

#### 7.3 **QEP** References

- a. QEP 04.02, Qualification and Certification of Audit Personnel
- b. QEP 04.03, Qualification and Certification of Quality Personnel
- c. QEP 04.04, Qualification and Certification of NDE Personnel
- d. QEP 11.01, Work Packages
- e. QEP 12.01, Inspection and Surveillance Planning
- f. QEP 15.01, Identification and Control of Deviations
- g. QEP 17.01, Quality Assurance Records
- h. QEP Appendix 1, Index of Quality Documents
- i. QEP Appendix 3, Inspection Codes
- j. QEP Appendix 4, Trend Codes

#### 8.0 ATTACHMENTS

- a. Attachment 1 Instructions for Completion of the "Daily Inspection Log"
- b. Attachment 2 Instructions for Completion of the "Deficiency Report"

C:\CorpQEPs\AFU\Pending\QEP\_1202\_S\_R4\_AFU.doc



Procedure Type

Procedure Title		Revision No / Status	Procedure No.
CONI	DUCT AND CONTROL OF INSPECTION AND	4 / AFU Revision Date	QEP 12.02 Page
I	SURVEILLANCE ACTIVITIES	03-Aug-09	9 of 13
	ATTACHMENT 1		
A1.0 INSTRU	CTIONS FOR COMPLETION OF THE "DAILY INSPECT	FION LOG"	
	owing instructions refer to the entries to be made by Qu EP 12.02-1, <i>Daily Inspection Log</i> :	uality personnel wł	nen filling out the
A1.1 Header	Information		
	bector's Initials Indicate the initials of the Quality Contra ;), or other individual (all referred to as Inspector in these		
(2) Date	e Indicate the date the Inspector started the inspections	s listed on the DIL.	
(3) Insp	pector's Signature Signature of the Inspector generating	g the DIL.	
	et of Enter the appropriate sheet number and pleted, the total number of DIL sheets.	, when inspections	for the shift are
A1.2 Inspecti	on Information		
(1) Insp	o No List a sequential 2-digit "DIL" number, with the firs	t inspection of the s	shift being 01.
Ord	No, PO/SC No, Sur No Indicate the Work er/Subcontract No) that contained the operation that cate the appropriate surveillance checklist number or the	was inspected. F	or surveillances,
this	D Type & No If the PCD is the Work Package (or if ther block. If the PCD is other than the Work Package, indica k (e.g., WDC-003). For surveillances, this block will norm	ate the PCD type a	nd number in this
step	p No If there is a PCD, this step is the PCD step numbe o number. If there is no Work Package or other PCI ough.		
	pection Type For an inspection, enter the type (I, P, or endor surveillance, enter a V.	F); for a surveilland	e, enter an S; for
	pection Code Inspection Codes are normally tied to ng of these codes is given in QEP Appendix 3, <i>Inspection</i>		sts. A complete
(7) Insp	pected Company Indicate the 3-digit Contractor Code o	f the company beir	g inspected.
(8) Qua welo	antity & Units Indicate the quantity of items inspected ds.	and the appropriat	te unit, such as 3
· · ·	TE Used & Cal Due Date Indicate the assigned Cont next calibration due date.	rol Number of any	device used and

C:\CorpQEPs\AFU\Pending\QEP\_1202\_S\_R4\_AFU.doc



Procedure Type

Engineering and Construction Projects QUALITY EXECUTION PROCEDURE				
Procedure Title CONDUCT AND CONTROL OF INSPECTION		Revision No / Status <b>4 / AFU</b>	Procedure No. QEP 12.02	
SURVEILLANCE ACTIVITIES		Revision Date 03-Aug-09	Page <b>10</b> of <b>13</b>	
ATTACHMENT 1 INSTRUCTIONS FOR COMPLETION C		INSPECTION LOC	3"	
(10) Welder(s) Inspected Indicate the Welder inspected.	r ID Symbol fo	r any welders wh	ose welding was	
(11) Pg. Ct. (Page count) List the number of pa	ges attached to	the DIL for that in	spection.	
(12) A/R Enter "A" to indicate accept. For an u to indicate Nonconformance, or "DR" to indic			dicate Reject, "N"	
(13) HP Indicate the type of Hold Point, if any Point and Witness Point designators are surveillances, or if the inspection is not a Hol	provided in C	EP 11.01, Work	Packages. For	
(14) Inspection Description / Remarks Briefly d can be used to note any other information the			med. This space	
(15) Material ID Number(s) Indicate the SGT ID installation.	Number for any	y materials that are	being verified for	
A1.3 Closing Deviation Information				
The last row of information for each DIL entry is an open deviation is not being closed, this entire			ed inspections. If	
(1) Referenced DIL – Indicate the DIL number the	nat originated the	e deviation.		
(2) R / DR / NCR Indicate the type of unaccep a "Deficiency Report") and the number (e.g.,		("Reject" or a "No	nconformance" or	
(3) Cause Code Enter the applicable Probable <i>Trend Codes</i> .	e Cause Code fi	rom those listed in	QEP Appendix 4,	
(4) Action Taken Enter the applicable Corre Appendix 4, <i>Trend Codes</i> .	ctive Action Ta	ken code from the	ose listed in QEP	
(5) Impact Level – To be entered by the QCS or listed in QEP Appendix 4, <i>Trend Codes</i> .	QAS only. The	Deviation Impact of	code numbers are	
(6) Closing Comments – Any comments regardi	ng closure of the	e deviation.		
A1.4 Reject Information				
(1) Insp No / Rej No Carry down the DIL No for a sequential number for each "Reject" of a For Nonconformances, indicate the NCR no indicate the DR number assigned by QRC.	given DIL. Star	rt with a Reject No	01 for each DIL.	



Procedure Type

#### **QUALITY EXECUTION PROCEDURE**

	Revision No / Status 4 / AFU	Procedure No. QEP 12.02
CONDUCT AND CONTROL OF INSPECTION AI	Revision Date	Page
SURVEILLANCE ACTIVITIES	03-Aug-09	<b>11</b> of <b>13</b>

### ATTACHMENT 1 (Continued) INSTRUCTIONS FOR COMPLETION OF THE "DAILY INSPECTION LOG"

- (2) R/DR/N -- Indicate if the unacceptable inspection is a "Reject" or a "Deficiency Report" or a "Nonconformance".
- (3) Qty Reject & Units -- Indicate the quantity of items rejected and the appropriate unit.
- (4) Const Seq -- Enter the appropriate Construction Sequence code from those listed in QEP Appendix 4, *Trend Codes*.
- (5) Reject Description -- Enter a brief description of the reason for the unacceptable condition of the item or activity.



#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status	Procedure No.
CONDUCT AND CONTROL OF INSPECTION AND SURVEILLANCE ACTIVITIES	4 / AFU Revision Date 03-Aug-09	QEP 12.02 Page 12 of 13

### **ATTACHMENT 2**

## A2.0 INSTRUCTIONS FOR COMPLETION OF THE "DEFICIENCY REPORT"

The following instructions refer to the entries to be made by Quality Personnel when filling out Form QEP 12.02-2, *Deficiency Report*.

### A2.1 General Information

- (1) Activity -- Enter the activity which was the subject of the surveillance.
- (2) Deficiency Report Number Next sequential number assigned by QRC.
- (3) Sheet 1 of \_\_\_\_ -- Fill in total sheet count **when report is closed**. A page count should appear on each attached page.
- (4) ASSIGNED TO -- The individual to whom the condition is addressed. Assigned by the PQM.
- (5) Department -- The department to which the condition is addressed. To be filled in by the PQM.
- (6) If Initiated, Reference NCR If an NCR was also generated to address a related hardware issue, enter that NCR number.
- (7) REPLY DUE DATE -- The date that the response from the Assigned To person is due back to the PQM. Determined by the PQM.
- (8) CONDITION DESCRIPTION -- A detailed description of the discrepant condition is given. Supporting documents may be attached.
- (9) INITIATED BY -- The signature and title of the Quality representative writing the report; the date that the report is issued; and the 2-digit DIL number.
- (10) APPROVED BY -- The signature and title of the PQM or designee, as well as the date the report was approved. This should be a different person than the INITIATED BY person from paragraph A2.1(9) above

### A2.2 Response to Deficiency Report

- (1) CAUSE AND CORRECTIVE ACTION -- A suspected cause and proposed corrective action are given by the Assigned To person, or designee.
- (2) EXTENT OF CONDITION An analysis of where else the problem might exist (e.g., other items or activities at the project, another project, another supplier) and how this was addressed.
- (3) PREVENTATIVE ACTION TAKEN TO ELIMINATE CAUSE -- Whatever preventative action that has been or will be taken to ensure that the discrepant condition will not reoccur is listed. An ANTICIPATED COMPLETION DATE shall also be provided as to when the preventative action will be complete.
- (4) RESPONSE BY: The signature and title of the individual responding to the report, and the date.



Procedure Type

#### QUALITY EXECUTION PROCEDURE

 
 Procedure Title
 Revision No / Status
 Procedure No.

 CONDUCT AND CONTROL OF INSPECTION AND SURVEILLANCE ACTIVITIES
 4 / AFU
 QEP 12.02

 Revision Date
 Page

 03-Aug-09
 13 of 13

## ATTACHMENT 2 (Continued) INSTRUCTIONS FOR COMPLETION OF THE "DEFICIENCY REPORT"

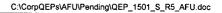
### A2.3 Completed by SGT Quality

(1) PQM Approval: The PQM signs in approval of the proposed corrective action and preventative action provided. This shall be a different person than the RESPONSE BY person from paragraph A2.2(4) above.

### A2.4 Corrective Action Follow-up

- (1) Const Seq -- A Construction Sequence code is obtained from QEP Appendix 4, *Trend Codes*.
- (2) Cause Code -- A Cause code is obtained from QEP Appendix 4, *Trend Codes*.
- (3) Action Taken -- A Corrective Action Taken code is obtained from QEP Appendix 4, *Trend Codes*.
- (4) Impact Level -- A Deviation Impact code is obtained from QEP Appendix 4, *Trend Codes*.
- (5) Closing Comments: Closing comments, if any, are listed.
- (6) QUALITY VERIFIED -- The signature and title of the Quality representative that verifies that all corrective action and preventive action have been satisfactorily completed, the date that the report is issued; and the 2-digit DIL number. This shall be a different person than the RESPONSE BY person from paragraph A2.2(4) above
- (7) REVIEWED BY -- PQM reviews and approves the corrective and preventative actions. This shall be a different person than the RESPONSE BY person from paragraph A2.2(4) above and should be a different person than the QUALITY VERIFIED person from paragraph A2.4(6) above.

				Earm Course	C:\CorpQEPs\AFU\Pending	UEP_1202F2_S_	R1E3_AFU.doc
<b>5</b> E		Engineering and	Standard Procedu Construction Proje		LITY EXECUTION PRO	OCEDURE	
Form Title	• ·· <del>·=</del> ··· · · · · · · · · · · · · · · · ·				Revision No / Status 1E3 / AFU	Form No. QEP 1	2.02-2
		DEFICIEN	CY REPORT		Form Revision Date 03-Aug-09	Form Page	
	<b></b>		GENERA			t. A Status integr	
Activity:			r	DEFICIENCY REPOR		Deficiency	
	TO				••	Sheet	
ASSIGNED	10:		Department:		If Initiated, Reference NCR:		UE DATE:
			CONDITIO	N DESCRIPTION			
							·
INITIATED	Signature:		Ti	tle:	· · · · · · · · · · · · · · · · · · ·	Date:	DIL No
BY:					1		
APPROVED BY PQM:	Signature:		Ti	tle:		Date:	
				ORRECTIVE ACTION			<u>x</u> 3 38 x 1
			EXTENT	OF CONDITION			
		PI	REVENTATIVE ACTION	TAKEN TO ELIMINAT	E CAUSE		
				ANTICIPATED	COMPLETION DATE:		
RESPONSE	Signature:		Tit	tle:		Date:	
BY:	17				191 Barrel A. A. C. & William Street and and		
	Signature:			D BY SGT QUALITY		Date:	
APPROVED BY PQM:	oignature.					Dale.	
			CORRECTIVE	ACTION FOLLOW-UP	and the second second		di antari di
Const Seq			act Level Closing Comm	nents	<u>an an an ann an Anna a</u>	matini ya ila ila ila ila	<u> </u>
QUALITY VERIFIED:	Signature:		Tit	tle:		Date:	DIL No
REVIEWED BY PQM:	Signature:		Ti	tie:		Date:	[





Procedure Type

IDENTIFICATION AND CONTROL OF DEVIATIONS         Revision Date         Page           1.0         SCOPE           This Quality Execution Procedure (QEP) describes SGT's process for ensuring the identification and resolution of deviations. This QEP also addresses identification of programmatic conditions that are adverse to Quality.           2.0         RESPONSIBILITIES           The following individuals have duties and responsibilities in the implementation of the procedure:           a. Project Manager (PM)           b. Project Engineering Manager (PEM)           c. Craft Superintendent           e. Project Quality Manager (PAM)           f. Catality Engineer (QEP)           h. Quality Engineer (QED)           h. Quality Engineer (QEC)           h. Quality Control Supervisor (QCS)           j. Quality Control Supervisor (QCS)           j. Quality Control Inspector (QCC)           h. Varehouse Manager (PMM)           o. All SGT Personnel           2022222222222222222222222222222222222	Procedure Tit	-	Revision No / Status <b>5 / AFU</b>	Procedure No. QEP 15.01
<ul> <li>This Quality Execution Procedure (QEP) describes SGT's process for ensuring the identification and resolution of deviations. This QEP also addresses identification of programmatic conditions that are adverse to Quality.</li> <li>2.0 <b>RESPONSIBILITIES</b> </li> <li>The following individuals have duties and responsibilities in the implementation of the procedure: <ul> <li>a. Project Manager (PM)</li> <li>b. Project Engineering Manager (PEM)</li> <li>c. Site Manager (SM)</li> <li>d. Craft Superintendent</li> <li>e. Project Quality Manager (PQM)</li> <li>f. Quality Assurance Director (QAD)</li> <li>g. Quality Assurance Director (QAD)</li> <li>g. Quality Assurance Director (QAC)</li> <li>i. Quality Assurance Director (QCS)</li> <li>j. Quality Control Supervisor (QCS)</li> <li>j. Quality Control Supervisor (QCS)</li> <li>i. Quality Records Center (QRC)</li> <li>i. Project Welding Engineer (CE)</li> <li>n. Varehouse Manager (WM)</li> <li>o. All SGT Personnel</li> </ul> </li> <li>21.2 Personnel signing the various signature blocks on the report forms referenced by ithis QE shall confirm that they have the propersionature authority</li> </ul> 3.0 PROCESSING OF DEVIATIONS 3.1 Identification of Deviations 3.1.1 All SGT personnel are responsible for reporting deviations that they identify. This may be accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, on totifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative. <li>3.1.2 Deviations can be identified by any worker and through any of the following means:     <ul> <li>a. During qu</li></ul></li>	10	DENTIFICATION AND CONTROL OF DEVIATIONS		
2111       The following individuals have duties and responsibilities in the implementation of th procedure:         a. Project Manager (PM)       b. Project Engineering Manager (PEM)         c. Site Manager (SM)       d. Craft Superintendent         e. Project Quality Manager (PQM)       f. Quality Assurance Director (QAD)         g. Quality Engineer (QE)       h. Quality Assurance Supervisor (QAS)         i. Quality Control Supervisor (QCS)       j. Quality Control Inspector (QCI)         k. Quality Records Center (QRC)       l. Project Welding Engineer (PWE)         m. Cognizant Engineer (CE)       n. Warehouse Manager (WM)         o. All SGT Personnel       signature blocks on the report forms referenced by this QE shall confirm that they have the proper signature authority         3.0       PROCESSING OF DEVIATIONS         3.1.1       All SGT personnel are responsible for reporting deviations that they identify. This may b accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, ontifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative.         3.1.2       Deviations can be identified by any worker and through any of the following means:         a. During quality inspections;       a.	1.0	This Quality Execution Procedure (QEP) describes identification and resolution of deviations. This QEP		
procedure:         a. Project Manager (PM)         b. Project Engineering Manager (PEM)         c. Site Manager (SM)         d. Craft Superintendent         e. Project Quality Manager (PQM)         f. Quality Assurance Director (QAD)         g. Quality Engineer (QE)         h. Quality Assurance Supervisor (QAS)         i. Quality Control Supervisor (QCS)         j. Quality Control Supervisor (QCS)         j. Quality Control Inspector (QCI)         k. Quality Records Center (QRC)         l. Project Welding Engineer (PWE)         m. Cognizant Engineer (CE)         n. Warehouse Manager (VMI)         o. All SGT Personnel         21.2         Personnel signing the various signature blocks on the report forms referenced by this QE shall confirm that they have the proper signature authority         3.0       PROCESSING OF DEVIATIONS         3.1.1       All SGT personnel are responsible for reporting deviations that they identify. This may b accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, onotifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative.         3.1.2       Deviations can be identified by any worker and through any of the following means:         a. During quality inspections;	2.0	RESPONSIBILITIES		
<ul> <li>b. Project Engineering Manager (PEM)</li> <li>c. Site Manager (SM)</li> <li>d. Craft Superintendent</li> <li>e. Project Quality Manager (PQM)</li> <li>f. Quality Assurance Director (QAD)</li> <li>g. Quality Engineer (QE)</li> <li>h. Quality Control Supervisor (QAS)</li> <li>i. Quality Control Supervisor (QCS)</li> <li>j. Quality Control Inspector (QCI)</li> <li>k. Quality Control Inspector (QCC)</li> <li>l. Project Welding Engineer (PWE)</li> <li>m. Cognizant Engineer (CE)</li> <li>n. Warehouse Manager (WM)</li> <li>o. All SGT Personnel</li> </ul> 2.102 Personnel signing the various signature blocks on the report forms referenced by this QE shall confirm that they have the proper signature authority 3.0 PROCESSING OF DEVIATIONS 3.1 Identification of Deviations 3.1.1 All SGT personnel are responsible for reporting deviations that they identify. This may b accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, or notifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative. 3.1.2 Deviations can be identified by any worker and through any of the following means: <ul> <li>a. During quality inspections;</li> </ul>	2.1.1		es in the implen	nentation of this
<ul> <li>3.0 PROCESSING OF DEVIATIONS</li> <li>3.1 Identification of Deviations</li> <li>3.1.1 All SGT personnel are responsible for reporting deviations that they identify. This may be accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, or notifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative.</li> <li>3.1.2 Deviations can be identified by any worker and through any of the following means: <ul> <li>a. During quality inspections;</li> </ul> </li> </ul>		<ul> <li>b. Project Engineering Manager (PEM)</li> <li>c. Site Manager (SM)</li> <li>d. Craft Superintendent</li> <li>e. Project Quality Manager (PQM)</li> <li>f. Quality Assurance Director (QAD)</li> <li>g. Quality Engineer (QE)</li> <li>h. Quality Assurance Supervisor (QAS)</li> <li>i. Quality Control Supervisor (QCS)</li> <li>j. Quality Control Inspector (QCI)</li> <li>k. Quality Records Center (QRC)</li> <li>l. Project Welding Engineer (PWE)</li> <li>m. Cognizant Engineer (CE)</li> <li>n. Warehouse Manager (WM)</li> </ul>		
<ul> <li>3.1 Identification of Deviations</li> <li>3.1.1 All SGT personnel are responsible for reporting deviations that they identify. This may be accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, on notifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative.</li> <li>3.1.2 Deviations can be identified by any worker and through any of the following means: <ul> <li>a. During quality inspections;</li> </ul> </li> </ul>	2,1.2		port forms referen	ced by this QEP
<ul> <li>3.1.1 All SGT personnel are responsible for reporting deviations that they identify. This may baccomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, on notifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative.</li> <li>3.1.2 Deviations can be identified by any worker and through any of the following means:</li> <li>a. During quality inspections;</li> </ul>	3.0	PROCESSING OF DEVIATIONS		
<ul> <li>accomplished by notifying their supervisor, contacting a SGT Quality Control Inspector, on notifying a Quality Engineer, Quality Supervisor, Design Engineer, or Client representative.</li> <li>3.1.2 Deviations can be identified by any worker and through any of the following means:</li> <li>a. During quality inspections;</li> </ul>	3.1	Identification of Deviations		
a. During quality inspections;	3.1.1	accomplished by notifying their supervisor, contacting a	SGT Quality Con	trol Inspector, or
	3.1.2	Deviations can be identified by any worker and through any	of the following me	eans:
b. During quality surveillance;		a. During quality inspections;		
		b. During quality surveillance;		

- c. During quality audits;
- d. During design or design related activities;



#### QUALITY EXECUTION PROCEDURE

Procedure Title Revision No / Status Procedure No. QEP 15.01 5 / AFU **IDENTIFICATION AND CONTROL OF DEVIATIONS** Revision Date Page 03-Aug-09 2 of 19 e. During disassembly, removal, or installation activities; f. Through Client identified concerns; or, g. Through other methods, such as an Employee Concern Report. 3.1.3 The Quality Control Supervisor (QCS) initially reviews deviations identified during routine inspections and surveillances. Deviations identified by other means are initially reviewed by the Project Quality Manager (PQM). 3.1.4 Processing of identified deviations depends on the type of deviation as follows: a. If the deviation does or could impact hardware, the steps starting with Section 3.3 shall be followed: b. If the deviation does or could impact design or design activities, the steps in Section 3.4 shall be followed: c. If the deviation does not or could not impact design, design activities, or hardware, the steps in Section 3.5 shall be followed. 3.2 **Classification of Deviations** 3.2.1 Deviations are divided into two (2) classifications: "Reject" and "Nonconformance." a. A Reject (R) is a Deviation that has not yet been offered to the Client for acceptance. Rejects are deviations that can be corrected through the performance of existing approved procedures or work instructions. Such Rejects are documented on the applicable Process Control Document. Rejects involving programmatic issues that require a longer term follow-up are documented using Form QEP 12.02-2, Deficiency Report. b. A Nonconformance (N) is any Deviation that can not be classified as a Reject. Nonconformances are typically hardware related and require review and disposition by Engineering. Nonconformances are reported and dispositioned using Form QEP 15.01-1. Nonconformance Report (NCR). 3.3 Processing of Hardware Related Deviations

- The Quality Control Supervisor and the Cognizant Engineer determine if correction of the 3.3.1 deviation that does or could impact hardware requires an engineering review.
- 3.3.2 Deviations affecting work in progress, which can be corrected by reperforming a sequence of operations previously specified by an approved Work Package or procedure, will not require an engineering review. These deviations are recorded and tracked as "Rejects." Examples include torquing out of sequence necessitates retorquing; and noncompliance with cleanness standards necessitates additional cleaning. Further processing of "Rejects" shall be done using the steps starting with Section 3.9.

Procedure No.



Standard Procedures Engineering and Construction Projects Procedure Type

#### QUALITY EXECUTION PROCEDURE

Revision No / Status

Procedure Title

IDENTIFICATION AND CONTROL OF DEVIATIONS

NTROL OF DEVIATIONS Bevision Date Page 03-Aug-09 3 of 19

- 3.3.3 Deviations that are determined to require engineering evaluation prior to correction are recorded and tracked as a "Nonconformance" (N). Further processing of Nonconformances shall be done using the steps starting with Section 4.0.
- 3.3.4 Nonconforming hardware may be conditionally released utilizing the process described in Section 5.1 of this QEP.

# 3.4 **Processing of Design Deviations**

- 3.4.1 Deviations identified in approved Design outputs shall be brought to the attention of the PEM.
- 3.4.2 All users of Design related computer software shall report problems or errors to the PEM for resolution.
- 3.4.3 The PEM shall notify the PQM concerning Nonconformances identified during design or design activities.
- 3.4.3.1 The PQM generates a Daily Inspection Log (DIL) entry and provides the PEM the next sequential SGT NCR Number.
- 3.4.3.2 The PEM generates a Form QEP 15.01-1, *Nonconformance Report*, filling in the "Condition Description" portion of the form and forwards it to QRC.
- 3.4.3.3 The process continues from paragraph 4.1.7.

# 3.5 Processing of Non-Hardware and Programmatic Related Deviations

- 3.5.1 Non-hardware and programmatic related deviations are normally identified during quality audits, quality surveillances, or quality inspection activities.
- 3.5.1.1 Such items identified during an audit, such as on a Form QEP 18.01-2, *Audit Finding Report*, shall be processed in accordance with QEP 18.01, *Quality Assurance Audits*.
- 3.5.1.2 Such items identified during a surveillance or inspection shall be processed in accordance with QEP 12.02, *Conduct and Control of Inspection and Surveillance Activities*.

# 3.6 Client Identified Concerns

- 3.6.1 Quality concerns or deviations identified by the Client shall be brought to the attention of the PQM.
- 3.6.2 The PQM shall review the item and determine the appropriate method to ensure resolution of the concern. The methods may include SGT's surveillance reporting process, deviation identification and control process, quality audit program, or the Client's condition / issue reporting process.

C:\CorpQEPs\AFU\Pending\QEP	1501	s	R5	AFU doc	



Procedure Type

### **QUALITY EXECUTION PROCEDURE**

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATI	Revision Date 03-Aug-09	Page <b>4</b> of <b>19</b>

### 3.7 Client Related Deviations

- 3.7.1 For any item(s) identified as not meeting the as-built dimension (within tolerances) or configurations as shown on Client reference drawings, for damaged Client components (e.g., loose bolts, leaking hydraulic fluid, bent steel members, etc.), or for instances of Client documents with missing, conflicting, or erroneous information, the following shall apply:
  - a. The PEM or SM shall notify the PQM and the designated Client representative;
  - b. When required by the Client, the item shall be reported using the Client's condition / issue reporting process;
  - c. The QCI/PQM shall initiate an NCR, using a "By Client" disposition, to track the deviation. The process continues from paragraph 4.1.2.

### 3.8 Supplier Related Deviations / Exception Requests

- 3.8.1 Deviations identified by a supplier will be submitted to SGT by use of a Form QEP 09.01-7, Supplier Exception Request / Deviation Notice (SERDN).
- 3.8.1.1 This form may also be used by a supplier to request exceptions to the technical requirements of the purchase order, such as a material substitution. Though such a request for a technical change is not really a deviation, it is processed using this QEP for tracking purposes.
- 3.8.1.2 When received, these forms will be routed to the PQM.
- 3.8.2 The PQM generates a Daily Inspection Log (DIL) "R" entry, obtains the next sequential SGT SERDN Number from QRC, and enters both of these numbers on the SERDN form.
- 3.8.3 QRC enters the SERDN information into the tracking system, retains a file copy of the SERDN, and forwards the SERDN to the PEM.
- 3.8.4 The PEM reviews the supplier's proposed disposition and completes the "SGT Justification and Comment" portion of the form (approval of the proposed disposition or issuance of an alternate or revised disposition).
- 3.8.4.1 10 CFR 50.59 licensing issues are considered at this time, in accordance with QEP 07.12, *10 CFR 50.59 Reviews*.
- 3.8.4.2 The PEM completes the processing of any necessary design change documentation required for the work to proceed in accordance with the applicable design QEP. Repair, Substitute, and Use-As-Is dispositions (see paragraph 4.2.1 for disposition descriptions) require an engineering evaluation and will require processing of an engineering change notice in accordance with QEP 07.09, *Design Change Control*.
- 3.8.4.3 If the SERDN is closed prior to completion of any required design change documentation, the open documentation changes shall be added to and tracked on the SGT Action Item List.
- 3.8.4.4 The PEM shall sign and date the form in the designated block and return the form to the PQM.

C:\CorpQEPs\AFU\Pending\QEP\_1501\_S\_R5\_AFU.doc



Standard Procedures

Engineering and Construction Projects

**QUALITY EXECUTION PROCEDURE** 

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>5</b> of <b>19</b>

Procedure Type

- 3.8.5 The PQM shall review the form and, if acceptable, sign in the designated block, enter a closing DIL number, and return the SERDN to QRC for updating of the tracking system.
- 3.8.6 QRC submits the SERDN to the Client for approval if the proposed disposition is Repair, Use-As-Is, or Substitute. The Client shall obtain concurrence from the Client's ANII, if required, prior to implementation.
- 3.8.7 Upon receipt of Client approval, if required, of the proposed disposition, QRC updates the tracking system.
- 3.8.8 A copy of the approved SERDN is next forwarded to the supplier for implementation of the disposition.
- 3.8.9 Items received on a Purchase Order associated with a SERDN shall not be accepted until the deviations identified on the SERDN have been dispositioned and resolved.

## 3.9 Processing of "Rejects"

- 3.9.1 Rejects are recorded by the QCI by indicating an "R" and the rejecting DIL/Reject Number at the appropriate step on the applicable Work Package (WP) or Process Control Document (PCD). The Reject is also recorded on Form QEP 12.02-1, *Daily Inspection Log* (DIL), with an "R" being indicated in the A/R column. The DIL is submitted to QRC on a daily basis.
- 3.9.2 The QCI advises the applicable Craft Superintendent or responsible management personnel of the Reject.
- 3.9.2.1 If the Reject involves a weld, the QCI/Craft Superintendent also advises the Project Welding Engineer (PWE).
- 3.9.2.2 The PWE and Craft Superintendent appraise the Reject and decide if a Form QEP 20.01-4, *Weld Repair Data Card* (WRDC), is needed in accordance with QEP 20.01, *Control and Documentation of Welding*.
  - a. If a WRDC is not needed, the steps starting with paragraph 3.9.3 shall be followed; or,
  - b. If a WRDC is needed, the steps starting with Section 3.10 shall be followed.
- 3.9.3 The Craft Superintendent has the item reworked or scrapped, as applicable, and then notifies the QCI for a re-inspection.
- 3.9.4 The QCI then re-inspects the item using the same inspection requirements that resulted in the original rejection.
- 3.9.5 If the re-inspection is acceptable, the QCI lines through the original "R" on the PCD and adds an "A" and the accepting DIL number at the appropriate step.
- 3.9.5.1 The QCI also adds a new entry on the DIL, indicates an "A" in the A/R column, references the original "R" DIL number in the inspection description/remarks space, and identifies the original "R" condition as acceptable and closed.



Procedure Type

### **QUALITY EXECUTION PROCEDURE**

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>6</b> of <b>19</b>

3.9.6 If the re-inspection is not acceptable, the process shall resume at Section 3.3.

# 3.10 Processing of Deviations Involving Weld Repair Data Cards

- 3.10.1 WRDC is prepared by the PWE in accordance with QEP 20.07, *Weld and Base Metal Repairs*, and routed for approval in accordance with QEP 20.01, *Control and Documentation of Welding*.
- 3.10.2 The PQM reviews the WRDC as part of the approval process, and:
  - a. Includes applicable Inspection/Hold points; and,
  - b. Closes out the original Reject record using the WRDC number as the "Close Reference."
- 3.10.3 Approved WRDCs are issued for use in accordance with QEP 20.01, *Control and Documentation of Welding.*

## 4.0 **PROCESSING OF "NONCONFORMANCES"**

## 4.1 **Issuance of an NCR**

- 4.1.1 As noted in paragraph 3.1.2, Nonconformances may be identified through many means. A Form QEP 15.01-1, *Nonconformance Report*, is used to document a Nonconformance and may be written against a drawing (e.g., identification of an as-found condition); Work Package; Purchase Order, Subcontract, or Service Agreement; other document type; or may be a standalone document.
- 4.1.2 Nonconformances are recorded on Form QEP 12.02-1, *Daily Inspection Log*, with an "N" being indicated in the A/R column, and are documented on other forms, as follows.
- 4.1.2.1 For Nonconformances identified during inspections or surveillances, the QCI enters an "N" and the NCR number at the appropriate step on the applicable WP/PCD. The QCI also enters the NCR number and a brief description of the condition in the "Nonconformance Reports" section of the applicable Work Package Master Index.
- 4.1.2.2 For Nonconformances identified at Receipt Inspection, the QCI enters the NCR number at the receiving record in the material management database (or on Form QEP 10.01-1, *Receipt Inspection Report*), in accordance with QEP 10.01, *Receipt Inspection*.
- 4.1.2.3 For Nonconformances identified through other means (by staff or craft personnel or when an inspector is not involved, such as audits, software validation, etc.), the QCI/PQM generates an "N" entry on the QCI/PQM's DIL.

NOTE: Attachment 1, Routing of NCRs, provides a flowchart of the typical NCR processes.

4.1.3 The QCI/PQM also initiates a Form QEP 15.01-1, *Nonconformance Report*, filling in the "Condition Description" portion of the form. The originator of the report shall contact QRC for the next sequential NCR number.

C:\CorpQEPs\AFU\Pending\QEP_	1501	s	R5	AFU doc
0.100 paci sen on changlaci	_ 001_			

-	

Procedure Type

### **QUALITY EXECUTION PROCEDURE**

Procedure Title	 on No / Status <b>5 / AFU</b>	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATION	on Date <b>3-Aug-09</b>	Page <b>7</b> of <b>19</b>

- 4.1.4 When appropriate, as determined by the QCS/PQM, the QCI/PQM attaches a "Quality Control Hold Tag", (a sample of the tag is shown as Exhibit 1) to the affected item. Hold Tags are numbered using the NCR number and a sequential number if multiple tags are used. The "Prohibited Work" and the "Permissible Work" are to be described on the Hold Tag(s). The number of Hold Tags used is noted on the NCR form.
- 4.1.5 The QCI/PQM is responsible for assuring that nonconforming items are segregated, when practical, by placing them in a clearly identified and designated hold area until they are properly dispositioned. When segregation is impractical or impossible due to physical conditions, such as size, weight, or access limitations, other precautions shall be employed to preclude inadvertent use of a nonconforming item.
- 4.1.6 An "Information" copy of the NCR form, as thus far completed, is then placed into the NCR section of the applicable Master Work Package. The original of the NCR form is forwarded to the PQM.
- 4.1.7 The PQM reviews the NCR, verifies proper form completion, and performs a screening for potential 10 CFR 21 applicability in accordance with Section 5.5 of this QEP.
- 4.1.8 QRC enters the NCR information into the tracking system, forwards a copy to the Client representative for information (if required), and retains a file copy of the NCR.

## 4.2 NCR Disposition

- 4.2.1 QRC forwards the NCR to the PEM for disposition. Nonconformance disposition, or combination of dispositions, shall be any of the following:
  - a. **Rework** A Rework disposition does not require an engineering evaluation and indicates that the condition can be corrected in process by reperforming a series of steps already specified by a PCD. Rework is the process by which a nonconforming condition is corrected by remachining, reassembling, or other corrective means.
  - b. Repair A Repair disposition requires an engineering evaluation and is 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.
  - c. Scrap/Return A Scrap/Return disposition does not require an engineering evaluation and requires that discrepant items or material be removed, replaced, returned to the supplier, or otherwise not used at all. Where an item to be scrapped is already installed or partially installed, a Scrap disposition may require generation of work instructions in accordance with paragraph 4.2.3.1 in order to remove and replace the item.
  - d. **Substitute** An option for a Supplier Exception Request, a Substitute disposition requires an engineering evaluation and may be imposed for a nonconformance when it can be established that the subject will satisfy all engineering functional requirements including those of performance, maintainability, fit, and safety.

C:\CorpQEPs\AFU\Pending\QEP_	1501	s	R5	AFU doc
o. oo paci sen on onungiaci _	_1001	-9.		0.000



Procedure Type

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>8</b> of <b>19</b>

- e. **Use-As-Is** A Use-As-Is disposition requires an engineering evaluation and may be imposed for a nonconformance when it can be established that no adverse conditions will exist and that the subject will satisfy all engineering functional requirements including those of performance, maintainability, fit, and safety.
- f. **By Client** This disposition would be used, for example, for an as-found plant condition where SGT is not responsible for the proposed disposition.
- 4.2.2 For "By Client" dispositions, the PEM checks the appropriate box, signs and dates the "Dispositioned By" area of the NCR form, and forwards the form to QRC. QRC updates the tracking system and forwards the NCR to the Client for disposition.
- 4.2.3 For other dispositions, the PEM completes the "Proposed Disposition" section of the NCR.
- 4.2.3.1 Any necessary work instructions are prepared and included. Form QEP 15.01-2, *Nonconformance Report Instruction Sheet*, may be used for this purpose.
- 4.2.3.2 Requirements for any required plant permits or work orders are considered at this time.
- 4.2.3.3 The disposition may include a consideration of potential actions to prevent recurrence. A brief statement documenting the basis/conclusion of the consideration should be included in the disposition.
- 4.2.3.4 In the disposition process, the PEM shall also take into consideration the extent of condition of the nonconforming item.
- 4.2.4 The PEM completes the "Approval of Proposed Disposition" portion of the form (approval of the proposed disposition or issuance of an alternate or revised disposition).
- 4.2.4.1 10 CFR 50.59 licensing issues are considered at this time, in accordance with QEP 07.12, *10 CFR 50.59 Reviews*.
- 4.2.4.2 If the nonconforming item is to be conditionally released, the requirements of Section 5.1 also apply.
- 4.2.4.3 The PEM completes the processing of any necessary design change documentation required for the work to proceed in accordance with the applicable design QEP. Repair and Use-As-Is dispositions require an engineering evaluation and will require processing of an engineering change notice in accordance with QEP 07.09, *Design Change Control*.
- 4.2.4.4 Upon completion of the "Approval of Proposed Disposition" section, the PEM shall sign and date the "SGT" column of the form and return the form to QRC for further processing.
- 4.2.5 QRC updates the tracking system and forwards the NCR package to the SM.
- 4.2.6 The SM reviews the approved disposition and signs and dates the "SGT" approval column of the form, and returns the form to QRC.
- 4.2.7 The PQM reviews and approves the NCR disposition.

		Standard Procedures Engineering and Construction Projects	Procedure Type QUALI	TY EXECUTION PR	
Procedure Ti	tle			Revision No / Status	Procedure No.
I	DENI	TIFICATION AND CONTROL OF DEVIA	TIONS	5 / AFU Revision Date 03-Aug-09	QEP 15.01 Page 9 of 19
	a.	Inspection and Hold Points are indicated	l at this time; an	1	
	b.	The PQM determines if a cause analysis	s is required, as	follows:	
		(1) If the condition warrants a more to <i>Report</i> , shall be initiated in account <i>Inspection and Surveillance Activitie</i>	rdance with QE		
		(2) If a repetitive condition exists management attention, a Corrective with Section 5.2 of this QEP.			
	C.	Upon acceptable review, the PQM sha return the NCR to QRC for updating of for hardware that has not been insta Proposed Disposition" section of the orig review blocks of this section.	the tracking sys lled, the PQM	stem. For a scrap signs and dates	/return dispositio the "Approval c
4.2.8	As	RC submits the NCR to the Client for app -Is dispositions. The Client shall obtain o implementation.			
4.2.8.1	•	on receipt of Client approval of the propo plementation of the disposition may now	•	•	• •
4.2.9	lf t	he NCR involves a supplier, a copy of the	NCR is forward	ded to that supplier	r.
4.3	Re	turn of Client Dispositions			
4.3.1		on return of a "By Client" NCR form position.	(paragraph 4.2	2), the PQM rev	views the Client'
4.3.1.1		r cases where the Client's disposition de rrect an existing plant condition):	oes not involve	action by SGT (e	.g., the Client w
	a.	The QCS/PQM shall generate a new reference the original "N" DIL number identify the original "N" condition as close	in the inspectio		
	b.	The QCS/PQM shall close the NCR b number in the "Re-Inspection" area of th			and accepting DI
	C.	The QCS/PQM shall coordinate with the items such as replacement of any SGT			

C:\CorpQEPs\AFU\Pending\QEP	1501	s	R5 4	ELI doc
C. COIDGET SPAL OF CHARGE	_1001_	_0_	_1.0_/	1 0.400



Procedure Type

### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>10</b> of <b>19</b>

- 4.3.1.2 For cases where the Client's disposition indicates action by SGT:
  - a. The NCR form is routed to the SM/PEM for preparation of any necessary work instructions and SGT "Approval of Proposed Disposition", using the process starting at paragraph 4.2.3.1, as applicable. The steps described in paragraphs 4.2.3.3 and 4.2.7b are not necessary.
  - b. The PQM shall determine if the SGT approved disposition needs to be resubmitted to the Client for concurrence in accordance with paragraph 4.2.8.

## 4.4 <u>Changes to NCRs</u>

- 4.4.1 When significant changes to an NCR are required, such as when a disposition is disapproved by the Client, form QEP 15.01-3, *Nonconformance Report Addendum*, may be used to document and resubmit a revised NCR description and/or proposed disposition.
- 4.4.2 When a form QEP 15.01-3, *Nonconformance Report Addendum*, is used, the Re-Inspection information shall be documented on the original NCR form.

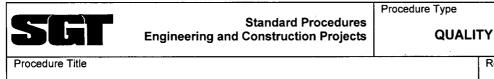
## 4.5 Implementation of Approved NCR Disposition

- 4.5.1 Depending on the approved NCR disposition, the process continues as follows:
- 4.5.1.1 Rework or Repair disposition;
  - a. The QCS obtains a stamped "duplicate original" of the dispositioned NCR from QRC, replaces the "Info" copy of the NCR with the duplicate in the Master Work Package, and updates the "Nonconformance Reports" section of the Work Package Master Index.
  - b. QRC maintains the original in a suspense file until the NCR is ready for closure.
  - c. The QCS notifies the Site Manager that an NCR has been posted to the Work Package and is ready for implementation of the disposition.
  - d. The process continues from Paragraph 4.5.2.

## 4.5.1.2 Use-As-Is disposition;

- a. The QCS shall:
  - Add a new entry to the DIL, indicating an "A" in the A/R column, reference the original "N" DIL number in the inspection description / remarks space, and identify the original "N" condition as acceptable and closed;
  - (2) At the applicable PCD work step, line through the original "N" and enter an "A" with the new accepting DIL number;

C:\CorpQEPs\AFU\Pending\QEP\_1501\_S\_R5\_AFU.doc



lure Title	Revision No / Status <b>5 / AFU</b>	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>11</b> of <b>19</b>

- (3) Remove the "Info" copy from the Master Work Package and update the "Nonconformance Reports" section of the Work Package Master Index to show the NCR as "removed";
- (4) Remove any Hold Tags;
- (5) Sign and date the "Closure Section" of the original NCR and indicate "N/A" in the ANII and Client Review blocks of the Closure Section; and,
- (6) Upon final closure review, place a completed "Info" copy into the Work Package.
- b. QRC updates the tracking system and prepares the original NCR for closure in accordance with paragraph 4.6.
- 4.5.1.3 Scrap or Return disposition (items that have not been installed);
  - a. The QCS notifies the Warehouse Manager and any other affected organization of the disposition.
  - b. The QCI verifies removal of nonconforming item(s) and removal of all Hold Tags.
  - c. The QCI adds a new entry to the DIL, indicating an "A" in the A/R column, reference the original "N" DIL number in the inspection description / remarks space, and identify the original "N" condition as acceptable and closed;
  - d. The QCI signs and dates the "Closure Section" of the original NCR and indicates "N/A" in the ANII and Client Review blocks of the Closure Section.
  - e. The QCS takes the closed NCR to QRC.
  - f. QRC updates the tracking system and prepares the original NCR for closure in accordance with paragraph 4.6.
- 4.5.1.4 Scrap or Return disposition (items related to a Work Package that have been installed);
  - a. The QCI shall verify that the originally rejected item has been removed;
  - b. The QCI shall reinspect the installation of the replacement item in accordance with the original work steps or in accordance with supplemental work steps prepared for this purpose;
  - c. If the results of the inspection are acceptable:
    - (1) The QCI generates a new DIL entry indicating an "A" in the A/R column, references the original "N" DIL number in the inspection description/ remarks space, and identifies the original "N" condition as acceptable and closed.
    - (2) At the applicable PCD work step, the QCI lines through the original "N" and enters an "A" with the new accepting DIL number.

	4504 0	DE ACUIDA	
C:\CorpQEPs\AFU\Pending\QEP_	_1501_5	_R5_AFU.doc	



Procedure Type

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>12</b> of <b>19</b>

- (3) The QCI removes the "Info" copy from the Master Work Package and updates the "Nonconformance Reports" section of the Work Package Master Index to show the NCR as "removed", and removes any Hold Tags;
- (4) The QCI signs and dates the "Closure Section" of the original NCR and indicates "N/A" in the ANII and Client Review blocks of the Closure Section.
- (5) The QCS takes the closed NCR to QRC.
- (6) QRC updates the tracking system and prepares the original NCR for closure in accordance with paragraph 4.6.
- d. If the results of the inspection are unacceptable, the QCI notifies the SM. The QCI shall make a new DIL entry noting the reject and referencing the NCR. The process resumes with Section 3.3.
- 4.5.2 For Rework and Repair dispositions, the SM ensures that corrective work is conducted in accordance with the approved disposition. The SM notifies SGT QCS when Hold Points are reached and when corrective work is completed.
- 4.5.3 Upon notification that corrective work has been competed, Quality Control performs an inspection.
- 4.5.3.1 If the results of the inspection are acceptable:
  - a. A new DIL entry is made indicating an "A" in the A/R column, references the original "N" DIL number in the inspection description/ remarks space and identifies the original "N" condition as acceptable and closed.
  - b. At the applicable PCD work step, the QCI lines through the original "N" and enters an "A" with the new accepting DIL number.
  - c. The QCS obtains the original NCR from QRC.
  - d. The QCI signs and dates the "Closure Section" of the original NCR, removes all Hold Tags, and notifies the QCS of this closure.
  - e. The QCS removes the duplicate original NCR from the Work Package and updates the "Nonconformance Reports" section of the Work Package Master Index to show the NCR as "removed".
  - f. The QCS delivers the signed original and the duplicate original NCR to QRC. QRC updates the tracking system and prepares the original NCR for closure in accordance with paragraph 4.6.
  - g. QRC updates the tracking system and prepares the NCR for closure in accordance with Section 4.6.

C:\CorpQEPs\AFU\Pending\QEP_	1501	S R	
0.100 pgtr avri 01 onungigtr	_1001	_0_0	5_A 0.000



Procedure Type

### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page 13 of 19

4.5.3.2 If the results of the inspection are unacceptable, the QCI notifies the SM. The QCI shall make a new DIL entry noting the reject and referencing the NCR. The process resumes with Section 3.3.

### 4.6 NCR Closure

- 4.6.1 QRC reviews the completed NCR and performs the following:
  - a. Assures that all required signatures have been obtained and any reinspection has been properly documented;
  - b. Removes any completed instruction sheets from the duplicate original and attaches them to the original NCR;
  - c. Obtains QE review and signature at the Quality Review block;
  - d. Obtains Client Quality signature, if required (i.e., Repair dispositions);
  - e. Obtains ANII signature, if applicable;
  - f. Processes and files NCRs as follows in accordance with QEP 17.01, *Quality Assurance Records*:
    - (1) Originals of NCRs are filed in a sequential file.
    - (2) Copies of Work Package related NCRs are also filed with the applicable Work Package.
    - (3) Copies of Purchase Order related NCRs are also filed with the applicable Purchase Order Package.
- 4.6.2 Following closure, an information copy of the completed NCR with all signatures is provided to the Client. The record copy is submitted in accordance with QEP 17.01, *Quality Assurance Records*.

## 5.0 ADDITIONAL REQUIREMENTS

### 5.1 **Conditional Release**

- 5.1.1 Nonconforming items may be conditionally released for installation, test, or use if the conditional release will not adversely affect nor preclude identification and correction of the nonconforming condition.
- 5.1.2 Conditionally released items will be documented on form QEP 15.01-1, *Nonconformance Report*, and processed and tracked in accordance with Section 4.0 of this QEP.



Procedure Type

#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>14</b> of <b>19</b>

- 5.1.3 A conditional release requires an evaluation that is documented, reviewed, and approved prior to implementation. This evaluation is documented on the NCR form, and/or continuation sheets, in addition to the information normally included on the form.
- 5.1.3.1 The initiator of the conditional release shall complete the Condition Description section of the NCR form. This section shall include:
  - a. A description of the nonconforming condition;
  - b. A description of the immediate need for the use of the nonconforming item;
  - c. The risks involved in use of the nonconforming item; and,
  - d. The justification for conditional use of the nonconforming item.
- 5.1.3.2 The initiator of the conditional release and/or the PEM shall complete the Proposed Disposition section and shall indicate a "YES" in the Conditional Release block of the NCR form. This section shall include:
  - a. A description of the work that IS permitted with or on the nonconforming item;
  - b. A description of the work that IS NOT permitted with or on the nonconforming item;
  - c. A description of what is needed to bring the nonconforming item into compliance; and,
  - d. A description of what actions are needed if the nonconforming item can NOT subsequently be brought into compliance. This would include:
    - (1) Removal of the material,
    - (2) Correction or replacement of affected documentation (e.g., weld cards, Material Data Sheets),
    - (3) Deletion of assigned SGT ID Numbers.
- 5.1.4 In addition to the usual SGT PEM, SM, and PQM approvals, an NCR involving a conditional release shall be approved by the PM.
- 5.1.5 Use of QC Hold Tags (see Exhibit 1) on the conditionally released item is required.
- 5.1.6 The quantity of material conditionally released shall be limited to only the amount required for the immediate need documented in paragraph 5.1.3.1b. Following assignment of a Material ID number in accordance with QEP 10.01, *Receipt Inspection*, the NCR form shall be amended to include the SGT ID Number(s) for the conditionally released material.
- 5.1.7 Closure of the NCR and removal of Hold Tags can not be done until applicable actions from paragraph 5.1.3.2 have been completed and verified by the QCI.

## 5.2 Corrective Action Request

Repetitive or significant conditions adverse to quality are documented on a Form QEP 18.01-4, *Corrective Action Request* (CAR). CARs are issued and processed in accordance with QEP 18.01, *Quality Assurance Audits*, and tracked in accordance with Section 5.4 of this QEP.

C:\CorpQEPs\AFU\Pending\QEP_150	01 S	R5_AFU.d	ос
---------------------------------	------	----------	----



Procedure Type

#### **QUALITY EXECUTION PROCEDURE**

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 15.01
IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>15</b> of <b>19</b>

## 5.3 <u>Stop Work</u>

- 5.3.1 The PQM is vested with the authority to Stop Work by the Quality Assurance Director. This authority is to be used when necessary to ensure that quality requirements are met. The need for a Stop Work Order (SWO) would imply that there was a systematic failure to achieve quality objectives.
- 5.3.2 A SWO may be issued verbally to the PM, but shall be followed up immediately by a memo to the PM and QAD. The Client shall be notified immediately upon issuance of a SWO.
- 5.3.3 A CAR shall be generated whenever a SWO is issued.
- 5.3.4 A SWO may be lifted by either a memo, if the CAR is still in the process of being resolved but the PQM believes that the conditions that caused the SWO are sufficiently under control, or closing of the related CAR. If a memo is issued, it shall provide the rationale / justification for lifting the SWO. The Client representative shall be on distribution of the memo.

### 5.4 Deviation Tracking and Follow-up

- 5.4.1 Identification of deviations, the corrective action taken, and the impact on the project is documented and reported. The inspection and deviation codes found in QEP Appendix 3, *Inspection Codes*, and QEP Appendix 4, *Trend Codes*, are used for trending deviations as required by QEP 16.01, *Trend Analysis*.
- 5.4.2 To ensure that open Rejects, Nonconformance Reports, Deficiency Reports, Audit Finding Reports, or Corrective Action Requests generated by SGT or sent to SGT for resolution are not inadvertently overlooked during an outage; QRC generates a weekly listing of open deviations.

## 5.5 Screening of NCRs and CARs for 10 CFR Part 21 Applicability

- 5.5.1 Identified deviations documented on a Nonconformance Report or Corrective Action Request are initially screened to determine whether or not the condition might meet the criteria for being potentially associated with the requirements of 10 CFR Part 21. This screening process is performed by the PQM. The PEM will provide technical input, as necessary
- 5.5.1.1 This screening process shall take place within five (5) working days of the "Discovery Date", as defined below:

a. For NCRs, the Discovery Date is the "Date Issued" at the top of the form. This date must be within five (5) working days of the actual identification of the hardware problem.

b. For CARs, the Discovery Date is the "Date Issued" at the top portion of the form. This date must be within five (5) working days of the identification of the problem or the decision to issue a CAR.

- 5.5.1.2 For cases where an NCR is written to document as-found plant conditions, the PQM will check the "Client Determination" block on the form and forward the form to the Client.
- 5.5.1.3 For other NCRs or CARs, the following criteria is used when performing this initial screening:



#### QUALITY EXECUTION PROCEDURE

Procedure Title		Revision No / Status <b>5 / AFU</b>	Procedure No. QEP 15.01
	ONS	Revision Date 03-Aug-09	Page <b>16</b> of <b>19</b>

- a. Does the deviation relate to a basic component? A basic component includes:
  - (1) a safety-related structure, system, or component, or part thereof, and/or,
  - (2) safety-related design, analysis, inspection, testing, fabrication, replacement of parts, or consulting services that are associated with the component hardware whether these services are performed by the component supplier or others.
- b. Has the item or activity been turned over to or submitted for acceptance to the purchaser or licensee, or is the item currently in the possession of the purchaser or licensee?
- 5.5.2 If the answer to either of the questions is "No", the condition does not relate to Part 21 and the screening process is complete.
- 5.5.3 If the answer to both of these questions is "Yes", the condition is potentially associated with the requirements of 10 CFR Part 21. The PQM shall check the "Possible Potential" box on the form and forward a document package consisting of a copy of the deviation report and any supporting documentation to the QAD within two (2) working days for further review. In addition, the PQM shall promptly notify the Client.
- 5.5.3.1 For additional tracking purposes, the PQM will include the 10CFR21 "Possible Potential" information in the monthly QA update to the project controls department.

5.5.3.2 The PQM shall forward to the QAD any pertinent followup information as it becomes available.

5.5.3.3 The PEM shall ensure that the subsequent disposition of an NCR provides adequate information to allow a thorough QAD review.

5.5.4 A copy of the final results of the QAD review shall be provided to the Client by the PQM.

### 5.6 Records

- 5.6.1 The following records generated by use of this procedure shall be processed in accordance with QEP 17.01, *Quality Assurance Records*, and QEP Appendix 1, *Index of Quality Documents*:
  - a. Nonconformance Report
  - b. Nonconformance Instruction Sheet;
  - c. Audit Finding Report;
  - d. Corrective Action Request; and,
  - e. Deficiency Report.

C:\CorpQEPs\AFU\Pending\QEP_	1501	s	R5	AFU do	~
C.ICOIPAErsMrUIrenainglaEr_	_1001_	_0.	ູຕວຼ		-

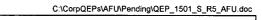


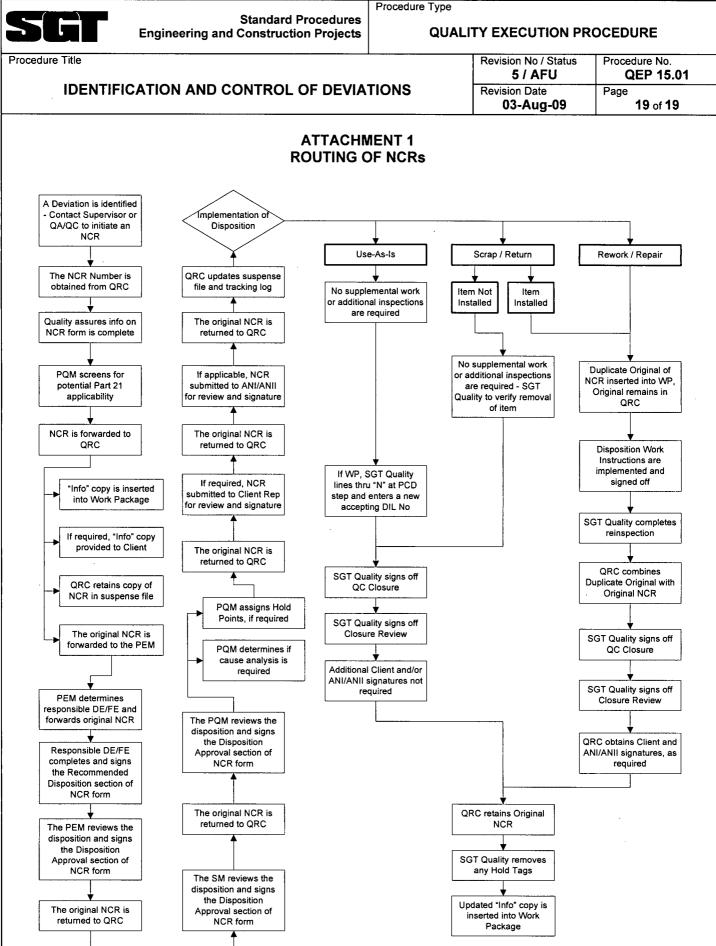
Procedure Type

l	IDENTIFICATION AND CONTROL OF DEVIATIONS		QEP 15.01
	IDENTIFICATION AND CONTROL OF DEVIATIONS	Revision Date 03-Aug-09	Page <b>17</b> of <b>19</b>
6.0	REFERENCED FORMS	:	
	<ul> <li>a. QEP 09.01-7, Supplier Exception Request / Deviation</li> <li>b. QEP 10.01-1, Receipt Inspection Report</li> <li>c. QEP 12.02-1, Daily Inspection Log</li> <li>d. QEP 12.02-2, Deficiency Report</li> <li>e. QEP 15.01-1, Nonconformance Report</li> <li>f. QEP 15.01-2, Nonconformance Report Instruction Sh</li> <li>g. QEP 15.01-3, Nonconformance Report Addendum</li> <li>h. QEP 18.01-2, Audit Finding Report</li> <li>i. QEP 18.01-4, Corrective Action Request</li> <li>j. QEP 20.01-4, Weld Repair Data Card</li> </ul>	•	
7.0	REFERENCES	1	
7.1	References Subject to Impact Review		
	None		
7.2	<u>References Not Subject to Impact Review</u>		
	a. 10 CFR 21 – "Reporting of Defects and Noncomplia	nce"	
7.3	QEP <u>References</u>		
	<ul> <li>a. QEP 07.09, Design Change Control</li> <li>b. QEP 07.12, 10 CFR 50.59 Reviews</li> <li>c. QEP 10.01, Receipt Inspection</li> <li>d. QEP 12.02, Conduct and Control of Inspection and Ste.</li> <li>QEP 16.01, Trend Analysis</li> <li>f. QEP 17.01, Quality Assurance Records</li> <li>g. QEP 18.01, Quality Assurance Audits</li> <li>h. QEP 20.01, Control and Documentation of Welding</li> <li>i. QEP 20.07, Weld and Base Metal Repairs</li> <li>j. QEP Appendix 1, Index of Quality Documents</li> <li>k. QEP Appendix 3, Inspection Codes</li> <li>l. QEP Appendix 4, Trend Codes</li> </ul>	urveillance Activities	
8.0	ATTACHMENTS		
	a. Exhibit 1 – Sample Quality Control Hold Tag b. Attachment 1 – Routing of NCRs		

Engineering and Construction Projects			ard Procedures uction Projects	QU	ALITY EXECUTION PR	ROCEDURE
edure Title			····· <b>/</b> ····		Revision No / Status	Procedure No.
					5 / AFU	QEP 15.0
IDENTIFICATION AND CONTROL OF DEVIA		TIONS	Revision Date 03-Aug-09	Page <b>18</b> of <b>19</b>		
		SAMPLE	EXHIB QUALITY CO		LD TAG	
	(Fro	nt)			(Back)	
	C	)			0	
		Deviation No.				
<b>5G</b>		Tag No.				
				Prohibited Wo	ork:	
CON Unautho	TRC	LITY DL HOL Dismissal				
CON Unautho		L HOL		Permissible V	Vork:	
CON Unautho	TRO Drized Remo Immediate	L HOL		Permissible V	Vork: QC HOLE	)
CON Unautho I Item Description:	TRO Drized Remo Immediate	L HOL		Permissible V		Date:

-----







Procedure Type

#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 18.01
QUALITY ASSURANCE AUDITS	Revision Date 03-Aug-09	Page <b>1</b> of <b>9</b>

### 1.0 **SCOPE**

This Quality Execution Procedure (QEP) establishes the responsibilities and methods for planning, scheduling, and performing audits of quality program implementation for project level activities and for audits of suppliers of nuclear safety-related material, items, and services.

Initial audits of potential suppliers are performed in accordance with <u>URS Washington Division</u> (<u>URS-WD</u>) procedures that are accepted by SGT. <u>URS-WD</u> or SGT personnel not assigned to the project conduct independent audits of the Project's Quality organization in accordance with project or <u>URS-WD</u> procedures accepted by SGT.

### 2.0 **RESPONSIBILITIES**

2.1.1 The following individuals have duties and responsibilities outlined in this procedure:

- a. Quality Assurance Director (QAD)
- b. Project Quality Manager (PQM)
- c. Project Engineering Manager (PEM)
- d. Lead Auditor
- e. Auditor

2.1.2 Personnel signing the various signature blocks on the report forms referenced by this QEP shall confirm that they have the proper signature authority.

## 3.0 AUDIT REPORTING TERMS

### 3.1 Audit Finding

An Audit Finding is the documented identification of a deficient condition in characteristic, documentation, or procedure that renders the quality of an item or activity unacceptable or indeterminate. Findings are reported using Form QEP 18.01-2, *Audit Finding Report*, and are classified as:

- 3.1.1 Major Finding A deficient condition which requires an investigation for cause determination and generic corrective action to prevent recurrence.
- 3.1.2 Minor Finding A deficient condition which has been determined to be an isolated event which does not require a determination of cause or generic corrective action to prevent a recurrence. Action to correct the condition is required.

### 3.2 Audit Observation

An Audit Observation is the documented identification of a condition which is not a deficiency but could be improved by additional procedures, instructions, and/or training. Observations are reported using Form QEP 18.01-5, *Audit Observation Report*, and are classified as:

3.2.1 Major Observation - A condition which, if no action is taken, is deemed by the Lead Auditor to be a potential quality problem. Major Observations require a response.



Procedure Type

#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 18.01
QUALITY ASSURANCE AUDITS	Revision Date 03-Aug-09	Page <b>2</b> of <b>9</b>

3.2.2 Minor Observation - A condition requiring consideration for change by the audited organization in order to improve quality. Minor Observations do not require a response.

## 4.0 AUDIT SCHEDULING AND PLANNING

## 4.1 Audit Scheduling

- 4.1.1 The PQM develops a schedule for the performance of project audits on an annual basis. This schedule also serves as a log of completed audit activities and is updated by the PQM as necessary. The audit schedule/log is used to track all types of audits conducted by the Project.
- 4.1.1.1 At the project level, each of the elements addressed in the 18 sections of the SGT 10CFR50 Appendix B and ASME NQA-1 Quality Assurance Program Manual, for which there is work activity, shall be audited at least annually or at least once within the life of the activity pertaining to an element, whichever is shorter.
- 4.1.1.2 The schedule/log indicates the audit type, the audit location, and designates the scope of the audit. The applicable time frame for scheduled audits is broken down by month.
- 4.1.2 The audit schedule/log shall be updated as needed to indicate schedule changes and to include actual date information for audits as they are conducted.
- 4.1.3 Unscheduled audits shall supplement scheduled audits when conditions warrant.

## 4.2 <u>Audit Teams</u>

- 4.2.1 The PQM shall designate a Lead Auditor for each audit to be conducted. The Lead Auditor shall be selected such that this individual is independent of the activity being audited and shall have no responsibility for resolving deviations or concerns noted during the course of the audit.
- 4.2.2 The Lead Auditor selects and assigns Auditors who are independent of any direct responsibility for performing the activities to be audited.
- 4.2.3 Personnel performing audits shall be qualified and certified in accordance with QEP 04.02, *Qualification and Certification of Audit Personnel.*
- 4.2.4 For audits of Engineering, the PQM and PEM shall determine if technical specialists should be added to the Audit Team to assist in review of the technical aspects of engineering documents. It is recommended that this be done at least once during the life of the project and if the project experiences problems with engineering deliverables. It is not required that such individuals have Auditor or Lead Auditor certifications.
- 4.2.5 The Lead Auditor orients the Audit Team and coordinates the audit to assure communications within and between the team and the organization being audited.

## 4.3 Audit Planning and Preparation

4.3.1 The Lead Auditor assures the Audit Team is prepared prior to the performance of the audit.

C:\CorpQEPs\AFU\Pending\QEP\_1801\_S\_R5\_AFU.doc



Standard Procedures Engineering and Construction Projects Procedure Type

#### **QUALITY EXECUTION PROCEDURE**

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 18.01
QUALITY ASSURANCE AUDITS	Revision Date 03-Aug-09	Page <b>3</b> of <b>9</b>

- 4.3.2 The Lead Auditor generates or delegates generation of a Form QEP 18.01-1, *Audit Plan*, which identifies the following information, as a minimum:
  - a. Audit Number;
  - b. Organization or Supplier to be audited and the location;
  - c. Audit Team members;
  - d. Audit scope/activities to be audited;
  - e. Reference documents (including procedures or checklists);
  - f. Audit schedule information;
  - g. Any follow-up items or corrective actions from previous audits; and,
  - h. Identification of organizations to be notified regarding the audit.
- 4.3.3 Audit Plans are reviewed and approved by the Lead Auditor prior to the performance of the audit.

4.3.4 The format of the audit number consists of the SGT project number, a letter code indicating the type of audit ("S" for Supplier, "P" for internal Project, "E" for External audits [by organizations other than SGT - the number is used for internal tracking purposes]), a number indicating the year, and a sequential number for all types of audits. The following is an example:

xxxxx-P-03-02

xxxxx (SGT Project Number) P (Signifies Project audit) 03 (Year Performed) 02 (Sequential Number)

- 4.3.5 The Lead Auditor makes available to the Audit Team for review the pertinent policies, procedures, standards, instructions, codes, regulations, and results of any prior audits. Each member of the Audit Team shall be provided a copy of the Audit Plan.
- 4.3.6 Supplier audits shall include a program review and verification that the program is implemented. Such audits shall be performed at the supplier's facility.
- 4.3.7 The Audit Team shall also get copies of, or develop if necessary, checklists to be used during the audit and review these documents as part of the preparation.
- 4.3.8 The Lead Auditor coordinates in advance with the organization/supplier to be audited and provides written notification of the scheduled audit date(s) and time.

## 5.0 AUDIT PERFORMANCE

## 5.1 Conduct of the Audit

- 5.1.1 The Lead Auditor conducts a brief pre-audit meeting with the cognizant organization/supplier management to confirm the audit scope, introduce the Audit Team, discuss the audit sequence, and establish a tentative time for the post-audit meeting.
- 5.1.2 Audits are performed in accordance with written procedures or checklists.

Procedure Type

#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Stat	us Procedure No. QEP 18.01
QUALITY ASSURANCE AUDITS	Revision Date 03-Aug-09	Page <b>4</b> of <b>9</b>

- 5.1.3 The Auditor(s) assures that the audit covers a representative selection of procedures, records, and interviews with personnel.
- 5.1.4 The Auditor(s) discusses audit findings with the organization/supplier being audited as soon as possible so that findings and comments are stated accurately.
- 5.1.5 The Lead Auditor shall, at the conclusion of the audit, conduct a post-audit meeting with the management of the audited organization/supplier to present and clarify the audit findings and comments.
- 5.1.5.1 If an Audit Finding is identified, an interim Form QEP 18.01-2, Audit Finding Report, shall be prepared and provided to the audited organization. This interim AFR shall be completed to include the finding description and the 10CFR21 screening portion of the form.

## 5.2 **Reporting of Audit Results**

- 5.2.1 Upon completion of the audit, the Lead Auditor documents the results of the audit using the format of Form QEP 18.01-3, *Quality Audit Report*. The Quality Audit Report shall contain the following information:
  - a. Audit Number;
  - b. Audited organization/supplier;
  - c. Location of audit;
  - d. Scope of audit;
  - e. Audit personnel;
  - f. Audit date(s) and report date;
  - g. Personnel contacted during audit;
  - h. Summary of audit results, including a statement on the effectiveness of the quality program elements which were audited;
  - i. A statement regarding the effectiveness of corrective action taken for any previous Audit Findings;
  - j. Summary of any new Audit Findings and Observations; and,
  - k. A closing statement, including any comments or recommendations.
- 5.2.2 The Lead Auditor shall issue the audit report within thirty calendar days of audit completion to the management of the audited organization/supplier.
- 5.2.3 The report shall include copies of any Forms QEP 18.01-2, *Audit Finding Report*, that were issued for any items that were found to not meet the applicable requirements. Any AFRs shall be screened for 10CFR Part 21 applicability by the Lead Auditor in accordance with Section 5.5.

### 5.2.3.1 Procedural noncompliances shall, as a minimum, be classified as minor findings.

- 5.2.4 The report shall also include copies of any Forms QEP 18.01-5, *Audit Observation Report*, that were issued for any items that were found that could be improved.
- 5.2.5 A response due date is established for AFRs and Major AORs. This date is normally within thirty days of date of the AFR or AOR, depending on the phase of the project (e.g., it will be much shorter during an outage).

C:\CorpQEPs\AFU\Pending\QEP\_1801\_S\_R5\_AFU.doc



Standard Procedures Engineering and Construction Projects Procedure Type

# QUALITY EXECUTION PROCEDURE

	Revision No / Status	Procedure No.
1.	5 / AFU	QEP 18.01
	Revision Date	Page
	03-Aug-09	<b>5</b> of <b>9</b>
		5 / AFU Revision Date

- 5.2.6 AFRs and AORs are numbered sequentially, starting with one (1), for each audit.
- 5.2.7 A copy of the audit report shall be submitted to the PQM, including:
  - a. The "original" copies of any Forms QEP 18.01-2, *Audit Finding Report*, or QEP 18.01-5, *Audit Observation Report*; and,
  - b. The completed checklists used to conduct the audit.
- 5.2.8 A copy of the audit report, including any AFRs and AORs, shall be provided to the Client.
- 5.2.9 The Lead Auditor shall notify the PQM of any significant concerns related to supplier audits. The PQM shall determine if immediate action is required (i.e., notification to Procurement for pending or existing orders with supplier).

## 5.3 Audit Follow-Up

- 5.3.1 The PQM generates a Form QEP 12.02-1, *Daily Inspection Log*, entry for each AFR and Major AOR for tracking purposes and maintains outstanding AFRs and AORs in an "Action Pending" file to facilitate follow-up.
- 5.3.1.1 When a Major AFR is written, the management of the audited organization/supplier shall submit to the PQM a written explanation of each AFR. This response shall address the following:
  - a. The steps which have been or will be taken to correct the condition reported in the finding;
  - b. The cause that led to the condition reported in the finding;
  - c. The extent of the condition (where else might the problem exist; e.g., other items or activities at the project, another project, another supplier);
  - d. The steps which have been or will be taken to preclude recurrence (if appropriate); and,
  - e. The dates when the indicated actions were or will be completed.
- 5.3.1.2 When a Minor AFR is written, the management of the audited organization/supplier shall be requested to submit to the PQM a written explanation of the AFR identifying;
  - a. The steps which have been or will be taken to correct the condition reported in the finding; and,
  - b. The dates when the indicated actions were or will be completed.
- 5.3.1.3 When a Major AOR is written, the management of the audited organization/supplier shall be requested to submit to the PQM a written explanation of the AOR identifying;
  - a. The steps that have been or will be taken to address the condition identified in the observation; and,
  - b. The dates when the indicated actions were or will be completed.
- 5.3.2 If responses are not received by the due date, the PQM notifies the responsible organization that responses are overdue. If responses are not forthcoming, the PQM shall elevate overdue notifications to higher levels of SGT and/or supplier management. Any overdue notifications and/or extensions of due dates shall be documented and included in the audit file.

5	Γ

Procedure Type

#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status 5 / AFU	Procedure No. QEP 18.01
QUALITY ASSURANCE AUDITS	Revision Date 03-Aug-09	Page <b>6</b> of <b>9</b>

- 5.3.3 Upon receipt of response to AFRs and Major AORs, the PQM shall coordinate the evaluation of responses with the Lead Auditor/Quality staff.
- 5.3.4 The results of evaluation of the response are documented on the record copy of the AFR or AOR, or on supplemental sheets.
- 5.3.4.1 Unacceptable responses shall be noted with the specific reason for rejection. An AFR or AOR is then re-issued to the responsible organization, delineating a new response due date and including a copy of the original document with evaluation comments. Review and distribution of the re-issued document shall be the same as for the original.
- 5.3.4.2 For acceptable responses, the responsible organization shall be notified.
- 5.3.5 Acceptable responses shall be verified by one or a combination of the following:
  - a. Sufficient documented evidence provided by the audited organization to satisfactorily show that the corrective action has been carried out;
  - b. Brief follow-up visit to verify accomplishment of corrective actions concerning the identified conditions;
  - c. Re-audit of the areas where the conditions were found.
- 5.3.6 Unacceptable verification of stated corrective actions shall be handled in accordance with paragraph 5.3.4.1. Unacceptable verification of supplier stated corrective actions may be cause for removal of the supplier from the SGT ASL.
- 5.3.7 Upon completion (closeout) of all AFRs and AORs, the PQM notifies the audited organization, by letter, that all actions are complete and have been approved. The PQM also generates another Form QEP 12.02-1, *Daily Inspection Log*, entry to close out the original entry (reference paragraph 5.3.1).

## 5.4 Corrective Action Request (CAR)

- 5.4.1 Repetitive or significant conditions adverse to quality are documented on a Form QEP 18.01-4, *Corrective Action Request.* At the project level, significant conditions adverse to quality are usually identified during the course of an audit or during trend analysis. Nonetheless, a single occurrence of some types of deviations may be considered significantly adverse to quality to warrant the issuance of a CAR.
- 5.4.2 The PQM shall make the determination of significance and the need to issue a CAR at the project level.
- 5.4.3 When a CAR is issued, the PQM shall perform the following:
  - a. Obtain a CAR number from the Quality Assurance Director (the project number shall also be indicated in the "Contract Number" block of the CAR form);
  - b. Indicate the Responsible Manager and response due date on the CAR. The response due date shall not exceed ten (10) working days following notification of issuance of the CAR;

SET	

Procedure Type

#### QUALITY EXECUTION PROCEDURE

Procedure Title	Revision No / Status <b>5 / AFU</b>	Procedure No. QEP 18.01	
	Revision Date 03-Aug-09	Page <b>7</b> of <b>9</b>	

- c. At a minimum, distribute the CAR to the Responsible Manager, Project Manager, Charlotte Quality Engineer, President, Engineering Director, Vice President Operations, and Client representative;
- d. Generate a Form QEP 12.02-1, Daily Inspection Log, entry for tracking purposes;
- e. Review the responses to the CAR and evaluate their adequacy and timeliness of implementation prior to accepting the responses; and,
- f. Verify that the specified corrective action is taken.
- 5.4.4 To ensure that the next higher level of Quality management remains fully aware of significant conditions adverse to quality, the Quality Assurance Director shall be copied on the initial issue of the CAR and shall be kept informed regarding all subsequent actions taken to resolve the CAR.
- 5.4.5 The PQM shall determine the adequacy of proposed corrective actions and the adequacy of the schedule for implementation. The PQM shall follow up to assure the corrective actions have been implemented and have achieved the desired results. The follow up shall occur within 30 days of the scheduled implementation date. Should Quality management and Project management not be able to agree, they may ask the successively higher levels of management to become involved, up to the President of SGT, who shall make a final decision, if necessary.
- 5.4.6 The PQM shall ensure that the cause of the condition for which the CAR was generated has been identified and documented. The extent of the condition (where else might the problem exist; e.g., other items or activities at the project, another project, another supplier) shall also be identified and documented.
- 5.4.7 If responses are not received by the due date, the PQM notifies the responsible organization that responses are overdue. If responses are not forthcoming, the PQM shall elevate overdue notifications to higher levels of SGT and/or supplier management. Any overdue notifications and/or extensions of due dates shall be documented and included in the CAR file.
- 5.4.8 When the CAR is closed, the PQM also generates another Form QEP 12.02-1, *Daily Inspection Log*, entry to close out the original entry (reference paragraph 5.4.3d).
- 5.4.9 Copies of any CAR follow-up and closeout documentation shall be distributed to the same individuals as indicated in paragraph 5.4.3c above.

## 5.5 Screening of AFRs and CARs for 10CFR Part 21 Applicability

5.5.1 Identified deviations documented on AFRs and CARs are initially screened to determine whether or not the condition might meet the criteria for being potentially associated with the requirements of 10CFR Part 21. AFRs generated during an audit are initially screened by the Lead Auditor. All other AFRs and all CARs are initially screened by the PQM. The PEM will provide technical input, as necessary.

5.5.1.1 This screening process shall take place within five (5) working days of the "Discovery Date", as defined below:

				C:\CorpQEPs\AFU\P	ending\QEP_1801_S_R5_AFU.doc
SG		Standard Procedures Engineering and Construction Projects	Procedure Type QUAL	TY EXECUTION PR	OCEDURE
Procedure Title			I	Revision No / Status 5 / AFU	Procedure No. QEP 18.01
		QUALITY ASSURANCE AUDITS		Revision Date 03-Aug-09	Page <b>8</b> of <b>9</b>
	no	r AFRs, the Discovery Date is the "Date is the "Date is the "Date than the completion date of the all audit report has not been issued.			
	mu	r CARs, the Discovery Date is the "D ist be within five (5) working days of ue a CAR.			
5.5.1.2	The fol	llowing criteria shall be used when pe	erforming this ini	tial screening:	
	a. Do	es the deviation relate to a basic con	nponent? A bas	ic component inclu	des:
	(1)	a safety-related structure, system, o	or component, o	r part thereof, and/	or,
	(2)	safety-related design, analysis, ins consulting services that are assoc services are performed by the com	iated with the o	component hardwa	
		s the item or activity been turned ove ensee, or is the item currently in the p		•	•
5.5.2		answer to either of the questions is "I ing process is complete.	No", the conditio	on does not relate t	o Part 21 and the
5.5.3	require copy c	answer to both of these questions is " ements of 10 CFR Part 21. The PQN of the deviation report and any sup g days for further review. In addition	V shall forward	a document packa entation to the QA	ge consisting of a
5.5.3.1		dditional tracking purposes, the PC ation in the monthly QA update to the	1000 galgerige 151 g	,	ossible Potential"
5.5.3.2	The PO	QM shall forward to the QAD any per	tinent followup ii	nformation as it bec	comes available.
5.5.3.3	The P review.	EM shall provide additional technic	al input, as ne	cessary, to allow	a thorough QAD
5.6	<u>Status</u>	Reporting			
5.6.1		QM shall provide a quarterly status CARs, AFRs, and AORs and those ed on.	•	•	<b>U</b>

## 5.7 Administrative Closure

5.7.1 In cases where identified deficiencies subsequently result in issuance of a higher-tier document (e.g., a CAR is issued following an AFR), or multiple documents covering similar issues are combined into one, the lower-tier or "duplicate" documents may be administratively closed, with such action being documented on the closed documents. Any incomplete corrective action shall be tracked to completion using the higher-tier or combined document.

C:\CorpQEPs\AFU\Pending\QEP\_1801\_S\_R5\_AFU.doc



Standard Procedures Engineering and Construction Projects Procedure Type

**QUALITY EXECUTION PROCEDURE** 

Procedure Title		Revision No / Status 5 / AFU	Procedure No. QEP 18.01	
QUALITY ASSUR	QUALITY ASSURANCE AUDITS	Revision Date 03-Aug-09	Page 9 of 9	

### 5.8 <u>Records</u>

5.8.1 The following records generated by use of this procedure shall be processed in accordance with QEP 17.01, *Quality Assurance Records*, and QEP Appendix 1, *Index of Quality Documents*:

- a. Audit Plan
- b. Audit Finding Report
- c. Audit Observation Report
- d. Quality Audit Report
- e. Corrective Action Request

### 6.0 **REFERENCED FORMS**

- a. QEP 12.02-1, Daily Inspection Log
- b. QEP 18.01-1, Audit Plan
- c. QEP 18.01-2, Audit Finding Report
- d. QEP 18.01-3, Quality Audit Report
- e. QEP 18.01-4, Corrective Action Request
- f. QEP 18.01-5, Audit Observation Report

### 7.0 **REFERENCES**

### 7.1 References Subject to Impact Review

None

## 7.2 References Not Subject to Impact Review

None

### 7.3 **QEP** References

- a. QEP 04.02, Qualification and Certification of Audit Personnel
- b. QEP 17.01, Quality Assurance Records
- c. QEP Appendix 1, Index of Quality Documents

### 8.0 **ATTACHMENTS**

None

C:\CorpQEPs\AFI	J\Pendina\QEP	1801F2	s	R2	AFU.doc

SGT	Sta Engineering and Cor	Indard Procedui	es	N Source	ALITY EXECUTION PROCEDURE			
Form Title					Revision No		Form No. QEP 18.01-2	
		G REPORI	-		Form Revisi		Form Page <b>1</b> of <b>2</b>	
Audit Number:	-P		AFR Num	ber: AFR -		Date Issu	ed:	
Organization / Supplie	er:	COMPLETE		UDITOR on Contacted:				
Referenced Requiren	nents (Section Number, Paragr	aph Number, etc.):						
FINDING – include S	pecific Requirement(s) Violate	d: C	assificatio	on:	Major 🗌		Minor 🗌	
For a Major Find	ng, you are requested to	identify the act	ion take		the identified	condition	You are further	
requested to inve required. The re For a <u>Minor Findi</u>	estigate the cause and ef sults of this review are to ing, you are requested or	fect of the cond be considered	ition in o in your r e action	rder to dete eply. taken to cor	rmine the ext rect the iden	tent of pro	eventative action	
Response DUE DATI	E:		Aud	tor's Signature	):			
	uditor / PQM screening ciation with 10CFR21:	NO Potenti Possible Po		Signature			Date	

C:\Cor	pQEPs\Al	FU\Pendir	ia\QEP 1	801F2	s	R2	AFU.doc

	Standard Proc								
	Engineering and Construction P	rojects							
Form Title				Revision No.	<b>\FU</b>	Form No. QEP 18.0 <sup>4</sup>			
	AUDIT FINDING REPC	ORT		Form Revis 03-Au	ıg-09	Form Page 2 of 2			
Audit Number:	-P	AFR	Number: AFR -		Date Issu	ed:			
	COMPLETED BY	ORG/	NIZATION AU	DITED		and B			
Corrective Action Take	n or Proposed to Correct Discrepancy:								
Correct Cause of Discrepancy:	ive Action Completion Date:			Actual	Projecte	d 🗌			
Extent of Condition		· · · · · · · · · · · · · · · · · · ·							
Preventative Action Ta	ken to Eliminate Cause of Discrepancy								
Preventative Action Ta	ken to Eliminate Cause of Discrepancy:								
Preventative Action Ta	ken to Eliminate Cause of Discrepancy:								
Preventative Action Ta	ken to Eliminate Cause of Discrepancy:								
Preventative Action Ta	ken to Eliminate Cause of Discrepancy:								
	·			Actual 🗌	Projecte	d []			
Preventa	ken to Eliminate Cause of Discrepancy: tive Action Completion Date: sed Submitted by (Signature and Title):		Submitted Date:	Actual 🗌	Projecte	d []			
Preventa	tive Action Completion Date: sed Submitted by (Signature and Title):		Submitted Date:	Actual 🗌	Projecte	d 🗌			
Preventa Actions Taken / Propo	tive Action Completion Date: sed Submitted by (Signature and Title): COMPL	ETED	Submitted Date: BY AUDITOR Ve	rification of	mplemen	tation of			
Preventa Actions Taken / Propo Corrective	tive Action Completion Date: sed Submitted by (Signature and Title): <b>COMPL</b> of Preventative Action Evaluation		Submitted Date: <b>3Y AUDITOR</b> Ve Co	rification of l	mplemen	tation of Action			
Preventa Actions Taken / Propo Corrective Acceptable	tive Action Completion Date: sed Submitted by (Signature and Title): <b>COMPL</b> of Preventative Action Evaluation		Submitted Date: BY AUDITOR Ve	rification of l	mplemen	tation of			
Preventa Actions Taken / Propo Corrective Acceptable	tive Action Completion Date: sed Submitted by (Signature and Title): <b>COMPL</b> of Preventative Action Evaluation		Submitted Date: <b>BY AUDITOR</b> Ve Co Acceptable	rification of l	mplemen	tation of Action			
Preventa Actions Taken / Propo Corrective Acceptable	tive Action Completion Date: sed Submitted by (Signature and Title): <b>COMPL</b> of Preventative Action Evaluation		Submitted Date: <b>3Y AUDITOR</b> Ve Cc Acceptable	rification of l	mplemen	tation of Action			
Preventa Actions Taken / Propo Corrective Acceptable	tive Action Completion Date: sed Submitted by (Signature and Title): <b>COMPL</b> of Preventative Action Evaluation		Submitted Date: <b>3Y AUDITOR</b> Ve Cc Acceptable	rification of l	mplemen	tation of Action			
Preventa Actions Taken / Propo Corrective	tive Action Completion Date: sed Submitted by (Signature and Title): <b>COMPL</b> of Preventative Action Evaluation		Submitted Date: <b>3Y AUDITOR</b> Ve Cc Acceptable	rification of l	mplemen	tation of Action			

SG	Enginee		tandard Procedur	res		TY EXECUTION PRO	
Form Title					1 (,,	Revision No / Status 1E1 / AFU	Form No. QEP 18.01-4
	CORRECT	IVE AC	TION REQU	JEST		Form Revision Date 03-Aug-09	Form Page 1 of 1
	ction Request Number:	Revision:	GENERAL Contract Number:	INFORMA Project N			
C	AR -	0		-			Sheet 1 of
Issued to: Condition D				Depar	tment:		
					RES	PONSE DUE DATE:	
INITIATED BY:	Signature:		Titl	le:			Date Issued:
	PQM screening for	potential	No Potentia	al	Signature:		Date:
associatior	with 10CFR21:		Possible Po		· · · · · · · · · · · · · · · · · · ·	EST	and the second
Extent of Co	ondition	nate Cause					
				ANT	CIPATED C	OMPLETION DATE:	
PREPARED	Signature:		Titl				Date:
BY:					CEPTANCE		
ACCEPTED BY:	Signature:		Titl	le:			Date:
S. Andre Maria	l Sianatura:	CORR			N AND FOLLO	DW-UP	
ACTION COMPLETE:	Signature:	. •	Titl	ie:			Date:
VERIFIED BY:	Signature:		Titl	le:			Date:

Docket Number 99901334 SGT M-09-0050 Attachment 1 Page 1 of 2

11

#### Kovacs, Bruce

From:McDonald, DavidSent:Friday, July 31, 2009 10:03 AMTo:Kovacs, BruceSubject:FW: Audit 38241-P-08-02

From: McDonald, David Sent: Friday, November 07, 2008 5:51 AM To: Nichols, Charlie Cc: Helton, Paul; Scott, Barry; Stuckey, Bill Subject: RE: Audit 38241-P-08-02

Charlie

I am out of the office today. As you mentioned in your phone message last night, you can send the response both by email and US mail. The sooner I receive the information the sooner we can start working on getting the findings closed.

The extension to 11-20-08 is granted for AFRs 3, 4, 5, 6, 12, 16, 17 and 18.

David E. McDonald Lead Quality Engineer Quality Programs Princeton, NJ 08540 (609) 720-2412

From: Nichols, Charlie Sent: Thu 11/6/2008 4:04 PM To: McDonald, David Cc: Nichols, Charlie; Helton, Paul Subject: RE: Audit 38241-P-08-02

David -

As per my voice mail to you earlier today, the extension request (below) should have included AFR's 06, 16 and 17. Response to AFR-03 will be issued today. As below, response to all AFR's will be provided no later than 11-20-08.

Sorry for the inconvenience!

Charlie Nichols

From: McDonald, David
Sent: Thursday, November 06, 2008 5:33 AM
To: Nichols, Charlie
Cc: Helton, Paul; Bourque, Hugh; Flodman, Richard; Strupp, Kenny; OMalley, Kathy; Bill Taylor; Bruce Emmons; Scott, Barry; Stuckey, Bill
Subject: RE: Audit 38241-P-08-02

Charlie,

Your request for a time extension to 11-20-08 to provide a corrective action response to AFR-03, -04, -05, -12 and -18 is granted.

Thank you for the update on the status of the AFR's.

08/03/2009

David McDonald Lead Quality Auditor Quality Programs Princeton, NJ (609) 720-2412

Docket Number 99901334 SGT M-09-0050 Attachment 1 Page 2 of 2

# From: Nichols, Charlie Sent: Wednesday, November 05, 2008 5:21 PM To: McDonald, David Cc: Helton, Paul; Bourque, Hugh; Flodman, Richard; Strupp, Kenny; OMalley, Kathy; Bill Taylor; Bruce Emmons Subject: Audit 38241-P-08-02

#### David;

Our responses to 14 of the 19 subject audit findings, or observations requiring a response, will be issued tomorrow (11/6). After a review of progress on the remaining 5 items, I would like to request a time extension to 11-20-08. We will expedite response to the final 5 items to the extent possible.

Those items which require additional effort and time are:

- AFR-03, -04, and -05 dealing with elements of the training program
- AFR-12 regarding document references in DMS
- AFR-18 relative to provision of un-priced copies of purchase orders to Document Control Center

Please don't hesitate to call if you have any questions or concerns.

Thanks very much for your consideration.

Best Regards,

Charlie Nichols 805.545.6770



Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 1 of 151

A URS-Washington Division , AREVA NP Company

#### INTER-OFFICE CORRESPONDENCE

38241-PM-08-0042

Action Required: Yes 🛛 No 🗌

To:

From:

David MacDonald Charlie Nichols

Date: November 6, 2008

Subject: Audit Number 38241-P-08-02

Please find attached for you review, consideration, and approval, responses to the following audit findings: AFR -01 through -03; AFR-07 through 11, AFR-13 through 15, and AOR-01.

Response to AFR-03, -04, -05, -12, and -16, -17, -18 will be forthcoming as soon as possible, but not later than 11-20-08.

Please don't hesitate to contact me at 805.545.6770 with any questions.

cc: (w attachment) H. Bourque, B. Scott (w/o attachment) P. Helton, L. Dietrich, R. Flodman, W. Taylor, K. Strupp, K. O'Malley

File: Project File: 11.0393.f Subject File: 17.082.f Quality Records File: 18.1.2

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 2 of 151

(

Audit Number 38241-P-08-02

AFR Number: AFR - 01

				SGT Page	e 4 of 151	Attachment 2
····	· ••••••••••••••••••••••••••••••••••••		S Common QUALITY	Aud/1 38423-P-08-0	021D ao o Canyo	AFP-01-PLD RESPONSE co
5	Standard Pro					CEDURE
Form Title	· · · ·	0.87	<u> </u>	Revision No 0E2 /	AFU	Form No. QEP 18.01-2
	AUDIT FINDING REP			Form Revisio	y-05	Form Page 1 of 2
Audit Nur	38241-P-08-02	AFF	R Number: AFR - 01		Date Issue Oc	a: tober 7, 2008
			BY AUDITOR			
Organiza Project	tion / Supplier: Cost: Project Administration; Project Quality		Person Contacted:	i Schulz, Ra	ay Fink, Ja	ick VanDyke, Paul
Beferenc	ed Requirements (Section Number, Paragraph Numbe	er. etc.):	Į			
Manage	re received at the project level by the PM. ( er (PQM). The PQM assures that SGT has ited with the change. Any comments are su Approval of the Change Order is by the PM.	the neces	sary QA Program the PM for resolution	controls in ution. This r	place to p eview is c	erform the work locumented by the
		•				
(						
FINDING	i – Include Specific Requirement(s) Violated:	Class	ification:	Major 🔲		Minor 🖂
files wh change docum	views of the prepared change orders, seven ben requested of the Project Cost Departme orders had not been presented to the PQN ented review for those which had been pres to date:	ent. Along I for review	with the missing f w. It also was ver	iles, it was o y difficult to	liscovered retrieve th	I that five of the e PQM's
Linit 2 (	Thange Order No					
	Change Order No.					
	Change Order No. I, 2, 3, 4, 5, and 9 have documented PQM r	eviews in	the DCPP QRC C	Center.		
No's.: 1				Center.		
No's.: 1 No's.: 7	1, 2, 3, 4, 5, and 9 have documented PQM r			Center.		х
No's.: 1 No's.: 7 <u>Unit 1 (</u>	1, 2, 3, 4, 5, and 9 have documented PQM r 7 and 8 have not been presented to the PQN	M for revie	<b>W.</b>	Center.		:
No's.: 1 No's.: 7 <u>Unit 1 (</u>	1, 2, 3, 4, 5, and 9 have documented PQM r 7 and 8 have not been presented to the PQN Change Order No.	M for revie	<b>W.</b>	Center.		х
No's.: 1 No's.: 7 <u>Unit 1 (</u>	1, 2, 3, 4, 5, and 9 have documented PQM r 7 and 8 have not been presented to the PQN Change Order No.	M for revie	<b>W.</b>	Senter.	•	:
No's.: 1 No's.: 7 <u>Unit 1 (</u> No's.:1 For a <u>M</u> request require	<ul> <li>1, 2, 3, 4, 5, and 9 have documented PQM r</li> <li>7 and 8 have not been presented to the PQN</li> <li><u>Change Order No.</u></li> <li>2. 3 and 4 have not been presented to the</li> </ul>	M for revie PQM for the action the action idered in y	taken to correct the nin order to deterriour reply.	ne identified mine the ext	ent of pre	ventative action
No's.: 1 No's.: 7 <u>Unit 1 (</u> No's.:1 For a <u>M</u> require For a <u>M</u>	<ul> <li>1, 2, 3, 4, 5, and 9 have documented PQM r</li> <li>7 and 8 have not been presented to the PQN</li> <li><u>Change Order No.</u></li> <li>, 2, 3 and 4 have not been presented to the</li> <li><u>Major Finding</u>, you are requested to identify t</li> <li>ied to investigate the cause and effect of the</li> <li>d. The results of this review are to be consi</li> <li><u>linor Finding</u>, you are requested only to identify to identify to identify the results of the results on the requested only to identify to identify.</li> </ul>	M for revie PQM for the action the action idered in y	taken to correct th n in order to detern our reply. ction taken to correct	ne identified mine the ext	ent of pre	ventative action
No's.: 1 No's.: 7 <u>Unit 1 (</u> No's.:1 For a <u>M</u> require For a <u>M</u>	<ul> <li>1, 2, 3, 4, 5, and 9 have documented PQM r</li> <li>7 and 8 have not been presented to the PQN</li> <li><u>Change Order No.</u></li> <li>2. 3 and 4 have not been presented to the</li> </ul>	M for revie PQM for the action the action idered in y	taken to correct the nin order to deterriour reply.	ne identified mine the ext	ent of pre	ventative action



Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 5 of 151

#### 38241-PM-08-0041

#### INTER-OFFICE CORRESPONDENCE

Action Required: No

To: Hugh Bourque

From: Raymond P. Fink

Date: October 31, 2008

Subject: Response to Audit Number: 38241-P-08-08, AFR Number: 01

In response to the above Auditing Finding, the following action has been taken to correct the identified condition:

- 1. The Diablo Canyon Unit 1 and 2 Change Orders identified in AFR-01 have been reviewed by the PQM.
- 2. A complete set of Diablo Canyon Unit 1 and 2 Change Orders will be provided to the Site Quality Assurance Group for their project records.
- 3. Pursuant to SGT's "Corporate Directive" concerning utilization of Share Point for management of documentation, the Quality Assurance Group has been made of aware of the file locations to retrieve Diablo Canyon Unit 1 and 2 Change Orders. https://collaborationext.us.arevaeroup.com/sites/SGT/DCPP/DCPP/10.035 1 and 10.35 2.
- 4. The current process for completing the review and approval of Diablo Canyon Change Orders incorporates a routing transmittal reflecting signatory review/approval by SGT Site Project Management, SGT Quality Assurance and SGT Senior Management prior to submittal to PG&E for approval.
- 5. The Quality Assurance Group has been added to the distribution list for all future Diablo Canvon Change Orders.

Action Required:

Attachment: 1) Share Point Screen prints of Diablo Canyon Project Folders – Issue Change Orders Files 10.035.1 and 10.035.2

2) Change Order 9 Unit 2 Diablo Canyon

Ce: R. Flodman, C. Nichols, P. Helton and Project File: 11.020F, Subject File: 15.321 F

7207 IBM Drive, CLT-3A, Charlotte, NC 28262

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 3 of 151

			S Common QUALITY	Aucht 38-21-P-08-00	2 Diacio Car	yor AFR-01-RLD RESPONSE doc			
			Form Source						
SG	Standard Procedu Engineering and Construction Proje		QUALITY EXECUTION PROCEDURE						
Form Title			<u>.</u>	Revision No . 0E2 / /		, Form No. QEP 18.01-2			
	AUDIT FINDING REPORT		Form Revisio 04-Ma	y-05	Form Page 2 of 2				
Audit Number:	38241-P-08-02	AFF	Number: AFR - 01		Date Issu	ed: ctober 7, 2008			
	COMPLETED BY O	RG/	ANIZATION AUD	DITED					
Corrective Action Take	en or Proposed to Correct Discrepancy:			······					
have been review A complete set of	rder No's. 1, 2, 3 and 4 and Unit 2 Char red. Unit 1 and Unit 2 change orders have cordance with corporate direction.	-							
Constitute Action Tal	en by (Signature and Title):		Corrective Action Co						
Corrective Action Tak		1.1.		31-0 g					
Cause of Discrepancy	MANAGER CONTE	ACA	s 70°2	57-04					
1	, ledge of the requirements by previous p	proje	ect staff, and inade	equate job to	ols to re	inforce the			
					· ·	• • •			
Brougstative Action T	aken to Eliminate Cause of Discrepancy:					·			
	reviewed requirements for approval and	d und	derstand the proce	ess. Further	a 'routin	g slip' has been			
implemented to p	hysically verify routing and approval of	cont	tracts prior to com	pletion.					
See attached IOC	C dated 10/31/08 from R Fink to H Bour	2010	outlining the audit	finding resc	lution				
See allached IOC	dated 10/31/00 hom in his to it bodi	que	outining the addit	inding resc	nution.				
Preventative Action T	akep by (Signature and Title):	. <u> </u>	Date:						
Radi	The MANAGER CONTRAC	55	10-31-	18					
			BY AUDITOR						
				fication of In	nplemen	tation of			
Correctiv	e / Preventative Action Evaluation			rective / Pre					
Acceptabl	e 🗌 Unacceptable 🗌		Acceptable	Unaccer	otable 📋	Not Required			
Reason:			Reason:						
			ĺ			•			
					2				
Evaluated by:	Date		Verified by:			Date:			
L			I						

 $\cdot$ 

The Steam Generaling Team

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 6 of 151



Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 7 of 151

#### 38241-PM-08-0041

#### INTER-OFFICE CORRESPONDENCE

Action Required: No

To: Hugh Bourque

From: Raymond P. Fink

Date: October 31, 2008

Subject: Response to Audit Number: 38241-P-08-08, AFR Number: 01

In response to the above Auditing Finding, the following action has been taken to correct the identified condition:

- 1. The Diablo Canyon Unit 1 and 2 Change Orders identified in AFR-01 have been reviewed by the PQM.
- 2. A complete set of Diablo Canyon Unit 1 and 2 Change Orders will be provided to the Site Quality Assurance Group for their project records.
- Pursuant to SGT's "Corporate Directive" concerning utilization of Share Point for management of documentation, the Quality Assurance Group has been made of aware of the file locations to retrieve Diablo Canyon Unit 1 and 2 Change Orders. <u>https://collaborationext.us.arey.aeroup.com/sites/SGT/DCPP/DCPP/10.035.1 and 10.35.2</u>.
- 4. The current process for completing the review and approval of Diablo Canyon Change Orders incorporates a routing transmittal reflecting signatory review/approval by SGT Site Project Management, SGT Quality Assurance and SGT Senior Management prior to submittal to PG&E for approval.

5. The Quality Assurance Group has been added to the distribution list for all future Diablo Canyon Change Orders.

Action Required:

Attachment: 1) Share Point Screen prints of Diablo Canyon Project Folders – Issue Change Orders Files 10.035.1 and 10.035.2

2) Change Order 9 Unit 2 Diablo Canyon

Cc: R. Flodman, C. Nichols, P. Helton and Project File: 11.020F, Subject File: 15.321 F

7207 IBM Drive, CLT-3A, Charlotte, NC 28262

The Sleam Generating Team

SGI

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 8 of 151

#### Nichols, Charlie

From: Fink, Raymond

Sent: Friday, October 31, 2008 11:27 AM

To: Bourque, Hugh: Flodman, Richard; Nichols, Charlie; Helton, Paul

Cc: Schulz, Cecelia

Subject: Audit Finding AFR -01

Attachments: Interoffice Correspondence Template.doc; rfinksharepoit.PDF; rfinkco9.PDF

Hugh, please see attached my response to Audit Finding AFR -01 including supporting documentation. Ray

#### Raymond P. Fink

Contract Administration Manager Diablo Canyon SGT The Steam Generator Team A URS - Washington Division/AREVA NP Company 805-545-6774 Office 856-628-6963 Cell raymond.fink@wgint.com

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 10 of 151



August 22, 2008

PG&E 08 0176 Action Required Yes 🔀 No 🗔

Diablo Canyon Power Plant P.O. Box 56 Avila Beach, CA 93424

Attention: Mr. Bob Exner, Mail Code Trailer 250

Subject: RSG Installation - Unit 2 Agreement Change Order No. 9

Reference: 1) Agreement Number 3500621110

Dear Mr. Phillips:

Please find enclosed a copy of Change Order Number 9 to above referenced Agreement reflecting SGT's acceptance and corresponding signature authority. The two (2) originals of this Agreement Change Order Number 9 are provided to Mr. Phillips for PG&E's signature.

For purposes of clarification, it is understood by parties the language in this Change Order Number 9 in Section II. CONSIDERATION, Subsection A. stating "Delete Section 6.9 in its entirety" shall be incorporated in the next the Agreement Change Order to Unit 1 Agreement Number 3500621158.

After the appropriate PG&E individual has countersigned this Agreement Change Order No. 9, please provide one (1) fully-executed original to SGT for its records.

If you have any questions in this regard, please contact me at (805) 545-6180 or (805) 458-7803.

Action Required:

PG&E to provide on fully-executed original of Agreement Change Order No. 9 to SGT.

Sincerely,

Hugh Bourque Project General Manager Diablo Canyon SGRP SGT West

Attachments 1 Agreement Change Order No. 9 - Two (2) Originals

 B. Brannan, R. Phillips, two original Change Order Documents, Project Fre, 11, 326 F. Subject File 15,321 F.

> 545 AAST + 107 BM DRUG + 12013 + 105 RAHA AR 26034 Prove 204 904 0510 + 538 7 4 905 1975

SCI West is a Joint Venture Between Washington Group International, Inc., and Accya NP. Inc.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 11 of 151

Pacific Gas and Electric Company Agreement Change Order

Washington Group International, Inc. 720 Park Blvd Boise, ID 83729 Agreement No. 3500621110 Change Order No. 9 Page 1 of 4

AREVA NP, Inc. 7207 IBM Dr., MC CLT-3-A Charlotte, NC 28262 FOR RSG Installation Agreement – Unit No. 2

The following changes are hereby authorized subject to the terms and conditions in the agreement referred above ("Agreement"):

#### I. SPECIFIC CONDITIONS

A. PURPOSE

The purpose of this Change Order is to add numerous Contract Change Orders, Estimates (CCOEs), set Reimburse Cost maximum and finalize Contractor's Fee.

B. SCOPE OF WORK AND ADMINISTRATIVE TARGET COST CHANGES

Contractor shall provide and/or perform:

- Old Steam Generator Storage Facility (OSGFS) Roadway Soil Remediation (COOE 056) -Soil remediation and replacement was required due to unsatisfactory pumping conditions experienced during road construction at the Old Steam Generator Storage Facility.
- SGT Corporate Overhead Allocations (CCOE 060) 2005 adjustment from estimated to actual cost.
- 3. Additional engineering and construction for Outside Lift System (OLS) Foundation (COOE 094).
- 4 Containment Access Facility (CAF) Flooring (CCOE 165) Installation of carpet flooring tiles in the Containment Access Facility.
- Added storage container construction for manway and inspection ports Scope (CCOE 166) – This CCOE will not be added to Target Cost. PG&E will not pay for SGT Overhead and Fee for this CCOE.
- 6 Outage Delays Prior to Replacement Steam Generator (RSG) Window (CCOE 171)

C	FIRM NAME Washington Group International, Inc.	Р	NAME Des Bell
Ň	Richard B. Wilkerson	G	SIGNATURE
R	Richard B. Wilkenon	8	TITLE Vice President, Shared Services & Uniet Produrement (1950er
C	President, SAT	Έ	DATE EXPORTED
0 . R	(VATE ATY EDTED 08/20/2008		- 1938E NEIGLY ATOR B R Philips PHONE 14151 373-1561 PR No 11838886

C. Theologies and Nettings Hok My Tokuments 3500601110-169, 8-15-06 Job

#### Agreement No. 3500621110 Change Order No. 9 Page 2 of 4

- Support for RSG (CCOE 173) Unload, scaffold support, and removal of sludge collector blowdown pipe fittings.
- Main Steam/Feedwater (MS/FW) Rupture Restraint Bumper Removal (CCOE 174) - Grind down and remove crushable bumper welds.
- Additional manpower required for crane walkers and housekeeping in Containment.(CCOE 176).
- Insulator and pipefitter additional support for instrument tubing relocation (CCOE 179).
- 11. Upper Lateral Support RSG Window Delay (CCOE 180) As-found conditions at the Upper Lateral Supports differed from those shown on drawings provided.
- 12. Additional busing (CCOE 182) Busing encountered when employees were laid off, but unable to leave site due to unavailability of transportation.
- Various Non-Conformance Reports (NCRs) and As-found Conditions (CCOE 183) - Several conditions resulted in NCRs and actions to rectify the problems.
- 14. Human Performance (HU) Training (CCOE 184) Additional human performance training.
- 15. Extra Banding at Sump (CCOE 187) Additional scope to the double banding work.
- 16. Plant Scaffold Rework (CCOE 188) Modifications, rework, and rebuilds due to changes and miscommunication between the Parties.
- 17. Manway Access Platform Modifications (CCOE 190) Miscommunication between Parties resulted in rework,
- 18. Heat-up Delays (CCOE 192) Delay in DCPP heat-up resulting in personnel being held on site for an additional period of time.
- 19. 2007 Escalation Adjustment (CCOE 194).
- 20. 2008 Escalation Adjustment (CCOE 195).
- 21 Additional Smoke-eaters (CCOE 196) Smoke-eaters at selected locations were modified by PG&E.
- 22 Non-Manual Performance Incentive Plan (PIP) (CCOE 199) This CCOE and pending CCOE 200 (Unit 1) supersede CCOE 130

#### C QUALITY ASSURANCE

The Nork supplied in Sections I B 13 and I B.17 are nuclear safety related and are subject to the reporting requirements for defects and honcompliance under the provisions of Part 21 of 7 the 10 of the Code of Federal Regulations (10CFR21)

Should the Contractor provide any information to the Nuclear Regulatory Commission (NRC) resulting from the above reporting requirements, this information shall be provided immediately to

Agreement No. 3500621110 Change Order No. 9 Page 3 of 4

PG&E - Diablo Canyon Power Plant Manager, Quality Verification Department P. O. Box 56 Avila Beach, CA 93424

The Contractor's Quality Assurance Program shall comply with the applicable portions of Title 10, Code of Federal Regulations, Part 50 (10CFR50), "Domestic Licensing of Production and Utilization Facilities," Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," as implemented by the Contractor's Quality Assurance Manual Issue 2, Revision 9 dated 7/16/07 or latest PG&E approved revision, and approved by PG&E to provide steam generator products and services.

PG&E shall have the right of access (1) to enter the premises of the Contractor to witness inspection/test activities and/or (2) to conduct surveillance or quality assurance audits. This right shall extend to all Subcontractors and shall be coordinated through the Contractor.

Contractor shall comply with PG&E's QSL restriction: The provisions of ASME Section III, Subsection NX-2610 Paragraph (B) shall not be utilized for ASME Section III material. ASME Subsuppliers shall be prohibited from utilizing the provisions of NX-2610 (B), unless the quality of such material is verified by the Supplier.

PG&E reserves the right to review, comment, and approve Contractor documents.

Contractor shall submit all non-conformance notices to PG&E.

Documents shall be maintained in accordance with the QA documentation requirements in PG&E Specification 10047-N-NPG, Section 2.6.2.4. QA documentation supporting Certified Material Test Reports (CMTRs) shall include CMTRs for the starting material, results of any testing needed to upgrade the material if it is not qualified source material, and results of all tests and inspections required by Specification 10047-N-NPG and ASME code.

All remaining items in Section I.B are not safety related.

#### CONSIDERATION

11.

The Parties have agreed to the following settlement for the DCPP Unit 2 Work as follows.

A Contractor's Feel

This fee is the final total fee amount and supersedes Base Fee and any and all Fee Adjustments

Delete Section 6.9 in its entirety

B. The Contract Target Cost shall be increased by (Exhibit I. Section 1)

CCOE 166 will not be added to Target Cost and SGT Overhead and Fee will not be paid.

Target Dost (except for DODE 166) for CODEs are shown in this Change Order, however, Target Cost, escalation adjustments and all other Target Cost monetary considerations (e.g. Fee Adjustment for Cost) are not applicable due to the final, fixed Documents registerings fink My Documents 350621111, eg. 8-15-28, esc.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 14 of 151

#### Agreement No. 3500621110 Change Order No. 9 Page 4 of 4

amount of Contractor's Fee at paragraph takes priority over a For the avoidance of coubt, this incline Tarcet Cost terms

paragraph takes priority over any our encondicting Target Cost terms

The amour	t of the CCQEs are:	
056	OSGSF Roadway Soil Remediation	
C60	SGT Corporate Overhead Allocations	
	Additional Eng and Construction due to unknowns at OLS	
094	foundation	••
165	CAF Flooring	
166	Added Manway & Inspection Port Scope (not in Target cost)	
171	Outage Delays Prior to RSG Window	
173	Plant Support for RSG	
174	MS/FW Rupture Restraint Bumper Removal	
176	Additional Plant Support	
179	Insulator & Pipefitter Support	
180	Upper Lateral Support RSG Window Delay	
182	Additional Busing Costs	
183	Various NCR and As-found Conditions	
184	HU Training Adjustment	
187	Extra Banding at Sump	
188	Plant Scaffold Rework	
190	Manway Access Platform Modifications	
192	Heat-up Delays	
- 194	2007 Escalation	
195	2008 Escalation	20
196	Additional Smoke-eaters	
199	Actual Non-Manual PIP	
	Total	

C Reimbursable Costs shall paid by PG&E to a maximum

The settlement of Target Cost not being applicable as stated in Section II B. Contractor's Fee and maximum Reimbursable Cost in no way reduces, waives or supersedes the requirements of Contractor or rights of PG&E

ALL OTHER TERMS AND CONDITIONS SHALL REMAIN THE SAME

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 15 of 151

Date

\$ 113/08

8-12-08

12 AUG 08

12 AUG 08

12 Aug 08

08

7/10/08

### **ROUTING FOR SIGNATURE**

Diablo Canyon Unit 2 - Contract Change Order #9

Name

Signature

? Telto

George Krauss

Chris Good

Paul Helton

Hugh Bourque

Geoff Wilde

SIGNATURE:

Kuth Willight

Dick Wilkerson

Please return both executed copies to Cici Schulz at Diablo Canyon

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 16 of 151

Audit Number 38241-P-08-02

AFR Number: AFR - 02

· .		
Docket Number 99901334		
SGT M-09-0050 Attachment 2		
Page 17 of 151		

			Page	17 of 151	Attachment 2
SGT	Standard Procedures Engineering and Construction Projects	Form Source		•1	OCEDURE
Form Fille			Revision No 0E27	AFU	QEP 18.01-2
	AUDIT FINDING REPORT		04-Ma	y-05	Form Page 2 of 2
Audit Number	38241-P-08-02	FR Number AFR – 02		Date issu	od ctober 7, 2008
This condition was Corrective Action approved by the S As a result of the	investigation supporting DR-034, SGT No	Number 034 on 24 nate Cause of this o phoonformance Rep	September deficiency ha	ive been 2-084 ha	proposed and is been generated
Attached is a cop will be verified as See attached NCI		tation. The correcti	ve actions a		a with these repor
Corrective Action Tak	en by (Signature and Title):	Corrective Action Co	ompletion Date:		
	Helton	15 1	ecember	$\mathcal{O}\mathcal{O}$	
See attached NC					
	iken to Eliminate Cause of Discrepancy:				
	sken to Eliminate Cause of Discrepancy:				
Preventative Action Ta	sken to Eliminate Cause of Discrepancy:				
Preventative Action Ta	sken to Eliminate Cause of Discrepancy:				
Preventative Action Ta See attached NCI Presentative Action Ta	sken to Eliminate Cause of Discrepancy:	Cate:	erris to r	2	
Preventative Action Ta See attached NCI Presentative Action Ta	sken to Eliminate Cause of Discrepancy: R 2-084. Isen by (Cigidature and Tale)		)conta Lor		
Preventative Action Ta See attached NCI Presentative Action Ta	isken to Eliminate Cause of Discrepancy: R 2-084. Isket: by (Signature and Tate)	BY AUDITOR Ver	fication of In	npiement	
Preventative Action Ta See attached NCI Presentative Action Ta Presentative Action Ta Presentative Acceptable	e / Preventative Action Evaluation	BY AUDITOR Ver Cor Acceptable	n general de la composition de la compo	nplement ventative	Action
Preventative Action Ta See attached NCI Presentative Action To Action To Courective	e / Preventative Action Evaluation	BY AUDITOR Ver Cor	fication of in rective / Pre	nplement ventative	Action
Preventative Action Ta See attached NCI Presentative Action Ta Presentative Action Ta Presentative Acceptable	e / Preventative Action Evaluation	BY AUDITOR Ver Cor Acceptable	fication of in rective / Pre	nplement ventative	Action
Preventative Action Tr See attached NCI Presentative Action Tr Acceptable Receptable	e / Preventative Action Evaluation	BY AUDITOR Ver Cor Acceptable	fication of in rective / Pre	nplement ventative	Action

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 18 of 151

## Deficiency Report No (38241) 034

1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Page 19 of 15	50 Attachment 2 1
		S COMPANY EXECUTION P	ROCEDURE
Form The		Revision No., Status 1E1 / AFU Form Revision Date	Form No QEP 12.02-2 Form Page
	GENERAL INFORM	28-Mar-05	1 cf 1
Activity NDE of Welder Perform		CY REPORT NO. (38241) 034	Deficiency Record Sheet 1 of
ASSIGNED TO: Paul Helton	Department Quality	it in trated Reference NC	
mechanical testing for evalua Radiography shall be perfor Contrary to these requirement Services Inc. performed radio accordance with QEP 12.06.	ance Qualification, paragraph 5.2.1 s ating the welders, performance quali- med in accordance with QEP 12.06. hts: no objective evidence exists to c iography and film review of SGT wel Sheet for Newsions.	fication". In addition, paragrap Radiographic Examination (ASN locument that Valley Industrial X der performance qualification co	h 5 2.2 states. in part. ME; -Ray and Inspection upon welds in
INITIATED Signature:	Steet for revisions.		Date: DIL No
BY: K. Licy APPROVED Signature: BY: APPROVED Signature:	etta Title:	QA Supervisor	24-Sep-08 01
BY: Tank g. We		Project Quality Manager	24-Sep-08
	CAUSE AND CORRECT		
Lie atta	CAUSE AND CORRECT		
Lee atta	CAUSE AND CORRECT	VEACTION	
Lie atta	CAUSE AND CORRECT	VEACTION	
	CAUSE AND CORRECT	VEACTION	E:
	CAUSE AND CORRECT	O ELIMINATE CAUSE	E:
	CAUSE AND CORRECT	O ELIMINATE CAUSE	E:

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 20 of 151

> DR-034 Sheet 2 of \_\_\_\_\_

This updated description (Revision 1) is based on the discovery of the scope of this condition.

To further describe this condition, the following items have been identified:

- a. No radiographs, reader sheets or RT reports were reviewed and approved by SGT as required per QEP 20.04.
- b. Additional vendor has been identified as Conam. Inc. who performed RT services for the qualification of Wachs welders.
- c. Conam does not appear on any SGT Parent Company Approved Suppliers List (ASL).

etre Initiated by

QA Supervisor

10.2.08 Date

Approved by PQM

#### DR-034 <u>SUMMARY</u>

Prior to 2R14. SGT utilized the services of a subcontractor to perform and interpret radiography testing of the welder qualification coupons in accordance with the requirements of ASME Section IX for weld test coupons fabricated onsite at DCPP. The subcontractor was Valley Industrial X-Ray & Inspection Services. Inc. of Bakersfield, CA. Also, SGT subcontracted E.H. Wachs Co. to provide qualified welders for the DCPP Unit 2 SGRP when local union resources were depleted. (SGT Welding Engineering implemented SGT's QA Program at the Wachs facility during welder qualification performance). Conam Inspection and Engineering Services, Inc. was subcontracted by Wachs to perform and interpret radiography of the qualification coupons for the welder performance qualification performed at their North Carolina facility. Neither of the providers of radiography services appeared on the Areva, URS-Washington Division (SGT, LLC), or PG&E's approved supplier/vendor lists (ASL/AVL) and therefore, would be required to perform work under SGT's QA Program, as stated on the Form QEP 09.01-1, Purchase Order.

The results from a review of these radiographs and a review of the bend test of the welder whose weld test coupon radiograph could not be located, indicates all 148 welders are qualified to ASME Section IX requirements.

The following sections contain a summary of the results of the review of radiographs for the qualification welds at DCPP before and during 2R14. Subsequent sections cover the programmatic deficiencies identified.

#### **REVIEW OF RADIOGRAPHS**

To validate the qualification of the welders, and the quality of the welds performed. SGT's Level HI Radiographer, Bob Scholes, interpreted the performance qualification test (PQT) radiographs for 147 of 148 welders qualified by RT and as performed by the two non-ASL subcontractors. This review of the qualification radiographs determined that the Unit 2 welders satisfied the qualification requirements were acceptable as previously evaluated at the Conam and Valley facilities. Mr. Scholes' review is contained in Attachment 1 of this report. Therefore, 147 welders met the ASME Section IX qualification requirements

The qualification radiograph for PQT 409, performed by Mark Keith (welder ID/symbol) K1243) could not be located. This PQT was rejected according to weld history records anantaned by SGT's Project Welding Engineer (PWF). However, Mill Keith also performed SGT PQT test hamber SGT 001 which required quantification by an acceptable bend test. This bend test was performed by SGT and qualified Mill Keith to perform at areas and the knowns of the following to the PWF's review of Artachment 2. Protocol (K1247) and go effectively of discussion endows of Mill Keith to perform at a first review K1247. The go effectively of discussion endows of Mill Keith to region of following the R1447 source of the R144 source of the review of Mill Keith to region affective endows of the R144 source of the review of Mill Keith to region affective endows of the R144 source of the review of Mill Keith to region affective endows of the R144 source of the review of Mill Keith to region affective endows of the R144 source of the review of Mill Keith to red the affective endows of the R144 source of the review of Mill Keith to red the affective endows of the R144 source of the review of Mill Keith to red the affective endows of the R144 source of the review of Mill Keith to red the

#### APPARENT CAUSE (Programmatic Issues)

The SGT QA Program procedures contained adequate and appropriate guidance to ensure compliance with ASME Section IX requirements for the qualification of welders. However, project personnel responsible for the management and supervision of the procedure implementation failed to ensure execution of the instructions. As a result, the following conditions were identified:

- 1. Ineffective implementation of the SGT QA Program by the responsible quality project management and supervision.
  - a. Interviews with quality personnel active on the project at the time of occurrence indicate that the SGT QA Manager provided direction to the staff and supervision that he would take responsibility for the implementation of the requirements associated with the vendors of the welder qualification radiography testing.
  - b. PQM/Quality Engineers did not scheduled surveillance of radiography activities at the subcontractor facilities.
  - c. Lack of surveillance/reviews of documentation of welder qualification activities by Quality Engineers.
- 2. Requirements of QEP 9.01, Procurement, not met:
  - a. Purchase Requisition submitted however, not all required forms were included from the requisition stage to issue of the Purchase Order.
  - b. Purchase Order was never reviewed and signed by Project Quality Manager or designee.
  - c. Supplemental Exhibit DD to PO not implemented as issued:
    - i. Correct requirements as stated were not invoked (i.e. Subcontractor performs work in accordance with SGT's QA Program:
    - ii. Incorrect requirements stated not applicable to this type of PO (see Attachment 3, Item Nos. 2, 3, and 4)
    - iii. Contradiction in terms on Exhibit DD concerning QEPs. One time it says any QEP can be obtained by requesting to SGT: later it states Subcontractor to work to SGT's QA Program and QEPs.
    - iv. Subcontractor working to SGT QA Program shall work to a <u>controlled copy</u> of the applicable QEP(s) issued by SGT Document Control Center (DCC). None provided to the Subcontractor.
- 3 Requirements of QEP 12.06, Radiographic Examination (ASME), not met-
  - a. Personnel performing radiography shall be certified in accordance with QEP 04.04, Qualification and Certification of NDF Personnel (para, 3.1.1)
  - Procedure qualification shall be documented on Form QEP 12 0001 with record of procedure demonstration and approval maintained in accordance with QEP Appendix 1. *Index of Que by Documents*, pair 3/2/30

is factorize instructions, according to A13-24

. . . . . . . .

1. Of all data set of some constraints of the set of set of the set of the

12.1

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 23 of 151

#### CORRECTIVE ACTIONS

A. Welder Qualifications

- 1. Retrieved documents and test coupon radiographs to validate original welder qualification results from 2R14.
- 2. Review of documents and test coupon radiographs by SGT RT Level III for acceptance.
- 3. SGT's Project Welding Engineer performed additional review of welder test qualifications (WQT) to verify acceptability.
- 4. SGT's RT Level III review and acceptance has been documented on a master Form QEP 12.06-1 (reader sheet see Attachment 1).
- 5. Client RT Level III performed a review of radiographs at random to determine WQT welder qualification coupon acceptability.
- 6. Randomly, select a minimum of six (6) WQT coupons for radiography reshoot and subsequent comparison to the original radiograph. This is to provide assurance that original radiographs are as identified on the film.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 24 of 151

#### PREVENTIVE ACTIONS

A. Amended the <u>Wachs Technical Services, Ltd.</u> subcontract requirements to reflect correct SGT Quality Program requirements as follows:

#### EXHIBIT DD

#### QUALITY CONTROL PROGRAM

- Centractor's work is controlled by Contractor's NQA-1 Quality Assurance Program in full compliance with the requirements of 10 CFR 50. Appendix B. "Quality Assurance Criteria for Nuclear Power Plants." Execution of the work is procedurally governed by Contractor's project specific Quality Execution Procedures (QEPs).
- 2. Subcontractor shall perform all work in accordance with the QEPs specified in the Purchase Order.
- 3. All radiography shall be performed under the Contractor's QA Program.
- 4. Contractor shall provide direct control of any subcontracted radiography of welder qualification test coupons.
- 5. Subcontracted radiography of welder qualification test coupons will require that a Contractor Level II or III radiographer(s) perform set-up and supervise during all radiography evolutions.
- 6. The Contractor's Quality Engineer(s) shall have access to the Subcontractor's Radiography supplier and shall have the right to perform surveillance of the RT activities or audit any and all records pertaining to the Purchase Order.
- 7. Subcontractor shall ensure radiographer supplier double loads all cassettes in order to supply Contractor a copy of the film.
- 8. The Contractor's radiographer shall take possession of one copy of all weld test coupon radiographs for submittal to a Contractor Level III radiographer for interpretation and acceptance.
- XII radiography will be performed using a motually agreed upon technique in accordance with QEP 12.06, prior to exposure.
- 16 An weld test compone shall be retained to the Contractor facility in the DCPP site. Method of singiment to be coordinated with doct onitiaet. Advancementation
- (4) Description of the descri

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 25 of 151

B. Amended the <u>Valley Industrial X-Ray and Inspection Services</u>, Inc. subcontract requirements to reflect correct SGT Quality Program requirements as follows:

#### EXHIBIT DD QUALITY CONTROL PROGRAM

 Contractor's work is controlled by Contractor's NQA-1 Quality Assurance Program in full compliance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants." Execution of the work is procedurally governed by Contractor's project specific Quality Execution Procedures (QEPs).

2. Radiography shall be performed under Contractor's QA Program.

- 3. Subcontracted radiography of welder qualification test coupons will require a Contractor Level II or III radiographer perform set-up and supervise during all radiography evolutions.
- 4. The Contractor's Quality Engineer(s) shall have access to the Subcontractor's radiography facility and shall have the right to perform surveillance of the RT activities or audit any and all records pertaining to the Purchase Order.
- 5. Subcontractor shall double load all film cassettes.

C

- 6. The Contractor's radiographer shall take possession of all weld test coupon radiographs for submittal of one copy to a Contractor's Level III radiographer for interpretation and acceptance. The other copy shall be maintained at SGT Document Control Center or in the Quality Records Center at the DCPP site.
- 7. All radiography will be performed using a mutually agreed upon technique in accordance with QEP 12.06, prior to exposure.
- 8. All weld test coupons shall be returned to the Contractor facility at the DCPP site. Method of shipment to be coordinated with the Contract Administrator.
- Assign SGT certified RT Level II at each location [one at Valley facility in Bakerstield, CA, and one at Conam Inspection facility in Monroe, NC (Wachs Technical Services, Ltd) subcontracted supplier for radiography services (
- D Provide Quality Engineers for perform surveillance activities frame rudic graphy processes at both Conant and Valley fractities. 2

Docket Number 99901334 SGT M-09-0050 Attachment 2 -Page 26 of 151

#### ATTACHMENTS

The following attachments detail the actions taken during this investigation:

Attachment 1: Master Reader Sheet developed by Mr. Scholes to identify the PQT numbers and the review of the weld quality against the criteria specified in QEP 12.06. Attachment 3 (Acceptance Criteria for' ASME Section IX).

Attachment 2: A report was generated from SGT's Quality Performance Management System (QPMS) for Mr. Keith identifying the work package that contained the weld history cards applicable to Mr. Keith's welding activities in question.

Attachment 3: EXHIBIT DD to original Purchase Orders to E.H. Wachs Co. and Valley Industrial X-Ray and Inspection Services, Inc.

#### <u>CONCLUSION</u>

After completion of this investigation, interpretation of radiographic film, documentation reviews, and interviews with personnel, it has been determined that all welds completed prior to and during 2R14 were made by qualified welders who satisfactorily met the requirements of ASME Section IX.

This deficiency was also identified during the internal Project Audit 38421-P-08-02 as a Major Audit Finding (AFR-02). With the conclusion of this investigation, it has been determined that no potential association with 10CFR21 is applicable. This was limited only to a programmatic failure and no hardware issues exist.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 27 of 151 しんてこうく

	415	ы <del>й С</del>	De.A	ـــــــــــــــــــــــــــــــــــــ	i			(		_	Sourc		Owner M	'y Dacun	rents A	mernést Proje	5357 RT.R	eport for DR 034
<b>SG</b>	Er	ngine	ering				Proces on Pro		5,		•		LITY	EXE	cut	ION PR	OCEDU	RE
Form Title												• •	F		n No 2 / A	Status F <b>U</b>	Form N	o. P 12.06-1
RAI	DIOGRA	٩P		EXA	MI	NA7	rio!	R	EP	POP	RT		F	orm R		in Date	Form P	
Project Ve	ork Package N.	umber	-	CC 77	ce i hiu			ŵР	FC	C Step	Nur:	cer	Sit	Numbe	r		Report	
Part . Joint Number		iter:	escriptio			·	System		A-224			Marana		. Thek			Shee	E.ameter
an . 20.81 - 405- 081			escopia	<b>,</b>			Cys.c.			:08		* a.C 3	Sase Weld	וייי א <b>כו</b> ע קי זי	.629	10.	ritoreent	0.3
itatus of Work	New C Repair			ation S	tandard	3			Acc	eptan	ce Sta	ndaro		6		-	Procedure P 12.06	Nov Rev No
adiation Source	Curies / X-ray			Number		Weldir	ng Proce	55	Γ			raph ue Sk				posure: 🗋	Single Wali	🗌 Coubie V
ff Source Size (f)	Cbject-Film C	ist d)	Source	-Оъј D	ist (C)	Result	ing Dy	Z	P	1 es							Single /yai:	
2i Location	iQI Material		íQI Siz	8	5	iour	antity	· .										
Ensitivity Reqd	Shim Thickne	ss 	No of E	Exposur	<b>#</b> 5	Expos	ure		1									
ilm Brand / Type	Films per Hol	der	Film Si	28		Film Q	luantity		1									
ead Screens Front	Pilm Process	-	Dev Te	amp		Dev Ti	me		1									
Center Back	Autom																	
Radiographic identification	Location Markers	Unacceptable	Surface Indication	Non-Relevant Radiograph Artifact	Rounded Indication	Linear Indication	Lack of Penetration	Crack	Undercut	Concavity	Convexity	Minimum, Density	Maximum Density	#1 IQI Density	#2 IQI Density	Densitome	l dimensions ter - M&TE Cal Du tip - M&TE Cal Du	No e No
	· · ·	1		; ;					11			}				;	· · ·	
			edic															
			etatro Noted											-01-	· · · · · · · · · · · · · · · · · · ·			
	یب، میدانید. بیر آرچورید در در م	ాశ స	e 73	2.	<del>-</del> - <del>-</del>		n 17.2	r syx	243 C	s.÷		Alto		ಂಕಂ.				
. 1. av. a <b>vers</b> t maarseg	n na state	19 <b>7</b> 97.1	111 và •		- ()	191										6 A 1 A 1 A 1 A 1	1	····
n i anomi	• • • • • • • • •	1: .4	 	÷ .		·		27		•							÷	
	** -																	
:	• •		**					• • •	• • •		t •	. ,				•	2	
			-1		•		•			•	.,			:				
			÷ +			e	·	: .		•	• •					×		
	•• ••									• • •	÷							
			na na Lina Tao A	*** ··	n ma	•			• •	• •		- 	t og og	., .	· .	art a		
•	· .			• .		18				. :						`		
•																		
-				··· .														
						۲. ۲.	) }						~					

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 28 of 151

10/9/2008

## DR - 034 RT REVIEW SHEET

The following PQT's were reviewed as a part of the resolution of the abovementioned Deficiency Report. The DR addresses the problem and subsequent Corrected Actions. It should be noted that Radiography was not carried out in accordance with QEP12.06 as directed in QEP.20.04, but instead would appear to have been completed in accordance with the NDT contractor's procedure and the requirements of ASME Section IX. The referencing code applicabe at the time of the work in progress would have been ASME. IX 2006 Edition, which specifies compliance with ASME Section V is proven if the density is within specification (2.0 to 4.0) and the correct wire or pentrameter hole combination is seen.

The NDT Contractor companies have provided various report and technique sheet formats which contain multiple discrepancies. QEP 12.06 specifies the use of form QEP1206F1 which would have guided the contractor companies to providing better technique information.

Consequently, understanding that this is a post fact review, the problems associated with the respective supplied documentation is not a part of this review, but also, I have selected to use the requirements of ASME IX as the basis for weld assessments. "Acceptance" or "Rejection" is stated below and where "Accept" is stated, it is considered the films meet the general acceptance requiements of ASME Section IX, but is not necessarally acceptance of the technique. Some of the films reviewed have incorrect penetrameter selection and placement by which the radiograph would not meet the requirements of the referenced Code, but is still of adequate quality to be able to say with a reasonable degree of confidence that the deposited weld is within the acceptable indication parameters defined in ASME Section IX.

#### PQT #

271	0 to 1 1 to 2 2 to 0	Accept Accept Accept
269	0 to 1 1 to 2 2 to 0	Accept Accept Accept
436	0 60 120	Accept Accept Accept
323	1 2 3	Accept Accept Accept
327	* 2 3	Accept Accept Accept
	•	Accept Accept Accept

#### NOTE:

During the Quality Engineer review of this Master Reader Sheet prepared by Bob Scholes, SGT RT Level III it twis noted that two (2) PQT's were innited in profils ust the case of the Espire concases and a Espire concases and a Espire con-

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 29 of 151

10/9/2008

## DR - 034 RT REVIEW SHEET

DOT #

PQT #									
35 - 5G	0 to 6	Accept		35 - 6G	1	Accept			
	6 to 12	Accept			2	Accept			
	12 to 16				3	Accept		`	
	16 to 0	Accept						•	
									-
203,	0	Accept							
	60	Accept							
	120	Accept							
440	0	Accept							
	60	Accept							
	120	Accept							
	-								
294	0	Accept							
	60	Accept			•				
	120	Accept							
113	0	Accept							
115	60	Accept							
	120	Accept							
	120	Accept							
241	0	Accept							
_ · ·	45	Accept							
	90	Accept							
	135	Accept							
			*						
431	0	Accept							
	60	Accept							
	120	Accept							
				•					
111	0	Accept							
	60	Accept		•		•			
	120	Accept							
201	0	Accept							
201	60	Accept							
	120	Accept							
	120	, locopt							
208	0.	Accept							
	60	Accept					· .		
	120	Accept				<i>x</i>			
		·							
437	0.	Accept							
	ō0	Accept							
	120	4 ccept							
	* .								
196	÷	Proept -						`	
	<b>7</b> .7,	Notept							÷
		- '92'							
							,		

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 30 of 151

10/9/2008

## DR - 034 RT REVIEW SHEET

PQT # 142	0 60 120	Accept Accept Accept
289	0 60 120	Accept Accept Accept
233	0 1 2	Accept Accept Accept
318	0 60 120	Accept Accept Accept
244	0 <sup>-</sup> 45 90 135	Accept Accept Accept Accept
57	1 2 3	Accept Accept Accept
38	1 2 3	Accept Accept Accept
193	0 60 120	Accept Accept Accept
180	0 60 120	Accept Accept Accept
196	0 60 120	Accept Accept Accept
413	0 60 120	Accept Accept Accept
295		Acteor Accept Accept Accept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 31 of 151

10/9/2008

# DR - 034 RT REVIEW SHEET

PQT#		
73	0	Accept
	1	Accept
	2	Accept
		, 1000pt
14	0	Accept
1.4	1	Accept
	2	Accept
	2	Accept
202	0	4 cco.ct
202		Accept
	60	Accept
	120	Accept
(00	•	
433	0	Accept
	60	Accept
	120	Accept
	•	
288	0	Accept
	60	Accept
	120	Accept
176	0	Accort
170	60	Accept
		Accept
	120	Accept
434	0	Accept
404	60	
		Accept
	120	Accept
293	0	Accept
200	60	Accept
	120	Accept
	120	Accept
178	0	Accept
	60	Accept
	120	Accept
	120	Accept
169	0	Accept
	1	Accept
	2	Accept
	2	Accept
403	0	Accept
	05	Accept
	120	Accept
	.20	- noah(
474	0	Accept
	5 5	Accept
		a compti A compti

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 32 of 151

10/9/2008

# DR - 034 RT REVIEW SHEET

<b>PQT #</b> 290	0 60 120	Accept Accept Accept
245	- 0 45 90 135	Accept Accept Accept Accept
154	1 2 3	Accept Accept Accept
444	0 60 120	Accept Accept Accept
430	0 60 120	Accept Accept Accept
60	1 2 3	Accept Accept Accept
224	0 60 120	Accept Accept Accept
132	0 60 120	Accept Accept Accept
258	0 60 120	Accept Accept Accept
329	0 60 120	Accept Accept Accept
- 44	0 50 120	Accept Accept Accept
- <del>58</del>	0 47 100	Accept Accept Accept Accept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 33 of 151

10/9/2008

PQT # 442	0 60 120	Accept Accept Accept
22	1 2 3	Accept Accept Accept
192	0 60 120	Accept Accept Accept
251	0 60 120	Accept Accept Accept
140	0 60 120	Accept Accept Accept
262	0 60 120	Accept Accept Accept
443	0 60 120	Accept Accept Accept
250	0 60 120	Accept Accept Accept
32	1 2 3	Accept Accept Accept
232	1 . 2 3	Accept Accept Accept
432	0 60 120	Accept Accept Accept
4:0	0 60 124	Accept Accept Accept
· ,=	· • • •	2000 

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 34 of 151

10/9/2008

PQT #							
373	0 -	Accept		0	Accept		
	45	Accept	· ·	45	Accept		
	90	Accept		90	Accept		
				135			
	135	Accept		135	Accept		
15	1	Accept					
	2	Accept					
	3	Accept					
		•					
439	0	Accept					
-05							
	60	Accept					
	120	Accept			•		
261	0	Accept					
	60	Accept					
	120	Accept					
		•					
182	0	Accept					
102	60	Accept					
	120	Accept					
050	•						
259	0	Accept					
	-60	Accept					
	120	Accept					
207	0	Accept					
	60	Accept					
	120	Accept					
457	0 to 1	Accept					
407	1 to 2						
		Accept					
	2 to 0	Accept					
	<b>0</b> · · · ·						
460	0 to 1	Accept					
	1 to 2	Accept					
	2 to 0	Accept					
	*						
149	0 to 1	Accept		0 to 1	Accept		
	1 to 2	Accept		1 to 2	Accept		
	2 to 0	Accept			Accept		
	2.000	1000pr		2.00	ccopt		
195	0 to 1	4ccept					
:90							
		4 ccept					
	2 to 9	Accept					
102	0 fo €	Alicept	17 17				
		àdiep'					
	· · · · · · · · · · · · · · · · · · ·	A. Jert					
	i El terrori	- · · ·					
		~					

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 35 of 151

10/9:2008

PQT # 167	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept Accept Accept		
161	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept Accept Accept		
164	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept Accept Accept		
150	0 to 1 1 to 2 2 to 0	Accept Accept Accept	•	
452 5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept		2G
34 2G	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept Accept Accept		5G
236	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept Accept Accept		
17	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept Accept Accept		
23	0 to 5 5 to 10 10 to 15 15 to 0			
.0	1 2 3	Accept Accept Accept		
		Alcept Allert Allert		

2G	0 to 1	Accept
	1 to 2	Accept
	2 to 0	Accept
5G	0 to 5	Accept
	5 to 10	Accept
	10 to 15	Accept
	15 to 0	Accept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 36 of 151

10.9.2008

PQT #		
128	0 . 60 120	Accept Accept Accept
328	0 60 120	Accept Accept Accept
332	0 60 120	Accept Accept Accept
197	0 60 120	Accept Accept Accept
128	0 60 120	Accept Accept Accept
412	0 60 120	Accept Accept Accept
260	0 60 120	Accept Accept Accept
243	0 45 90 135	Accept Accept Accept Accept
256	0 60 120	Accept Accept Accept
32	0 60 120	Accept Accept Accept
13	1 2 3	Accept Accept Accept
30	•	Arcept Arcept Arcept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 37 of 151

10.9.2008

## DR - 034 RT REVIEW SHEET

<b>PQT #</b> 255	0 60 120	Accept Accept Accept
151	1 2 3	Accept Accept Accept
225	0 60 120	Accept Accept Accept
130	0 60 120	Accept Accept Accept
114	0 60 120	Accept Accept Accept
407	0 60 120	Accept Accept Accept
401	0 60 120	Accept Accept Accept
253	0 60 120	Accept Accept Accept
320	0 60 120	Accept Accept Accept
112	0 60 120	Accept Accept Accept
322	0 60 120	Accept Accept Accept
:46	0 <sup>°</sup> to 1 1 to 2 2 to 0	Accept Accept Accept

5G

1 to 2 - Accept 2 to 1 - Accept 1

Accept

3:5-1

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 38 of 151

10,9/2008

## DR - 034 RT REVIEW SHEET

PQT #							
334	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
450	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
36	0 to 6	Accept					
	6 to 12	Accept					
	12 to 18	Accept					
	18 to O	Accept					
212	0 to 1	Accept		5G	0 to 1	Accept	
2.2	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
					-		
339	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
	• • • • •			50	<b>A</b> ( )		
307	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
247	0 to 6	Accept		5G	0 to 6	Accept	
	6 to 12	Accept			6 to 12	Accept	
	12 to 18	Accept			12 to 18	Accept	
	18 to 0	Accept			18 to 0	Accept	
	0.1-1				0.0.4		
	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
122	0 to 1	Accept		5G .	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
	2	<b>.</b>		~~	<b>a</b>	· · ·	
416	0 to 1	Accept		5G	0 to 1	≏ccept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
216	D to 1	Accept		5G	0 to 1	Accept	
2	1 to 2	Accept			1 to 2	Accept	
	2 :0 0	Accept			2 to 0	Accept	
	2.00	20001	•			1-2H1	
	-2 <del>-5</del> -1	Porest					

. . ·

• •

i medr

1 1921

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 39 of 151

10/9/2008

PQT #					
304	0 to 1	Accept	5G	0 to 1	Accept
		Accept		1 to 2	Accept
	2 to 0	Accept		2 to 0	Accept
306	0 to 1	Accept			
	1 to 2	Accept			
	2 to 0	Accept			
333	0 to 1	Accept	5G	0 to 1	Accept
-	1 to 2	Accept		1 to 2	Accept
	2 to 0	Accept		2 to 0	Accept
351	0 to 6	Accept	5G	0 to 6	Accept
•••	6 to 12	Accept		6 to 12	Accept
	12 to 18	Accept		12 to 18	Accept
	18 to 0	Accept		18 to 0	Accept
	10 10 0				
58	0 to 6	Accept	5G	0 to 6	Accept
00	6 to 12			6 to 12	Accept
	12 to 18	Accept		12 to 18	Accept
	18 to 0	Accept		18 to 0	Accept
46	0 to 6	Accept	5G	0 to 6	Accept
	6 to 12	Accept		6 to 12	Accept
	12 to 18	Accept		12 to 18	Accept
	18 to 0	Accept		18 to 0	Accept
		•			
187	0 to 1	Accept	5G	0 to 1	Accept
	1 to 2	Accept		1 to 2	Accept
	. 2 to 0	Accept		2 to 0	Accept
426	0 to 1	Accept	5G	0 to 1	Accept
	1 to 2	Accept		1 to 2	Accept
	2 to 0	Accept		2 to 0	Accept
					3
308	0 to 1	Accept	5G	0 to 1	Accept
	1 to 2	Accept		1 to 2	Accept
	2 to 0	Accept		2 to 0	Accept
			1		
213	0 to 1	Accept	5G	0 to 1	-ccept
	1 10 2	≙ccept		1 to 2	<sup>≜</sup> ccept
		Accept		2 to 0	Accept
461	C to 1	4ccept	5G	C to 1	Accept
-	1:02	≐ccept		1 to 2	
	2 to 1	Absect		3 10 0	- Laept
	· · · ·	:-: <u>+</u> .:	- 5	-	1. <del>4</del> 0
		- : *			- ÷2:
	· · ·	; · -,			- <del>2</del> 11

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 40 of 151

10/9/2008

PQT #				
456	0 to 1	Accept	5G	
400	1 to 2	Accept	53	0 to 1 Accept
	2 to D	Accept		1 to 2 Accept
	, 2 10 0	Accept		2 to 0 Accept
300	0 to 1	Accept	5G	0 to 1 Accept
· ·	1 to 2	Accept	ia.	1 to 2 Accept
	2 to 0	Accept		2 to 0 Accept
185	0 to 1	Accept	5G	0 to 1 Accept
	1 to 2	Accept		1 to 2 Accept
	2 to 0	Accept		2 to 0 Accept
173	0 to 6	Accept		0 to 6 Accept
	6 to 12	Accept		
	12 to 18	Accept		•
•	18 to 0	Accept		
	10100	, looopt		18 to 0 Accept
417	0 to 1	Accept	5G	0 to 1 Accept
	1 to 2	Accept		1 to 2 Accept
	2 to 0	Accept		2 to 0 Accept
302	0 to 1	Accept	5G	0 to 1 Accept
	1 to 2	Accept		1 to 2 Accept
	2 to 0	Accept		2 to 0 · Accept
249	0 to 6	Accept		0 to 6 Accept
	∶6 to 12	Accept		6 to 12 Accept
	12 to 18	Accept		12 to 18 Accept
	18 to 0	Accept		18 to 0 Accept
448	0 to 1	Accept	5G	0 to 1 Accept
	1 to 2	Accept		1 to 2 Accept
	2 to 0	Accept		2 to 0 Accept
	*	·		
421	0 to 1	Accept	5G	0 to 1 Accept
	1 to 2	Accept		1 to 2 Accept
	2 to 0	Accept		2 to 0 Accept
68	0 to 6	Accept		
	6 to 12	Accept		
	12 to 18			
	18 to 0	4ccept		
			•	
69	0 to 6	incept		
		Accept		
	12.0.13			
	iê to l	- ncept		

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 41 of 151

10 9/2008

PQT #			50	0.44		
264		Accept	5G	0 to 1	Accept	
		Accept		1 to 2		
	2 to 0	Accept		2 to 0	Accept	
138	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
274	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	•
. 337	0 to 1	Accept	5G	0 to 1	Accept	
. 337	1 to 2	Accept	20	1 to 2	Accept	
				2 to 0	Accept	
	2 to 0	Accept		2 10 0	Accept	
215	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
	2.00				•	
28	0 to 6	Accept				
	6 to 12	Accept				
	12 to 18	Accept				
	18 to 0	Accept				
194	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
	2.00					
267	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
146	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
2	2100	·				
341	0 to 1	Accept	5G	C to 1	Accept	,
	1 to 2	Accept		1 to 2	Accept	
	2 to C	Accept		2 to 0	Accept	
177	0 to ≮	≜ ccept	5G	0 to 1	Accept	
	1 10 2			1 10 2	Accept	
	2.00	∸ccept		2 10 5	Accept	
	2.000	-01656		2 1 7 2	-ccebi	
108	3.0.	cect				
	3.10.2	- : .=et				
	· · · ·	14 - 14 g -				

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 42 of 151

10:9/2008

PQT #								
118	0 to 1	Accept				•		
	1 to 2	Accept						
	2 to 0	Accept	,					
135	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 to 0	Accept				2 to 0	Accept	
		•					•	
335	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 to 0	Accept				2 to 0	Accept	
344	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 to 0	Accept				2 to 0	Accept	
		•					·	
214	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 to 0	Accept				2 to 0	Accept	
							·	
134	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 to 0	Accept				2 to 0	Accept	
422	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 tọ 0	Accept				2 to 0	Accept	
276	0 to 1	Accept		50	3	0 to 1	Accept	
	1 to 2	Accept				1 to 2	Accept	
	2 to 0	Accept				2 to 0	Accept	
. 24	0 to 6	Accept						
	6 to 12	Accept						
	12 to 18	Accept						
	18 to 0	Accept						
	0.4-6	1						
29	0 to 6	Accept						
	6 to 12	Accept						
	12 to 18							
	18 to 0	Accept						
740	0 10 3	100001				0.00	* * * * * *	
248	6 of 0 8 to 10	Accept Locept					Accept	
	6 to 12					5 to 12		
	12 to 18					12 to 13		
	1 3 to 0	-clept				13.10.0	- ttent	

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 43 of 151

10/9/2008

PQT #							
277	- 0 to 1	Accept		5G -	0 to 1	A	
2,,,				50		Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
102	0 to 1	Accept					
	1 to 2	Accept					
	2 to 0	Accept					
19	0.45.0		•				
19	0 to 6	Accept					
	6 to 12	Accept					
	<ul> <li>12 to 18</li> </ul>	Accept					
	18 to O	Accept					
		•					
33	0 to 6	Accept			0 to 6	Accept	
	6 to 12	Accept			6 to 12	Accept	
	12 to 18	Accept					
					12 to 18	Accept	
	18 to O	Accept		•	18 to 0	Accept	
160	0 to 6	Accent					
100		Accept					
	6 to 12	Accept					
	12 to 18	Accept					
	18 to 0	Accept					
166	0 to 6	Accept					
	6 to 12	Accept					
	12 to 18	Accept					
	18 to 0	Accept					
	10 10 0	лосері					
265	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept		50			
					1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
136	0 to 1	Accept		5G	0 to 1	4 4	
	1 to 2	Accept		50		Accept	
					1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
124	0 to 1	10000		50	<b>D</b>		
124	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
	<b>5</b> · · · ·						
427	0 to 1 ,			5/G -	0 to 1	4 ccept	
	i to 2	4 ccept			1:02	Accept	
	2 10 0	Accept			2 10 5	Accept	
					-		
4:4	0 to 1	∴ccept		59	5 to 1	Accept	
		-iccept			1:02	- scest	
		Actept					
	- • •	<del>.</del> .			3 m 7	Arcept	

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 44 of 151

10/9/2008

PQT #							
336	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
. • •	_,						
119	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
			•				
338	0 to 1	Accept		.5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
321	0	Accept					
	60	Accept					
	120	Accept					
	120						
400	. 0	Accept					
	60	Accept					
	120	Accept					
21	1	Accept					
	2	Accept					
	3	Accept					
25	0 to 5	Accept					
20	5 to 10	Accept					
	10 to 15	Accept					
	15 to 0	Accept					
423	0 to 1	Accept			0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
129	0	Accept					
120	60	Accept					
	120	Accept					
	120	Accept		,			
31	0 to 5	Accept					
	5 to 10	Accept					
	10 to 15	Accept				·	
	15:00	≏ccept					

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 45 of 151 ンパーンナ

Attachment 2.

### WO 38241 - SGT Welder Use Log

(Report 3141) Page 1 of 2 3:14 PM 15-Oct-08

Welder iD_K1	243	_				
PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No	
			•		·	

Welder - K1	243 - Keith, Mark		Welder - K1	1243 - Keith, Mark	L.
WP 2-1522A,	, Chg 0, 5/22/2007		WP 2-3524A	, Chg 0, 11/15/2007	
1.40.02*	3 = 12.4	u4-2125 2008-1	NH0-201	3 FN -24	0H-3 8 2008-8
V-0-501	3 F.N-2	04-2 28/2008-M	.∵−C-05t	4 FM - 13	GLO-3 E 2008-2
N-0-001	3 = 13-3	14-2 25-2008-1	∴-0-01	4 F.), 17	910-33/2003-3
(+C-1)	BRE CAR	14-2 25 2003-1	∴HC-661	4 E.N13	GLC-3 3 2003-1
VP 2-1522C	, Chg 0, 5/22/2007		llo=0-081	4 F N-24	CH-3-8-2008-4
V-C-001	3.FV/-6	PP-2/23/2008-3	MHC-017	3 FW-108	PP-4 3.2008-1
NP 2-1522D	, Chg 0, 5/22/2007		7.1 <del>⊷</del> C-017	3.FVv-109	PP-4/3/2008-1
VHC-001	3∉FW-1	PP-2.20-2008-1	:\v∺C-017	3°FW-110	PP-4/3.2008-1
VHC-001	3 F77-2	PP-2/20-2003-1	7/HC-017	3/F /V-111	PP-4/3-2008-1
VHC-001	3/F\V-3	FP-2/20/2008-1	WP 2-3524B	, Chg 0, 11/15/2007	
	, Chg 0, 10/27/2007		WHC-001	3.EW-1	SED-3/9/2008-1
VHC-301	3.FW-9	JA-2125/2008-5	WHC-001	3/FW-15	SED-3.9/2008-1
	, Chg 0, 10/27/2007		MHC-001	3.71%-19	SED-3.9-2008-1
VF 2-15240, VHC-001	3.F.V-9	PP-2/20/2008-2	₩ <b>H</b> 0-001	3.FW-20	SED-3, 9/2008-1
	, Chg 0, 8/29/2007		MHC-001	3. FWV-5	SED-3/9/2008-1
VP 2-3522A, VHC-001	2:F <sup>10</sup> -6	PP-2/21/2003-7	NH0-201	3.FW/-9	SED-3/9/2008-1
(+C-001 (+C-001	2.F - v-6 3./F1//-6	EB-2/21/2008-6	AH0-001	4 F 🕖 1	GLC-3/9/2003-1
(HC-001	4 F.V-6	GLC-2/21/2003-5	AHC-001	4.FM-15	GEC-3/9/2005-1
VHC-001	2.FW-31	BLB-3/3/2008-1	TVHC-001	4:FW-19	GLC-3/9/2003-2
VHC-004	2.FW-31	DLB-3/3/2008-2	WHC-001	4/FW-20	GLC-3 9/2008-2
		DE5-3/3/2006-2	WRC-004	4.F)/2-5	GLC-3:9/2003-1
	, Chg 0, 8/29/2007		10H0-051	4. F 👋 9	GLC-819-2606-4
14-0-001	1.5VX-5	PP-2"21 2008-3	WH0-069	1. EVW 51	EB-3 19-2008-2
1.80-001	2 EV#6	PP-2.21/2003-6	AH0-009	3:F:V-82	EB-3 19/2008-2
NHC JRT	GEW45	EB-2-2*-2008-5	.∿⊢C.009	31F /V-33	EE-3.19 2008-2
VHC-281	4 = 0,45	GLC-2/21/2008-4	WP 2-3524C	. Chg 0, 11/15/2007	
	, Chg 0. 8/29/2007		.h=0-00¥	3.F. N-5204	<u>°</u> −-3 23 2013-4
1940 (201	1 EW 8 1 EW 8	PF-2212903/2	je-Cola		0 <del>1</del> -3-23-236,8-4
	2 동안 동 	12221221			1
Sezîqt		最佳 4 章 1 4 钟子 4 	1	. <u>17</u> N	1+211, at 4
· • · · · · · · · · · · · · · · · · · ·	4 8 <u>1.5</u> 8		·····		······································
	, Chg 0, 11/15/2007		• • • •	20	
	**				
	e and a second sec	e e constante de la constante d La constante de la constante de		<del>.</del> .	
•			• • • • • • • •	2 C	and a second
			,, <b>*</b>	100 1 A	
·· ·		······································		ed.	
			· .	· ·	
,					
		·			
		÷.			

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 46 of 151

JR-134

WO 3824	1 - SGT Welde	r Use Log			Report 3141) Page 2 of 2 3:14 PM 15-Oct-08
PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No
Welder - K1	243 - Keith, Mark	L			
	Chg 0, 11/15/2007	• •	•		
N <u>MER-2-04</u> 7-11- 007	-0-3F1-3	SH5-3 22 2028-3			
NGR-2-047-00- 101	-3-350-5	5=5-3 22 2008-3			
V0-004	3 F.N804	1 SAS-2 08/2006-2			·
八平(2-304	3 F N-F0B	5-5-2 26 2003-2			
∴ -C-0(4	3 F.N 61,4	SHS-0 29 2003-2			
NH0-004	3 F.N-61B	SHS-2 29 2008-2			
N-C-034	3 F7. 62A	SHS-2 29 2003-2			
WHC-004	3.F./62B	SHS-2-29/2008-21	·		
NHC-007	3 FN-680	SHS-2/29/2008-3			
.∿HC-607	3 FW-60C	SHS-2 29/2008-3			
WHC-DOT	3:FW-60D	SHS-2 29/2008-3			
WHC-007	3₄F₩-69D	SHS-2/29/2003-3			
WHC-007	3.FW-61C	SHS-2/29-2008-3			
WHO-997	3 F.1-61C	SHS-2.29/2008-3			
WHC-807	3:F%-61D	SHS-2/29/2008-3			
WHC-007	3 FW-61D	SHS-2/29/2008-3		4	
WHC-397	31FW-620	SHS-2/29/2008-3			
.∜HC-007	3 FV: 620	SHS-2/29-2008-3			
WHO-007	3 FW-62D	S≒S-2 29 2008-3			
WHC-007	3 FW-62D	SHS-2/29/2003-3			
WHC-009	3 F.V-83	CW-3, 13/2008-7			
.∿HC-009	3/F)%-84	CIN-3-13-2008-7			
WHC-009	30FIN-35	CM#3 13 2008-7			
A HORO20	3 F F.4138	₽,-4,3,30,2008-1			
1.40.020	3 F	RUH-3 30/2603-1			
∴+C-225	: F: 41)2	₹18-3.60/2008-1			
<b>⊢</b> C -32 °		(P=4-3-2003-2			
7.40.021	3 年末 104	, 1 <sup>07</sup> 4 3 2 308+2			

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 47 of 151



Attachment 3

1.1.74

#### A Washington Group international AREVANP Combany

### EXHIBIT DD QUALITY CONTROL PROGRAM

- Contractor's work is controlled by Contractor's NQA-1 Quality Assurance program in full compliance with the requirements of 10 CFR 50. Appendix B. "Quality Assurance Criteria for Nuclear Power Plants." Execution of the work is procedurally governed by Contractor's project specific Quality Execution Procedures (QEPs).
- 2. Contractor's QEPs are available to Subcontractor upon request. Subcontractor will be placed on controlled distribution for QEPs specifically applicable to Subcontractor's scope of work.

3. Subcontractor's work shall comply with Contractor's QA program or Subcontractor's QA program as approved in writing by Contractor.

- a. Subcontractor's approved QA procedures shall be available for review by Contractor and Owners at the facilities at which such procedures are normally located.
- b. Subcontractor shall maintain Quality Assurance records in accordance with NRC regulations and shall be retained or furnished to Contractor as required by Contractor's QA program.
- 4. When applicable, Subcontractor shall comply with the provisions of 10 CFR 21, "Reporting of Defects and Noncompliance." Subcontractor shall furnish a copy of all reports sent to the NRC under 10 CFR 21, or information received which the Subcontractor is unable to evaluate thereunder, in connections with this Subcontract to: Barry Scott, SGT QA Manager; 510 Carnegie Center , Princeton, New Jersey, 08540.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 48 of 151

### Nonconformance Report No (38241) 2084

		Docket Number SGT M-09-0050 Page 49 of 151	
ORIGINALINE	<b>HVA</b> scorn	אינים בראי אישיומים ביסופי	siunit 21NOR 2-054/NOR 2-0
Standard Proc			
Engineering and Construction Pr		TY EXECUTION PR	OCEDURE
Form Title		Revision No / Status 0E1 / AFU	Form Nc. QEP 15.01-
NONCONFORMANCE RE	PORT	Form Revision Date	Form Page
		06-Dec-04	1 of 1
Responsible Organization / Department		ANCE REPORT NO	(39241) 2094
SGT / Weld Engineering Description / Location of Affected Item or System	Date issued	No of Hold Tags	:Tota: Sheets
Weld Test Coupon Qualification, 2R14	03-Nov-08	NA	1 of
	ASME Section NA	Inspection Code DR-10	Const. Seq. Code
Source of Requirement Not Met	WP / PO No N/A	PCD / CO No	Step No
QEP 12.06, 20.4 Condition Description	<u>i N/A</u>	NA	N/A
			~
See attached			
RECOM Proposed Disposition Rework	iDIL Number         RLD/11-03-08.         th 10CFR21:       Signature         nt Determination       702         MENDED DISPOSITION         Repair       Scrap/Retu	ulf theto	Date 03
R. Lucy Dietrich. QAS/APQM	RLD/11-03-08           th 10CFR21:         Signature           th Determination         Y22           MENDED DISPOSITION	101 Continuation	n Sheets 2 thru 33 Date כיש שביא אינו
R. Lucy Dietrich. QAS/APQM - Ucy Kuluu         Results of PQM screening for potential association wit         NO Potential       Possible Potential         Recom         Proposed Disposition       Rework	RLD/11-03-08           th 10CFR21:         Signature           th Determination         Y22           MENDED DISPOSITION	101 Continuation	n Sheets 2 thru 33 Date כיש שביא אינו
R. Lucy Dietrich. QAS/APQM       Ucy Kuluu         Results of PQM screening for potential association wit         NO Potential       Possible Potential         Proposed Disposition       Rework         See attached	RLD/11-03-08           th 10CFR21:         Signature           th Determination         Y22           MENDED DISPOSITION	DISPOSITIC	n Sheets 2 thru 33 Date c3 Date c3 By Client
R. Lucy Dietrich. QAS/APQM	RLD/11-03-08       th 10CFR21:     Signature       Int Determination     Y22       MENDED DISPOSITION       Repair     Scrap/Retu       Date     // - 4 - 64       OSITION APPROVAL	DISPOSITIC Continuation	n Sheets 2 thru 33 Date כא אישר By Client
R. Lucy Dietrich. QAS/APQM - Ucy Kuluur         Results of PQM screening for potential association wit         NO Potential       Possible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       William         William       Mag         Dispositioned By       Disposition         Approval of Proposed Disposition       X Approved	RLD/11-03-08       th 10CFR21:     Signature       Int Determination     Y22       MENDED DISPOSITION       Repair     Scrap/Retu       Date     // - 4 - 64       OSITION APPROVAL	Image: Continuation	n Sheets 2 thru 33 Date c3 Date c3 By Client
R. Lucy Dietrich. QAS/APQM Way Kuluwer         Results of PQM screening for potential association wit         NO Potential       Possible Potential         Proposed Disposition       Rework         See attached       See attached         Dispositioned By       William Tage         Approval of Proposed Disposition       Disposition	RLD/11-03-08       th 10CFR21:     Signature       Int Determination     Y22       MENDED DISPOSITION       Repair     Scrap/Retu       Date     // - 4 - 64       OSITION APPROVAL	DISPOSITIC Continuation	DN Sheets 34 thru
R. Lucy Dietrich. QAS/APQM       Ucy Kuluce         Results of PQM screening for potential association wit       NO Potential         NO Potential       Prossible Potential       Clier         Proposed Disposition       Rework       See attached         Dispositioned By       Disposition       Disposition         Approval of Proposed Disposition       SGT       Disposition         TITLE       SIGNATURE       D/	RLD/11-03-08         th 10CFR21:       Signature         Int Determination       Y2         MENDED DISPOSITION       Repair         Repair       Scrap/Retu         Date       II - 4 - 64         OSITION APPROVAL       Rev	Continuation	Sheets     2     thru     33       Date c3     Date c3
R. Lucy Dietrich. QAS/APQM - Ucy Aluluce         Results of PQM screening for potential association with         NO Potential       Possible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Approval of Proposed Disposition       X Approvi         SGT       TITLE       SIGNATURE         PEM       Willing Tagew       U-y	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       722         MENDED DISPOSITION       Repair         Repair       Scrap/Retu         Date       1/- 4/- 04         OSITION APPROVAL       Rev         ed as Proposed       Rev	Continuation	Sheets     2     thru     33       Date c3     Date c3
R. Lucy Dietrich. QAS/APQM - Ucy Kuluur         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Approval of Proposed Disposition       SGT         TITLE       SIGNATURE       DA         PEM       Willing Taylow       H-4         SM       Variable Support       11-0	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       72         MENDED DISPOSITION       Repair         Repair       Scrap/Retu         IDate       // - 4/- 64         OSITION APPROVAL       Rev         ed as Proposed       Rev         ATE       TITLE         I-00       CLIENT REP	Continuation	Sheets     2     thru     33       Date c3     Date c3
R. Lucy Dietrich. QAS/APQM	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       Y22         MENDED DISPOSITION       Repair         Repair       Scrap/Retu         IDate       II - 4 - 64         OSITION APPROVAL       Rev         ATE       TITLE         I-00       CLIENT REP         I2208       ANI / ANII	Continuation	Sheets     2     thru     33       Date c3     Date c3
R. Lucy Dietrich. QAS/APQM - Ucy Multice         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Person of Proposed Disposition       Approve         SGT       Signature       Disposition         PEM       Willing Taylow       H-9         SM       Name       Name         PQM       Suppose       Mathematical Science         If Initiated, Reference DR:       N       N         R       N       N       N	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       YZ         MENDED DISPOSITION         Repair       Scrap/Retu         Date       II - Y - 04         OSITION APPROVAL         ed as Proposed       Rev         ATE       TITLE         I.2008       ANI / ANII         // ARE-INSPECTION       I/A	Image: Continuation       Image: Contin	DN Sheets 34 thru thru
R. Lucy Dietrich. QAS/APQM - Ucy Multice         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Person of Proposed Disposition       Approve         SGT       Signature       Disposition         PEM       Willing Taylow       H-9         SM       Name       Name         PQM       Suppose       Mathematical Science         If Initiated, Reference DR:       N       N         R       N       N       N	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       722         MENDED DISPOSITION       Repair         Repair       Scrap/Retu         Date       // - 4 - 64         OSITION APPROVAL       Rev         ed as Proposed       Rev         ATE       TITLE         /.2xx B       ANI / ANII         //a       /// ANII	Image: Continuation       Image: Contin	Sheets 2 thru 33       Date c3       Date
R. Lucy Dietrich. QAS/APQM - Ucy Multice         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Person of Proposed Disposition       Approve         SGT       Signature       Disposition         PEM       Willing Taylow       H-9         SM       Name       Name         PQM       Suppose       Mathematical Science         If Initiated, Reference DR:       N       N         R       N       N       N	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       YZ         MENDED DISPOSITION         Repair       Scrap/Retu         Date       II - Y - 04         OSITION APPROVAL         ed as Proposed       Rev         ATE       TITLE         I.2008       ANI / ANII         // ARE-INSPECTION       I/A	Image: Continuation       Image: Contin	Date c3 Date
R. Lucy Dietrich. QAS/APQM - Ucy Multice         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Person of Proposed Disposition       Approve         SGT       Signature       Disposition         PEM       Willing Taylow       H-9         SM       Name       Name         PQM       Suppose       Mathematical Science         If Initiated, Reference DR:       N       N         R       N       N       N	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       YZ         MENDED DISPOSITION         Repair       Scrap/Retu         Date       II - Y - 04         OSITION APPROVAL         ed as Proposed       Rev         ATE       TITLE         I.2008       ANI / ANII         // ARE-INSPECTION       I/A	Image: Continuation       Image: Contin	DN DN DN DSheets 34 thru thru DA Froppis Cause Cape Cause Cape Cause Cape
R. Lucy Dietrich. QAS/APQM - Ucy Multice         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Person of Proposed Disposition       Approve         SGT       Signature       Disposition         PEM       Willing Taylow       H-9         SM       Name       Name         PQM       Suppose       Mathematical Science         If Initiated, Reference DR:       N       N         R       N       N       N	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       YZ         MENDED DISPOSITION         Repair       Scrap/Retu         Date       II - Y - 04         OSITION APPROVAL         ed as Proposed       Rev         ATE       TITLE         I.2008       ANI / ANII         // ARE-INSPECTION       I/A	Image: Continuation       Image: Contin	Properies Caute Case
R. Lucy Dietrich. QAS/APQM       Wey Multice         Results of PQM screening for potential association wit       Image: Constraint of the potential inclusion of the potential inclusion of the potential inclusion of the potential inclusion of the proposed Disposition       Rework inclusion of the potential inclusis and potential inclusion of the potential inclusion o	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       YZ         MENDED DISPOSITION         Repair       Scrap/Retu         Date       II - Y - 04         OSITION APPROVAL         ed as Proposed       Rev         ATE       TITLE         I.2008       ANI / ANII         Joir 95       II/A	Image: Continuation       Image: Contin	Sheets 2 thru 33       Date c3       Date
R. Lucy Dietrich. QAS/APQM - Ucy Multice         Results of PQM screening for potential association with         NO Potential       Prossible Potential         Proposed Disposition       Rework         See attached         Dispositioned By       Disposition         Person of Proposed Disposition       Approve         SGT       Signature       Disposition         PEM       Willing Taylow       H-9         SM       Name       Name         PQM       Suppose       Mathematical Science         If Initiated, Reference DR:       N       N         R       N       N       N	RLD/11-03-08.         th 10CFR21:       Signature         Int Determination       YZ         MENDED DISPOSITION         Repair       Scrap/Retu         Date       II - Y - 04         OSITION APPROVAL         ed as Proposed       Rev         ATE       TITLE         I.2008       ANI / ANII         Joir 95       II/A	Image: Continuation       Image: Contin	Propagies  Propagies

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 50 of 151

#### NCR 2-084

Sheet 2 of

#### **Condition Description**

This NCR is being issued based on the results of Deficiency Report DR034 which documented that radiography and film interpretation of SGT welder performance qualification coupons were not performed in accordance with QEP 12.06, Radiography (ASME), as required by QEP 20.04, Welder Performance Qualification.

In evaluating all previous welder qualifications for those performing small bore and instrumentation welding during 2R14 by either acceptable radiography or bend test, a total population of thirty-two (32) welder's PQTs did not meet procedural requirements.

The following are attached.

Attachment 1 (29 pages) is DR034 which details the process used to provide an alternate acceptance method for the qualification of 2R14 welders.

Attachment 2 (2 pages) details the safety-related welds performed by welder ID G7561 (Terrance Gill). PQT 373 was the test performed by G7561 and coupon cannot be located. The film for PQT 373 did not meet Section V requirements.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 51 of 151

~03'w=\*

Form No.

Date

5 i yan i

101 

10.0

03 7

NCR 2084

QEP 12.02-2

ORIGINAL
----------

ų

RESPONSE Byrgura BN

li ja v Strav

Friday Martal

=

1,99 - Faj, v<del>. -</del> 1,

Form Title

Standard Procedures Engineering and Construction Projects

S.Commonia Form Source

Attachmen

QUALITY EXECUTION PROCEDURE

Revision No / Status

1E1/AFU

# DEFICIENCY PEDOPT

DEF	ICIENCI REFUR	1	28-Mar-05	i form Hage
	GENE	RAL INFORMATION		
Activity: NDE of Welder Perform	nance Qualification	DEFICIENCY REPORT	NO. (38241) 034	Deficiency Report: Sheet 1 of 29
ASSIGNED TO:	Department:	·	Unitiated, Reference NCR:	REPLY DUE DATE:
Paul Helton	Quality		N/A	16-Oct-08
	CONDI	TION DESCRIPTION		
QEP 20.04, Weider Perform mechanical testing for evalu "Radiography shall be perfor Contrary to these requireme	ating the welders' perform med in accordance with C	ance qualification". In QEP 12.06, Radiograph	n addition, paragraph ( ic Examination (ASME	5.2.2 states, in part. )*.
Services, Inc. performed rad accordance with QEP 12.06 Update: Refer to	lography and film review of	of SGT welder performa	ance qualification coup	on welds in
NITIATED Signature: BY:	Dietzich	Tite: QA Sup	bervisor	Date: DIL No 24-Sep-03 01
APPROVED Signature: BY: Faul 7 The	tter_	Title: Project Qua	lity Manager	Date: 24-Sep-C8
	RESPONSE	TO DEFICIENCY REPORT		
Lee atta	ched	D CORRECTIVE ACTION	CAUSE	NCR <u>2084</u> Page <u>3</u> of
See litta		ON TAKEN TO ELIMINATE	CAUSE	
			COMPLETION DATE	10/-10

• 0

(E 40

COMPLETED BY SOT QUALITY

عمية رم مج ر

61 Juger son

TONFOLLOW-UP

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 52 of 151

DR-034 Sheet 2 of 29

This updated description (Revision 1) is based on the discovery of the scope of this condition.

To further describe this condition, the following items have been identified:

- a. No radiographs, reader sheets or RT reports were reviewed and approved by SGT as required per QEP 20.04.
- b. Additional vendor has been identified as Conam, Inc. who performed RT services for the qualification of Wachs welders.
- c. Conam does not appear on any SGT Parent Company Approved Suppliers List (ASL).

etric Initiated by

QA Supervisor

10-2.08 Date

Approved by PQM

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 53 of 151

NCR <u>2084</u>	DR-034
Page <u>5</u> of	Sheet 3 of 29

### DR-034 SUMMARY

Prior to 2R14, SGT utilized the services of a subcontractor to perform and interpret radiography testing of the welder qualification coupons in accordance with the requirements of ASME Section IX for weld test coupons fabricated onsite at DCPP. The subcontractor was Valley Industrial X-Ray & Inspection Services, Inc. of Bakersfield, CA. Also, SGT subcontracted E.H. Wachs Co. to provide qualified welders for the DCPP Unit 2 SGRP when local union resources were depleted. (SGT Welding Engineering implemented SGT's QA Program at the Wachs facility during welder qualification performance). Conam Inspection and Engineering Services, Inc. was subcontracted by Wachs to perform and interpret radiography of the qualification coupons for the welder performance qualification performed at their North Carolina facility. Neither of the providers of radiography services appeared on the Areva, URS-Washington Division (SGT, LLC), or PG&E's approved supplier/vendor lists (ASL/AVL) and therefore, would be required to perform work under SGT's QA Program, as stated on the Form QEP 09.01-1, Purchase Order.

The results from a review of these radiographs and a review of the bend test of the welder whose weld test coupon radiograph could not be located, indicates all 148 welders are qualified to ASME Section IX requirements.

The following sections contain a summary of the results of the review of radiographs for the qualification welds at DCPP before and during 2R14. Subsequent sections cover the programmatic deficiencies identified.

#### **REVIEW OF RADIOGRAPHS**

To validate the qualification of the welders, and the quality of the welds performed, SGT's Level III Radiographer, Bob Scholes, interpreted the performance qualification test (PQT) radiographs for 147 of 148 welders qualified by RT and as performed by the two non-ASL subcontractors. This review of the qualification radiographs determined that the Unit 2 welders satisfied the qualification requirements were acceptable as previously evaluated at the Conam and Valley facilities. Mr. Scholes' review is contained in Attachment 1 of this report. Therefore, 147 welders met the ASME Section IX qualification requirements.

The qualification radiograph for PQT 409, performed by Mark Keith (welder ID/symbol K1243) could not be located. This PQT was rejected according to (weld history records maintained by SGT's Project Welding Engineer (PWE). However, Mr. Keith also performed SGT PQT test number SGT-001 which required qualification by an acceptable bead test. This bend test was performed by SGT and qualified Mr. Keith to perform all sites and tincknesses of filter we ds. According to the PWE's review of American 2 clusters of K1243 welding activities and welds performed by Mr. Keith during new ortple young at the QCTP TRP page filter welds. This herd test we ds. According to the PWE's review of American 2 clusters of K1243 welding activities and welds performed by Mr. Keith during new ortple young at the QCTP TRP page filter welds. Physica Science Filter welds activities a discussion of the performed by Mr. Keith during new ortple young at the QCTP TRP page filter welds, and because filter welds activities a discussion of the performed by Mr. Keith during here welds a filter welds. The page filter welds activities of the performed by Mr. Keith during here welds activities of the QCTP TRP page filter welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the Prove filter welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Keith during here welds activities of the performed by Mr. Kei

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 54 of 151

NCR<u>2084</u> DR-034 Sheet 4 of 29 Page 6 of

#### APPARENT CAUSE (Programmatic Issues)

The SGT QA Program procedures contained adequate and appropriate guidance to ensure compliance with ASME Section IX requirements for the qualification of welders. However, project personnel responsible for the management and supervision of the procedure implementation failed to ensure execution of the instructions. As a result, the following conditions were identified:

- 1. Ineffective implementation of the SGT QA Program by the responsible quality project management and supervision.
  - a. Interviews with quality personnel active on the project at the time of occurrence indicate that the SGT QA Manager provided direction to the staff and supervision that he would take responsibility for the implementation of the requirements associated with the vendors of the welder qualification radiography testing.
  - b. PQM/Quality Engineers did not scheduled surveillance of radiography activities at the subcontractor facilities.
  - c. Lack of surveillance/reviews of documentation of welder qualification activities by Quality Engineers.
- 2. Requirements of QEP 9.01, Procurement, not met:
  - a. Purchase Requisition submitted however, not all required forms were included from the requisition stage to issue of the Purchase Order.
  - b. Purchase Order was never reviewed and signed by Project Quality Manager or designee.
  - c. Supplemental Exhibit DD to PO not implemented as issued:
    - i. Correct requirements as stated were not invoked (i.e. Subcontractor performs work in accordance with SGT's QA Program;
    - ii. Incorrect requirements stated not applicable to this type of PO (see Attachment 3, Item Nos. 2, 3, and 4)
    - iii. Contradiction in terms on Exhibit DD concerning QEPs. One time it says any QEP can be obtained by requesting to SGT; later it states Subcontractor to work to SGT's QA Program and QEPs.
    - iv. Subcontractor working to SGT QA Program shall work to a <u>controlled copy</u> of the applicable QEP(s) issued by SGT Document Control Center (DCC). None provided to the Subcontractor.
- 3. Requirements of QEP 12.06. Radiographic Examination (ASME), not met:
  - a. Personnel performing radiography shall be certified in accordance with QEP 04.04. Qualification and Certification of NDE Personnel (para. 3.1.1).
  - b. Procedure qualification shall be documented on Form QEP 12.06-1 with record of procedure demonstration and approval maintained in accordance with QEP Appendix 1. Index of Quality Decuments (paral 3/2.3).
  - Geometric unsharpness calculation (p.r.a. 4/18/2).
  - d. Api selection mara, 4489.
- Reconcision of QEP 20104, Weldong and the galaxies of the contension of the second se
  - a RECEIVENENT CONTRACTOR STREET

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 55 of 151

DR-034 Sheet 5 8/29 NCR 2084 Page 7 of

#### CORRECTIVE ACTIONS

- A. Welder Qualifications
  - 1. Retrieved documents and test coupon radiographs to validate original welder qualification results from 2R14.
  - 2. Review of documents and test coupon radiographs by SGT RT Level III for acceptance.
  - 3. SGT's Project Welding Engineer performed additional review of welder test qualifications (WQT) to verify acceptability.
  - 4. SGT's RT Level III review and acceptance has been documented on a master Form QEP 12.06-1 (reader sheet see Attachment 1).
  - 5. Client RT Level III performed a review of radiographs at random to determine WQT welder qualification coupon acceptability.
  - 6. Randomly, select a minimum of six (6) WQT coupons for radiography reshoot and subsequent comparison to the original radiograph. This is to provide assurance that original radiographs are as identified on the film.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 56 of 151

NCR 2084 DR-034 Sheet 6 of 29 Page 8 of

#### PREVENTIVE ACTIONS

A. Amended the <u>Wachs Technical Services</u>, <u>Ltd.</u> subcontract requirements to reflect correct SGT Quality Program requirements as follows:

#### EXHIBIT DD QUALITY CONTROL PROGRAM

- Contractor's work is controlled by Contractor's NQA-1 Quality Assurance Program in full compliance with the requirements of 10 CFR 50. Appendix B, "Quality Assurance Criteria for Nuclear Power Plants." Execution of the work is procedurally governed by Contractor's project specific Quality Execution Procedures (QEPs).
- 2. Subcontractor shall perform all work in accordance with the QEPs specified in the Purchase Order.
- 3. All radiography shall be performed under the Contractor's QA Program.
- 4. Contractor shall provide direct control of any subcontracted radiography of welder qualification test coupons.
- 5. Subcontracted radiography of welder qualification test coupons will require that a Contractor Level II or III radiographer(s) perform set-up and supervise during all radiography evolutions.
- 6. The Contractor's Quality Engineer(s) shall have access to the Subcontractor's Radiography supplier and shall have the right to perform surveillance of the RT activities or audit any and all records pertaining to the Purchase Order.
- 7. Subcontractor shall ensure radiographer supplier double loads all cassettes in order to supply Contractor a copy of the film.
- 8. The Contractor's radiographer shall take possession of one copy of all weld test coupon radiographs for submittal to a Contractor Level III radiographer for interpretation and acceptance.
- 9. All radiography will be performed using a mutually agreed opon technique in accordance with QEP 12.06, prior to exposure.
- 10. All weld test coupons shall be returned to the Contractor facility a the DCPP site. Method of shipment to be coordinated with the Contract Administrator.
- 11 Direct centrel of welder quantization testing (c) dpen preparation also prinprogramps wolding conduct referation of costrollar testing and the performal (by 1.2 a) constants. Welder & Held (even only dpen effect) of Contacts (suggestion) and all.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 57 of 151

NCR 2084 DR-034 Page 9 of Sheet 7 of 29

B. Amended the <u>Valley Industrial X-Ray and Inspection Services. Inc.</u> subcontract requirements to reflect correct SGT Quality Program requirements as follows:

#### EXHIBIT DD QUALITY CONTROL PROGRAM

- 1. Contractor's work is controlled by Contractor's NQA-1 Quality Assurance Program in full compliance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants." Execution of the work is procedurally governed by Contractor's project specific Quality Execution Procedures (QEPs).
- 2. Radiography shall be performed under Contractor's QA Program.
- 3. Subcontracted radiography of welder qualification test coupons will require a Contractor Level II or III radiographer perform set-up and supervise during all radiography evolutions.
- 4. The Contractor's Quality Engineer(s) shall have access to the Subcontractor's radiography facility and shall have the right to perform surveillance of the RT activities or audit any and all records pertaining to the Purchase Order.
- 5. Subcontractor shall double load all film cassettes.
- 6. The Contractor's radiographer shall take possession of all weld test coupon radiographs for submittal of one copy to a Contractor's Level III radiographer for interpretation and acceptance. The other copy shall be maintained at SGT Document Control Center or in the Quality Records Center at the DCPP site.
- 7. All radiography will be performed using a mutually agreed upon technique in accordance with QEP 12.06, prior to exposure.
- 8. All weld test coupons shall be returned to the Contractor facility at the DCPP site. Method of shipment to be coordinated with the Contract Administrator.
- C. Assign SGT certified RT Level II at each location [one at Valley facility in Bakersfield, CA, and one at Conam Inspection facility in Monroe, NC (Wachs Technical Services, Ltd. subcontracted supplier for radiography services)].
- D. Provide Quality Engineers to perform surveillance activities during radiography processes at both Contam and Valley facilities.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 58 of 151

NCR 2084	DK-034
Page <u>10</u> of	Sheet 8 of 29

### ATTACHMENTS

The following attachments detail the actions taken during this investigation:

Attachment 1: Master Reader Sheet developed by Mr. Scholes to identify the PQT numbers and the review of the weld quality against the criteria specified in QEP 12.06, Attachment 3 (Acceptance Criteria for ASME Section IX).

Attachment 2: A report was generated from SGT's Quality Performance Management System (QPMS) for Mr. Keith identifying the work package that contained the weld history cards applicable to Mr. Keith's welding activities in question.

Attachment 3: EXHIBIT DD to original Purchase Orders to E.H. Wachs Co. and Valley Industrial X-Ray and Inspection Services, Inc.

#### <u>CONCLUSION</u>

After completion of this investigation, interpretation of radiographic film, documentation reviews, and interviews with personnel, it has been determined that all welds completed prior to and during 2R14 were made by qualified welders who satisfactorily met the requirements of ASME Section IX.

This deficiency was also identified during the internal Project Audit 38421-P-08-02 as a Major Audit Finding (AFR-02). With the conclusion of this investigation, it has been determined that no potential association with 10CFR21 is applicable. This was limited only to a programmatic failure and no hardware issues exist.

														SGT I			12 R-034	
	A	Hach	ment	- 1				c.	nemuceO	ts and	Setting:	s:Dwnerd	Vy Docu	mants A	martest Proj	Meet SGTA RE	1 01 29 DD DT DT C34	.000
<b>5G</b>			ering ar	Star			cedur Projec		Form	Sou			Y EXI	ECUI		ROCEDUR	١E	
Form Title						-						.!.		2/A			12.06- <b>1</b>	
KAI	DIOGI	KAPF	IIC E	XAW	INA			<b>K</b> E	-201	K I				Revisio <b>2-Ma</b>	on Date r-07	Form Pa	ge 1 of 1	
Project W	iorik Pasikagi	e Number	20	C Type / I	Numba /	ť	Ŵ	P71	PCD Ste:	b-Nürr	nber	51	<u>לרדעא</u>	e7-		Report Sheet	1 25	$\geq$
Part / Joint Number		tiert D	escription		· · · · · · · · · · · · · · · · · · ·	Sys	nem / Li	ne h	Number		Mater	a: Type Base	i Thior		7	enforcement	Diámeter	
Status of Work	New T R	ecair	Examinat	on Stand	iard ·				Acceptan	ice St	andard	weid	~	ı	Exercitate	Procedure (	- - J. Rev No	
🖸 Prep 🗋 Root 🗍	intermedia	te 🖸 Final						1 0.1			کم	24	6		C	EP 12.06 /		
Radiation Source	Curies / X	-тау к√	Seria: Nu	mber	Vvei	ding P:	100855		R	adio	jue S	hie ketch			•	] Single Wall ] Single Wall		- 1
Eff Source Size 🥎	Object-Fil	m Đist (d)	Source-C	bj, Dist (C	C) Res	ulting t		J							<b></b>		1	
IQI Location	IQI Materi		iQ: Size	<u> </u>	20	uanti	tý								NC	<u>= 2084</u> e <u>//o</u> f_	•	
Sensitivity Reod	Shim Thic	kness	No of Exp	05050	Εxp	osure						• • ul			Pag	e	1	
Film Brand / Type	Films per	riolde	Film S'ze		Film	Quarri	ü.y										لعو	
Lead Screens Front Center Back		tomatic	Dev Tem	2	Dev	Time												
Radiographic	Location Markers	Acceptable Unacceptable	Surface Indication	Radiograph Artifact	Linear Indication	Lack of Penetration	Lack of Fusion Crack		Undercut Concavity	Convexity	Minimum Density	Maximum Density	#1 IQI Density	#2 IQI Density	(∕ Densito.π	ditional Data / NI dimensions eter - M&TE h Cal Due trio - M&TE N Cal Due	in inches) lo	
					; i	1 1 Î 1	:	L.	-		alline na di		2		1 •.	<u></u>	)	
			ed to th etations										POT	) trat	۱ ۱ <u>.</u>			
	<u>.</u>		luded in											,				
	<u></u>	The we Reject	eids ) sti on expl					jes	stave	the	ir, Ace	ceoter	çce o	ir.	·	• • • • • • • • • • • • • • • • • • • •		×0:0*
		) [This R. Informa	eportido ation	es no:	i deta	el tre	e tech	<u>c</u> ię	ipe ol	<del>ci</del> re	97 59	î, e	-		Jean Internet	······································		
and the second second	• •														•	ant of the second of	na sisa i ti	- × • 4
na in the second s				••••••• ، ويريد •• ••		<b></b>			007 /2 <b>29</b> 00	- · •		· 60460-46.4 · 10	••••••	•	•	and Maria II. and		
<u>1.</u>		•	••••		•••••		<i></i>	•••		·· · · · ·	•••••	• • •	025 m.	• • • • •	••••••	rətçin ər	· · · · »	
<b>1</b>	∎t even t.	an sa s				• • • • • • • • •		- 85 Q -	* Anno 4 - 19 - 19 - 19		in parts an •	منعته معاصر					1.8 ., <sup>1</sup>	
n Angeler (n. 1928) en an ei A		aren yezha yezhañ	artina portena		****	•••••	÷	•••	- 1• × 1•				ee ares	•32 •				
n an	ga senar kesin di Badala Maran Maranggi di Sanar Maranggi di Aranggi di Sanar Maranggi di Aranggi di		n an	strum ( )	Ls			 	••• , , , , , , , , , , , , , , , , , ,					87 ° 11 K. 19 ° 1 ( 11 K.	an an tain y t- minin y Naakt an aa ta' - taya	nan na an in in in Maria an an in		
1 and the	:													•				
				• . • •													•	

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 60 of 151

### DR - 034 RT REVIEW SHEET

The following PQT's were reviewed as a part of the resolution of the abovementioned Deficiency Report. The DR addresses the problem and subsequent Corrected Actions. It should be noted that Radiography was not carried out in accordance with QEP12.06 as directed in QEP 20.04, but instead would appear to have been completed in accordance with the NDT contractor's procedure and the requirements of ASME Section IX. The referencing code applicabe at the time of the work in progress would have been ASME IX 2006 Edition, which specifies compliance with ASME Section V is proven if the density is within specification (2.0 to 4.0) and the correct wire or pentrameter/hole combination is seen.

NCR 2084

Page<u>12</u>of

10/9/2008

Sheet 10 g 29

The NDT Contractor companies have provided various report and technique sheet formats which contain multiple discrepancies. QEP 12.06 specifies the use of form.QEP1206F1 which would have guided the contractor companies to providing better technique information.

Consequently, understanding that this is a post fact review, the problems associated with the respective supplied documentation is not a part of this review, but also, I have selected to use the requirements of ASME IX as the basis for weld assessments. "Acceptance" or "Rejection" is stated below and where "Accept" is stated, it is considered the films meet the general acceptance requiements of ASME Section IX, but is not necessarally acceptance of the technique. Some of the films reviewed have incorrect penetrameter selection and placement by which the radiograph would not meet the requirements of the referenced Code, but is still of adequate quality to be able to say with a reasonable degree of confidence that the deposited weld is within the acceptable indication parameters defined in ASME Section IX.

#### PQT#

271	0 to 1	Accept
	1 to 2	Accept
	2 to 0	Accept
269	0 to 1	Accept
	1 to 2	Accept
	2 to 0	Accept
436	0	Accept
100	60	Accept
	120	Accept
323	1	Accept
	2	Accept
	3	Accept
327	;	Accept
	2	-CCEDt
	ં ર	Accept <sup>.</sup>
326	:	410958
-	-	/ atest
		- 0.22.24

#### NOTE:

During the Quality Engineer review of this Master Reader Sheet/prepared by Bob Scholes, SGT RT Level III it was noted that two (2000)'s were mitted that two (2000)'s were mitted that two (2000) this was verified by review office 40% and 45% caller the total by the schole of the total by the schole of the total by the schole

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 61 of 151

10/9/2008 Sheet 110/29

00T #								
<b>PQT #</b> 35 - 5G	0 to 6 6 to 12 12 to 16 16 to 0		35 - 6G	1 2 3	Accept Accept Accept		NCR Page	<u>2084</u> 13 of
203	0 60 120	Accept Accept Accept					L	
. 440	0 60 120	Accept Accept Accept						
294	0 60 120	Accept Accept Accept						
.113	0 60 120	Accept Accept Accept				·		
241	0 45 90 135	Accept Accept Accept Accept						
431	0 60 120	Accept Accept Accept						• •
111	0 60 120	Accept Accept Accept						
201	0 60 120	Accept Accept Accept						
203	0 う0 120	Accept Accept Accept	· .					
437	0 60 120	Accept Accept Accept						
. 36	و 15 - ا	A stept A stept - stept						

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 62 of 151

10/9/2008 Sheet 120129

NCR\_2084

Page 14ot

PQT #		
142	0 60	Accept Accept
	. 120	Accept
289	0 60 120	Accept Accept Accept
233	0 1 2	Accept Accept Accept
318	0 60 120	Accept Accept Accept
244	0 45 90 135	Accept Accept Accept Accept
57	1 · 2 3	Accept Accept Accept
38	1 2 3	Accept Accept Accept
193	0 60 120	Accept Accept Accept
180	0 60 120	Accept Accept Accept
196	0 60 120	Accept Accept Accept
413	0 60 120	Accept Accept Accept
200	0 60 110	Accept Accept Accept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 63 of 151

10/9/2008 Skeet 13 of 29

### DR - 034 RT REVIEW SHEET

<b>PQT #</b> 73	0 1 2	Accept Accept Accept
14	2 0 1 2	Accept Accept Accept
202	0 60 120	Accept Accept Accept
433	0 60 120	Accept Accept Accept
288	0 60 120	Accept Accept Accept
176	0 60 120	Accept Accept Accept
434	0 60 120	Accept Accept Accept
293	0 60 120	Accept Accept Accept
178	0 60 120	Accept Accept Accept
:69	0 1 2	Accept Accept Accept
403	0 60 120	Accept Accept Accept
404	0 30 112	Alcoept Alcoept Alcoept

NCR<u>2084</u> Page<u>/5</u>0f

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 64 of 151

Sheet 14 of 29

10/9/2008

NCR 2084 Page 16 of

<b>PQT #</b> 290	0 60 120	Accept Accept Accept
245	0 45 90 135	Accept Accept Accept Accept
154	1 2 3	Accept Accept Accept
444	0 60 120	Accept Accept Accept
430	0 60 120	Accept Accept Accept
60	1 2 3	Accept Accept Accept
224	0 60 120	Accept Accept Accept
132	0 60 120	Accept Accept Accept
258	0 60 120	Accept Accept Accept
329	0 60 120	Accept Accept Accept
144	0 60 120	Accept Accept Accept
193	0 60 112 -	Abbebt Abbebt Abbebt

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 65 of 151

Sheet 15 of 29

10/9/2008

NCR 2084

Page1.7 of

		•
PQT # 442	0 50 120	Accept Accept Accept
22	1 2 3	Accept Accept Accept
192	0 60 120	Accept Accept Accept
251	0 60 120	Accept Accept Accept
140	0 60 120	Accept Accept Accept
262	0 60 120	Accept Accept Accept
443	0 60 120	Accept Accept Accept
250	0 60 120	Accept Accept Accept
32	1 2 3	Accept Accept Accept
232	1 2 3	Accept Accept Accept
432	0 60 120	Accept Accept Accept
ن- <del>د</del> ,	) 40 120	Accept Accept Accept Accept
205	) 14. 15.	Accept Hitegt Accept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 66 of 151

Sheet 16 of 29

10/9/2008

	RI REVIEW SHEEI					NCR <u>2084</u> Page <u>/8</u> of		
PQT#								
373	0	Accept			0	Accept		Parte / 8 of
	45	Accept			45	Accept		
	90	Accept			90	Accept		
	135	Accept			135	Accept		
15	1	Accept						
	2	Accept						
	3	Accept						
439	0	Accept						
	60	Accept						
	120	Accept						
261	0	Accept						
201	,60	Accept					•	
	120	Accept						
	120	Accept						· .
182	0	Accept						
	60	Accept						· .
	120	Accept						
259	0	Accept						
	60	Accept						
	120	Accept						
207	0	Accept						
207	60	Accept						
	120	Accept						
	120	Accept						
457	0 to 1	Accept						-
	1 to 2	Accept						
	2 to 0	Accept						
460	0 to 1	Accept						
	1 to 2	Accept						
	2 to 0	Accept						
149	0 to 1	Accept			O to 1	100001		
140	1 to 2	Accept			0 to 1	Accept		
	2 to 0	Accept			1 to 2 2 to 0	Accept		
	2.00	Accept			2.00	Accept		
195	0 to 1	4 coept	•					i a
	1 to 2	Accept						
	2.60	4 poept						
182	D :5 6	Accept						
	5 to 13	Alopadt						•
	riz to Té							
	18150	-01623						
		,						

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 67 of 151

ŋ

Sheet 17 of 29 10:9:2008

## DR - 034 **RT REVIEW SHEET**

<b>PQT #</b> 167	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept	·
161	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept	
164		Accept Accept	
150	0 to 1 1 to 2 2 to 0	Accept	
452 5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
34 2G		Accept Accept Accept Accept	
236	0 to 5 5 to 10 10 to 15 15 to 0	Accept Accept	
17	0 to 5 5 to 10 10 to 15 15 to 0	Accept	
23	0 to 5 5 to 10 10 to 15 15 to 0		
16	1 2 3	Accept Accept Accept	
		- 22823 4 22823 - 28623	

NCR 2084 Page/9 of

2G	0 to 1	Accept
	1 to 2	Accept
	2 to 0	Accept
5G	0 to 5	Accept
	5 to 10	Accept
	10 to 15	Accept

15 to 0 Accept

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 68 of 151

Sheet 18 of 29 10/9/2008

### DR - 034 RT REVIEW SHEET

PQT # 128	0 60 120	Accept Accept Accept
328	0 60 120	Accept Accept Accept
332	0 60 120	Accept Accept Accept
197	0 60 120	Accept Accept Accept
128	0 60 120	Accept Accept Accept
412	0 60 120	Accept Accept Accept
260	0 60 120	Accept Accept Accept
243	0 45 90 135	Accept Accept Accept Accept
256	0 60 120	Accept Accept Accept
82	0 60 120	Accept Accept Accept
13	1 2 3	Accept Accept Accept
30	the first	Abcept 4 (cept - : rept

NCR<u>2084</u> Page<u>20</u>of\_\_\_\_

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 69 of 151

Sheet 19 of 29 10:9:2008

# DR - 034 RT REVIEW SHEET

Accept Accept Accept

PQT #	0				
255	0 60 120	Accept Accept Accept			
151	1 2 3	Accept Accept Accept			
225	0 60 120	Accept Accept Accept			
130	0 60 120	Accept Accept Accept			
114	0 60 120	Accept Accept Accept	·		
407	0 60 120	Accept Accept Accept			
401	0 60 120	Accept Accept Accept			
253	0 60 120	Accept Accept Accept			
320	0 60 120	Accept Accept Accept			
112	0 60 120	Accept Accept Accept			
322	0 60 120	Accept Accept ≏ccept			
340	0 to 1 1 to 2 3 to 0	Accept Accept		5 <u>9</u>	0 to 1 1 to 2 2 to 9

NCR 2084 Page<u>2/of</u>

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 70 of 151

Sheet 20 of 29 10/9/2008

PQT #							
334	O to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
450	O to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
36	0 to 6	Accept					
	6 to 12	Accept					
		Accept		•			
	18 to 0	Accept					
212	O to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
339	O to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
307	O to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept		•	1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
247	0 to 6	Accept		5G	0 to 6	Accept	
	6 to 12	Accept	<b>,</b>		6 to 12	Accept	
	12 to 18	Accept			12 to 18	Accept	
	18 to 0	Accept			18 to 0	Accept	
)	O to 1	Accept		5G -	0 to 1	Accept	
	1 to 2	Accept	· ·		1 to 2	Accept	·
	2 to 0	Accept			2 to 0	Accept	
122	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
416	0 to 1	Accept		5G	0 to 1	Accept	
		Accept				Accept	
	2 to 0	Accept			2 to 0	Accept	
2,16	Olto 1	Accept		56	0 to 1		
		Accept			1 to 2		
	2 to 0	4ccept			2 to C	- ocept	
119	Ŭ to	4crest					
	1:50	i coact					
	2 15 1						

NCR\_2084 Page22 of

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 71 of 151

Sheet 21 of 29 10/9/2008

PQT #						
304		Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
306	O to 1	Accept				
	1 to 2	Accept				
	2 to 0	Accept				
		•				
333	O to 1	Accept	.5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		\ 2 to 0	Accept	
	2100	71000pr		. 2.00	, acopt	
351	O to 6	Accept	5G	0 to 6	Accept	
501	6 to 12	Accept	50	6 to 12	Accept	
					Accept	
		Accept		18 to D		
	18 to 0	Accept		10 10 0	Accept	
58	O to 6	Accept	5G	0 to 6	Accept	
50		Accept	56	6 to 12	Accept	
	6 to 12	Accept				
		Accept			Accept	
	18 to 0	Accept		18 to 0	Accept	
40	0.4-0	A	50	0 40 0	A	
46	0 to 6	Accept	5G	0 to 6	Accept	
	6 to 12	Accept		6 to 12	Accept	
		Accept			Accept	
	18 to 0	Accept		18 to 0	Accept	
(07	0 1 - 4		50	0.4- 4	A	
187	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
426	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
	<b>A</b>			<b>a</b>		
308		Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept	•	2 to 0	Accept	
213		Accept	5G		Accept	
		Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
461	0 to 1	Accept	53	0 to 1	A poept	
	1 to 2	Accept		1:02	Acces:	
	2 to 3	-ocest		3 to 0	4 ocept	
•						
	б <u>т</u> ; *	4 : 19:51	63	2 to 1	400901	
	1 to 3	- mepr		• • •	100400	
	2 17 1	- tert	•	Tire T	-10901	

NCR 208 Page 23 of

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 72 of 151

Sheet 2207,29 10/9/2008

PQT #							
456	0 to 1	/ ccont		5G	0 to 1	A coopt	
400	1 to 2	Accept		56		Accept	
		Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	<del>-</del> .
300	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 9	Accept			2 to 0	Accept	
185	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
173	0 to 6	Accept			0 to 6	Accept	
	6 to 12	Accept			6 to 12	Accept	
	12 to 18	Accept			12 to 18	Accept	
	18 to O	Accept			18 to 0	Accept	
447	0.45.1	1t		50	0.1- 1	<b>A</b>	
417	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
302	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
		•					
249	0 to 6	Accept			0 to 6	Accept	
	6 to 12	Accept			6 to 12	Accept	
	12 to 18	Accept				Accept	
	18 to 0	Accept			18 to 0	Accept	
	<b>e</b> ( )						
448	0 to 1	Accept		5G		Accept	
	1 to 2	Accept			1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
421	0 to 1	Accept		5G	0 to 1	Accept	
	1 to 2	Accept		00	1 to 2	Accept	
	2 to 0	Accept			2 to 0	Accept	
	2.00	1.0000			2.00	Facept	
58	0 to 3	Accept					
	6 to 12	Accept					
	12 to 48	Accept					
	19 to 0	4ccept	·				
20							
99	0 to 6	-ccept					
	5 to 12 -						
	12 to 13	- ccect					
	18 to D	Hopeot			•		

NCR<u>2084</u> Page 34of

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 73 of 151

het 29 230 10/9/2008

PQT#						
264	O to 1	Accept		5G	0 to 1	Accept
201	1 to 2	Accept	•		1 to 2	Accept
	2 to 0	Accept			2 to 0	Accept
	2100	7.000pt				
138	O to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
	2 to 0	Accept			2 to 0	Accept
	2100	10000				,
274	0 to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
	2 to 0	Accept			2 to 0	Accept
		· · F -				•
337	0 to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept	-		1 to 2	Accept
	2 to 0	Accept			2 to 0	Accept
	200	,p.				
215	0 to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
	- 2 to 0	Accept			2 to 0	Accept
28	0 to 6	Accept				
	6 to 12	Accept				
	12 to 18	Accept				
	18 to 0	Accept				
194	0 to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
	2 to 0	Accept			2 to 0	Accept
		, <b></b>				•
267	0 to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
	2 to 0	Accept			2 to 0	Accept
•						
146	0 to 1	Accept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
		Accept			2 to 0	Accept
		,				
341	0 to 1	.≙ccept		5G	0 to 1	Accept
	1 to 2	Accept			1 to 2	Accept
	2 to J	Accept			2 to 0	Accept
177	0 to 1	Accept		5G	0 to 1	Accept
		A.ccept				Accept
	2 to 0	Accept				Accept
		- (				
1.5	C to 1	Abbest				
	1 to 2					
	2-20	·57621				

NCR\_208 Page 25 of

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 74 of 151

29 /2008

PQT # 118	0 to 1 1 to 2 2 to 0	Accept Accept Accept					
135	0 to 1 1 to 2 2 to 0	Accept Accept Accept		5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
<i>(</i> 335	0 to 1 1 to 2 2 to 0	Accept Accept Accept		5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
344	0 to 1 1 to 2 2 to 0	Accept Accept Accept		5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
214	0 to 1 1 to 2 2 to 0	Accept Accept Accept		5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
134	0 to 1 1 to 2 2 to 0	Accept Accept Accept	J ,	5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
422	O to 1 1 to 2 2 to 0	Accept Accept Accept		5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
276	0 to 1 1 to 2 2 to 0	Accept Accept Accept	<b>,</b>	5G	0 to 1 1 to 2 2 to 0	Accept Accept Accept	
24	0 to 6 6 to 12 12 to 18 18 to 0	Accept Accept Accept Accept					
29 _	0 to 6 6 to 12 12 to 18 18 to 0	Accept Accept Accept Accept		·		·	
<sup>,</sup> 278	0 to 6 6 to 12 12 to 13 ( 16 to 2	Accept Accept			0 to 6 6 to 12 12 to 16 13 to 0	Accept Accept	

NCR 2081 Page=260f

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 75 of 151

Sheet 25 of 29 10/9/2008

		1 1 1			<b>U L</b>			
PQT#							NCR	2084
277	0 to 1 1 to 2	Accept Accept	Ę	5G	0 to 1 1 to 2	Accept Accept	Pages	2084 270f_
	2 to 0	Accept			2 to 0	Accept		
102	O to 1 1 to 2	Accept Accept						
	2 to 0	Accept						
19	0 to 6	Accept						
	6 to 12 12 to 18	Accept Accept						
	18 to 0	Accept.						
33	O to 6	Accept			0 to 6 6 to 12	Accept		•
	6 to 12 12 to 18	Accept				Accept Accept		
		Accept			18 to 0	Accept		
160	O to 6	Accept						
	6 to 12 12 to 18	Accept Accept						
	18 to 0	Accept						
166	O to 6	Accept						
	6 to 12 12 to 18	Accept Accept						
	18 to 0	Accept						
265	O to 1	Accept		5G	0 to 1	Accept		÷
	1 to 2 2 to 0	Accept Accept			1 to 2 2 to 0	Accept Accept		
				-0				
136	O to 1	Accept		5G	0 to 1 1 to 2	Accept Accept		
	1 to 2 2 to 0	Accept Accept			2 to 0	Accept		
				=0				
124	O to 1 1 to 2	-Accept Accept		5G	0 to 1 1 to 2	Accept Accept		
	2 to 0					Accept		
				5G				
427	0 to 1	Accept Accept		56		Accept Accept		
	2 to 0	4 ccept				≙ccept		
414	O to 1			5-3		4 orept		
		Accept				- opect		
• * * * * * * * * * * * * * * * * * * *	S 42 ()	Accept			I H D	Attent		

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 76 of 151

theet 2608 29 10:9:2008

NCR <u>2084</u> Page<u>28</u> of \_\_\_\_

PQT #						I
336	D to 1	Accept	5G	0 to 1	Accept	i
	1 to 2 2 to 0	Accept		1 to 2 2 to 0	Accept	
	2 to 0	Accept		2 to 0	Accept	
119	O to 1	Accept	5G	D to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
338	0 to 1	Accept	5G	0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
321	0	Accept				
	60	Accept				
	120	Accept				
400	0	Accept				
	60	Accept				
	120	Accept				
21	1	Accept				
	2	Accept				
	3	Accept				
25	0 to 5	Accept				
	5 to 10	Accept				
	10 to 15					
	15 to 0	Accept				
423	0 to 1	Accept		0 to 1	Accept	
	1 to 2	Accept		1 to 2	Accept	
	2 to 0	Accept		2 to 0	Accept	
129	0	Accept				
	60	Accept				
	120	Accept				
31	0 to 5	Accept				
	5 to 10	Accept				
	10 to 15	Accept				
	15 to 0	Accept				

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 77 of 151 Sheet 27 of 29 NCR 2084 IR-034 Attachment 2 Page 29 of WO 38241 - SGT Welder Use Log (Report 3141) Page 1 of 2 3:14 PM 15-Oct-08 Welder D K1243 PCD No Step / Fw No DIL No PCD No Step / Fw No DIL No Welder - K1243 - Keith, Mark L Welder - K1243 - Keith, Mark L WP 2-1522A, Chg 0, 5/22/2007 WP 2-3524A, Chg 0, 11/15/2007 3:F.(-1 W-0-051 34-2/25/2008-1 V/HC-001 3/FW-24 Ó∺-3/8/2008-3 3.F.K-2 MHO-901 W-0-001 1A-2/26/2008-1 4.FW-\*3 GLC-3/8/2008-2 .∢<÷0-561 3F.(4-3 UA-2/25/2008-1 WHC-051 4:=:/---GLO-3/5/2008-3 3714-3 WH-0-001 UA-2/25/2006-1 WH0-551 4/FW-18 GLC-3.3/2008-1 WP 2-1522C, Chg 0. 5/22/2007 WHO-901 4/F/V-24 CH-3/8/2006-4 WHC-017 3/FVV-108 PP-4/3/2008-1 3.FW-6 WH0-501 PP-2/23/2008-3 WH0-947 3/FW-109 PP-4/3/2008-1 WP 2-1522D, Chg 0, 5/22/2007 WH0-017 3/FV/-1/0 PP-4/3/2008-1 WHO-991 3.FW-1 PP-2/20/2008-1 WHC-017 3/FW-111 PP-4/3/2008-1 WHC-081 3 FW-2 PP-2/20/2008-1 WP 2-3524B, Chg 0, 11/15/2007 W-C-001 3.FW-3 PP-2/20/2008-1 WHC-061 3.FW-1 SED-3/9/2003-1 WP 2-1524A, Chg 0, 10/27/2007 WHO-D01 3. FW-15 SED-3/9/2003-1 WHC-001 3/FW-9 JA-2/25/2008-5 WHC-001 3.FVV-19 SED-3/9/2008-1 WP 2-1524D, Chg 0, 10/27/2007 WHC-001 3/FW-20 SED-3/9/2008-1 WHO-001 3/F/V-9 PP-2/20/2008-2 WHC-001 3.7.1-5 SED-3/9/2008-1 WP 2-3522A, Chg 0, 8/29/2007 WHC-004 3/FW-9 SED-3/9/2008-1 W-C-001 2.FW-3 PP-2/21/2008-7 WHC-001 4 F /V-1 GEC-3/9/2003-1 W.=C-001 3/FVV-8 EB-2/21/2008-6 WHO-001 4/FW-15 G2C-3/9/2008-1 WHC-001 4-714-3 GLC-2/21/2008-5 WEC-001 4:EW-19 GLC-3/9/2008-2 2/FW-31 W-C-004 DEE-3/3/2008-1 WH0-001 4/FV8-20 GLC-3/9/2008-2 3.FW-31 W/HO-004 DLE-3/3/2008/2 WFC-001 4/F'A-5 GLC-3/9/2008-1 WP 2-3522C, Chg 0, 8/29/2007 7450-034 4/FV/-9 GLC-3/9/2008-1 V.&-O-001 1/7/2-5 PP-2/21/2008-3 WF+©-009 3.511-31 EB-3/19/2008-2 WHO-001 2.FW-5 PP-2-21-2008-5 WH0-009. 3.FVV-82 EE-3/19/2008-2 10-0-0st 3:54-5 EB-2/21/2008-5 WHQ-009 3(FW-53 EB-3-19/2008-2 11-0-051 4,FW-5 GLC-2/21/2008-4 WP 2-3524C, Chg 0, 11/15/2007 WP 2-3522D, Chg 0, 3/29/2007 345-0-2024 3.51/4529 01-32331034 - = 4-5-01-0-001 PP-2, 21-2018-2 iden side siden a S(-S-34) BIF ANEXS. 270-5 20-02-00<sup>+</sup> PP-2/21/2005-5 신화하-224 3,755-5317 6P+3/23/2663-4 ser - Casini i 3-0-5 89-3215203-4 3 把爆伤入 DH-37372363-4 a - 7- 99 t 4 2 5 SLO-2-21 2003-3 ae e a 3, FN 8- 52 (C 0+3833.PHF WP 2-3524A, Chq 0, 11/15/2007 1.000 200 \* Frant 3 1444.3.3.6.5.2度22 و من جو را \* -----MAANA BILOG II 그는 것 같은 것 같다. l estat at det er af a · · · · · · · · · · · · · a a' 1., 5 ÷. 1.22.23 and an and a second -----1.23.23 11

.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 78 of 151

Sheet 28 of 29 JR-034 NCR 2084 Page<u>30</u>of (Report 3141) Page 2 of 2

## WO 38241 - SGT Welder Use Log

					3:14 PM 15-Oct-0
PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No
Welder - K1	243 - Keith, Mark	L			
WP 2-3524D	, Chg 0, 11/15/2007				
NOR-2-047-W 991	-C-3FN-2	SHS-3/22/2003-3			
NCR-2-047-W 001	-0- 3/FW-5	SHS-3/22/2008-3	•		
Ni∺0-304 ×	S F:14-80A	SHS-2/29/2003-2			
W-0-334	3/5/(0-608	5#8-2/29/2003-2			
WHC-004	3.F.V-81A	SHS-2/29/2008-2	,		
W0-904	S/FW-615	SHS-2/29/2008-2			
WHC-004	3/FM-62A	SHS-2/29/2003-2			
W∺C-004	3.FW-623	SHS-2/29/2003-2			
WHC-007	3/FW-50C	SHS-2/29/2008-3			
W∺C-007	3%FW-600	SHS-2/29/2008-3			
₩≓C-997	3/FW-60D	SHS-2/29/2008-3			
WHC-507	3/FW-50D	SHS-2/29/2008-3			•
WHC-007	3/FW-61C	SHS-2/29/2008-3			
WHO-007	3/FW-510	SHS-2/29/2008-3			
WH:0-007	3/FW-610	SHS-2/29/2008-3			
WH0-007	3:FW-610	SHS-2/29/2008-3			
NHO-937	3/FW-620	SHS-2/29/2003-3			
WHC-007	3 FW-620	SHS-2/29/2008-3			
WHC-207	3/FW-62D	SHS-2/29/2008-3			
WHC-207.	3.FW-62D	SHS-2/29/2003-3		, ,	
M3H0-999	3/FW-83	CW-3/13/2003-7			
w.∺0-009	3/FW/-84	014-3/13/2038-7			
WHC-009	B.₹W-35	C//P-3/13/29D3-7			
WH0-920	39774-100	RUH-3/30/2008-1.			
M∺C-32∂	3.FW-111	RUH-3/30/2008-1			
N~C-020	3.FW-182	R1H-3/59/2903-1			
N-0-021	3.81N 103	LP-4/3/2003-2			
.×−0-021	まれ、とうと	_9.4.6.2003-2			

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 79 of 151



Attachment 3

heet 29 \$29 JP-034 NCR 209 Page 3/m

A Washington Group International " AREVA Nº Company

### EXHIBIT DD QUALITY CONTROL PROGRAM

- Contractor's work is controlled by Contractor's NQA-1 Quality Assurance program in full compliance with the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants." Execution of the work is procedurally governed by Contractor's project specific Quality Execution Procedures (QEPs).
- Contractor's QEPs are available to Subcontractor upon request. Subcontractor will be placed on controlled distribution for QEPs specifically applicable to Subcontractor's scope of work.
- 3. Subcontractor's work shall comply with Contractor's QA program or Subcontractor's QA program as approved in writing by Contractor.
  - a. Subcontractor's approved QA procedures shall be available for review by Contractor and Owners at the facilities at which such procedures are normally located.
  - b. Subcontractor shall maintain Quality Assurance records in accordance with NRC regulations and shall be retained or furnished to Contractor as required by Contractor's QA program.
- 4. When applicable, Subcontractor shall comply with the provisions of 10 CFR 21, "Reporting of Defects and Noncompliance." Subcontractor shall furnish a copy of all reports sent to the NRC under 10 CFR 21, or information received which the Subcontractor is unable to evaluate thereunder, in connections with this Subcontract to: Barry Scott, SGT QA Manager: 510 Carnegie Center, Princeton, New Jersey, 08540.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 80 of 151

NCR 2-024 Sheet <u>32</u> of \_\_\_\_\_

## WO 38241 - SGT Welder Use Log

;

(Report 3141) Page 25 of 67 3:18 PM 15-Oct-08

PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No
	7303 - Golston, Sc	otty B		7561 - Gill, Terranc	<b>e</b>
WP 2-3524A,	Chg 0, 11/15/2007		WP 2-3524A,	Chg 0, 11/15/2007	A.
WHC-338	3/FW-54B-	PP-4/3/2008-3	WH0-301 61	<ul> <li>本国社会委員</li> </ul>	GLC-5/3/2008-1
WP 2-3524B,	Chg 0, 11/15/2007		- WHO-SON 1	4 FV-24	CH-3/8/2008-4
WHC-515	3/FW+107	PP-4/3/2003-5	W-0-001	4./EVv-30	0H-3/8/2008-4
WP 2-3534A,	Chg 0, 10/15/2007	······································	T W+0-994	4/FW-36	0H-3/5/2008-4
₩₩C-006	3.7%-24	CH-3/16/2008-11	WHO-901 (	4年11-5	GLC-3/5/2003-2
	7561 - Gill, Terrand	P	WHD-061	1 4/FW9-8 🖗	GLD-3/8/2008-2
	Chg 0, 10/27/2007		WHO-004 544	W 3/FW-52 STR.	DLB-3/11/2008-3
WHC-001 SH		n RUH-2/11/2008-1	WHO-906 6TA	AL BETW-53A STA.	PP-4/3/2008-3
WHC-301	3/FW-5 4	RUH-2/11/2003-1	WHC-008	3.FW-53B	PP-4/3/2008-3
	Chg 0, 8/29/2007		- WHO-DOB	3/FV#-54A	PP-4/3/2008-3
₩7 2-35220, W710-002 SM		LP-2/24/2008-5	WHC-906	3/FW-65A 🍦	PP-4/3/2008-3
	:		vv∺C-006	3.FW-55B	FP-4/3/2008-3
WHC-002	3/FW-11	LP-2/24/2008-5	WHC-006	3/FW-56A	FP-4/3:2008-2
N <sup>2</sup> ∺C-304 (	3/F/V-14 F	PP-2/23/2003-1	- WHC-908 6	3/FW-568	PP-4/3/2008-2
WP 2-3524A,	Chg 0, 11/15/2007		WHC-014 54	AND BIFW-101 STR	RC-4/1/2009-1
	920	SED-3/7/2008-1	WHO-015 (	3/FW-101A	RC-4/1/2008-3
	640	SED-3/7/2008-2	WHC-015 🖌	3/FVV-102	RC-4/1/2008-4
1 <b>7</b> -	960	SED-3/7/2008-3	WP 2-3524B.	Chg 0, 11/15/2007	
WHC-391 🦣		MAM-3/8/2008-1	WHO-DOI STA	<b>u</b> :	SED-3/9/2008-1
WHC-201 ∫	SFW-13	MAM-3/8/2008-1	WHC-061	3/FW-15	SED-3/9/2003-1
WHC-001	1)FV-17	MAM-3/8/2003-1	WHC-001	3/EVV-19	SED-3/9/2008-1
WHO-951	1/FW-13	MAM-3/5/2008-1	WHC-901	3/FW-20	SED-3/9/2008-1
VHC-001	1. FV4-24	SED-3/7/2008-1	WHO-001	3/FW-5	SED-3/5/2008-1
WHC-001	NEW-30	SED-3/7/2008-2	WHC-391	3/FV(-9	SED-3/9/2008-1
WHO-085	%FW-36	SED-3/7/2008-3	WHC-951	4,714-1	GLC-3/9/2008-1
MHC-99+	·F::-5	MAM-3:8-2002-1	WHC-001	4/=\\+15	GLC-3/9/2008-1
√+C-001	1 (FW-3	WAW-3/3/2003-1	WH-C-30%	- 49 (j. 19	GLC-3/9/2002-7
WHC-994	217-14-1	CW-3/3/2008-1	WHO-307	4.7.8-2	PP-1/31/2008-2
WHC-98%	24月11月3	077-3,2/2003-1	AF0-301	4FX-20	610-367205-2
N-0001	and the second	CAN PRESSER 1	Vehice Den	11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1	Fert 31 2003-2
i,∺C-QBi	10E Weiter	CVV-3,872308/1		al Tara	PP-1 84/2008-2
~~C-07	200,002.4	SED/94710025-4		生化学的 <del>世</del> 建行的 截	610-3 <i>626</i> 06-2
11-1 <u>0-</u> 10-		SED-2, 1601-54	an an ann an thairte an		
	2. Frank Street	aed-autoricale	e i si su fina di su si su	<b>本時</b> 1995年 4月月2日	
ter Çiyit		and a strain of the strain of	and the second secon		
N -=	11年月 11月				
	1 an .	i i statur	n na sana ya sa Ngabbatan sa s <b>a</b> ka g		
í ·	2 # 14*2			ere e mar de l'Englis. El tradición de la compañía	
	2.				
1. 1	1 . A .	s is the second way		° ″	
• at 1 1					
	· .				
		и и 	· · ·	. :	
•		•			are a f
		,	•		
		× .			
		•			

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 81 of 151

NCR 2-084 Sheet <u>33</u> of \_\_\_\_

## WO 38241 - SGT Welder Use Log

Report 3141) Page 25 of 67 3:18 PM 15-Oct-08

PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No
	7561 - Gill, Terranc		4	1561 - Gill, Terranc	······································
WP 2-3524C,	Chg 0, 11/15/2007			Chg 0, 11/15/2007	4
WHO-DET GTA	10 1 FA-1 50	V 0W-3/5/2008-4	WHO-013 SA	HU BENGBED STR	. R0-3/24/2008-22
N-C-325	17FW-13	CW-3/6/2008-4	<ul> <li>WHO-013</li> </ul>	3.Ftt-894	RC-3/24/2008-23
VVHC-001 🦾	1:5,5-19	CW-3/6/2008-4	WHO-013	3/FW-398	RC-3/24/2005-24
VvHC-301	1 FW-25	CVV-3/8/2008-4	WHC-018	; SIFIN-90A	RC-3:25;2903-1
WHE-991	1/FW-28	DVN-3/6/2008-4	WHO-013	<sub>:</sub> अहास-908	RC-3/25/2008-2
WR-C-001	1, F.V-7	CW-3/6/2003-4	WHC-813	BIFIN-91A	RC-3/25/2008-3
WHC-SOL	2/FWP1	CW-3/6/2008-5	WHC-013	3/FW-918	RC-3/25/2008-4
WHC-001	2.FW-13	CW-3/5/2008-5	WHC-014 \$4		RC-3/24/2008-19
₩HC-901	2/FW-19	CW-3/6/2008-5	WHC-014	1 3/FW-928 4	RC-3/24/2008-25
WHC-061	2.F.N-25	CW-3/6/2008-5	WHC-015 GT	W 3/FW-93A STR	RC-3/24/2008-7
WHC-001	2/FW-26	CW-3/6/2003-5	WHC-015	3/FW-933	RC-3/24/2008-8
WHC-981	2/FW-7	CW-3/6/2009-6	WHC-015	3.FW-94A	RC-3/24/2008-9
WHC-001	3/FW-1	PP-3/7/2008-13	WHC-015 🖌	3/FW-945 🥉	RC-3/24/2008-10-
WHC-001	3/FW-13	PF-3/7/2008-13	WHO-DIE CTA	W SIFW-95A STR	RC-3/24/2908-11
WHC-001	3/FW-19	PP-3/7/2008-13	WHC-016 🖌	3.FVV-953 🏑	RC-3/24/2008-20
WH0-991	3/FW-25	PP-3/7/2005-13	WHO-019 GT	W SIFW-29 STR	1P-4/3/2008-2
WHC-38%	3/FW-26	PP-3/7/2008-13	WHC-021 54	HAN BEIN-108 STR	LP-4/3:2008-2
WH0-001	3.FW-7	PP-3/7/2008-13	WHC-021	3.FW-104	LP-4/3/2008-2
WH0-001	4/FW-1	GLC-3/7/2008-3	WHC-022 5/	AW 3.FVV-108 37K	RC-3/31/2008-10
WHC-001	4/FW-13	GLC-3/7/2008-3	WHC-023	3/FW-107	RoH-4/1/2008-1
WHC-991	4.≓₩-19	GLC-3/7/2008-3	WHC-023 Y	3/FIV-503	RUH-4/1/2008-1
WF0-001	* 4/FW-7 ¥	GLC-3/7/2008-3	Welder - G	3841 - Gann, Marty	
WHC-204 54	ARI BIFW-52M STR	08-3/23/2003-4	WP 0-1530, (	Chg 0, 10/9/2007	· · · · · ·
WHC-304	3/FW-52N	CH-3/23/2008-4	WHC-901	3.FVV-1	JSS-12/3/2007-1
WHC-384	; 3/FV¥-63M	08-3/23/2008-4	WHG-081	3.784-10	LSE-12/3/2007-1
WH0-004	D BAFWARSN 🖡 👘	CH-3/23/2003-4	WHC-001	3.77 (d. 11)	.SE-12/3/2007-4
WHO-SIN SHA	AND BIFN-520 STR	03/23/2008-5	WHC-901	3,FV-52	JSE-12/3/2007-1
WED-611	1 3/FW-53Q 1	CH-3/23/2003-5	WH0-991	3,744.2	USB-12-3/2007-1
WHE-DM	3/F/V-36	0+-3(23)2003-5	<b>√%</b> ₩C₂0501	3.70°.3	- SB-12-3-2-901-1
V.Heleir 🤞	2 BONGT 🖉	0/*+12.X2.027-5	web wat	3. F. <b>.</b> . 4	198-12-12097-1
WH0-072 \$4	<b>6</b> 87 375 37647 598	CH-8(23/2058)8	A-0-01		-33-12 3:2001-1
10+6 812 <sup>- 1</sup>	SARA - EER	0++-3/28/2003-45	24-03-257		3342330674
		0+-5217133-8	an an an an an Anna An Anna an Anna Anna	s Frank	554-12-13-20-00-1-1
	ತಿ ಆನ್ಯಾಕಿಕರ್ 🥐	CH : Stange	-2.52	a Filma	
WP 2-3524D	. Chg 0, 11/15/2007				
	-	şəsəri də məla	1 C. 2204		
-944					
t, Çekaşet A ⊂ La	e ja anti-	این استانها میشون و مراد در ا این استان استان استان میزاند. و استان استان میشون از آن			
				·	
n de a					
		,		2 · · · · ·	
•					
	ч <sup>.</sup>			Ŷ	n an tr
	`				
					: 

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 82 of 151

NCR 2-084

Sheet 34 of \_\_\_\_\_

#### Proposed Disposition

Of these 32 Welder Qualifications, thirteen (13) could be qualified by virtue of bend tests that were performed on their test coupons. Of the nineteen (19) remaining performance qualification tests, two welders did not make any welds on site and two additional welders were qualified based on SGT qualifications from the FP&L St. Lucie Project.

This placed the total for unsubstantiated Welder Qualifications at fifteen (15). Thirteen of these welder qualifications will be re-evaluated for acceptability. Of these thirteen Welder Qualifications, six (6) were performed at Conam and no coupons exist to be re-radiographed. These six Welder Qualifications radiograph film sets were reviewed by the SGT Level III. The remaining seven (7) Welder Qualifications tested at Valley X-Ray and are available for radiography and will be evaluated by the SGT RT Level III after re-examination.

The remaining two (2) Welder Qualifications will be evaluated as follows:

Welder S3144 (David Soloman) qualified utilizing PQT 73, 162, and 167. PQT 167 cannot be located for reshooting therefore; the film must be re-evaluated by an SGT and Client RT Level III.

Welder G7561 (Terrance Gill) performed PQT 373 which cannot be located and the existing radiographs are not acceptable. This PQT will be dispositioned by the SGT Project Welding Engineer.

#### **Project Welding Engineer disposition:**

The last welder's test coupon could not be located on site for second radiography. His original coupon RT films for PQT 373 did not meet the criteria of ASME Section V.

This welder, Terrance Gill (G7561), was rehired by SGT for 1R15 on 10/27 08. He took a requalification test, PQT 504, which he completed on 10/29 08. His test coupon along with other rehire's test coupons were sent to Valley X-Ray on 10/29 08 for RT.

The SGT Level II has performed an initial film interpretation on PQT 504 that was acceptable per ASME Section IX acceptance criteria. One set of film was forwarded to a SGT Level III for final acceptance. This final acceptance has not been completed.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 83 of 151

### NCR 2-084

Sheet 35 of

The work performed by Mr. Gill during 2R14 utilizing the Gas Tungsten Arc Welding (GTAW) process was all on the Blowdown system. These welds were all socket weld connections of P-Number 1 carbon steel NPS 2 schedule 80 pipe to fittings. These welds all received pre-fit up cleanness inspections, fit up inspections, final weld Visual inspections, and final liquid penetrant inspections, all performed by QC inspectors. The Blowdown system also received an in service leak test.

SGT realizes that PQT 504 is not specifically applicable to the work performed during 2R14. Based on the acceptable inspections performed during 2R14 followed up by the later 1R15 acceptable weld test, there is no reason to believe that Mr. Gill did not have the skills required to deposit filler material using the GTAW process during 2R14.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 84 of 151

## Audit Number 38241-P-08-02

.

	Standard Procedu Engineering and Construction Proje		ITY EXECUTION PR	OCEDURE
orm Title	·		Revision No : Status 0E2 / AFU	GEP 18.01-2
	AUDIT FINDING REPOR	Т	Form Revision Date 04-May-05	Form Page 1 of 2
Audit Number:	38241-P-08-02	AFR Number: AFR 03	Date Issu O	ec: ectober 7, 2008
	COMPLET	ED BY AUDITOR		
Organization / Supplier, SGT / Diablo Canyo	n Power Plant SGR Project	Person Contacted: V. Allen		
Referenced Requiremen	is (Section Number, Paragraph Number, etc.)			
completing their rev	with the SGT Document Control Ce iew, managers shall return their com ment(s) or resolve the comment(s) v	ments to the procedu		
FINDING - Include Spec			Matas 53	
A review of the DCC	C file for QEP 10.04 Rev. 1 verified th	he signed Document T		Minor
A review of the DCC Client letter and con The comment form		ne signed Document T 11.ID2 Attachment forr 8 for QEP 10.04 Rev.	ransmittal form from n) was not in the file.	the Client, but the
A review of the DCC Client letter and con The comment form	C file for QEP 10.04 Rev. 1 verified th npleted approval documentation (AD from B. Kovacs from DT 2007-01563	ne signed Document T 11.ID2 Attachment forr 8 for QEP 10.04 Rev.	ransmittal form from n) was not in the file.	the Client, but the
A review of the DCC Client letter and con The comment form	C file for QEP 10.04 Rev. 1 verified th npleted approval documentation (AD from B. Kovacs from DT 2007-01563	ne signed Document T 11.ID2 Attachment forr 8 for QEP 10.04 Rev.	ransmittal form from n) was not in the file.	the Client, but the
A review of the DCC Client letter and con The comment form for the resolution of t	Tripleted approval documentation (AD from B. Kovacs from DT 2007-01563 the comments was not provided or f	he signed Document T 11.ID2 Attachment for 3 for OEP 10.04 Rev. bound in the file.	ransmittal form from n) was not in the file. t was venified. Howev	the Client, but the ver, documentation
A review of the DCC Client letter and con The comment form for the resolution of the resolution of the resolution of the resolution of the resolution of the resolution of the result for a <u>Maner Engline</u>	C file for QEP 10.04 Rev. 1 verified th npleted approval documentation (AD from B. Kovacs from DT 2007-01563 the comments was not provided or f	te signed Documérit T 01.ID2 Attachment forr 8 for OEP 10.04 Rev. found in the file. 9 for taken to correct th taken to correct th taken to correct to taken to correct to	ransmittal form from n) was not in the file. I was venified. Howev was venified condition methe avend of pre	the Client, but the ver, documentation You are further aventative action
A review of the DCC Client letter and con The comment form for the resolution of the resolution of the for a <u>Mater Funding</u> toquested to shoet toquired. The result for a <u>Mater Funding</u> For a <u>Mater Funding</u>	C file for QEP 10.04 Rev. 1 verified the npleted approval documentation (AD from B. Kovacs from DT 2007-01563 the comments was not provided or for the comments was not provided or for the comments are not provided or for the comments are not provided to dentify the actual the cause and effect of the considered is of this rearest are to be considered in the considered in	the signed Document T 01.ID2 Attachment for 3 for OEP 10.04 Rev. ound in the file. for taken to correct th thor to content to deter the your jecty to action taken to correct ("Audion's Symmetric	ransmittal form from n) was not in the file. I was venified. Howev was venified condition inclute enter the fore for the identified condition	the Client, but the ver, documentation ver, documentation ver, documentation ver, documentation ver, documentation ver, documentation ver, documentation

Standard Procedures	Farm Source		M-38-28-28-28 Canvers 4FB-23
Engineering and Construction Projects		TY EXECUTION P	ROCEDURE
Form The		Revision No / Status 0E2 / AFU	Form No QEP 18.01-2
AUDIT FINDING REPORT		Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number: AF 38241-P-08-02	R Number AFR - 03	Date Is	suea: October 7, 2008
COMPLETED BY ORG	ANIZATION AU	DITED	
Documentation is available electronically on PNET an downloaded and placed in file.	d Clicat has on file	⊧also. Copy of app	roval
Corrective Action Taken by reignature and Title)	Corrective Action C	ompletion Date: 10/	30/2008
Project Engineering Manager		· · · · · · · · · · · · · · · · · · ·	
Lack of attention to detail			
			· · · · · · · · · · · · · · · · · · ·
Documentation exists in electronic systems between the copy existed from prior DCC personnel manag Taylor as Manager will be discussed with DCC and Complete by 11/20/2008.	ing files. This AFI	R and all others with	
			.*
	Date	0/200 <b>8</b> .	• •
Project Engineering Manager	Date 11/2	)/200 <b>8</b> .	
	Date 11/20 BY AUDITOR	0/2008. Acation oUmpleme roctive / Proventati	ve Action
COMPLETED	Date 11/20 BY AUDITOR	fication of Impieme	ve Action
Project Engineering Manager COMPLETED Corrective / Preventative Action Evaluation Acceptable	Date 11/20 BY AUDITOR Ver Cor Acceptable	fication of Impieme rective + Proventation	ve Action

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 87 of 151

## Audit Number 38241-P-08-02

	L Form Source	2008 SGT Diablo Cenyon 35-28-01	
Standard Proced Engineering and Construction Pro	lures		OCEDURE
Form Tille	= -++++	Revision No Costatus 0E2 / AFU	Form No QEP 18.01-2
AUDIT FINDING REPOR		Form Revision Date 04-May-05	Form Fage 1 of 2
Audit Number 38241-P-08-02	AFR Number AFR - 07	Date Issu	ed: ctober 7 2008
COMPLE	TED BY AUDITOR		
Organization / Supplier: SGT / Diablo Canyon Power Plant SGR Project	Person Contacted William Taylor -	PEM	······
Referenced Requirements (Section Number, Paragraph Number, etc.			
QEP 07.01, section 3.8.7 requires that QEP form 07.01 from be used to document design verification	-1 Design Verification	Checkiist" or Client D	esign Verification
FINDING - Include Specific Requirement(s) Violated:	Classification:	Vlajor 🔲	Minor 🛛
<ol> <li>Contrary to this requirement, the "Design Verific CALC-C-102, rev. S2 did not match the latest re document title</li> <li>Contrary to this requirement, Keith Hernandez ( C-112, however he failed to sign and date the '</li> </ol>	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the tion 38241-CALC-
CALC-C-102, rev S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the tion 38241-CALC-
CALC-C-102, rev. S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the
CALC-C-102, rev S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the
CALC-C-102, rev. S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the
CALC-C-102, rev S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the
CALC-C-102, rev S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v	.01-1. The form did n erification on Calcula	ot include the
CALC-C-102, rev. S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez C-112, however he failed to sign and date the ' C-112, however he failed to sign and date the ' equested to investigate the cause and effect of the con equested to investigate the cause and effect of the con equired. The results of this review are to be considered	evision of QEP form 07 performed the design v Design Venification Che ction taken to correct th oution in order to determ d in your reply	.01-1. The form did n erification on Calcula ecklist". QEP form 07. elicentif ed banditign nine the extent of pre-	ot include the tion 38241-CALC- 01-1. You are function
CALC-C-102, rev. S2 did not match the latest re document title 2. Contrary to this requirement, Keith Hernandez	evision of QEP form 07 performed the design v Design Venification Che ction taken to correct th oution in order to determ d in your reply	.01-1. The form did n erification on Calcula ecklist". QEP form 07. elicentif ed banditign nine the extent of pre-	ot include the tion 38241-CALC- 01-1. You are function
<ul> <li>CALC-C-102, rev. S2 did not match the latest redocument title</li> <li>2. Contrary to this requirement, Keith Hernandez (C-112, however he failed to sign and date the 'C-112, however he failed to sign and date the 'equested to investigate the cause and effect of the domined of the results of this review are to be considered.</li> </ul>	evision of QEP form 07 performed the design v Design Venification Che ction taken to correct th ottion in order to deter o in your reply he action taken to correct Audiors Signature	.01-1. The form did n erification on Calcula ecklist". QEP form 07. ecklist". QEP form 07. ecklist" dentified structure structure extent of pre-	ot include the tion 38241-CALC- 01-1. You are function You are function
<ul> <li>CALC-C-102, rev. S2 did not match the latest redocument title</li> <li>2. Contrary to this requirement, Keith Hernandez (C-112, however he failed to sign and date the 'C-112, however he failed to sign and to si</li></ul>	evision of QEP form 07 performed the design v Design Venification Che ction taken to correct th ottion in order to deter o in your reply he action taken to correct Audiors Signature	.01-1. The form did n er/fication on Calcula ecklist?. QEP form 07. elicentif ed banditign nine the extent of pre-	ot include the tion 38241-CALC- 01-1. You are function You are function

			Form Source	008.513 T. Diazio (Lanyor: 05-06-01	
SGT	Standard Proc Engineering and Construction F		QUALI	IY EXECUTION PR	OCEDURE
form Tale	· · · · · · · · · · · · · · · · · · ·	l		Revision No / Status 0E2 / AFU	QEP 18.01-2
	UDIT FINDING REPO			Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number 38	32 <b>41-</b> P-08-02	AFRA	AFR + 07	Oate issu O	ed: ctober 7, 2008
	COMPLETED B Proposed to Correct Discrepancy.	Y ORGA	NIZATION AUD	DITED	
	Checklist was replaced with o d. There was no content differ ord file.				
					· .
Corrective Action Taken by	him My UL		Corrective Action Co	mpletion Date: 10/28	3/2008
Cause of Discrepancy:	oject Engineering Marlager				
. <b>.</b>					
Preventative Action Taken	to Eliminate Cause of Discrepancy:				
This error in the	to Eliminate Cause of Discrepancy: forms and lack of attention to o mpletion will be by 11/20/2008		e discussed in E	ngineering and	
This error in the	forms and lack of attention to c mpletion will be by 11/20/2008	<u>}</u>	e discussed in E		
This error in the solution documented. Co	forms and lack of attention to c mpletion will be by 11/20/2008	<u>}</u>		ngineering and 11/20/2008	. 19. 5 %
This error in the documented. Co	forms and lack of attention to c mpletion will be by 11/20/2008 by Signature and Title fect Engineering Manager	), 	Date Y AUDITOR	11/20/2008	й,
This error in the documented. Co	forms and lack of attention to c mpletion will be by 11/20/2008 by Signature and Title fect Engineering Manager	), 	Date <b>Y AUDITOR</b> Verif	11/20/2008	
This error in the v documented. Co Neventative Action Takes Pro Corrective - P Acceptable [	forms and lack of attention to o mpletion will be by 11/20/2008 by Signature and Title fect Engineering Manager COMPL	ו בדבס איי ו	Date <b>Y AUDITOR</b> Verif	11/20/2008	Action
This error in the v documented. Co Areventative Action Laker. Pro Corrective - P	forms and lack of attention to c mpletion will be by 11/20/2008 by Signature and Title fect Engineering Manager COMPL reventative Action Evaluation	ו בדבס איי ו	Date <b>Y AUDITOR</b> Verif Corr Acceptable	11/20/2008 ication of Imprement ective - Preventative	Action
This error in the v documented. Co Acceptable [	forms and lack of attention to c mpletion will be by 11/20/2008 by Signature and Title fect Engineering Manager COMPL reventative Action Evaluation	ו בדבס איי ו	Date <b>Y AUDITOR</b> Verif Corr Acceptable	11/20/2008 ication of Imprement ective - Preventative	

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 90 of 151

## Audit Number 38241-P-08-02

### Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 91 of 151

	Standard Pro		Form Source	ITY EVECUTION	
	igineering and Construction	Projects	QUAL	ITY EXECUTION	
Form Titje		~~~		Revision No / Statu 0E2 / AFU	QEP 18.01-2
AU	IDIT FINDING REP	ORI		Form Revision Date 04-May-05	Form Page
Audit Number <sup>®</sup> 3824	41-P-08-02	AFR	AFR - 08		Issued: October 7, 2008
	COMP	LETED	BY AUDITOR		
Organization / Suoplier SGT / Diablo Carryon Po	ower Plant SGR Project		Person Contacted: William Taylor -	PEM	
Referenced Requirements (Se	action Number, Paragraph Numbe	er, etc.):	L		•
Contents, QEP 07,06-1	I.6 requires that the following that the following the second	QEP 07.	06-2 "Specification		
·					
				•	
FINDING - Include Specific Re	equirement(s) Violated:	Class	fication:	Major 🗌	Minor 🖾
	nent QEP Form 07.06-1 inc e form was missing the spe				
				and revision date	DIOCKS.
	· ·				DIOCKS.
	• •				DIOCKS.
					DIOCKS.
	· ·				DIOCKS.
	•				DIOCKS.
	· ·				DIOCKS.
• •					DIOCKS.
• • •					DIOCKS.
· ·		· · · ·	· · ·		DIOCKS.
requested to investigate required (Toe results of	The requested to identify the cause and effect of the this review are to be considered only to reet	ne action t condition dered in ye	aken to correct t n order to deter our Holy	ne identified const mine the extent of	ion - You are further preventative action
requested for hvestigate required i Toè results of Form <u>Minor Finaing</u> , you Bescarse SoB-CA18	the cause and effect of the this review are to be consid- care requested only to iden	ne action t condition dered in ye cfyribe acti	aken to correct t n order to deter our repty ado taken to corr Addition Signature	ne identified conic t mine the extent of ect the identified of	ion - You are further preventative action antation
requested for hvestigate required i Toè results of Form <u>Minor Finaing</u> , you Bescarse SoB-CA18	the cause and effect of the this review are to be considered.	ne action t condition dered in ye cfyribe acti	aken to correct t n order to deter our repty ado taken to corr Addition Signature	ne identified conic t mine the extent of ect the identified of	ion - You are further preventaine activity

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 92 of 151

			SGT-Daso & Canvin DHUS-CAR	V-Diable Conyon AFR C8 Form dik
Stand Engineering and Constr	ard Procedures	Color Source QUALI	Y EXECUTION PR	OCEDURE
Form Title			Revision No EStatus 0E2 / AFU	Form No QEP 18.01-2
AUDIT FINDING		Number	Form Revision Date 04-May-05	Form Page 2 ct 2
Ldit Numeer 38241-P-08-02		AFR - 08	and the second secon	otober 7, 2008
COMPLE Corrective Action Taken or Proposed to Correct Discrep	TED BY ORGA	NIZATION AUD		
The specification cover page had no conte required. The differences are editorial. The be revised, a new cover page would be fur No action required.	he document is ap	ice it is only a title	e page - no further a lient. If the specifica	action is ation were to
· · · · · · · · · · · · · · · · · · ·		·		
Corrective Action Telenby Schrätture and Title A Project Engineering Man	Jun 1	Corrective Action Co	mpletion, Date: 10/2	8/2008
Cause of Discrepancy:				
Preventative Action Taken to Exminate Cause of Discre No further action required for this find however, this error in the forms and la documented. Completion will be by 11	ing due to historica ack of attention to	al personnel no lo detail will be disc	onger supporting the cussed in Engineeri	e project: ng and
No further action required for this findi however, this error in the forms and la	ing due to historica ack of attention to	al personnel no lo detail will be disc	onger supporting the cussed in Engineeri	e project: ng and
No further action required for this findi however, this error in the forms and la documented. Completion will be by 11 Recentative Action Taken by (Signature and Tide)	ing due to historica ack of attention to 1/20/2008.	al personnel no lo detail will be disc nare 11/20/200	cussed in Engineeri	e project: ng and
No further action required for this find however, this error in the forms and la documented. Completion will be by 11 recentative Action Taken by (Signature and Title) Project Engineering Manager.	ing due to historica ack of attention to 1/20/2008.	detail will be disc Date 11/20/290	cussed in Engineeri	e project: ng and
No further action required for this find however, this error in the forms and la documented. Completion will be by 11 Project Engineering Manager. Corrective / Preventative Action Eva	ing due to historica ack of attention to 1/20/2008.	detail will be disc Date 11/20/200 Y AUDITOR Ven	cussed in Engineeri	ng and
No further action required for this find however, this error in the forms and la documented. Completion will be by 11 Breventative Action Taken by (Signature and Tale) Project Engineering Manager. Corrective / Preventative Action Eva AcceptableUnacce	ng due to historica ack of attention to 1/20/2008. COMPLETED B	detail will be disc Date 11/20/200 Y AUDITOR Ven	Restion of Implement	ng and
however, this error in the forms and la documented. Completion will be by 11 Preventative Action Taken by (Signature and Title) Project Engineering, Manager, Corrective / Preventative Action Eva Acceptable L Unacce Reason	Ing due to historica ack of attention to 1/20/2008.	Dare 11/20/200 Y AUDITOR Ven Cor Acceptable	Restion of Implement	ng and Talion of e Action

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 94 of 151

Audit Number 38241-P-08-02

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 95 of 151

	Standard	Procedures	Form Source		
	Engineering and Constructi		QUALI	TY EXECUTION PR	OCEDURE
orm Title				Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2
	AUDIT FINDING RE			Form Revision Date 04-May-05	Ferm Page 1 of 2
Audit Number	38241-P-08-02		R Number AFR – 09	) Oste iss C	ued: Octoper 7, 2008
	COM	MPLETED I	BY AUDITOR		
Organization / Supplie SGT / Diablo Can	r yon Power Plant SGR Project		Person Contacted: William Taylor		
QEP 07.07, sectio	ents (Section Number, Paragraph Num on 3.3.2 (f) requires that a copy ordance with QEP 07.04, Calcu Iculation title.	of the instal			
					· · · ·
	· · · · · · · · · · · · · · · · · · ·				
Contrary to this re GT STRUDL, vers	pecific Requirement(s) Violated: equirement, no SGT Calculation sion 28 was generated for this C-1	n for the "Ana	alytical Software II		
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana	alytical Software II	nstallation Test" for o	computer software
Contrary to this re GT STRUDL, vers Calculation 22180 For 3 <u>Major Findin</u> reducested to my es required to my es	quirement, no SGT Calculation sion 28 was generated for this	n for the "Ana project. This y the action r the conductor is derect in yo	alytical Software In software was use aken to correct th in profer to desem our reply	e dentries conducer	Computer software coment of SGT
Contrary to this re GT STRUDL, vers Calculation 22180 For 3 <u>Major Findin</u> reducested to my es required to my es	equirement, no SGT Calculation sion 28 was generated for this C-1 ig. you are requested to identify tighte the cause and effect of turs of this review are to be con-	n for the "Ana project. This y the action r the conductor is derect in yo	alytical Software In software was use aken to correct th in order to deter our reply tion taken to corre Averars 2 photole	e dentries conducer	computer software oment of SGT

C rusers(OP0)(OTE)(3)	MENDEMOCIALL FILCAUDITS	COUBISIOTIO abid Canyon NU-CT-	08\Qiablo Qwhyon Af HiddiFV
Standard Procedures Engineering and Construction Projects		TY EXECUTION PR	OCEDURE
		Revision No / Status 0E2 / AFU	Form No QEP 18.01-2
AUDIT FINDING REPORT		Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number AF1 38241-P-08-02	R Number AFR - 09	Date Issu	ed: ctober 7, 2008
COMPLETED BY ORG	ANIZATION AU	DITED	
Calculation 38241-CALC-C-119 was approved 10/24/ "Analytical Software Installation Test"	/2008 and sent to [	Document Control. T	itle is
Corrective Action Takeprov (Signature and Title)	Corrective Action Co	mpletion Date:	
Project Engineering Manager	10/2	28/2008	
Preventative Action Taken to Eliminate Cause of Discrepancy SGT PEM performs and it was missed in 2006 when se anymore. No further action is required.	oftware was first u	sed. That PEM is no	t with SGT
Preventative Action Taxed by :Signature and Title:	10/28/	2008	
COMPLETED	And annual and a state of the second se	6	- -
Corrective./ Preventative Action Evaluation		fication of Implement rective. Preventative	
Acceptable Unacceptable	Acceptable	Unacceptable	
e of entred by	an than anna strainn anna Straight I airg (air	: <u>2</u>	t ite

٤

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 97 of 151

## Audit Number 38241-P-08-02

Docket Number 99901334 . SGT M-09-0050 Attachment 2 Page 98 of 151

C d. sers/OPD	OTE: DMS-DE	MODVALL-PLEXAUDITSU008	SGT-Diatio Danyo	X-DR-CERV	-2 at t Canyon AFR 2011 onto
Standard Pro Engineering and Construction		QUALI	TY EXECUT	ION PR	DCEDURE
			Revision No I	<b>AFU</b>	Etim No QEP 18.01-2
			Form Revisio 04-May	/-05	Form Page 1 of 2
38241-P-08-02	AFF	AFR - 10		Date issui Oc	ed stober 7 2008
	LETED	BY AUDITOR			
liganization / Supplier: SGT / Diablo Canyon Power Plant SGR Project		Person Contacted William Taylor - I	PEM		
teferenced Requirements (Section Number, Paragraph Number, DEP 07:08, section 4:3:10 requires that the DCP for procedure CF3 ID9, "Design Change Development" CF3 ID9 shall be used to complete the forms:	rms listed				
Design Change Summary Form 69-20113 Design Change Evaluation Form 69-20114 Independent Evaluation Form 69-20163 Design Change Notice Form 69-20115					
DEP 07.08, section 4.4.2 requires that design verific Design Verifier completes and signs from 69-20163			cumented p	er QEP (	07.01 and the
<ol> <li>INDING - Include Specific Requirement(s) Violated:</li> <li>Contrary to this requirement, form 602133 of 3 of 6 and also has the incorrect page count page count should be 7 not 6.</li> <li>Contrary to this requirement, the Independe performed and documented on the incorrect should have been documented on form 69-2</li> <li>Contrary to this requirement, Form 69-20113 Team Leader and the Station Director.</li> </ol>	n DCP-E t. Page 3 Int Eva ua t form, Th 20163	-049772 make ref indicates that the ation performed ar ne evaluation was	revision is ", nd attached t documented	A", it sho o DCP-E I on from	uld be "0". Also th -049772 was 69-21213 and
Note: DCP-E-049772 and DCP-P-049740 had beer	n status A	AFU)			·
		;			
				• 1	
for a <u>Major Financo</u> , you are requested to reentify the equasted to investigate the cause and effect of the t coursed. The results of this review are to be toursely or a <u>Minor Financ</u> , Johand requested of third debr-	tondition Ried ip gr	in order to Jetern og segginn	vné tře akle	et of ite.	verstative action
isstante DUS CATE November 5, 2008		Autorics Styration	E. Mad	Coral.	el :0 07.08
esuite of Lead Auditor - PGM screaning (12 NC Por « Botemina lassociation with 100FR21 (17 Possib)	tent al le <sup>p</sup> orent	ia Dawid	E. Mag	Ionale	1007.08

Characterist State Stat	Form Source	MG - 10 35-0 2,31910 (9-1	PARES	. abe Laryon AFR 11 - om
Standard Procedures Engineering and Construction Projects	·	Y EXECUTIO	N PRO	CEDURE
orm Title	· · · ·	Revision No./ Sta 0E2 / AFU		Form No. QEP 18.01-2
AUDIT FINDING REPORT		Form Revision Di 04-May-0		Form €age 2 of 2
38241-P-08-02	Number. AFR - 10	(Dai	te issua Oc	d: tober 7, 2008
COMPLETED BY ORGAN	NIZATION AUD	DITED	·····	
orrective Action Taken of Proposed to Correct Discrepancy:	······································			
he page count was corrected.				
EP lists initial forms when the QEP is first written. Forms hav	e been updated	to newer revisi	ions a	nd although
GT is exempt from using the new forms; use of the new form				
pproved by Client. Client signature page with missing signatu				
FF. • • • • • • • • • • • • • • • • • •			-,	
he Client signed the page they did not sign.				
	·····			
Corrective Action Taken by (Signatere and Titler	Corrective Action Co	npletion Date:		
Project Engineering Manager		0/28/2008		
ause of Discrepancy:		·····		·····
Incorrect page count is an attention to detail error.				
Use of newer Client forms is not a discrepancy.				
The Client not signing their paper and SGT not seeing when	n filing is an atter	ntion to detail e	rror.	
	n filing is an atter	ntion to detail e	rror.	
	n filing is an atter	ntion to detail e	rror.	
The Client not signing their paper and SGT not seeing when	n filing is an atter	ntion to detail e	rror.	
The Client not signing their paper and SGT not seeing when reventative Action Taken to Eliminate Cause of Discrepancy	n filing is an atter	ntion to detail e	rror.	
The Client not signing their paper and SGT not seeing when	n filing is an atter	ntion to detail e	rror.	
The Client not signing their paper and SGT not seeing when reventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms.				
The Client not signing their paper and SGT not seeing when Reventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms.				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008.				. This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008.	submittals and p	ay attention to o		This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing a documented. This will be completed by 11/20/2008.	submittals and p Date 11/20/20	ay attention to o		This will be
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing a documented. This will be completed by 11/20/2008.	submittals and p	ay attention to o		. This will be
The Client not signing their paper and SGT not seeing when reventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing a documented. This will be completed by 11/20/2008.	submittals and p Date 11/20/20	ay attention to o	details	····· .
The Client not signing their paper and SGT not seeing when reventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing a documented. This will be completed by 11/20/2008.	submittals and p Date 11/20/20 Y AUDITOR Verif	ay attention to o	details	lion of
The Client not signing their paper and SGT not seeing when reventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing a documented. This will be completed by 11/20/2008.	submittals and p Date 11/20/20 Y AUDITOR Verif	ay attention to o 008	details menta ative	lion of
The Client not signing their paper and SGT not seeing when reventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008. Project Engineering Manager COMPLETED BY Corrective Preventative Action Evaluation Acceptable Unacceptable	Submittals and p Date 11/20/20 Y AUDITOR Verif Corr	ay attention to o 008 cation of Imple	details menta ative	lion of Action
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008. Project Engineering Manager COMPLETED BY Corrective Preventative Action Evaluation Acceptable	Submittals and provide the second sec	ay attention to o 008 cation of Imple	details menta ative	lion of Action
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008. Project Engineering Manager COMPLETED BY Corrective Preventative Action Evaluation Acceptable	Submittals and provide the second sec	ay attention to o 008 cation of Imple	details menta ative	lion of Action
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008.	Submittals and provide the second sec	ay attention to o 008 cation of Imple	details menta ative	lion of Action
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008. Project Engineering Manager COMPLETED BY Corrective Preventative Action Evaluation Acceptable	Submittals and provide the second sec	ay attention to o 008 cation of Imple	details menta	lion of Action
The Client not signing their paper and SGT not seeing when Preventative Action Taken to Eliminate Cause of Discrepancy No action required regarding changing of the forms. DCC will be reminded to validate records when processing s documented. This will be completed by 11/20/2008. Project Engineering Manager COMPLETED BY Corrective Preventative Action Evaluation Acceptable	Submittals and provide the second sec	ay attention to o 008 cation of Imple	details menta	lion of Action

Date

L

n Starfeyse S

1.04

i.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 100 of 151

Audit Number 38241-P-08-02

AFR Number: AFR - 11

.

			Ener Source		
SGF	Engineering and	Standard Procedur Construction Project	res	ALITY EXECUTIO	N PROCEDURE
Form Title				Revision No - Sta	J QEP 18.01-2
-		ING REPORT		Form Revision D 04-May-0	5 1 of 2
kudit Number	38241-P-08-02		AFR Number: AFR -		te Issued: October 7, 2008
		COMPLETE	D BY AUDITOR	र	
SGT / Diablo Car	er: Nyon Polwer Plant SG	R Project	Person Contact William Taylo		
	•			nding organization	in accordance with QEI
QEP 07.15, secti	on 3.7 "Response Pr	eparation" requires	that the RFI respo	onse include the fol	llowing:
Listing of reference Sheet numbering	ne RFI form with sign. ced documents, revis j of completed RFI. If ent shall be numbere	ion and date attachments are a		ents shail be listed o	on response and each
	и				
	•				
	peafic Requirement(s) Vic	narou,	assification:	Major 🔀	Minor 🗋
1.Contrary to this been transmitted RFI-38241-006		smittal documentat			Minor following RFI's have
1.Contrary to this	requirement no trans to the responding or	smittal documentat			
1.Contrary to this been transmitted RFI-38241-006 RFI-38241-0023 2. Contrary to this RFI-38241-0010 RFI-38241-0016 (blocks are N/A'e RFI-38241-0023 verifier and appro RFI-38241-0029 AFU status. The RFI-38241-006 in	requirement no trans to the responding or s requirement: has not had the REL is missing the verifier d) is shown as AFU stat oval signatures are m was returned with co REL in the SGT DCC	response approved s signature, title an tus, however the Ri issing, mments from the ci file is incomplete, o 1, 2 and 3, these at	The form is miss to date, along with Fin the SGT DCC tent and the appro- t is missing all the tachments are col	indicating that the ing the approval sign the approval signa files is incomclete oved RFL is not in S RFI Response sign	following RFI's have gnature, title and date ature, title and date e. The final resolution an GT DCC. This RFI is
1.Contrary to this been transmitted RFI-38241-006 RFI-38241-0023 2. Contrary to this RFI-38241-0010 RFI-38241-0010 (blocks are N/A'e RFI-38241-0023 verifier and appro RFI-38241-0029 AFU status. The f RFI-38241-0029 AFU status. The f RFI-38241-005 in host been proparty For a <u>Major Finda</u>	s requirement no trans to the responding or s requirement: has not had the RFL is missing the verifier d) is shown as AFU stal oval signatures are m was returned with co RFL in the SGT DCC notudes attachments y nombered in accord sogate the cause and sogate the cause and sogate the cause and solution of this net evident	response approved s signature, title an tos, bowever the Ri issing, mments from the d file is incomplete, if 1, 2 and 3, these at ance with QEP 07 to identify the action suffect of the considered	The form is miss to date, along with Et in the SGT DCC tent and the appro- tachments are pol 15, section 3.7 too taken to correc- tion taken to correc-	indicating that the ing the approval sig the approval signal files is incomplete oved RFL is not in S RFL Response sign (histed within the RI bit the donate field con- termine the extent articlation decision	following RFI's have gnature, title and date ature, title and date ature, title and date b. The final resolution and GT DCC. This RFI is natures and dates. FI response and have a tion inclusive hotes of prevent time hotes
1.Contrary to this been transmitted RFI-38241-006 RFI-38241-0023 2. Contrary to this RFI-38241-0010 RFI-38241-0010 (blocks are N/A'e RFI-38241-0023 verifier and appro RFI-38241-0029 AFU status. The RFI-38241-005 in host been property For a <u>Major Findi</u> reduced to the reduced finances	s requirement no trans to the responding or s requirement: has not had the RFL is missing the verifier d) is shown as AFU stal oval signatures are m was returned with co RFL in the SGT DCC notudes attachments y nombered in accord sogate the cause and sogate the cause and sogate the cause and solution of this net evident	response approved s signature, title an us, however the Ri issing, mments from the d file is incomplete, it 1, 2 and 3, these at ance with QEP 07 thought of the action action of the action action of actions.	The form is miss to can be located The form is miss to date, along with Et in the SGT DCC tent and the appro- tis missing all the tachments are got 15, section 3 7 to n taken to correc- tion taken to correction to correction to correc- tion taken to correction to correc- tion taken to correction to co	indicating that the ing the approval sig the approval signal files is incomplete oved RFL is not in S RFL Response sign (histed within the R) (histed within the R)	following RFI's have gnature, title and date ature, title and date ature, title and date ature, title and date ature, title and date atures and dates. FI response and have a tion inclusion are further of prevent at verification
1.Contrary to this been transmitted RFI-38241-006 RFI-38241-0023 2. Contrary to this RFI-38241-0010 RFI-38241-0010 (blocks are N/A'e RFI-38241-0023 verifier and appro RFI-38241-0029 AFU status. The f RFI-38241-003 in host been property for a <u>Mater Find</u> Policested to rise required find ess for a <u>Mater Find</u> Policested to rise	requirement no trans to the responding org s requirement: has not had the RFL is missing the verifier d) is shown as AFU stat oval signatures are m was returned with co RFL in the SGT DCC actudes attachments (nombered in accord stigate the cause and shifts of the new eway of the transported in accord	response approved s signature, title an ius, however the Ri issing, mments from the d file is incomplete, r 1, 2 and 3, these at ance with QEP 07 : 15 dentify the action a incervice considered a infect of the action a infect of the action	The form is miss to can be located The form is miss to date, along with Et in the SGT DCC tent and the appro- tis missing all the tachments are got 15, section 3 7 to n taken to correc- tion taken to correction to correction to correc- tion taken to correction to correc- tion taken to correction to co	indicating that the ing the approval sig the approval signal files is incomplete oved RFL is not in S RFL Response sign (histed within the R) (histed within the R)	following RFI's have gnature, title and date ature, title and date ature, title and date b. The final resolution and GT DCC. This RFI is natures and dates. FI response and have a tion inclusive hotes of prevent time hotes

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 102 of 151

			EMODIAL - FILEVAL D-711	2009-00 included that per render.	REAL PLANNER REPORT
SGT En	Standard Pro gineering and Construction	ocedures i		TY EXECUTION PR	OCEDURE
Form Title	~			Revision No - Status 0E2 / AFU	Form No QEP 18.01-2
	DIT FINDING REP			Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number. 3824	41-P-08-02	AFR	AFR - 11	Date Issu	eo ctoper 7, 2008
y na nine <u>na secon</u> trend ponsenza an <u>an</u> System se pu	COMPLETED I	BY ORGAI	NIZATION AU	DITED	
RFIs were reviewed a processes for approve DITs (design informat	oposed to Correct Discrepancy: and it was verified all respon- ed responses and subsequi ion transmittals) where app aperwork. No corrective ac	ent use in S propriate an	GT work. Clien d this obviates t	t responds to SGT by	y letters and
Corroctive Action Taken by S	ionatura and Titiah	4 - 1	Parastiva Action Co	moletion Date:	
Corrective Action Taken by (S)	thin My	2	Corrective Action Co	mpletion Date: 10/28/2	2008
Cause of Discrepancy:	oject Engineering Mañager	:i		·	
					• 1
Sufficient approved and Client is on file. Client	Eliminate Cause of Discrepancy d documented records exis requires correspondence w ed to update the RFI files.	t to demons	strate the reques the RFI files to	t for information requise the method they r	lested of the respond to SGT
Sufficient approved and Client is on file. Client	d documented records exis requires correspondence v	t to demons which is with	strate the reques the RFI files to	t for information requ be the method they r	lested of the respond to SGT
Sufficient approved and Client is on file. Client	d documented records exis requires correspondence v	vhich is with	the RFI files to	be the method they r	lested of the respond to SGT
Sufficient approved and Client is on file. Client RFIs No action require	d documented records exis requires correspondence w ed to update the RFI files.	which is with	the RFI files to	t for information requ be the method they r /28/2008	lested of the respond to SGT
Sufficient approved and Client is on file. Client RFIs No action require	d documented records exis requires correspondence w ed to update the RFI files.	which is with	the RFI files to Date 10	be the method they r /28/2008	espond to SGT
Sufficient approved and Client is on file. Client RFIs No action require Preventative Action Tagen by Proj	d documented records exis requires correspondence w ed to update the RFI files.	which is with	the RFI files to Date 10 Y AUDITOR Ver f	be the method they r	espond to SGT
Sufficient approved and Client is on file. Client RFIs No action require Preventative Action Tagen by Proj	d documented records exis requires correspondence w ed to update the RFI files. Sufficiency and Triel Company Triel Comp	LETED BY	the RFI files to Date 10 Y AUDITOR Ver f	be the method they r /28/2008	espond to SGT
Sufficient approved and Client is on file. Client RFIs No action require Preventative Action Tagen by Proj Corrective i Prev Acceptable	d documented records exis requires correspondence w ed to update the RFI files. Sufficiency and Triel Company Triel Comp	LETED BY	the RFI files to bate 10 AUDITOR Ver f Corr Acceptable ]	be the method they r /28/2008 itation of mplement ective / Preventative	espond to SGT ation of Action

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 103 of 151

### Audit Number 38241-P-08-02

SGT	Standard Proced Engineering and Construction Pro		UALITY EXE		OCEDURE
Form Title			06	n No / Status E2 / AFU	Form No. QEP 18.01-2
	AUDIT FINDING REPOR			ev sion Date -May-05	' Form Page 1 of 2
Nüdit Numper 3	38241-P-08-02	AFR Number AFR	- 13	Date ssue Cr	<sup>ad</sup> ctober 7, 2008
	COMPLE	TED BY AUDITO			
Organization / Supplier. SGT / Diablo Cariyo	n Power Plant SGR Project	Person Sonta Vikk: Ailen	⊢ DCC Supei	rvisor	
QEP 07.08 Section 4 QEP 07.09 Section 3 QEP 08 01 Section 3	ts (Section Number, Paragraph Number, et 4.4.9 – Design Change Packages 3.4.5 – Design Change Contro 5.2.1 – Document Control by will be provided to the Client	c. <u>}:</u>			
	sued to controlled holders of affect	ad documento			
<ul> <li>SDL indicated compared set</li> </ul>	ontrolled Work Packages to be iss Unit 2 – no Work Packages are iss	ued to SET ID 7 (V		SET ID 26 (P	aul Helton) none
				<del></del>	
	afic Requirement(s) Violated:	Classification:	Major 🔀		Minor 🗌
The SDL doesn't har Dient as to whether evise SDL to includ SDL needs to be rev The SDL indicates c cullpen) – if this is n of WPs as this allevi	ve the Client stated to receive any they wish to be on distribution for le the document types and issue th vised to remove MCPs. controlled copies of Work Packages of going to happen revise the SDL lates DCC making additional indivis	controlled DCPs, I these documents - e documents contr s will be :ssued to ( - though it is a go	ECRs, drawin - If not revise rolled to the C Quality and D od practice to	gs, Specs or QEP to delet Client. CC (intended	Calcs. Query the e requirement or as a satellite in the le of controlled sets
The SDL doesn't har Client as to whether revise SDL to includ SDL needs to be rev The SDL indicates c builpen) – if this is no of WPs as this allevi	ve the Client stated to receive any they wish to be on distribution for le the document types and issue th vised to remove MCPs. controlled copies of Work Packages of going to happen revise the SDL lates DCC making additional indivis	controlled DCPs, I these documents - e documents contr s will be :ssued to ( - though it is a go	ECRs, drawin - If not revise rolled to the C Quality and D od practice to	gs, Specs or QEP to delet Client. CC (intended	Calcs. Query the e requirement or as a satellite in the le of controlled sets
The SDL doesn't har Client as to whether revise SDL to includ SDL needs to be rev The SDL indicates c bullpen) – if this is no of WPs as this allevi	ve the Client stated to receive any they wish to be on distribution for le the document types and issue th vised to remove MCPs. controlled copies of Work Packages of going to happen revise the SDL lates DCC making additional indivis	controlled DCPs, I these documents - e documents contr s will be :ssued to ( - though it is a go	ECRs, drawin - If not revise rolled to the C Quality and D od practice to	gs, Specs or QEP to delet Client. CC (intended	Calcs. Query the e requirement or as a satellite in the le of controlled sets
The SDL doesn't har Client as to whether revise SDL to includ SDL needs to be rev The SDL indicates of bullpen) – if this is ni of WPs as this allevit reading or training b reading or training b For a <u>Major Froand</u> requested to investig teo used. The fastist Fir a <u>Major Froand</u>	ve the Client stated to receive any they wish to be on distribution for le the document types and issue th vised to remove MCPs. controlled copies of Work Packages of going to happen revise the SDL lates DCC making additional indivis	controlled DCPs, I these documents - e documents contr s will be issued to ( - though it is a go dual copies for eng dual copies for eng issues for eng total copies for eng total copies for eng total copies for eng	ECRs, drawin - If not revise rolled to the C Quality and D od practice to meers Super ect the scentific lefers no me	gs, Specs or QEP to deletic lient. CC (intended have a coup rintendents, T ed coedition	Calos. Query the e requirement or as a satellite in the le of controlled sets ask Managers for Mou are further vental to action
The SDL doesn't har Client as to whether revise SDL to includ SDL needs to be rev The SDL indicates of coullpen) – if this is mo of WPs as this allevi reading or training of reading or training of reading or training of equasted to investig equasted to investig equasted to investig equasted to investig equasted to investig equasted to investig equasted to investig	ve the Client stated to receive any they wish to be on distribution for le the document types and issue the vised to remove MCPs. controlled copies of Work Packages of going to happen revise the SDL lates DCC making additional indivi- ing additional indivi- pages.	controlled DCPs, I these documents - e documents contr s will be issued to ( - though it is a go dual copies for eng dual copies for eng dual copies for eng issues for eng issues to com- testion reken to com- testion prefer to com- testion prefer to com- testion prefer to com-	ECRs, drawin - If not revise rolled to the C Quality and D od practice to meens Super ectribe -centif lefant do the pointer the d	gs, Specs or QEP to delet Client. CC (intended have a coup intendents, T ed coestiton escent 51 pre-	Calos. Query the e requirement or as a satellite in the le of controlled sets ask Managers for Mou are further vental ve action

ರ ಅಂಟಿಗೆ225-2750	450FMCDVALL-FUEXUD(78/200)	REGT-Diat & Carvan 08-08-08-08-	9-Diablo Canyon AFR-DC-001 co
Standard Procedur Engineering and Construction Project	es	TY EXECUTION PR	OCEDURE
form file		Revision No / Status 0E2 / AFU	Corm No QEP 18.01-2
		Form Revision Date 04-May-05	Form Page 2 of 2
ud t Number: 38241-P-08-02	AFR Number AFR – 13	Date issu	ed ctober 7, 2008
COMPLETED BY OF priective Action Taken or Proposed to Correct Discrepancy	RGANIZATION AU	DITED	
Only SDL for MCP is to DCC (Vikki Allen). It will be dele become active for the project. Client changes requested Client for another change will be made by 11/06/2008. It give Client controlled documents is met at end of Project the Companies now.	I to SDL were made 9 No additional changes	/9/2008. Recent (10 to SDL are required	/23/08) request by Requirement to
Corrective Action Taken by Signature and Title): TAYM	Corrective Action Co	mpletion Date:	
Project Engineering Manager			······
Preventative Action Taken to Eliminate Cause of Discrepancy. There are no procedural violations associated with th is issued and when documents are issued as controll controlled manner at Project Closeout. No action re-	ed. SGT issues reco	2.1 states the PEM of rds noted here-in to the state of	decides what Client in a
Project Engineering Menager	Pale	0/28/2008	
	D BY AUDITOR	· · · · · · · · · · · · · · · · · · ·	·····
Corrective-Preventative Action Evaluation	Ver	ication of implement rective / Preventative	
Acceptable Unacceptable	Acceptable	Unacceptable	Not Required
	:		

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 106 of 151

Audit Number 38241-P-08-02

AFR Number: AFR - 14

Docket Number 99901334 SGT M-09-0050 Attachment 2. Page 107 of 151

	~ · ·	12	e te fi skie fatur				
	Drandord Engineering and Construct	Procedur 13 don Projects					
or tille T		· -		UE2/AFU	U CEP 18.01-2		
· A	UDIT FINDING RE	EPORT		Fron Ray sect Or 04-May-05			
LIST MUMBER		AFF	RN unber AFR = 14		66.52 00006411, 2008		
38	241-P-08-02			i	CCCCC+1+1,22000		
- raanzator / Suppers		MPLEIEUI	BY AUDITOR				
	Power Plant SGR Project		Scott Parker L	lead Field Engli	ਰਦਾ		
-feller and the gunder als	Benuen Number Piling aph Nu	नाहल चंद	L				
	4-3 requires that the work k to be performed and in a						
					ч. - С		
	c Requirement(s) Violated: rement i during review of a	Class		Major	Minor 🖾		
Contrary to this requir vork package incorre hat the mark number	e Requirement(s) Violated rement, during review of a ect references were being i should be 1-2530-MK-00 marking of material is not (	pproved Wor made to mate 1 and the MD	k Package 1-253( erial mark number 0S Material Data	CA it was noted t s. The Work Ins Sheet identified	hat the through out the truction steps indicate		
Contrary to this requir work package incorre- hat the mark number	rement, during review of a ict references were being i should be 1-2530-MK-00	pproved Wor made to mate 1 and the MD	k Package 1-253( erial mark number 0S Material Data	CA it was noted t s. The Work Ins Sheet identified	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre hat the mark number	rement, during review of a ict references were being i should be 1-2530-MK-00	pproved Wor made to mate 1 and the MD	k Package 1-253( erial mark number 0S Material Data	CA it was noted t s. The Work Ins Sheet identified	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre- hat the mark number	rement, during review of a ict references were being i should be 1-2530-MK-00	pproved Wor made to mate 1 and the MD	k Package 1-253( erial mark number 0S Material Data	CA it was noted t s. The Work Ins Sheet identified	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre- hat the mark number	rement, during review of a ict references were being i should be 1-2530-MK-00	pproved Wor made to mate 1 and the MD	k Package 1-253( erial mark number 0S Material Data	CA it was noted t s. The Work Ins Sheet identified	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre- hat the mark number	rement, during review of a ict references were being i should be 1-2530-MK-00	pproved Wor made to mate 1 and the MD	k Package 1-253( erial mark number 0S Material Data	CA it was noted t s. The Work Ins Sheet identified	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre- hat the mark number	rement, during review of a ict references were being i should be 1-2530-MK-00	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number 0S Material Data	CA it was noted t is. The Work Ins Sheet identified d.	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre- nat the mark number	rement, during review of a sct references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number DS Maferial Data eds to be corrected	CA it was noted t is. The Work Ins Sheet identified d.	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre hat the mark number	rement, during review of a sct references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number DS Maferial Data eds to be corrected	CA it was noted t is. The Work Ins Sheet identified d.	hat the through out the truction steps indicate		
Contrary to this requir vork package incorre- hat the mark number	rement, during review of a sct references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number S Malerial Data eds to be corrected	CA it was noted t 's. The Work Ins Sheet identified d.	hat the through out the truction steps indicate the mark number as		
Contrary to this requir vork package incorre hat the mark number	rement, during review of a sct references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number S Malerial Data eds to be corrected	CA it was noted t 's. The Work Ins Sheet identified d.	hat the through out the truction steps indicate the mark number as		
Contrary to this requir vork package incorre hat the mark number	rement, during review of a sct references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number DS Material Data eds to be corrected	CA it was noted t is. The Work Ins Sheet identified d.	hat the through out the truction steps indicate the mark number as		
Contrary to this requir vork package incorre hat the mark number 2530A MK-001. The r	rement, during review of a ict references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee	k Package 1-253( erial mark number IS Malerial Data eds to be corrected	CA it was noted t 's. The Work Ins Sheet identified d.	hat the through out the truction steps indicate the mark number as		
Contrary to this requir work package incorre- that the mark number 2530A MK-001. The r	rement, during review of a sct references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee clear and nee	k Package 1-253( erial mark number 2S Material Data eds to be corrected	CA it was noted t s. The Work Ins Sheet identified d.	hat the through out the truction steps indicate the mark number as		
Contrary to this requir vork package incorre- hat the mark number 2530A MK-001. The r	rement, during review of a set references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee clear and nee	k Package 1-253( erial mark number 2S Material Data eds to be corrected	CA it was noted t is. The Work Ins Sheet identified d.	hat the through out the truction steps indicated the mark number as		
Contrary to this requir vork package incorre- hat the mark number 2530A MK-001. The r	rement, during review of a ist references were being i should be 1-2530-MK-00 marking of material is not o	pproved Wor made to mate 1 and the MD clear and nee former and nee	k Package 1-253( erial mark number 2S Material Data eds to be corrected	CA it was noted t is. The Work Ins Sheet identified d.	hat the through out the truction steps indicated the mark number as		

						SGT M		99901334 Attachment	:2
									•
Slaf	, Toganovalog	Staread P and Constructio		() 	UAL P	(EXECUTIC)	: N PROP	ТЕРГОР	••
	AUDIT FIN		PORT	i		0E2/AFI	1	OEP 18	01-2
				< N Ler		04-May 0		2	2.
	38241 P-38-02	2	-	AFR	R - 14		Ocu	оры 7, 29	63
orrective Auton Fliker		COMPLETED	BY ORG	ANIZATION	N AUDI	TED			-
Vork Packages we tops (both to Mast			acrians to H	he moniert	(naikin) T	imper were o	orracted	dim the w	тĸ
						and an and a second	• ••	• • • •	
Corrective Action Taker	1111	SCOTT PA	RICER	Corrective Ad	tion Com	pletion Date D6-Nov-	-C8	••••	
S = 1	1111	SCOTT PA SCOTT PA EAD FIELD	RKER SNGINE	}	tion Com		08	· · · · ·	· · · · · · · · · · · · · · · · · · ·
Cause of Discrepancy	<u> </u>	SCOTT PA	RKER Engine	}	tion Com		.08		
Cause of Discrepancy	<u> </u>	SCOTT PA	RKER SNGINE	}	tion Com		-C8		
Corrective Action Taker	<u> </u>	SCOTT PA	RKER SNGINE	}	tion Com		C8		
Cause of Discrepancy	<u> </u>	SCOTT PA	RICER ENGINE	}	tion Com		CB		
Cause of Discrepancy	<u> </u>	SCOTT PA	RKER SNGINE	}	ction Com		C8		
Cause of Discrepancy	<u> </u>	SCOTT PA	RICER ENGINE	}	tion Com		C8		
Cause of Discrepancy Inattention to Detail	il.	SCOTT PA E AD FIRD	<u>5 NGINS</u>	}	tion Com		C8		
Cause of Discrepancy inattention to Detail	il.	SCOTT PA E AD FIRD	<u>5 NGINS</u>	}	tion Com		C8		
Cause of Discrepancy Inattention to Detail	il.	SCOTT PA E AD FIRD	<u>5 NGINS</u>	}	tion Com		C8		
Cause of Discrepancy Inattention to Detail	il.	SCOTT PA E AD FIRD	<u>5 NGINS</u>	}	tion Com		C8		
Cause of Discrepancy	il.	SCOTT PA E AD FIRD	<u>5 NGINS</u>	}	tion Com		C8		
Cause of Discrepancy Inattention to Detail	il.	SCOTT PA E AD FIRD	<u>5 NGINS</u>	}	tion Com		C8		
Cause of Discrepancy inattention to Detail Preventative Action Ta- N/A - Minor Fundir	il. Nen to Eliminate Ca. 9	SCOTT PA E AD FIND	<u>5 NGINS</u>	}	tion Com				
Cause of Discrepancy nattention to Detail	il. Nen to Eliminate Ca. 9	SCOTT PA E AD FIND	<u>5 NGINS</u>	ER.	tion Com				
Cause of Discrepancy nattention to Detail Preventative Action Ta- N/A - Minor Fladin	il. Nen to Eliminate Ca. 9	SCOTT PA E AD FIND	<u>5 Ν<u>G</u>IUS</u>	ER.		06-Nov-		· · · · ·	
Cause of Discrepancy Inattention to Detail Preventative Action Ta- N/A - Minor Fundin N/A - Minor Fundin	il. Sen to Eliminate Ca. g	SCOTT PA E AD FIELD use of Discrepancy as Too.	N/A	ER.	DR X	06-Nov-			
Cause of Discrepancy Inattention to Detail Preventative Action Tas N/A - Minor Fundin N/A - Minor Fundin	il. Nen to Eliminate Ca. 9 Garry (Signature of Cartos Sautz Boots	SCOTT PA E AD FIELD use of Discrepancy as Too.	N/A NPLETED I	ER BY AUDITO	DR	06-Nov-			

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 109 of 151

# Audit Number 38241-P-08-02

٢

# AFR Number: AFR - 15

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 110 of 151

 $\cap$ 

		S::Comm Form Source	ion'QUALITY Audit	38421-P-08-0	02'Diablo Canyon AFR-15-RV.do
	Standard Procedures Engineering and Construction Projects				
Form Title	<b>i</b>	•	Revision No 0E2 / J		Form No. QEP 18.01-2
AUDIT FINDING REPOR	Т		Form Revisio 04-Ma		Form Page 2 of 2
Audit Number: 38241-P-08-02	AFR	Number: AFR - 15		Date Issu Octo	ed: ber 7, 2008 <b>Error!</b>
COMPLETED BY O	RGA	NIZATION AUD	DITED		
Corrective Action Taken or Proposed to Correct Discrepancy: This condition was identified on SGT Nonconformance R September 2008 respectively. Both of these NCRs have closure review and approval.					
See Attached NCRs 2-082 and 2-083.	-	. · · ·			
Corrective Action Taken by (Signature and Title): Faul 9. Helton		Corrective Action Con			· · · · · · · · · · · · · · · · · · ·
Cause of Discrépancy:	l	- / .			······································
Preventative Action Taken to Eliminate Cause of Discrepancy: See Attached NCRs 2-082 and 2-083.					
Preventative Action Taken by (Signature and Title):					
COMPLETE	ED B)				
Corrective / Preventative Action Evaluation			ication of Im ective / Prev		
Acceptable Unacceptable	F	Acceptable	Unaccep	·	Not Required 🗌
Evaluated by. Date:	<u> </u>	/enfied by			Costo-
		enied by			Date:

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 111 of 151

# Nonconformance Report No (38241) 2082

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 112 of 151

			Form Source				
SGT		tandard Procedures onstruction Projects					
Form Title		· · · · · · · · · · · · · · · · · · ·	L	Revision No / Status 0E1 / AFU	Form No. QEP 15.01-1		
			-	Form Revision Date 06-Dec-04	Form Page 1 of 1		
Responsible Organizatio	n / Denarment	NONCONFORMANC					
SGT Quality	on / Department		NONCONFORM	IANCE REPORT NO	. (38241) 2-082		
	f Affected Item or System		Date Issued 21-Jul-08	No of Hold Tags O	Total Sheets 1 of 388		
Misplaced, Lost, Co	ontaminated, or Out-of	-Tolerance M&TE	ASME Section N/A	Inspection Code DR-34	Ccnst. Seq. Code SU		
Source of Requirement			WP / PO No	PCD / CO No	Step No		
QEP 14.01 Rev 1 E Condition Descrip	2 Para. 3.3.2, 3.4.1 &	3.7.3	See Attached	I See Attached	See Attached		
	eening for potential as Possible Potentia	Client Deter	mination Yau		21-Jul-0		
Proposed Disposi	Possible Potentia	al 📋 Client Deter	mination Fai		21-Jul-0		
Proposed Disposit See attack.	Possible Potentia     tion	Client Deter	mination / Cu DISPOSITION		By Client		
Proposed Disposi See attach	Possible Potentia     tion	al Client Deter RECOMMENDED work Repair	mination / Cu DISPOSITION C Scrap/Retu P 9/13/08	irn 🛛 Use-As-Is	By Client		
Proposed Disposit See attack. Dispositioned By	Possible Potentia tion     Re     D	al Client Deter RECOMMENDED work Repair	mination / Cu DISPOSITION DISPOSITION Scrap/Retu P 9/13/08 APPROVAL	DISPOSITION	By Client		
Proposed Disposit See attack.	Possible Potentia tion     Re     Disposition	al Client Deter RECOMMENDED work Repair	mination / Cu DISPOSITION DISPOSITION Scrap/Retu P 9/13/08 APPROVAL	DISPOSITIO Continuation /ised See Sheets	By Client		
Proposed Disposit See attack. Dispositioned By	Possible Potentia tion     Re     D	al Client Deter RECOMMENDED work Repair	mination / Cu DISPOSITION C Scrap/Retu Scrap/Retu Proval C Scrap/Return Scrap/Scrap Scrap/Scrap Scra	DISPOSITION Continuation S Vised See Sheets	By Client		
Proposed Disposit See attack.	Possible Potentia tion     Re     Disposition SGT	al Client Deter RECOMMENDED work Repair Dat DisPosiTION Approved as Pl	mination / Cu DISPOSITION DISPOSITION Scrap/Retu P 9/13/08 APPROVAL	DISPOSITIO Continuation /ised See Sheets	Sheets δ thru δδ		
Proposed Disposit See attack. Dispositioned By Approval of Propo	Possible Potentia tion     Re     Disposition SGT	al Client Deter RECOMMENDED work Repair Date DisPosition Approved as Pl	mination /cu DISPOSITION C Scrap/Retu Scrap/Retu Scrap/Retu Scrap/Retu Return CLIENT REP	DISPOSITION Continuation S Vised See Sheets	Sheets δ thru δδ		
Proposed Disposit See attack. Dispositioned By Approval of Propo TITLE PEM SM	Possible Potentia tion     Re     Disposition SGT	al Client Deter RECOMMENDED work Repair Dat DISPOSITION Approved as Pl DATE 9//8/09 7/22/07	mination /du DISPOSITION C Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL roposed Rev TITLE	DISPOSITION Continuation S Vised See Sheets	Sheets δ thru δδ		
Proposed Disposit See attack. Dispositioned By Dispositioned By Approval of Propo TITLE PEM SM PQM PQM P	Dessible Potentia tion Re Disposition Set Disposition SGT SIGNATURE HOCON Ling E Alatures Ling Districts	al Client Deter RECOMMENDED work Repair Date DisPosition DATE 9//8/08 9/22/08	mination /cu DISPOSITION C Scrap/Retu Scrap/Retu Scrap/Retu Scrap/Retu Return CLIENT REP	DISPOSITION Continuation S Vised See Sheets	Sheets δ thru δδ		
Proposed Disposit See attack. Dispositioned By Approval of Propo TITLE PEM SM CH PQM R. If Initiated, Reference	■ Possible Potentia tion □ Re ↓ D'spintered sed Disposition sed Disposition Signature % Contractor </td <td>al Client Deter RECOMMENDED work Repair Date DisPosiTION Approved as PI DATE 9// \$/08 9/22/08 N/A</td> <td>mination / Cu DISPOSITION DISPOSITION DISPOSITION Scrap/Return APPROVAL roposed Rev TITLE CLIENT REP ANI / ANII</td> <td>DISPOSITION Continuation S Vised See Sheets CLIENT SIGNATURE</td> <td>N Sheets 8 thru 38 thru DATE N/2405 M_10/1</td>	al Client Deter RECOMMENDED work Repair Date DisPosiTION Approved as PI DATE 9// \$/08 9/22/08 N/A	mination / Cu DISPOSITION DISPOSITION DISPOSITION Scrap/Return APPROVAL roposed Rev TITLE CLIENT REP ANI / ANII	DISPOSITION Continuation S Vised See Sheets CLIENT SIGNATURE	N Sheets 8 thru 38 thru DATE N/2405 M_10/1		
Proposed Disposit See official Dispositioned By Approval of Propo TITLE PEM SM PQM If Initiated, Reference	☑ Possible Potentia tion □ Re ↓ D'spinteres sed Disposition sed Disposition Signature ¶ Or Level E diatacts Level E diatacts Level A vistrich DR:	al Client Deter <u>RECOMMENDED</u> work Repair DisPosition DisPosition DATE 9//8/08 9/22/08 N/A RE-INSPE	mination / Cu DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu Proposed Rev TITLE CLIENT REP ANI / ANII CTION	In I Use-As-Is DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE	By Client By Client Sheets & thru 38 thru DATE 1011 Malos Malos Malos		
Proposed Disposit S=e attack Dispositioned By Dispositioned By Approval of Propo TITLE PEM SM PQM If Initiated, Reference Re-Inspection Res	Possible Potentia  tion Re  Disposition SGT SIGNATURE  Disposition Lucy Austrich DR: Lucy Austrich DR: Lucy Accepte	al Client Deter RECOMMENDED work Repair Dat DisPosition/ PApproved as Pr DATE 9//8/08 9/22/08 N/A RE-INSPE d Rejected —	mination /du DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL TITLE CLIENT REP ANI / ANII CTION Give Explanation	DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE	DATE DATE 10/1 B/10-02-08/0		
Proposed Disposit S=e attack Dispositioned By Dispositioned By Approval of Propo TITLE PEM SM PQM If Initiated, Reference Re-Inspection Res	☑ Possible Potentia tion □ Re ↓ D'spinteres sed Disposition sed Disposition Signature ¶ Or Level E diatacts Level E diatacts Level A vistrich DR:	al Client Deter RECOMMENDED work Repair Dat DisPosition/ PApproved as Pr DATE 9//8/08 9/22/08 N/A RE-INSPE d Rejected —	mination /du DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL TITLE CLIENT REP ANI / ANII CTION Give Explanation	Irrn $\square$ Use-As-Is DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE $\square$ SIGNATURE $\square$ DIL Number $\square$ D	By Client By Client Sheets & thru 38 thru DATE 10/1 10/1 B/10-02-08/0 Probatie Cause Coze DE Core ::/ve		
Proposed Disposit S=e attack Dispositioned By Approval of Propo TITLE PEM SM C PQM Re-Inspection Res MG Re-1 Re-1 C MG Re-1 C C C C C C C C C C C C C	■ Possible Potentia tion □ Re ↓ Dispussion sed Disposition SGT SIGNATURE Ø Disposition Local E diatacts Lucy Districts DR: Ults X Accepte Zospection R	al Client Deter RECOMMENDED work Repair Dat DisPosition/ PApproved as Pr DATE 9//8/08 9/22/08 N/A RE-INSPE d Rejected —	mination /du DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL TITLE CLIENT REP ANI / ANII CTION Give Explanation	DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE MAT DIL Number CH DISPOSITION	N Sheets & thru & & Sheets & thru & & thru DATE N/29/06 N/29/06 N/29/06 N/29/06 Date Cause Coze Core tive Action Coze Deviation Tobatie Cause Coze Core tive Action Coze Deviation Tobatie Coze Core tive Action Coze Deviation Tobatie Coze Core tive Action Coze Deviation Tobatie Coze Core tive Action Coze Deviation Tobatie Coze Deviation		
Proposed Disposit S=e attack Dispositioned By Approval of Propo TITLE PEM SM C PQM Re-Inspection Res MG Re-1 Re-1 C MG Re-1 C C C C C C C C C C C C C	☑ Possible Potentia tion □ Re ↓ D'spectrum sed Disposition sed Disposition SGNATURE ¶ <p< td=""><td>al Client Deter RECOMMENDED work Repair Dat DisPosition, PApproved as Pl DATE 9//8/08 9/22/08 N/A RE-INSPE Page LIKE D - LA</td><td>mination /du DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL TITLE CLIENT REP ANI / ANII CTION Give Explanation</td><td>DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE MAT DIL Number CH DISPOSITION</td><td>By Client By Client Sheets &amp; thru 38 thru DATE 10/1 B/10-02-08/0 Probatie Cause Coze Corective Action Code DATE Cause Coze DE Corective Action Code UA DATE Cause Coze Corective Action Code UA DATE Cause Coze Corective Corective Cause Coze Cause Coze Corective Cause Coze Corective Cause Coze Cause Coze Corective Cause Coze Cause Coze Corective Cause Coze Cause Coze Corective Corective Cause Coze Corective Corective Corective Corective Corective Corective Corective Corective Corective Coze Corective Coze Co</td></p<>	al Client Deter RECOMMENDED work Repair Dat DisPosition, PApproved as Pl DATE 9//8/08 9/22/08 N/A RE-INSPE Page LIKE D - LA	mination /du DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL TITLE CLIENT REP ANI / ANII CTION Give Explanation	DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE MAT DIL Number CH DISPOSITION	By Client By Client Sheets & thru 38 thru DATE 10/1 B/10-02-08/0 Probatie Cause Coze Corective Action Code DATE Cause Coze DE Corective Action Code UA DATE Cause Coze Corective Action Code UA DATE Cause Coze Corective Corective Cause Coze Cause Coze Corective Cause Coze Corective Cause Coze Cause Coze Corective Cause Coze Cause Coze Corective Cause Coze Cause Coze Corective Corective Cause Coze Corective Corective Corective Corective Corective Corective Corective Corective Corective Coze Corective Coze Co		
Proposed Disposit S=e attack Dispositioned By Approval of Propo TITLE PEM SM C PQM Re-Inspection Res MG Re-1 Re-1 C MG Re-1 C C C C C C C C C C C C C	■ Possible Potentia tion □ Re ↓ Dispussion sed Disposition SGT SIGNATURE Ø Disposition Local E diatacts Lucy Districts DR: Ults X Accepte Zospection R	al Client Deter RECOMMENDED work Repair Date DisPosition DATE 9//8/09 7/22/08 N/A RE-INSPE ed Rejected $2 p \in D$	mination /du DISPOSITION DISPOSITION Scrap/Retu Scrap/Retu e 9/13/08 APPROVAL TITLE CLIENT REP ANI / ANII CTION Give Explanation	DISPOSITION Continuation Vised See Sheets CLIENT SIGNATURE MAT DIL Number CH DISPOSITION	N Sheets & thru & & Sheets & thru & & Thru DATE N DA N DA N DA N DA N DA N DA N DA N D		

;

- ...

... .

# Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 113 of 151

.

•



SGT
QA RECORD VALIDATION
TOTAL PAGE COUNT
INTERIM FILE NO. 15.1.1
REVIEWED BY All
DATE OF REVIEW 10/14 108

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 114 of 151

NCR 2-082 Sheet 2 of <u>388</u>

During the turnover Quality Records pertaining to Measuring and Test Equipment (M&TE) used during 2R14 Steam Generator Replacement Outage at Diablo Canyon Power Plant (DCPP), it was discovered that numerous M&TE post-use calibrations had not been performed and that several items were missing.

SGT Quality Execution Procedure (QEP) 14.01, Section 3.0, paragraph 3.3.2 states, in part, "Calibration verification of M&TE used to verify functional operability of a Safety Related item or component shall be performed at the normal calibration cycle or upon completion of the work, whichever comes first."

In addition, Section 3.0, paragraph 3.7.3 states, "If a piece of calibrated M&TE is damaged or lost, the QCS shall review the M&TE Usage Log to verify the use of M&TE and to identify the items used on. If the M&TE in question was used for final acceptance of an item, the QCS shall generate a Form QEP 15.01-1, *Nonconformance Report*, in accordance with QEP 15.01, *Identification and Control of Deviations*."

Contrary to these requirements, several M&TE items utilized for final acceptance of Safety Related items are missing and unavailable for post use calibration. In addition, other M&TE failed to meet calibration requirements and recorded out-of-tolerance conditions.

The following Continuation Sheets provide a summary of the M&TE Useage Log (Attachment 1), the Work Package Utilization Summary (Attachment 2), and calibration results (Attachment 3).

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 115 of 151

2-082	
NCR 265 Condition Description - continued	
Ng14/08	

NCR<u>\_2-082</u> Page<u>\_3\_</u>of<u>388</u>

The following M&TE was not returned for Post- Calibration due to contamination or lcst (ref. QEP 14.01, para. 3.7.3):

M&TE #	Description	<u>Work</u> PKG/Step(s)	PKG Activity
			· · ·
DC-004	Thermometer		
SGT-006	Tension Link		
SGT-018	Dial Caliper		
SGT-028	Digital		
	Thermometer		
SGT-030	Digital		
	Thermometer		
SGT-039	Micrometer		
SGT-062	Pressure		
· · · · · · · · · · · · · · · · · · ·	Gage		
SGT-113	Torque		
	Wrench -		
	1/4" Drive	· · · · · · · · · · · · · · · · · · ·	
SGT-132	Torque		
	Wrench	<u>'</u>	
	1/2" Drive		
SGT-136	Torque		
}	Wrench		
	½" Drive	ļ	
SGT-142	Contour		
	Probe	}	
SGT-144	Contour		
0.07.450	Probe		
SGT-153	Digital		
	Thermometer		
SGW E-	Hydraulic		
11282	Torque		
	Wrench	 	
SGW-	Digital	•	
_ <u>101</u> 	Caliper		
	Digital		
107 SGW-	Caliper   10# Test		
111	Weight		

# 2-082 NCR 265 Condition Description - continued $M_{a/4}^{2}/\sigma^{2}$ The following pieces of M&TE were received at the lab for post-use calibration and found to be in an "out-of-tolerance" condition (ref. QEP 14.01, para. 3.3.2):

M&TE #	Description	Work PKG/Step(s )	WP Activity
SGT-68	Thermometer	<u>SC-11</u>	
SGT-134	Torque Wrench – 1/2" drive		
SGW-116	Torque Wrench – 1/4" Drive		

NCR 2.08. Page 4 of 388

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 117 of 151

# Page5 of 388

# NONCONFORMANCE REPORT: 2-082

# Table of Contents

A. Condition Description and Usage Summary
B. Impact Evaluation and Proposed Disposition
C. Attachments
Attachment 1: DC-004 reference material
Attachment 2: SGT-006 reference material4 pages
Attachment 3: SGT-018 reference material11 pages
Attachment 4: SGT-028 reference material17 pages
Attachment 5: SGT-030 reference material44 pages
Attachment 6: SGT-039 reference material13 pages
Attachment 7: SGT-062 reference material
Attachment 8: SGT-113 reference material
Attachment 9: SGT-132 reference material23 pages
Attachment 10: SGT-134 reference material72 pages
Attachment 11: SGT-136 reference material22 pages
Attachment 12: SGT-153 reference material16 pages
Attachment 13: SGW E-11282 reference material7 pages
Attachment 14: SGW-101 reference material
Attachment 15: SGW-107 reference material18 pages
Attachment 16: SGW-111 reference material
Attachment 17: SGW-116 reference material
Attachment 18: Guide to Evaluation of Out-of Tolerance Conditions2 pages
Attachment 19: SGT M&TE Control No. Use Log

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 118 of 151

#### NCR 2-082

# Page 6 of 388

## A. Condition Description and Usage Summary

Based on the post calibration results and the identification of equipment being lost the following is the evaluation of the M&TE use and its condition:

#### I. DC-004, Thermometer, Lost, No recal performed.

- Usage: (see attachment 1 for WP and Calibration information)
  - 1. Weld preheat verification of 200°F (LLS repair plate).

# II. SGT-006, Tension Link, Lost, No recal performed.

- Usage: (see attachment 2 for WP, NDE and Calibration information)
  - 1. Penetrant Test on FW-1 & FW-2 (blowdown piping reinstallation).

# III. SGT-018, Dial Caliper, Lost, No recal performed.

- Usage: (see attachment 3 for WP, NDE and Calibration information)
  - 1. Verify gaps and bearing requirements at the LLS keyway shims.

# IV. SGT-028, Digital Thermometer, Lost, No recal performed.

- Usage: (see attachment 4 for WP, NDE and Calibration information)
  - 1. Magnetic Particle Test (at ULS Bumper Bearing Block welds).
  - 2. Ultrasonic Test (at Feedwater Nozzle to NPS 16 pipe weld).

#### V. SGT-030, Digital Thermometer, Lost, No recal performed.

Usage: (see attachment 5 for WP, NDE and Calibration information)

- 1. Penetrant Test (RCS Crossover Leg Elbow to RSG Nozzle Safe End weld).
- 2. Penetrant Test (RCS Hot Leg Elbow to RSG Nozzle Safe End weld and the RCS Crossover Leg Elbow to RSG Nozzle Safe End weld).
- 3. Penetrant Test (root valve assembly to RSG Nozzle weld for LT-517 (L), LT-518 (L) and LT-519 (L)).

# VI. SGT-039, Micrometer, Lost, No recal performed.

Usage: (see attachment 6 for WP and Calibration information) 1. Various weld inspections.

#### VII. SGT-062, Torque Wrench, Lost, No recal performed.

Usage: (see attachment 7 for WP and Calibration information)

1. Torque the cradle lashings for transporting RSG 2-4.

#### VIII. SGT-068

#### Usage: none

1. Surveillance control (not used on any field applications).

#### IX. SGT-113, Torque Wrench, Lost, No recal performed.

Usage: (see attachment 8 for WP and Calibration information)

1. Instrument support installation (LT-518 U&L).

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 119 of 151

#### NCR 2-082

# Page 7 of 388

#### X. SGT-132, Torque Wrench, Lost, No recal performed.

Usage: (see attachment 9 for NDE and Calibration information)

- 1. Surveillance control (not used on any field applications).
- 2. Crosby swivel holst installation at Reactor Cavity Deck panels.
- 3. Trunnion bolt installation.
- 4. Flange gasket reinstallation (nitrogen blanketing system).
- 5. Hydrogen Recombiner reinstallation.

## XI. SGT-134, Torque Wrench, Out-of-tolerance.

Usage: (see attachment 10 for WP, NDE and Calibration information) 1. MRI Support Ring Installation.

# XII. SGT-136, Torque Wrench, Lost, No recal performed.

- Usage: (see attachment 11 for WP, NDE and Calibration information)
  - 1. Crosby swivel hoist installation at Reactor Cavity Deck panels.
  - 2. Bring ULS flange surfaces into contact.
  - 3. Anchor bolt installation on pressurizer wall (platform 76 F-2)

# XIII. SGT-142, Contour Probe, Lost, No recai performed.

Usage:

1. Magnetic Particle Test at various locations.

#### XIV. SGT-144, Contour Probe, Lost, No recal performed.

Usage:

1. Magnetic Particle Test at various locations.

## XV. SGT-153, Digital thermometer, Lost, No recal performed.

- Usage: (see attachment 12 for WP, NDE and Calibration Information)
  - 1. Penetrant Test.
  - 2. Verify preheat.

## XVI. SGW E-11282, Hydraulic Torque Wrench, Lost, No recal performed. Usage: (see attachment 13 for WP and NDE)

- e. (See allachment 15 for WF and NDE)
- 1. Magnetic Particle Test at various locations.

## XVII. SGW-101, Digital Caliper, Lost, No recal performed.

Usage: (see attachment 14 for WP, NDE and Calibration Information) 1. Repair of superficial gouges.

## XVIII. SGW-107, Digital Caliper, Lost, No recal performed.

- Usage: (see attachment 15 for NDE and Calibration information)
  - 1. Snubber reinstallation.
  - 2. RCP cold gaps.

## XIX. SGW 111, 10# Test Weight, Lost, No recal performed.

- Usage: (see attachment 16 for Calibration information)
  - Magnetic Particle Test at various locations.

#### XX. SGW-116, Torque Wrench, Out-of-tolerance.

Usage: (see attachment 17 for WP, NDE and Calibration information)

1. MRI Support Ring Installation.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 120 of 151

# NCR 2-082

# Page 8 of 328

## B. Impact Evaluation and Proposed Disposition

The NCSL International Recommended Practice 10, Appendix was used as a basis for evaluating the potential impact to plant equipment that the lost or out-of -calibration M&TE could have. See "Guide to Evaluation of Out-of-Tolerance Conditions (Reference attachment 18).

SGT Engineering has reviewed the identified M&TE and associated inspection reports and provides the following disposition:

# I. DC-004, Thermometer, USE AS IS based on the following (see attachment 1 for WP and Calibration information)

This M&TE was used to verify preheat on the LLS before welding the repair plate. No impact to the plant based on NCSLI RP-10, appendix D evaluation.

- i. First use after a successful calibration check. This M&TE was calibrated prior to the outage (12-26-2007) and used for the first time after that on this application (2-10-2008).
- ii. There is no evidence that the instrument was not functioning properly or not providing accurate readings at the time of the application.
- iii. The weld was inspected and determined to be acceptable.

# **II.** SGT-006, Tension Link, USE AS IS based on the following (see attachment 2 for WP and NDE reports)

The M&TE number was transferred incorrectly from the NDE examination report to the M&TE Control Use Log. The M&TE used for the PT exam is DC-006 and is not part of the tools that were determined to be lost or out of calibration. Therefore there is no impact to the plant.

# III. SGT-018, Dial Caliper, USE AS IS based on the following (see attachment 3 for WP, NDE reports and Calibration information)

The minimum bearing requirements at the LLS keyway shims as well as the final gap/clearances were verified by engineering using different measuring devices before QC did their final inspection. Hold point on step 600 confirm that this was done.

The fact that different people using different tools (engineers had micrometers and go/no-go gauges) came to the same conclusion (gap & bearing surface within tolerances) is enough evidence that the measurements were correct and that the tools were calibrated.

No impact to the plant based on NCSLI RP-10, appendix D evaluation.

- First use after a successful calibration check. This M&TE was calibrated prior to the outage (12-27-2007) and used for the first time after that on this application (3-16-2008).
- ii. There is no evidence that the instrument was not functioning properly or not providing accurate readings at the time of the application.
- iii. There were devices besides the one in question that provided comparable data.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 121 of 151

## NCR 2-082

Page 9 of 388

# IV. SGT-028, Digital Thermometer, USE AS IS based on the following (see attachment 4 for WP, NDE reports and Calibration information)

Digital thermometers are typically not subject to drift, the out of tolerance mode for this type of M&TE is "non-functional". In other words it either gives an accurate reading or it does not work at all. However an evaluation was still performed as shown below.

## • WP 2-3050D

This M&TE was used to perform the final NDE for the welds on the ULS Bumper Bearing Blocks (MT-QEP 12.05). The recorded readings are well below the maximum acceptable temperature of 600°F. The reading is essentially ambient temperature which is consistent with conditions at the time of test and the expected temperature. Had the actual material temperature been significantly different than the conditions indicated, the QC inspector who is trained and experienced in the test requirements would have questioned the inconsistencies and performed additional measurements with alternate M&TE. Therefore there is no impact to the plant.

#### WP 2-3085A

This M&TE was used to perform a PSI on the Feedwater Nozzle to NPS 16 pipe weld (UT-QEP 12.16). According to QEP 12.16 the temperature of the component shall not exceed 100°F during the examination. The temperature recorded on the NDE report was 68°F, which provides an adequate margin of error for the range needed to perform the test. The QEP also requires that a calibrated thermometer is used to record the differential temperature between the calibration standard and the examination surface. This difference or "delta" shall be 25°F or less. The differential in temperature would have still been detected had the thermometer been out of calibration. Therefore there is no impact to the plant.

# V. SGT-030, Digital Thermometer, USE AS IS based on the following (see attachment 5 for WP, NDE reports and Calibration information)

Digital thermometers are typically not subject to drift, the out of tolerance mode for this type of M&TE is "non-functional". In other words it either gives an accurate reading or it does not work at all. However an evaluation was still performed as shown below.

#### • WP 2-3065A & WP 2-3065B

The M&TE number was transferred incorrectly from the NDE examination report to the M&TE Control Use Log. The M&TE used for the PT exam is VH-10844 and is not part of the tools that were determined to be lost or out of calibration. Therefore there is no impact to the plant.

## • WP 2-3065C

This M&TE was used to perform the final PT on the RCS Hot Leg Elbow to RSG Nozzle Safe End weld and the RCS Crossover (Cold) Leg Elbow to RSG Nozzle Safe End weld. The thermometer was used to verify the material's temperature for performing the liquid penetrant test (FW-1 & FW-2). The reading is essentially ambient temperature which is consistent with conditions at the time of test and the expected temperature. The standard technique for penetrant testing allows a range between 50°F to 125°F with 10-minute dwell time. All readings taken provide an adequate

#### NCR 2-082

## Page/0 of 388

margin of error for the range needed to perform the liquid penetrant test. Therefore there is no impact to the plant.

#### • WP 2-3524A

This M&TE was used to perform the final NDE on root valve assembly to RSG Nozzle weld for LT-517 (L), LT-518 (L) and LT-519(L). This thermometer was used to verify the material's temperature for performing the liquid penetrant test (FW-24, FW-30 & FW-36). The reading is essentially ambient temperature which is consistent with conditions at the time of test and the expected temperature. The standard technique for penetrant testing allows a range between 50°F to 125°F with 10-minute dwell time. All readings taken provide an adequate margin of error for the range needed to perform the liquid penetrant test. Therefore there is no impact to the plant.

# VI. SGT-039, Micrometer, USE AS IS based on the following (see attachment 6 for WP and Calibration information)

## • WP 2-3522B; WP 2-3534B

This tool is not required per QEP 12.03 "Visual Examination" or QEP 12.18 "Weld Inspection". While the micrometer might have been checked out and used, it is to be considered as a construction aid (no data recorded). Therefore there is no impact to the plant based on NCSLI RP-10, appendix D evaluation.

# VII. SGT-062, Torque Wrench, USE AS IS based on the following (see attachment 7 for WP and Calibration information)

#### • WP 2-3040D

The wrench was used to torque the cradle lashings for transporting RSG 2-4 from the OLS to the SPLS. There were no issues associated with the transport of the RSG and the lashings were removed after this activity was completed, therefore there is no impact to the plant.

# VIII. SGT-068, Torque Wrench, USE AS IS based on the following

# • SC11

SC-11 is a surveillance control. This M&TE was not used on any field applications and therefore no post calibration is required. No impact to the plant based on NCSLI RP-10, appendix D evaluation.

# IX. SGT-113, Torque Wrench, USE AS IS based on the following (see attachment 8 for WP and Calibration information)

#### • WP 2-3524B

Steps 1880, 1960, 2040, A120, A200, A280, A360 & A40. While the torque wrench (M&TE SGT-113) might have been checked out it was not required to perform Anchor Inspection Checklist Part A. No impact to the plant based on NCSLI RP-10, appendix D evaluation (no field-use application of the instrument).

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 123 of 151

#### NCR 2-082

Page 11 of 388

#### • WP 2-3524C

→ Step A720. M&TE SGT-113 was erroneously entered in the Daily Inspection Log. M&TE SGT-126 was used to perform Anchor Inspection Checklist Part B.

→ Step A800. No impact to the plant based on NCSLI RP-10, appendix D evaluation.

- i. First use after a successful calibration check. This M&TE was calibrated prior to the outage and used for the first time after that on instrument tubing support SP-41 (LT-538).
- ii. Identified error during the calibration process was in the conservative direction for the clockwise function.
- iii. No history of this tool being out of tolerance.
- iv. No indication of damage or malfunction.

# X. SGT-132, Torque Wrench, USE AS IS based on the following (see attachment 9 for NDE reports and Calibration information)

## • QEP 14.01 & SC-17

These are surveillance controls. The M&TE was not used to perform work and therefore there is no impact to the plant based on NCSLI RP-10, appendix D evaluation (no field-use application).

#### • WP 2-1060

Crosby swivel hoist installation. The Reactor Cavity Deck panels were installed with no issues and removed at the end of the Unit 2 outage. This is to be considered a construction aid (no data recorded). Therefore there is no impact to the plant.

#### • WP 2-3040C & D

The trunnion bolts were torqued in more than one plateau. The misplaced torque wrench was only used for the first plateau. Also, the trunnion bolts were removed after the SG was lifted and positioned in its final location. This is to be considered a construction aid (no data recorded). Therefore there is no impact to the plant.

#### • WP 2-3080B

After the nitrogen blanketing system was reassembled, a leak check was performed under normal operating pressure by PG&E and no leakage was identified (see report attached). This is evidence enough that the tools was working properly. Therefore there is no impact to the plant.

#### • WP 2-3510

On 4-1-2008 this M&TE was used to reinstall the hydrogen recombiner using existing anchor bolts. The nuts were torqued to a minimum of 150 ft-lb as noted in the work package.

Prior to that on 3-19-2008, the torque wrench was used on the nitrogen blanketing system creating a leak tight seal as demonstrated by the in-service leak test performed by PG&E. The torque value for this was determined to be 124 ft-lb. This is evidence that the tool was working properly in the range needed for the hydrogen recombiner.

The torque value specified in the work package is for setting anchor bolts and while called out in the work step it is not the torque value needed for re-installing this piece of equipment. The hydrogen recombiner has a bearing type connection and

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 124 of 151

#### NCR 2-082

Page 12 of 388

therefore common practice would be to torque the nuts to snug tight. Therefore there is no impact to the plant.

# XI. SGT-134, Torque Wrench, USE AS IS based on the following (see attachment 10 for WP, NDE reports and Calibration information)

# WP 2-3540A, WP 2-3540B, WP 2-3540C & WP 2-3540D

Installation of MRI Support Ring MK-G2A, MK-G2, MK-G3 MK-G4 & MK-G5. Review of TRANSCO calculation RG-49596-TCR2 Rev 4 Section 4.7 "Bolt Torque" shows that the highest calculated torque value is 53.62 ft-lb for MK-G4. Based on the post calibration information it is conservative to assume that the bolts were torqued to at least 60 ft-lb this value is greater than the minimum required. Also, it should be noted that MRI and support rings are **not safety related**. Therefore there is no impact to the plant.

# XII. SGT-136, Torque Wrench, USE AS IS based on the following (see attachment 11 for WP, NDE reports and Calibration information)

# • WP 2-1060

Crosby swivel hoist installation. The Reactor Cavity Deck panels were installed with no issues and removed at the end of the Unit 2 outage. This is to be considered a construction aid (no data recorded). Therefore there is no impact to the plant.

# • WP 2-3050A, WP 2-3050B, WP 2-3050D

The requirement in the work package is to bring together the ULS flange surfaces by applying torque to the cap nuts from snug tight (min) to 7000 ft-lb (max). The fact that the flange surfaces came in contact is evidence that the tool was applying a positive torque. The instrument was not used to record quantitative data. Therefore there is no impact to the plant based on NCSLI RP-10, appendix D evaluation.

## • WP 2-3535B (Anchor Bolt Installation at pressurizer wall)

#### USAGE HISTORY

After reviewing the history of use for this M&TE the following was determined (see attachment 11):

- A calibration report from St. Lucie 6-04-07 confirmed that the wrench was within tolerance for the full range in its clockwise function.
- This M&TE was last calibrated on 01-17-08 and was found to be within tolerance. This represented the St. Lucle post-calibration test and the pre-calibration test for Diablo.
- This tool was used for the following applications during the 2R14 outage:
  - On 2-11-08 it was used for installing Crosby Swivel Hoists Rings on Reactor Cavity Deck panels #6 & #7. Required torque was 160 ft-lb. Non-permanent plant application.
  - o On 3-8-08 this tool was used to bring the ULS flange surface to contact on SG 2-4. Specific torque value was not required.
  - On 3-13-08 it was used to bring the ULS flange surface to contact on SG[2-1.8 SG 2-2 (partial). Specific torque value was not required.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 125 of 151

#### NCR 2-082

Page 1305 388

- On 3-22-08 this M&TE was used on the SG 2-2 ULS ring and a torque value of 240 ft-lb recorded in work package 2-3050-B step 260. The fact that the flange surfaces came in contact is evidence that the tool was applying a positive torque. Specific torque value was not required.
- The anchor bolts installed at the pressurizer wall (platform 76 F-2) were torqued to 250 ft-lb (min.) as recorded in work package 2-3535B step 1020 and on Attachment 40 sheet 2 of 2 "Anchor Inspection Checklist. These anchor bolts were set on 3-23-08.

#### PROPOSED DISPOSITION = Use As Is

- Torque capability is demonstrated by the history as noted here-in.
- The records indicate that this tool was never found to be out of calibration for the clockwise function. Therefore, while a torque approaching 250 ft-lbs was applied, it is reasonable to consider a minimum torque of 200 ft-lbs was achieved.

## XIII. SGT-142, Contour Probe, USE AS IS based on the following

## WP 2-3080A; WP 2-3080B; WP 2-3080D & WP 2-3085B

Magnetic Particle Test – Prior to using the Contour Probe, SGT's QEP requires the probe to be verified to be in proper operating condition before and after a series of tests by lifting a calibrated 10 pound weight. Review the inspection reports shows that this calibration was performed, therefore a calibration has been performed and the M&TE is acceptable. Therefore there is no impact to the plant.

#### XIV. SGT-144, Contour Probe, USE AS IS based on the following

## WP 0-1530; WP 2-3050A thru D; WP 2-3055D; WP 2-3080B, C & D; WP 2-3085A thru D; WP 2-3534A, B & D

Magnetic Particle Test – Prior to using the Contour Probe, SGT's QEP requires the probe to be verified to be in proper operating condition before and after a series of tests by lifting a calibrated weight. Review the inspection reports shows that this calibration was performed, therefore a calibration has been performed and the M&TE is acceptable. Therefore there is no impact to the plant.

# XV. SGT-153, Digital Thermometer, USE AS IS based on the following (see attachment 12 for WP, NDE reports and Calibration information)

Digital thermometers are typically not subject to drift, the out of tolerance mode for this type of M&TE is "non-functional". In other words it either gives a reading or it does not work at all. However an evaluation was still performed as shown below.

#### WP 2-3522A

Piping support welds. This thermometer was used to verify temperature of material for performing the liquid penetrant test. The temperature readings identified on the NDE reports are essentially ambient temperature. Had the actual material temperature been significantly different than the conditions indicated, the OC

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 126 of 151

#### NCR 2-082

Page Hof 388

inspector who is trained and experienced in the test requirements would have questioned the inconsistencies and performed additional measurements with alternate M&TE. The standard technique for penetrant testing allows a range between 50°F to 125°F with 10-minute dwell time. All readings taken provide an adequate margin of error for the range needed to perform the liquid penetrant test. Therefore there is no impact to the plant.

#### • WP 2-3522B

When preheating its common practice to do it to a higher temperature than the minimum specified so that the material's temperature doesn't drop under the required preheat during the welding process. The higher preheat is not an issue and helps ensure a good weld. As it can be seen on WHC-002 & WHC-003 preheating was performed and it's reasonable to assume it was done to a higher temperature to account for a drop in the temperature during the welding process. This should accommodate for the thermometer being out of calibration by a small amount; had the out of calibration been by a large amount the bogus readings would have been noted. Also, the fact that the weld was inspected and determined to be acceptable is evidence that the tool was working properly. Therefore there is no impact to the plant.

# XVI. SGW E-11282, Hydraulic Torque Wrench, USE AS IS based on the following (see attachment 13 for WP & NDE reports)

## • WP 2-3050A, WP 2-3085A

The M&TE number was transferred incorrectly from the NDE examination report to the M&TE Control Use Log. The M&TE used for the MT exam Is S/N 16949 (in lieu of SGW E-11282) and is not part of the tools that were determined to be lost or out of calibration. Therefore there is no impact to the plant.

# XVII. SGW-101, Digital Caliper, USE AS IS based on the following (see attachment 14 for NDE reports and Calibration information)

#### • WP 2-3534B

Repair of superficial gouges. No impact to the plant based on NCSLI RP-10, appendix D evaluation; first use after a successful calibration check. The same M&TE was used to record the minimum thickness before and after blending the gouges & scratches. All the work was performed in the same day and it's reasonable to assume that even if the dial caliber was out of calibration the differential measured with this M&TE would have not been affected. Therefore there is no impact to the plant.

# XVIII. SGW-107, Digital Caliper, USE AS IS based on the following (see attachment 15 for NDE reports and Calibration information)

#### • WP 2-3050D

Step 520 requires performing a VT-3 inspection (visual); after reviewing the VT-3 report it can be seen that SGT-170 (light meter) was used. VT-3 examinations are conducted to determine the general mechanical and structural condition of components and their supports. A dial caliper would have not been required to perform this inspection, therefore it can be concluded that SGW-107 was entered in error into the M&TE Use Log. Therefore there is no impact to the plant.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 127 of 151

#### NCR 2-082

Page 15 of 388

## • WP 2-3055C & WP 2-3055D

The reason for measuring the RCP cold gaps is to be certain that the hot gaps would be within tolerance, and can be considered as "in-process verification". The fact that the hot gaps were within tolerance is enough proof that the M&TE was acceptable. Therefore there is no impact to the plant.

# XIX. SGW 111, 10# Test Weight, USE AS IS based on the following (see attachment 16 for Calibration information)

• WP 2-3050A, B, C & D; WP 2-3080A, B, C & D; WP 2-3085A, B, C & D; WP 2-5030

This M&TE was found after NCR 2-082 was initiated. The test weight was sent for post-calibration and the results came back within tolerance (see attached). Therefore there is no impact to the plant.

# XX. SGW-116, Torque Wrench, USE AS IS based on the following (see attachment 17 for WP and Calibration information)

# • WP 2-3540B, C & D

Installation of MRI Support Ring MK-G1. The range of use for installing the insulation support was outside of the OOTC range. No work was performed within the OOTC range. Therefore, there is no impact to the plant based on NCSLI RP-10, appendix D. Also, it should be noted that MRI and support rings are **not safety related**.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 128 of 151

IO-QAD-08-012



# INTER-OFFICE CORRESPONDENCE

Action Required: NO

Date: October 20, 2008

From: B Scott

Location: Princeton 06P8

To: P Heiton

Location: Diablo Canyon

Subject: Diablo Canyon 2 NCR 2-082 & 2-083 -Part 21 Review

As required by CQP01.01, the completed "Determination Checklist for 10CFR Part 21 Applicability" (Form No. CQP 01.01-1) is attached for Diablo Canyon 2 NCRs 2-082 & 2-083. The NCRs addressed M&TE that was contaminated, lost or damaged and did not undergo post outage calibration as required by QEP 14.01 or was found to be out of calibration. It has been determined that the existence of a 10CFR21 Reportable condition does not exist.

The determination that a reportable condition does not exist is supported by the "USE-AS-IS". dispositions of attached NCRs 2-082 & 2-083 The dispositions were based on an Engineering usage review for each identified M&TE.

Please advise if you have any questions.

Sany Scott

cc: R Wilkerson – Charlotte G Nash – Princeton L Davis – Charlotte W Taylor – Diablo Canyon K Willingham – Charlotte L Dietrich – Diablo Canyon H Bourque – Diablo Canyon B Kovacs – Charlotte (SGT Corporate Files)

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 129 of 151

				BSISGTIPart 21/Drabio	CanyonWCR	2-082 8 2-083101803030
1 1		Corporate Office	Form Source			
	<b>DUIL</b>	Charlotte, NC	CORPOR	RATE QUALIT	Y PROC	EDURE
Fo	rm Title	******	<u> </u>	Revision No / Stat	us Fo	orm No.
		MINATION CHECKLIST F		4 / AFU Form Revision Da	ta Fr	CQP 01.01-1
	10 CF	R PART 21 APPLICABILIT	ΓY	22-Jun-06		1 of 1
Α.		DEVIATION OR NONCOMPLIANCE not undergo post outage calibration be of calibration.				
В.	REVIEW PHASE		<del></del>			
	b: <u>Has</u> been turr If either "No" opti	ated (is or relates to a Basic Compone ned over to or is in the possession of t on above is checked, 10 CFR Part 21	he Purchaser / Lice			ı
	-	d with Item 2 of the Review Phase.				
		service is Commercial Grade, was it d has NOT already been reported to the	•	☐ Yes ⊠ Yes		N/A Unknown by SGT
		plied facility, activity, or component co	ntain a potential de	fect? 🗌 Yes	🛛 No	Unknown by SGT
		I "No", 10CFR21 does not apply. Proc . In such instances, further research i				
		F PART 21 REPORTABILITY:	, ,	·		
	Comments: Each N	does not, or ☐ does, or ☐ r ICR has been dispositioned "Use-As-I ted after the outage or was found to be	s" based on an Eng	apply. ineering usage	e review	of all M&TE that
	Deviaued by	Barry B. Scatt	10/20/1	. n		
	Reviewed by:	Quality Assurance Director			Date" fo	
C.	EVALUATION					r does or might)
	1. SGT does not ha					r does or might)
		ve the capability to conduct the evaluation	ation.	🗌 Yes	🗌 No	r does or might)
	Part 21 regulation safety hazard and	ve the capability to conduct the evaluate in a facility, activity, or basic compon- ns and, on the basis of evaluation, cou- d therefore is considered a "defect" or ct of 1954 as amended.	ent subject to 10 CI Id create a substan	FR Yes		r does or might) Unknown by SGT
	Part 21 regulation safety hazard and Atomic Energy A 3. The facility, activi	a in a facility, activity, or basic components and, on the basis of evaluation, could therefore is considered a "defect" or	ent subject to 10 Cl Id create a substan fails to comply with	FR Yes	□ No	Unknown by
	Part 21 regulation safety hazard and Atomic Energy A 3. The facility, activi delivered by SGT	a in a facility, activity, or basic components of and, on the basis of evaluation, could therefore is considered a "defect" or ct of 1954 as amended. ty, or basic component containing a "d for use by the Purchaser/Licensee. olves a "basic component" and the def	ent subject to 10 Cl Id create a substan fails to comply with lefect" has been	FR Yes tial the	No	Unknown by SGT
	<ul> <li>Part 21 regulation safety hazard and Atomic Energy A</li> <li>3. The facility, activi delivered by SGT</li> <li>4. The deviation inv to the exceeding</li> </ul>	a in a facility, activity, or basic components of and, on the basis of evaluation, could therefore is considered a "defect" or ct of 1954 as amended. ty, or basic component containing a "d for use by the Purchaser/Licensee. olves a "basic component" and the def	ent subject to 10 Cl Id create a substan fails to comply with lefect" has been	FR Yes tial the	No	Unknown by SGT Unknown by SGT Unknown by
-	<ul> <li>Part 21 regulation safety hazard and Atomic Energy At</li> <li>3. The facility, activit delivered by SGT</li> <li>4. The deviation invito the exceeding</li> <li>FINAL EVALUATION</li> </ul>	a in a facility, activity, or basic compon- ns and, on the basis of evaluation, cou d therefore is considered a "defect" or ct of 1954 as amended. ty, or basic component containing a "d for use by the Purchaser/Licensee. olves a "basic component" and the der of a safety limit.	ent subject to 10 Cl Id create a substan fails to comply with lefect" has been vlation could contrit	FR Yes tial the	No	Unknown by SGT Unknown by SGT Unknown by
	<ul> <li>Part 21 regulation safety hazard and Atomic Energy Atomic energ</li></ul>	a in a facility, activity, or basic compon- ns and, on the basis of evaluation, cou- d therefore is considered a "defect" or ct of 1954 as amended. ty, or basic component containing a "c for use by the Purchaser/Licensee. olves a "basic component" and the der of a safety limit.	ent subject to 10 Cl Id create a substan fails to comply with lefect" has been vlation could contrib her evaluation;	FR Yes tial the	No	Unknown by SGT Unknown by SGT Unknown by
	<ul> <li>Part 21 regulation safety hazard and Atomic Energy Atomic energ</li></ul>	a in a facility, activity, or basic components of therefore is considered a "defect" or ct of 1954 as amended. ty, or basic component containing a "d for use by the Purchaser/Licensee olves a "basic component" and the der of a safety limit. N OF PART 21 REPORTABILITY: ed over to Purchaser/Licensee for furt	ent subject to 10 Cl Id create a substan fails to comply with lefect" has been vlation could contrib her evaluation;	FR Yes tial the Yes oute Yes	No	Unknown by SGT Unknown by SGT Unknown by
	<ul> <li>Part 21 regulation safety hazard and Atomic Energy Atomic energ</li></ul>	a in a facility, activity, or basic components of therefore is considered a "defect" or ct of 1954 as amended. ty, or basic component containing a "d for use by the Purchaser/Licensee olves a "basic component" and the der of a safety limit. N OF PART 21 REPORTABILITY: ed over to Purchaser/Licensee for furt	ent subject to 10 Cl Id create a substan fails to comply with lefect" has been viation could contrib her evaluation; or	FR Yes tial the Yes oute Yes	No	Unknown by SGT Unknown by SGT Unknown by

	<u> </u>	T and bla	Ener David - / China	Com Devision C	PT			WODY DAOIS		
SG	Standard ECP	Form No QEP 11.01-3	Form Rev No / Status 0E1 / AFU	Form Revision Date 21-Feb-06	Form Title		IN	WORK PACK		
Project	Unit No	Work Package N		Work Package Revis	ion No / Sta	atus:		ge Revision Date:	Work Pack	age Sheet
382	41 1		524D-5	0/A				Nov-08	6 of 15	
Step		WORK PA	CKAGE INSTRUCT	ION		HOLD	[	RELEA		
No.	!	-				POINT	CONS	• • • • •	OTHERS	<b>.</b>
	•						· · · · · · · · · · · · · · · · · · ·			
		F1-542 ROOL Val	ve Assembly Pref	aprication				l		
			·							
										!
					Þ.					
50	QC shall verify (	Class "C" Cleanlin	ess of all threaded	components of FT	-542					-1
	valve assembly	shown on Attachn	ment 5 pg 2 (Detail	3), prior to assem	oly in	QC				
	accordance with	QEP 10.04, Rev.	•							
	:	•	······					-		
							l			
60	NOTE: Valve(s	) should be in the	closed position for	welding.		+	····· -· -			•••
				-						
	Construction sha	all fabricate Piping	g, Tubing, Valve, a	nd Condensing pol						
	1D) Fit-up and	-542 Instrument III	nes shown on Atta ru FW-4 at locatior	chment 5 (Valve d	etail					
	pg 2 and in acco	ordance with Attac	chment 7, 1-3524D	-5-WHC-001 Com	nlete					
	FW-5 at location	shown on Attach	iment 5 pg 2 and in	accordance with	•					Pag
	, Attachment 8, 1-	-3524D-5-WHC-0	02. QC shall verify	Material on Attack	nment 1,					le 13
	MDS, including I	thread sealant.								ja ot
- 70	۲.		···			ļ		- <u>.</u> .		
	Install unique ID	tag #MS-1-4005	(as shown on Attac	chment 5 pg 2) on	valve	Į				
	E 1-542, tags sh	all be provided by	PG&E.							i
		·								

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 131 of 151

# Nonconformance Report No (38241) 2083

\

1

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 132 of 151

QUALITY EXECUTION PROCEDURE

# ORIGINAL

Standard Procedures Engineering and Construction Projects Form Source

5:\QUALITY\Obermeyer\NCR-2-083 1 .doc

#### Form Title Revision No / Status Form No. 0E1 / AFU QEP 15.01-1 NONCONFORMANCE REPORT Form Revision Date Form Page 06-Dec-04 1 of 1 NONCONFORMANCE DESCRIPTION Responsible Organization / Department NONCONFORMANCE REPORT NO. (38241) 2-083 Areva & SGT ENGR. Description / Location of Affected Item or System Date Issued No of Hold Tags Total Sheets 16-Sep-08 Misplaced. Lost, Out of Tolerance M&TE. 1 of 99 Ω Const. Seq. Code ASME Section Inspection Code N/A DR-033 ŚU Source of Requirement Not Met WP / PO No PCD / CO No Step No QEP 14.01 Rev. 1 E2 Para. 3.3.2, 3.4.1, 3.7.3 & 3.8.1 See Attached See Attached See Attached **Condition Description** Measuring & Test Equipment utilized during Unit 2 SGRO did not receive a Post-Use-Calibration check as required by QEP 14.01. See attached Condition Description continuation sheet for details. DIL Number Issued By Derne, C CONDITION 9-16-08 Gary E. Obermeyer GEO-09-16-08/01 Continuation Sheets 2 thru Z Results of PQM screening for potential association with 10CFR21: Date NO Potential X Possible Potential Client Determination 9/16 建成的过去式 RECOMMENDED DISPOSITION 🛛 Use-As-Is Proposed Disposition Rework 🗌 Repair Scrap/Return By Client see attached DISPOSITION Dispositioned By Date 08 Continuation Sheets 3 thru 99 and the second DISPOSITION APPROVAL Approval of Proposed Disposition Approved as Proposed $\square$ Revised See Sheets thru SGT CLIENT TITLE SIGNATURE TITLE DATE SIGNATURE ML-251 108 CLIENT REP PEM SM ANI / ANII PQM If Initiated, Reference DR: 033 NÍA REINSPECTION Accepted Rejected — Give Explanation DIL Number 2HB/10-02-08/02 Re-Inspection Results Probable No RE. TA SPECTION REJULTED. "USE AS TS" DISPOSITION . PE Cause Cod Corrective UA-Action Code Deviation 4 Impact C: Hold Teas MOITAGUAY ORICOBR MO (N/A TREGULATURES SIGNATURE CH JUE ANU: ANS 0.2.08 Review N/A citabales Clent Redevi Lucy Dielais N/2 April 2

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 133 of 151

# JAMEIAO

SGT QA RECORD VALIDATION TOTAL PAGE COUNT 29 INTERIM FILE NO, 5.1.1 REVIEWED BY 20.19.03 DATE OF REVIEW 20.19.03 NCR 2-083 Sheet 2 of <u>9</u>9

During the turnover of Quality Records pertaining to Measuring and Test Equipment (M&TE) used during 2RF14 Steam Generator Replacement Outage at Diablo Canyon Power Plant (DCPP), it was discovered that one SGT M&TE item and six Areva M&TE Post-Use Calibrations had not been performed and that several items were missing.

SGT Quality Execution Procedure (QEP) 14.01, Section 3.0, paragraph 3.3.2 states, in part, "Calibration verification of M&TE used to verify functional operability of a Safety Related item or component shall be performed at the normal calibration cycle or upon completion of the work, whichever comes first."

QEP 14.01; Section 3.0, paragraph 3.7.3 states, "If a piece of calibrated M&TE is damaged or lost, the QCS shall review the M&TE Usage Log to verify the use of M&TE and to identify the items used on. If the M&TE in question was used for final acceptance of an item, the QCS shall generate a Form QEP 15.01-1, *Nonconformance Report*, in accordance with QEP 15.01, *Identification and Control of Deviations.*"

In addition, Section 3.0 paragraph 3.8.1 states, "Subcontractors shall be required to submit Calibration of M&TE prior to use on SGT work. Calibration verification of M&TE shall be performed at the normal calibration cycle, at SGT's request, and/or upon completion of the work scope, whichever occurs first. Post outage calibration shall be completed and calibration records submitted as soon as possible and in no case later than 30 days after completion of work."

Contrary to these requirements, several M&TE items (as shown below) utilized for final acceptance of Safety Related items are missing and unavailable for post use calibration. SGW-110.

Areva VH-10690, VH-10811, VH-10812, VH-10881, VH-10882, VH-7784.

The following three Continuation Sheets (Attachment 1) provide a summary of the M&TE Usage Log, to Work Package Utilization Summary.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 135 of 151

# NCR 2-083

ļ

Page of

NCR 2-083: Post Cal of M&TE for Diablo Canyon U2 SGR	NCR <u>2-083</u>	
<u>Table of Contents</u>	Page <u>3</u> of <u>99</u>	
A. Proposed Disposition		
B. Attachments		

Attachment 1: SG	T M&TE Control No	. Use Log	3 pages
Attachment 2: VH-	7784 Calibration I	Report	2 pages
Attachment 3: SG	W-110 reference n	naterial	30 pages
Attachment 4: VH-	10690 reference r	naterial	4 pages
Attachment 5: VH-	10811 reference r	naterial	18 pages
Attachment 6: VH-	10812 reference r	naterial	8 pages
Attachment 7: VH-	10881 reference r	naterial	16 pages
Attachment 8: VH-	10882 reference r	naterial	12 pages

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 136 of 151

# NCR 2-083

# Page **#ICR<u>2-083</u>** Page <u>4 of 99</u>

# A. Proposed Disposition

The following M&TE used during the Diablo Canyon U2 SGR Outage cannot be post calibrated due to items being lost or damaged. Post calibration certifications have been previously submitted for all other M&TE. The items that cannot be post calibrated are:

LIST OF CALIBRATED EQUIPMENT ~ Lost or Damaged				
Control No	Equipment Name	Original Cal Date	Original Cal Due Date	
SGW-110	Digital Caliper, 6"	01/16/2008	01/16/2009	
VH-10690	Digital Caliper, 40"	01/15/2008	07/15/2008	
VH-10811	Digital Caliper, 6"	11/01/2007	05/01/2008	
VH-10812	Digital Caliper, 6"	11/01/2007	05/01/2008	
VH-10881	Digital Caliper, 6"	02/07/2008	08/07/2008	
VH-10882	Digital Caliper, 6"	02/07/2008	08/07/2008	

# SGW-110

Digital Caliper (6"), SGW-110 is lost and has not received a post-calibration.

This digital caliper was used in Work Package 2-3055B Step 1060 for checking RCP shim cold gaps. This is an in-process check prior to subsequent check of hot gaps. Since the hot gaps were found to be acceptable, no further action is required. There is no impact to the plant.

This digital caliper was checked out for in-process use with NCR2-058 to report dimensions of arc strikes on SG2-2 if needed. The arc strikes were subsequently repaired in accordance with the disposition of NCR2-058. Therefore, there is no impact to the plant.

This digital caliper was also checked out for in-process use with NCR2-060 to report dimensions of superficial gouges on SG2-2 if needed. The superficial gouges were subsequently repaired in accordance with the disposition of NCR2-060. Therefore, there is no impact to the plant.

## <u>VH-10690</u>

Digital caliper (40"), AREVA Control # VH-10690, is damaged and cannot be calibrated upon completion of site work.

The device is reported to have been used on two instances during the contracted SGR at Diablo Canyon U2. These involved measurements of the hot and cold leg nozzle weld prep geometry required by WP 2-3065A.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 137 of 151

## NCR 2-083

Page of

f the piping, ncR 2-083

The validity of these measurements was later verified by proper fit up of the piping, proper operation of the weld equipment (no interferences with the weld joint) and final acceptance of the weld. Based on this no further action is required.

<u>Conclusion</u>: Even though measurements were recorded in some cases, they are to be considered in-process verifications to ensure proper fit-up rather than the acceptance criteria. Fit-up and welds were inspected and determined to be acceptable. Therefore there is no impact to the plant.

# <u>VH-10811</u>

Digital Caliper, AREVA Control # VH-10811, is lost and therefore cannot be calibrated upon completion of site work.

The device is reported to have been used on eleven instances during the contracted SGR at Diablo Canyon U2. These involved measurements of the main steam nozzle weld prep geometry required by WP 2-3023 & 3024, feedwater nozzle weld prep geometry required by WP 2-3021 & 3023 and hot leg nozzle weld prep geometry required by WP 2-3021.

The validity of these measurements was later verified by proper fit up of the piping, proper operation of the weld equipment (no interferences with the weld joint) and final acceptance of the weld. Based on this no further action is required.

<u>Conclusion</u>: Even though measurements were recorded in some cases, they are to be considered in-process verifications to ensure proper fit-up rather than the acceptance criteria. Fit-up and welds were inspected and determined to be acceptable. Therefore there is no impact to the plant.

# <u>VH-10812</u>

Digital Caliper, AREVA Control # VH-10812, is lost and therefore cannot be calibrated upon completion of site work.

The device is reported to have been used on three instances during the contracted SGR at Diablo Canyon U2. These involved measurements of the cold leg nozzle weld prep geometry required by WP 2-3022, 2-3023, & 2-3024.

The validity of these measurements was later verified by proper fit up of the piping, proper operation of the weld equipment (no interferences with the weld joint) and final acceptance of the weld. Based on this no further action is required.

<u>Conclusion</u>: Even though measurements were recorded in some cases, they are to be considered in-process verifications to ensure proper fit-up rather than the acceptance criteria. Fit-up and welds were inspected and determined to be acceptable. Therefore there is no impact to the plant.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 138 of 151

## NCR 2-083

## <u>VH-10881</u>

Page	of	1
	NCR 2-083	
	Page 6 of 99	
alibrate		

Digital Caliper, AREVA Control # VH-10881, is lost and therefore cannot be calibrated upon completion of site work.

The device is reported to have been used on 8 instances during the contracted SGR at Diablo Canyon U2. These involved measurements of the main steam piping weld prep geometry required by WP 2-3080A, B, C, & D, and feedwater piping weld prep geometry required by WP 2-3085A, B, C, & D.

The validity of these measurements was later verified by proper fit up of the piping, proper operation of the weld equipment (no interferences with the weld joint) and final acceptance of the weld. Based on this no further action is required.

<u>Conclusion</u>: Even though measurements were recorded in some cases, they are to be considered in-process verifications to ensure proper fit-up rather than the acceptance criteria. Fit-up and welds were inspected and determined to be acceptable. Therefore there is no impact to the plant.

# <u>VH-10882</u>

Digital Caliper, AREVA Control # VH-10882, is lost and therefore cannot be calibrated upon completion of site work.

The device is reported to have been used on six instances during the contracted SGR at Diablo Canyon U2. These involved measurements of the main steam piping weld prep geometry required by WP 2-3080B, feedwater piping weld prep geometry required by WP 2-3085B and cold leg piping weld prep geometry required by WP 2-3065A & C..

The validity of these measurements was later verified by proper fit up of the piping, proper operation of the weld equipment (no interferences with the weld joint) and final acceptance of the weld. Based on this no further action is required.

<u>Conclusion</u>: Even though measurements were recorded in some cases, they are to be considered in-process verifications to ensure proper fit-up rather than the acceptance criteria. Fit-up and welds were inspected and determined to be acceptable. Therefore there is no impact to the plant.

#### <u>VH-7784</u>

Digital Caliper, AREVA Control # VH-7784. This M&TE was found after NCR2-083 was initiated. A post calibration was performed and found to be within tolerance. See attachment 2 for Calibration Report.

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 139 of 151

IO-QAD-08-012



# INTER-OFFICE CORRESPONDENCE

Action Required: NO

Date: October 20, 2008

From: B Scott

Location: Princeton 06P8

To: P Helton

Location: Diablo Canyon

Subject: Diablo Canyon 2 NCR 2-082 & 2-083 -Part 21 Review

As required by CQP01.01, the completed "Determination Checklist for 10CFR Part 21 Applicability" (Form No. CQP 01.01-1) is attached for Diablo Canyon 2 NCRs 2-082 & 2-083. The NCRs addressed M&TE that was contaminated, lost or damaged and did not undergo post outage calibration as required by QEP 14.01 or was found to be out of calibration. It has been determined that the existence of a 10CFR21 Reportable condition does not exist.

The determination that a reportable condition does not exist is supported by the "USE-AS-IS". dispositions of attached NCRs 2-082 & 2-083 The dispositions were based on an Engineering usage review for each Identified M&TE.

Please advise if you have any questions.

Barry Scatt

cc: R Wilkerson -- Charlotte G Nash -- Princeton L Davis -- Charlotte W Taylor -- Diablo Canyon K Willingham -- Charlotte L Dietrich -- Diablo Canyon H Bourque -- Diablo Canyon

B Kovacs – Charlotte (SGT Corporate Files)

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 140 of 151

r			C:Users\OualMomN	BESISGT/Parl 21/Diablo (	CanyonWCF	2-082 & 2-083\checkist,doc
	SGT	Corporate Office Charlotte, NC		RATE QUALITY	PROC	EDURE
Fo		MINATION CHECKLIST F	OR	Revision No / Stati 4 / AFU		orm No. CQP 01.01-1
		R PART 21 APPLICABILI		Form Revision Dat 22-Jun-06	ie F	orm Page 1 of 1
Α.		DEVIATION OR NONCOMPLIANCE of undergo post outage calibration be of calibration.				
В.	REVIEW PHASE		······································			······
	<ol> <li>The facility, activity, or component:</li> <li>a. Is Safety Related (is or relates to a Basic Component)?</li> <li>A Yes No</li> <li>b. Has been turned over to or is in the possession of the Purchaser / Licensee? Yes No</li> <li>If either "No" option above is checked, 10 CFR Part 21 reporting by SGT is not required. If both "Yes" options are checked, proceed with Item 2 of the Review Phase.</li> </ol>					
	b. The condition organization?	service is Commercial Grade, was it do has NOT already been reported to the plied facility, activity, or component co	e NRC by another	☐ Yes ⊠ Yes fect? ☐ Yes		N/A Unknown by SGT Unknown by SGT
	B2a, B2b, or B2c INITIAL REVIEW OF 10 CFR 21: 2 Comments: Each N	"No", 10CFR21 does not apply. Proc In such instances, further research in F PART 21 REPORTABILITY: does not, or does, or r r CR has been dispositioned "Use-As-Is red after the outage or was found to be	may be required to night possibly s" based on an Eng	answer the que	stions i	n" is checked in n Section C.
	Reviewed by:	Barry B. Scatt	10/20/2	, <b>8</b>		
		Quality Assurance Director	Da	te ("Discovery [	Date" fo	r does or might)
C.	EVALUATION 1. SGT does not ha	ve the capability to conduct the evaluation	ition.	🗌 Yes	🗌 No	
	Part 21 regulation safety hazard and	in a facility, activity, or basic compon- ns and, on the basis of evaluation, cou d therefore is considered a "defect" or ct of 1954 as amended.	ld create a substan	tial	□ No	Unknown by SGT
		ty, or basic component containing a "d for use by the Purchaser/Licensee.	lefect" has been	🗋 Yes	🗌 No	Unknown by SGT
	4. The deviation inv to the exceeding	olves a "basic component" and the dev of a safety limit.	viation could contrib	oute 🗌 Yes	🗌 No	Unknown by SGT
	FINAL EVALUATION	NOF PART 21 REPORTABILITY				
	Condition turn	ed over to Purchaser/Licensee for furt	her evaluation;			
	OR, a 10 CFR 21 Comments:	reportable condition:   does not,	or [] does .	exist.		
	Evaluated by:	Quality Assurance Director	Det	e		х.

C

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 141 of 151

# Deficiency Report No (38241) 033

ORIGINAL			Docket Number 9 SGT M-09-0050 / Page 142 of 151		233 see
		Form Source			
Standard Pr Engineering and Construction		QUALI	TY EXECUTION PR	OCEDURE	
		······································	Revision No.: Status 1E1 / AFU	Form No. QEP 12.02	-2
			Form Revision Date 28-Mar-05	Form Page 1 of 1	
Activity: Control & Use Of Measuring & Test Equipment.	DEFIC	CIENCY REPORT	NO. (38241) 033	Deficiency Rep Sheet 1 of	-
ASSIGNED TO: Departme Paul Helton Quality	ent:	1	Initiated Reference NCR: 2-053	Reply Due D 11 Sept. 20	ate
CC	NDITION DE				
Item #1: QEP 14.01; para 3.2.5 states that calibration docume this procedure. If acceptable the QCS/QAS shall india: & date may be released for use Item #2: QEP 14.01; para 3.6.1 states that the QC Superviso Item #3: QEP 14.01; para 3.9 <u>Client Provided M&amp;TE</u> para 3 be controlled and calibrated in accordance with the applicable record for inclusion in SGTs files. Item #4: QEP 14.01; para 3.3.2 states that Calibration verifica component shall be performed at the normal calibration cycle of	the socumen r (QCS) shall 8.9.1 states th client procedu ation of M&TE	ts & forward them to t be responsible for the lat in cases where M& ures. In such cases, t used to verify the fur	he Quality Records Center e care, custody, & issuing ( TE may be provided by the he PQM shall obtain a cop nctional operability of a Sat	<ul> <li>At this time the M</li> <li>of M&amp;TE.</li> <li>client, the M&amp;TE s</li> <li>y of the latest calibri</li> </ul>	&TE shall ation
INITIATED Signature:	Title:	Project Q. A.	Supervisor	Date: D 03 Sept 08	DIL No 01
APPROVED Signature BY: During Distance	Titie:	Project Q. A.		Date: 03 Sept. 01	
A course of a course of				<u></u>	-,
Su	re Per	ge 3			
PREVENTATIVE	ACTION TAK	EN TO ELIMINATE O	AUSE		
S	ree B	reje 3			
l 	d en marine en e	ANTICIPATED C	OMPLETION DATE:	9-11-0	X
an conservation of a weather than the second of the second of the second s	PLETED BY	H. Decles		Date 9-11-6	<u>У</u>
OUALITY STRUE REVIEWED STRUE	CTIVE ACTIO	C S 25 DN FOLLOW UP			
av start and a		4 Arright to	en 1947 - State St 2014 - State St		

## Deficiency Report (38241) 033 Sheet 2 of S

Contrary to these requirements the following M&TE items were documented as being used in subcort of the ECPP Unit 2 SGRP during 2RF14.

#### Finding

<u>No socumented evidence</u> found, that supports Calibration Records ever being supplied or reviewed by the QCS/QAS, for the M&TE items listed below.

<u>No Catheration Records</u> received, reviewed or filed for the M&TE items listed below, which includes SGT and Client (PG&E) supplied M&TE items listed below.

<u>Nc Post Calibration Records</u> received, reviewed or filed for the M&TE items listed below, which includes SGT and Areva.

Missing Calibration Certification. SGT\_M&TE\_items\_\_SGT-101, SGT-111, SGW-006, SGW-018, SGW-141.

**PG&E M&TE items**: 423.91.27, 432.92.19, 432.91.20, 432.91.21, 432.91.23, 432.91.26, 700 08.22, 700 08.31, 710.100.10, 20391.

<u>No PCST Calibration Reports</u> received to support M&TE items listed below. <u>SGT M&TE items</u>: SGW-110

<u>Areva M&TE items</u>: VH-10690. VH-10809, VH-10810, VH-10811, VH-10812, VH-10843, VH-10344 VH-10830, VH-10881. VH-10882, VH-7784.

## Deficiency Report (38241) -033 Sheet 3 of \_\_\_\_\_\_

### RESPONSE TO DEFICIENCY REPORT

#### CATSE AND CORRECTIVE ACTION

M&TE used for field verifications without QEP requirements being complied with. Verification & Acceptance of Pre-Calibration Certifications prior to use was by-passed on both the SOT & PG&E M&TE, available for and used during 2RF14.

Corrective Action: Verification of Pre-Calibration Certifications for all SGT M&TE items currently available for use has been performed. This will continue until all items have been received from the Calibration Lab. Prior to issue the M&TE item will be verified against the active M&TE calibration report. DIL reports when M&TE is used will be verified, prior to acceptance.

## Additional information:

According to the M&TE Usage Log none of the following SGT items were used to support work package verification or acceptance. <u>M&TE</u> SGT-101. SGT-111. SGW-006, SGW-018, SGW-141.

Received, reviewed & accepted all of the <u>PG&E</u> Pre. & POST-Calibration Reports, identified on sheet two of this DR. These have been processed for inclusion in the SGT files.

The following Areva Post Calibration M&TE certifications have been received, reviewed, accepted and processed for inclusion in the SGT files. These items are VH-16809, VH-10810, VH-10843, VH-10844, VH-10880.

SG1 M&TE SGW-110 and Areva M&TE VH-10690, VH-10811, VH-10812 VH-10381, VH-10882 and VH-7784 are addressed on NCR-2-083. Refer to Sheets 4 through 8 for all NCR details.

#### PREVENTATIVE ACTION LAKEN TO ELIMINATE CAUSE

Where s is a large of M& II calibration usage log, pre-and post-calibration files. All applies it Mec. I will be posted to assist all Q.C. Inspectors, prior to field verifications because of barrow.

the instance of process and compliance and will be documented on Surveillance https://www.commune.com/instance

<b>A</b> 7	SGT M-09-00	per 99901334 050 Attachment 2 151
N	-	TriOberteyerNOR-2-053 t a
	LITY EXECUTION PF	ROCEDURE
	Revision No / Status 0E1 / AFU	Form No. QEP 15.01-1
PRT	Form Revision Date 06-Dec-04	Form Page 1, of 1
ANCE DESCRIPTION		
	MANCE REPORT NO	D. (38241) 2-083
16-Sep-C8		Total Sheets
		Const. Seq. Code SU
WP / PO No	FCD / CO No	Step No See Attached
did not receive a Po ion sheet for details	ost-Use-Calibration ch 	eck as required by
DIL Number	CONDITION	
GEO-09-16-(		Date
	Luce Nieta	ich glicht
DED DISPOSITION	- fucy open	ceri niciere
Date	DISPOSITIO	
ON APPROVAL	Continuation evised See Sheets	
DN APPROVAL	EVISED See Sheets CLIENT	Sheets thru thru
DN APPROVAL	Continuation evised See Sheets	Sheets thru
DN APPROVAL Proposed Re TITLE	EVISED See Sheets CLIENT	Sheets thru thru
DN APPROVAL	EVISED See Sheets CLIENT	Sheets thru thru
DN APPROVAL Proposed Re TITLE	EVISED See Sheets CLIENT	Sheets thru thru
DN APPROVAL Proposed Re TITLE CLIENT REP ANI / ANII	EVISED See Sheets CLIENT	Sheets thru thru
DN APPROVAL Proposed Re TITLE	Continuation evised See Streets CLIENT SIGNATURE	Sheets thru thru
DN APPROVAL Proposed Re CLIENT REP ANI / ANII	Continuation evised See Sheets CLIENT SIGNATURE	Sheets thru thru DATE 2 2 2 2 2 2 2 2 2 2 2 2 2
DN APPROVAL Proposed Re CLIENT REP ANI / ANII	Continuation evised See Sheets <u>CLIENT</u> SIGNATURE	Sheets         thru           toru         DATE           1         1
DN APPROVAL Proposed Re CLIENT REP ANI / ANII	Continuation evised See Streets <u>CLIENT</u> SIGNATURE	Sheets         thru           thru         DATE           1         1
DN APPROVAL Proposed Re CLIENT REP ANI / ANII PECTION Give Exclanate	Continuation evised See Streets <u>CLIENT</u> SIGNATURE	Sheets thru thru thru DATE 7 1 1 1 1 1 1 1 1 1 1 1 1 1
DN APPROVAL Proposed Re CLIENT REP ANI./ ANII PECTION Give Exclanate	Continuation evised See Streets <u>CLIENT</u> SIGNATURE	Sheets thru thru DATE 7 7 7 7 7 7 7 7 7 7 7 7 7
DN APPROVAL  Proposed Re CLIENT REP ANI / ANII PECTION Give Explanate	Continuation evised See Streets <u>CLIENT</u> SIGNATURE	Sheets thru thru DATE 7 7 7 7 7 7 7 7 7 7 7 7 7
DN APPROVAL Proposed Re CLIENT REP ANI/ ANII PECTION Give Explanate Keinen	Continuation evised See Streets <u>CLIENT</u> SIGNATURE	Sheets thru thru DATE 7 7 7 7 7 7 7 7 7 7 7 7 7
	DRT  ANCE DESCRIPTION  NONCONFOR  Date !ssued 16-Sep-08  ASME Section N/A  WP : PO No See Attache  did not receive a Po ion sheet for details  DIL Number GEO-09-16-( CFR21: Signature  etermination DED DISPOSITION	Page 145 of SIDL4 Form Source Form Source ORT

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 146 of 151

#### NCR 2-083 Sheet 2 of \_\_\_

During the turnover of Quality Records pertaining to Measuring and Test Equipment (M&TE) used during 2RF14 Steam Generator Replacement Outage at Diablo Canyon Power Plant (DCPP), it was discovered that one SGT M&TE item and isix Areva M&TE Post-Use Calibrations had not been performed and that several items were missing.

SGT Quality Execution Procedure (QEP) 14.01, Section 3.0, paragraph 3.3.2 states, in part, 'Calibration verification of M&TE used to verify functional operability of a Safety Related item or component shall be performed at the normal calibration cycle or upon completion of the work, whichever comes first.'

QEP 14 01; Section 3.0. paragraph 3.7.3 states, "If a piece of calibrated M&TE is damaged or lost, the QCS shall review the M&TE Usage Log to verify the use of M&TE and to identify the items used on. If the M&TE in question was used for final acceptance of an item, the QCS shall generate a Form QEP 15.01-1, *Nonconformance Report*, in accordance with QEP 15.01, *Identification and Control of Deviatilions.*"

In addition, Section 3.0 paragraph 3.8.1 states, "Subcontractors shall be required to submit Calibration of M&TE prior to use on SGT work. Calibration verification of M&TE shall be performed at the normal calibration cycle, at SGT's request, and/or upon completion of the work scope, whichever occurs first. Post outage calibration shall be completed and calibration records submitted as soon as possible and in no case later than 30 days after completion of work."

Contrary to these requirements, several M&TE items (as shown below) utilized for final acceptance of Safety Related items are missing and unavailable for post use calibration. SGW-110.

Areva VH-10690, VH-10811, VH-10812, VH-10881, VH-10882, VH-7784.

The following three Continuation Sheets (Attachment 1) provide a summary of the M&TE Usage Log. to Work Package Utilization Summary.

sector 5

1X 12 1

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 147 of 151

fage 10F3

# NCR-Z-083 Attachmen Pag<u>e30F</u> WO 38241 - SGT M&TE Control No. Use Log

,

(Report 1027) Page 26 of 28 9:43 AM 15-Jul-08

PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No
M&TE Contro	No - SGW-107		M&TE Conf	trol No - SGW-111	
WP 2-3050D, C	hg 0, 8/24/2007		WP 2-3050D	, Chg 0, 8/24/2007	
	520	PP-3/20/2008-3	WHC-002	4/FW-58	BC-3/14/2008-2
WP 2-3055C. C	hg 0, 8/20/2007			4/FW-50	BC-3/14/2008-2
•••••	920	DLB-3/29/2008-2	WHC-002	4/FW-5D	BC-3/14/2008-2
WP 2-3055D C	hg 0, 8/20/2007		WP 2-3080A	, Chg 0, 4/18/2007	
	920	DLB-3/29/2008-1		140	LP-2/23/2008-5
ARTE Contro	I No - SGW-110		Ĩ	140	SHS-2/22.2008-1
		· · · · · · · · · · · · · · · · · · ·		290	SHS-3/11/2008-2
WP 2-3055B, C	hg 0, 8/20/2007		RTA-002	4	-GLC-2/27/2008-2
	1060	PP-3/25/2008-1	- WDC-002	14	GLC-2/27/2008-1
	hg 0, 10/15/2007	01.0.0.00.0000.0	WP 2-3080B.	Chg 0, 4/18/2007	
NCRIS 2-058	10	GLC-3/22/2008-3		40	GLC-2/25/2008-2
NCRiS 2-058	10	GLC-3/23/2008-4	WP 2-3080C	Chg 0, 4/18/2007	
NCRIS 2-058	16	GLC-3/22/2008-5	Wi 2-50000,	200	JSB-3/10/2008-1
VCR/S 2-058	16	GLC-3/23/2008-2		430	GLC-3/7/2008-2
CRIS 2-058	4	GLC-3/22/2008-2	RTA-002	4 .	GLC-2/25/2008-1
NCRIS 2-060	2	GLC-3/24/2008-1	WHC-003	4 FW-3	BC-3/17/2008-1
CRIS 2-060	4	GLC-3/24/2008-2			00-3/1//2000-1
<b>//&amp;TE Contro</b>	I No - SGW-111		WP 2-3080D,	Chg 0, 4/18/2007	C: C C/C C 2 2 7 4 0
VP 2-3050A, CI	hg 0, 8/24/2007			200 14	SHS-3/9.2008-10
VDRC-NCR-035-	3	GLC-3/5/2008-6	WDC-202		GLC-2/23/2008-1
			WP 2-3085A,	Chg 0, 10/31/2007	
VDRC-NCR-046		BC-3/20/2008-1		155	LP-2/23/2008-2
VDRC-NCR-046		BC-3/20/2008-1		170	LP-2/23/2008-3
VHC-001	4/FW-1A	BC-3.6/2008-2		340	DLB-3/10/2008-2
VHC-001	4.FW-1A	GLC-3/6/2008-1		360	DLB-3/10/2008-3
VHC-Ö01	4/FW-1D	BC-3/6/2008-2	WDC-001	15	BC-3/17/2008-2
VHC-001	4.FW-2B	BC-3/6/2008-1	WP 2-3085B,	Chg 0, 10/31/2007	
VHC-001	4:FW-2C	GLC-3/5/2008-1		340	GLC-3/12/2008-1
	ng 0, 8/24/2007			360	GLC-3/12/2008-2
VHC-001	4/EW-NA	BC-3/14/2008-3	WP 2-3085C,	Chg 0, 10/31/2007	
V∺C-001	4/FW-18	5C-3/14/2008-3		170	CP-2/23/2008-1
/HC-901	4%FW-10	BIC-6/54/2008-3		190	DLB-2/22.2008-1
-HC-001	49W-10	BC-3/14/2008-3		360	JISE-3/9/2008-2
/P 2-3050C, Ch	ng 0, 8/24/2007		RTA-004	۷.	BD-3/12-2008-5
140-901	4.EW/TA	80-8-350958-1	\\{\DC=054_	13	80-3/12/2003-2
/H0-97	4年14年1日	80-3-13-2008-1	WHC-051	4.FW-4	80-34172005-1
HO.XX	4 EVA 10	80/3/13/2018-1	WP 2-3085D, 0	Chg 0, 10/31/2007	
HC-001	4 FW (D	BO-3-4375908-1		340	SH\$-3-70208-4
/P 2-3050D, Ch	g 0, 8/24/2007			NG.3	8-8-3-1-3%38-2
HC.313	AFW 14	BO RI4POSA		- 7	GUG-2-28/2008-1
	1.277 P.	Baarrester	WP 2-5030, CH	ng 0, 10/25/2007	a mang mang pang pang pang pang pang pang pang p
			ACRIS MERS	1. 19 July 19	
		田白石(11年98日年)。 田白	10223-5-103		RUA-3 28 (013-5
			Mensemu	No-SGW-INS-	
	4 A 1 43	ede todeo	on and a subscription of the second	hg 0. 9/17/2007	
	$\sim \Sigma_{\rm eff} = 33^{\rm H}$	șt îs profes	TTI 2-0040Mg C		<ul> <li>to the the the</li> </ul>
	a di tana ka	eo en ancesa		С. ц.	그나 나는 가지 않는 것
					ž,

Attachment 1

NCR-2-083

page 40F\_\_\_

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 148 of 151

Page ZoF3

#### WO 38241 - SGT M&TE Control No. Use Log (Report 1027) Page 27 of 28 9:43 AM 15-Jul-08 PCD No Step / Fw No DIL No PCD No Step / Fw No DIL No . M&TE Control No - VH-10812 M&TE Control No - SGW-116 WP 2-3540B, Chg 0, 9/17/2007 WP 2-3022, Chg 0, 10/17/2007 120 RUH-3/16/2008-1 1000 RUH-1/15/2008-6 WP 2-3540C, Chg 0, 9/17/2007 WP 2-3023, Chg 0, 10/17/2007 JLA-3/20/2008-1 520 700 JSB-12/11/2007-3 WP 2-3540D, Chg 0, 9/17/2007 WP 2-3024, Chg 0, 10/17/2007 JLA-3/25/2008-1 120 700 JSB-12;8/2007-9 M&TE Control No - SGW-130 M&TE Control No - VH-10843 WP 2-3535A, Chg 0, 10/18/2007 WP 2-3065A, Chg 0, 9/29/2007 1090.06 PP-4/1/2008-3 WDC-001 54 AS-3/13/2008-3 1090.06 RJH-4/2/2008-2 WDC-062 54 AS-3/13/2008-4 M&TE Control No - VH-10844 M&TE Control No - SGW-131 WP 2-3535A, Chg 0, 10/18/2007 WP 2-3065B, Chg 0, 9/29/2007 1030 CW-3/27/2008-1 240 RC-3/4/2008-4 390 RC-3.4/2003-5. M&TE Control No - VH-10690 WDC-001 53 RC-3/14/2008-2 WP 2-3065A, Chg 0, 9/29/2007 WDC-001 54 RC-3/14/2008-3 210 RC-3/2/2008-1 WDC-002 53 RC-3/14/2008-4 360 RJH-3/2/2008-2 V/DC-002 54 RC-3/\*4/2008-5 M&TE Control No - VH-10808 WP 2-3065C, Chg 0, 9/29/2007 WP 2-3021, Chg 0, 10/17/2007 WDC-002 16 RC-3/7/2008-2 700 RJH-1/15/2008-3 WP 2-3065D, Chq 0, 9/29/2007 WP 2-3022, Chg 0, 10/17/2007 WDC-001 16 JST-3/6/2008-2 RJH-1/17/2008-4 1160 WDC-002 16 RC-3/6/2008-2 M&TE Control No - VH-10809 M&TE Control No - VH-10880 WP 2-3085A, Chq 0, 10/31/2007 WP 2-3080A, Chg 0, 4/18/2007 330 JSB-3/10/2008-3 150 RC-2:22/2008-3 350 JSB-3/10/2008-4 210 JSB-3/11/2008-3 M&TE Control No - VH-10810 WP 2-3080B, Chg 0, 4/18/2007 WP 2-3024, Chq 0, 10/17/2007 150 RC-2/23/2008-3 1160 ISB-12/12/2007-1 WP 2-3080C, Chg 0, 4/18/2007 JSB-12/19/2007-3 570 150 JSB-2/20/2008-6 M&TE Control No - VH-10811 WP 2-3080D, Cha 0, 4/18/2007 SC-17, Chg N/A, 2/20/2008 210 188-3-9-2098-1 UHB-12/1/2007/3 230 SHS-37-2098-3 UHB-12/10/007/4 WP 2-3085A, Chg 0, 10/31/2007 WP 2-3021, Chg 0, 10/17/2007 150 PO-2-22078-4 1000 RoB-1150338-5 1 1180 LP-1+16-DOME-6 的过去分词使马马 330 5.00 RUH 1 25/230E S WP 2-3085B, Chg 0, 10/31/2007 WP 2-3023, Chg 0, 10/17/2007 HE KATS ST LASS , SBHP 120219 30 • ::: Strate Contraction WP 2-3085C, Chg 0, 10/31/2007 2.5.4 1977 - 19 WP.7-3024/Chg 0, 10/17/2007 WP 2-3085D, Chg 0, 10/31/2007 1.1.1 usenta turxi a • antha a' an Ant a estre ture 326 1 1 1 1 1 1 1 1 Ż

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 149 of 151

page 30F3

Hachment 1

## WO 38241 - SGT M&TE Control No. Use Log

NCR-2-083 Page 50F\_\_\_

WP 2-3080A: Chg 0, 4/18/2007

(Report 1027) Page 28 of 28

9:43 AM 15-Jul-08

PCD No	Step / Fw No	DIL No	PCD No	Step / Fw No	DIL No
M&TE Control	No - VH-10880			trol No - VH-9274	
	No - VH-10881		WP 2-3080A	, Chg 0, 4/18/2007	
WP 2-3080A, CH	-			150	RC-2/22/2008-3
	440	JST-2/19/2008-4	WP 2-3080B	, Chg 0, 4/18/2007	
WP 2-3080B, Ch	-			*50	JSB-3/13/2008-2 RC-2/23/2008-3
	150	RC-2/24/2008-5	WD 2 2095A		
WP 2-3080C, CH	•		WP 2-3085A,	, Chg 0, 10/31/2007	RC-2/22/2008-4
	440	JST-2:16/2008-2		160	RC-2/22/2008-1
WP 2-3080D, Ch	•	107 04 00000 4	WP 2-3085B	, Chg 0, 10/31/2007	
	440	JST-2/16/2008-1	111 2-500QD	140	RC-2/23/2008-5
WP 2-3085A, Ch	-			160	RC-2/23/2008-4
	530	RC-2/19/2008-5	WP 2-3085C	Chg 0, 10/31/2007	
WP 2-3085B, Ch		DO 244 0000 0		160	RC-2/22/2008-2
	350	RC-3/11/2008-3	WP 2-3085D	Chg 0, 10/31/2007	·····
WP 2-3085C, Ch	•	10T 040/0000 0	1 00000,	140	JSB-2/20/2008-1
	280	JST-2/19/2008-2	-	160	JSB-2/19/2008-1
WP 2-3085D, Ch	-		<u></u>		
	580	JST-2/16/2008-3			
	No - VH-10882				
WP 2-3065A, Ch	•				
	210	RC-3/2/2008-1			
	360	RJH-3/2/2008-2	-		
NP 2-3065C, Ch	-				
	210	RC-2/29/2003-2			
	360	RC-2/29/2003-1			
VP 2-3080B, Ch	-				
	440	JST-2/21/2003-1			
VP 2-3085B, Ch	-				
· · · · · · · · · · · · · · · · · · ·	580	JST-2/22/2008-1			
A&TE Control	1 1116 1				
VP 2-3021, Chg		-			
	57C	RUH-1/25/2008-3			
VP 2-3023, Chg (					
	116)	JSB-18-12-2007-3			
	570	USE-11/ 9/2007-2/			
VP 2-3024, Chg (					
	1160	JSB-12/2007-1			
<b>1&amp; TE Control I</b>	10 - VH-9274	de an inder an addie het dan anderen en			
VP 2-3023, Chg (	, 10/17/2007				
-		"SB1211-20243			
VP 2-3024, Chg 0	1, 10/17/2007	<b></b> .			
	· · · · · · · · · · · · · · · · · · ·	SE LENGT			
/P 2-3065C, Chg	0,9/29/2007	· · · · · · · · · · · · · · · · · · ·			
	•	reger en de la seu			
:		eria de la c			

Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 150 of 151

## Audit Number 38241-P-08-02

# AOR Number: AOR - 01

## Docket Number 99901334 SGT M-09-0050 Attachment 2 Page 151 of 151

	UNISHSHCPTHOTELOWS	Form Source	Contraction (19-12-	CENDIAS A CLEVON A CRIATINSE S
Stard Engineering and Constr	ard Procedures ruction Projects		ITY EXECUTION PR	OCEDURE
Form The		· · ·	Revision No. Status 0E2 / AFU	QEP 18.01-5
			Form Revision Date 04-May-05	Form Page 1 of 1
Audie Number 38241-P-08-002	AOR	Number AOR - 0	Date Issu	.ed 07-Oct-08
(	COMPLETED B	Y AUDITOR	······································	
Organization: Supplier. SGT / Diablo Canyon Power Plant SGR Proj	•	Person Contacted. Vikk <sup>®</sup> Allen - DC		
Referenced Requiraments (Section Number, Paragraph	Number, atc.):		-	
QEP 02 01 - Quality Assurance Program Se	ection 5 5.4			
Verify a copy of the DT or other document in the SGT DCC file copy of the QEP.	dicating Client ap	proval along wi	th any Client commen	ts are retained with
OBSERVATION:	Classifi	cation:	Major 🛛	Minor 🗍
			,	•
			,	
Response DUE DATE 06 Nov-08		Auditor's Signature	2	
06 Ncv-98	-1010 D	David	E. MicDonsl	l
06-Nov-08	TED BY ORGA	David	2	£
06 Nov-08	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	L
D6-Nov-08 COMPLE DBSERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	
D6-Nov-08 COMPLE DBSERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	£
D6-Nov-08 COMPLE DBSERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	
06-Nov-08 COMPLE OBSERVATION RESPONSE For Major Observations ( Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	
06 Nov-08 COMPLE OBSERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	L
06 Nov-08 COMPLE OBSERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL	E. Milonsli IDITED	NT
D6-Nov-08 COMPLE DB5ERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL NIZATION AL tified in file. ractice but is no	<u>E Milonsl</u> IDITED	
D6-Nov-08 COMPLE DBSERVATION RESPONSE For Major Observations O Additional paper is for completeness Actual controlled and approved docume	TED BY ORGA	NIZATION AL NIZATION AL tified in file. ractice but is no	E. Milonsli IDITED	



Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 1 of 16

## INTER-OFFICE CORRESPONDENCE

38241-PM-08-0044

Action Required: Yes 🛛 No 🗌

To:

David MacDonald Charlie Nichols

Date:

From:

November 21, 2008

Subject: Audit Number 38241-P-08-02

Please find attached for you review, consideration, and approval, responses to the following audit findings: AFR -04 through -06; AFR-12, AFR-16, and AFR-17.

Response to AFR-18 is not yet available. I will be in contact with you on Nov 24 to discuss submittal of this item.

Please don't hesitate to contact me at 805.545.6770 with any questions.

cc: (w/attachment) H. Bourque, B. Scott (w/o attachment) P. Helton, L. Dietrich, R. Flodman, W. Taylor, K. Strupp, K. O'Malley

File: Project File: 11.0393.f Subject File: 17.082.f Quality Records File: 18.1.2

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 2 of 16

# Audit Number 38241-P-08-02

ŕ

# AFR Number: AFR - 04

Docket Number 99901334 SGT M-09-0050 Attachment 3 PagenmetrialErsonal Folderstamytafr-04.doc

<u></u>				Form Source			
SGF	Engineering and C	Standard Procedu Construction Proje	1		IY EXECU	TION PR	OCEDURE
Form Title		•			Revision No 0E2 /		Form No. QEP 18.01-2
	AUDIT FINDI	NG REPOR	Т		Form Revis		Form Page 2 of 2
Audit Number:			AFR	Number:		Date Issu	
	38241-P-08-02			AFR - 04		0	ctober 7, 2008
	COM	IPLETED BY O	RG/	<b>NIZATION AUE</b>	DITED	s iya Tita Sa Aya Gababatan Sa Sa Musuk Status	
Corrective Action Tak	en or Proposed to Correct [	Discrepancy:			· · · · · · · · · · · · · · · · · · ·		<u></u>
	ducted of the SGT Da incorrect revisions ha			Personnel. All trai	ning that w	as identif	ied by the Audit as
Corrective Action Tak	en by (Signature and Title):	·		Corrective Action Cor	mpletion Date		
		Task Mana	ger			lov-08	
	sho-						·
Cause of Discrepancy							÷
Procedures are b	eing revised routinely,	in some cases in	ndivid	luals are confused	I when they	, receive	a revision, they are
of the opinion the	y have completed the	training or readin	ıg.				•
· .							
			_				
Preventative Action Ta	aken to Eliminate Cause of	Discrepancy:					
	been instructed to com and the individuals ma						s being conducted
	ł						
,							,
				• •			
Preventative Action	ken by (Signature and Title	):		Date:			
N.X		Task Manag	ger		14-N	ov-08	
M M	m				vinitia de la compañía	Carlos Mariner	Man
/	少了/2003年前	COMPLETE	=D 8	Y AUDITOR			
Corrective	e / Preventative Action	Evaluation			cation of Ir ective / Pre		
Acceptable		acceptable 🗌		Acceptable		ptable	Not Required
Reason:				Reason:	JHACCE		
	·		. 1				
			-				
Evaluated by:		Date:		Verified by:	· · · · · · ·		Date:
					м. М		
	· · ·	I	!				

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 4 of 16

## Audit Number 38241-P-08-02

# AFR Number: AFR - 05

Docket Number 99901334 SGT M-09-0050 Attachment 3 ເຮັ**ລຍຣ**ຄລົມອົໂກຣ໌ໂສຣ໌NAL FOLDERS\Amy\AFR-05.doc

<u> </u>		Form Source							
SGT Engineering and	Standard Procedu Construction Proje		TY EXECUTION	PROCEDURE					
Form Title			Revision No / State 0E2 / AFU	us Form No. QEP 18.01-2					
	ING REPOR	Г	Form Revision Dat 04-May-05						
Audit Number: 38241-P-08-02		AFR Number: AFR - 05	Date	Issued: October 7, 2008					
CO	MPLETED BY O	RGANIZATION AU	DITED						
COMPLETED BY ORGANIZATION AUDITED Corrective Action Taken or Proposed to Correct Discrepancy:									
A review was conducted of the areas identified in the audit. It was verified that the individuals were qualified and documentation existed to verify this. This information is retained by the Responsible Department Managers and is readily available to the Project Training Managers.									
Corrective Action Taten by (Signature and Title	e): Task Mana	Ger Corrective Action Co	mpletion Date: 14-Nov-08	В					
Cause of Discrepancy: VV				······					
It has been common practice for Depa stated the information is available to t says "the use of equivalent forms may not retain weld records, the welding e same situation	he Training Manag y be used." Anothei	er. The auditor did not case in point is weldir	complete the stand	atement in the QEP that Training Manager does					
		•							
Preventative Action Taken to Eliminate Cause	of Discrepancy:	······································							
Preventative action not required.									
Preventative Action Taken by (Signature and T	itle);	Date:							
	Task Manag		November 14,	2008					
y yay	COMPLET	D BY AUDITOR							
Corrective / Preventative Activ		Verif	ication of Implem ective / Preventa						
Acceptable	Jnacceptable 🗌		Unacceptable						
Reason:		Reason:							
• •									
Fuclusted but	Detri	Madfaathar							
Evaluated by:	Date:	Verified by:		Date:					
	ł .		·	l					

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 6 of 16

## Audit Number 38241-P-08-02

# AFR Number: AFR - 06

Docket Number 99901334 SGT M-09-0050 Attachment 3 RadommofiléRsonal FolderstamytafR-06.doc

<u></u>			T	Form Source			
SGT	Star Engineering and Con	ndard Procedu struction Proje		QUALIT	YEXECUTIO	ON PROC	EDURE
Form Title					Revision No / S 0E2 / AF	U	orm No. QEP 18.01-2
	AUDIT FINDING	REPOR			Form Revision 04-May-	05	orm Page <b>2</b> of <b>2</b>
Audit Number:	38241-P-08-02		AFR	Number: AFR - 06	D	ate Issued: 0	7-Oct-08
			RGA	NIZATION AUD	ITED		
Corrective Action Take	n or Proposed to Correct Discr	repancy:					
Audit findings is inc client training form	complete, the rest of the s.	statement rea	ads" (	equivalent forms t	from other SG	T project	s, or equivalent
Correction Antion Tal	h by (Signature and Title):		<del></del>	Company Anti- C	anlatia - D. t		
Kat		Task Manag		Corrective Action Cor	14-Nov	-08	
Cause of piscrepancy:	VY.			· · · · · · · · · · · · · · · · · · ·			
The finding reads t	hat Procedures were Do	ocumented, eq	quivale	ent forms were us	ed.		
	н. А. С.			·			
			•				
	•.						
		,					
Preventative Action Tak	en to Eliminate Cause of Disc	repancy:					
Preventative Actior	n not Required.						
<u></u>							
Preventative Action Tak	en by (Signature and Title):	Task Manag		Date:	November 1	4, 2008	
	ny/	COMPLETE	ED B'				
Corrective	/ Preventative Action Ev	<u>erne ar eine reite singene</u>		Verifi	cation of Impl ective / Preve		
Acceptable	Unacc	eptable 🗌		Acceptable	Unacceptal		Not Required
Reason:		<u></u>	F	Reason:			
•			•				
				•			
			· .				
				1		<u> </u>	
Evaluated by:		Date:		/erified by:			Date:
		1	<u> </u>			<u>.</u>	1

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 8 of 16

## Audit Number 38241-P-08-02

ł

# AFR Number: AFR - 12

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 9 of 16

	Form Source	NSGT-Diabic Canyon 09-08-09\5			
Standard Procedures Engineering and Construction Project		QUALITY EXECUTION PROCEDURE			
	· · · ·	Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2		
AUDIT FINDING REPORT		Form Revision Date 04-May-05	Form Page <b>1</b> of <b>2</b>		
Audit Number: A 38241-P-08-02	FR Number: AFR - 12	Date Issu	ued: October 7, 2008		
COMPLETED	BY AUDITOR				
Organization / Supplier: SGT / Diablo Canyon Power Plant SGR Project	Person Contacted Vikki Allen – DC0	C Supervisor			
Referenced Requirements (Section Number, Paragraph Number, etc.): QEP 08.01- Document Control – Section 3.2.1.1	- <b>I</b>				
/erify DMS captures document type, number, title, revision Status category and references (used in design and are co			ceived As categor		
· · · · · · · · · · · · · · · · · · ·					
		lajor 🖾 een attached to the	Minor 🗌		
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re	ferences have not be	een attached to the			
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re Calculations, specifications, DCPs and Work Packages to a For a <u>Major Finding</u> , you are requested to identify the action equested to investigate the cause and effect of the condition	ferences have not be assure all references to taken to correct the on in order to determ	een attached to the s are captured.	document. Audit a		
Calculations 38241-CALC-C-011 & 38241-CALC-M-005 re Calculations, specifications, DCPs and Work Packages to a for a <u>Major Finding</u> , you are requested to identify the action equested to investigate the cause and effect of the condition required. The results of this review are to be considered in	ferences have not be assure all references taken to correct the on in order to determ your reply	een attached to the s are captured.	document. Audit a		
For a <u>Major Finding</u> , you are requested to identify the action equested to investigate the cause and effect of the condition required The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action required The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action requested to investigate the cause and effect of the condition required The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action requested to investigate the cause and effect of the condition required The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action requested to The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action requested to The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action requested to The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the action for a <u>Minor Finding</u> .	ferences have not be assure all references taken to correct the on in order to determ your reply action taken to correct Auditors Signature	een attached to the s are captured.	document. Audit a		

.

.

!

(

i. I

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 10 of 16

· ····································		Onuspin OPD/OTF/OMS	FORMODIALL-FILEIAUDITS 130	85GT-Diablo Canvon 03-08-085	H-D.ALIC DARYON AFR-DC-502
sgr	Stan Engineering and Const	dard Procedure truction Project	S	TY EXECUTION PR	OCEDURE
Form Title	1	****		Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2
	AUDIT FINDING			Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number	38241-P-08-02	A	FR Number AFR – 12	Date Issu	ed: ctober 7, 2008
		ETED BY OR	GANIZATION AU	DITED	
two records. Su	identified in audit have had bsequent review of specs, ched" to DMS record. DM	calcs, and DC	Ps showed 1 calcula	ation (52.27.55.54 Re	ev2) without
Corrective Action Taki	en by (Signature and Title):	•	Corrective Action Co	mpletion Date	
	wProject Engineering Ma	nader		• 11/11	/2008
Cause of Discrepancy		indger			
This is failure	to follow procedure.				
· · ·				1	
This item will	aken to Eliminate Cause of Discre be reviewed with DCC per eks and report findings to f	sonnel and doo	cumented by 11/20/2 This will start not la	2008. DCC will self a ater than week endir	assess ng 11/28/08.
Preventative Action To William Theyfir	iken by (Signature and Title)	anager	Date 11/28/2008	Ş.	
		COMPLETED	BY AUDITOR		
Corrective	e / Preventative Action Eva	aluation		ication of Implement ective / Preventative	
Acceptable Reason	Unacce	ptable [	Acceptable []	Unacceptable 🗍	
Ev iluated by	·	Date	Vertica by		Date
	!				•

(

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 11 of 16

Audit Number 38241-P-08-02

AFR Number: AFR - 16

	<i>.</i>	C.Documents and Setting	s\CNichol	N ocal Settinos\Tem	SG		- 99901334 ) Attachment 3 o Canyon AFR-16Complete (2).dd
SGT	Star Engineering and Con	ndard Procedures	Form	Source			OCEDURE
Form Title					Revision N 0E2	o / Status / AFU	Form No. QEP 18.01-2
	AUDIT FINDING REPORT				Form Revis 04-M	ay-05	Form Page 1 of 2
Audit Number:	38241-P-08-02	AF	RNum	ber: AFR – 16		Date Issu	ed: ctober 7, 2006
		COMPLETED	BY A	UDITOR			······
Organization / Supplie SGT / Diablo Can	r: yon Power Plant SGR Pi	roject		on Contacted: an Dyke			
Referenced Requirem	ents (Section Number, Paragra	aph Number, etc.):					
09.01-7 Supplier E	n 3.8.1 states that Devia Exception Request / Dev IL) "R" entry, obtains the ERDN form.	iation Notice (SEI	RDN).	Section 3.8.2	2 states that	at the PQN	I generates a Daily
FINDING - Include Sp	ecific Requirement(s) Violated	Clas	sificatio	n: N	Najor 🗌		Minor 🛛
It was verified that	t the DIL's issued for SE	RDN's 15, 16, 17	, 18, 1	9 and 21 had	"A" entrie:	s on the D	IL form.
							:
requested to invest required. The res	ng, you are requested to stigate the cause and eff ults of this review are to ng, you are requested on	ect of the condition be considered in	n in oi your ri	der to detern oply.	nine the ex	ctent of pro	eventative action
Response DUE DATE	-			or's Signature:			
Results of Lead Au	iditor / PQM screening	NO Potential		Signature			Date

(

· · ·				i0 Attachment 3	
ChDocuments and	Settingsi	Nichols/Local Settings/Temp Form Source	orary Internet HustOlik HADIab	lo Canyon AFR-16Complete (2).doc	
Standard Proced Engineering and Construction Pro					
Form Title	l	· · · · · · · · · · · · · · · · · · ·	Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2	
	8T		Form Revision Date 04-May-05	Form Page 2 of 2	
Audit Number: 38241-P-08-02	AFR	Number: AFR - 16	Date Iss	ued: October 7, 2008	
COMPLETED BY (	ORGA	NIZATION AUE	DITED		
Corrective Action Taken or Proposed to Correct Discrepancy:		<u> </u>	<u> </u>		
The DILs associated with all Supplier Exception Reque made to being the DILs in line with the requirements of applicable.	st/Dev QEP	riation Notices (SE 15.01, <i>Identificatio</i>	ERDN) were review on and Control of D	ed and corrections eviations, as	
The two individuals whose Daily Inspection Log entries this deficient condition should not be a cause for conce and closure procedure process for SERDNs to all Qual for the 1R15 outage.	rn. In	addition, the QA	Supervisor shall em	phasize the issue	
Corrective Action Taken by (Signature and Title):		Corrective Action Co			
QA Super	visor	,	11/11/08		
Cause of Discrepancy:					
N/A					
Preventative Action Taken to Eliminate Cause of Discrepancy:	·····				
reventative Action Taken to Enminate Gause or Discrepancy.					
N/A					
-					
· · · ·			· .		
			, f		
Preventative Action Taken by (Signature and Title):	I	Date:			
N/A			N/A		
COMPLET	TED E	BY AUDITOR			
Corrective / Preventative Action Evaluation			ication of Implementer rective / Preventativ		
Acceptable 🗌 Unacceptable 🗌	}	Acceptable	Unacceptable		
Reason:		Reason:		t	
				•	
	1				
	ļ				
	l				
Evaluated by: Date:		Verified by:		Date:	
	1			1	

 $\langle \cdot \rangle$ 

Docket Number 99901334

.

Docket Number 99901334 SGT M-09-0050 Attachment 3 Page 14 of 16

Audit Number 38241-P-08-02

AFR Number: AFR - 17

	ttings\CNichols\Local Settings\Ten	<u> </u>		
Standard Procedure Engineering and Construction Proje	res		ION PR	OCEDURE
Form Title	_	Revision No / 0E2 / A		Form No. QEP 18.0
		Form Revision 04-May		Form Page 1 of 2
Audit Number: 38241-P-08-02	AFR Number: AFR - 1		Date Issue Oc	<sup>ed:</sup> ctober 7, 2006
	ED BY AUDITOR			
Organization / Supplier: SGT / Diablo Canyon Power Plant SGR Project	Person Contacted: J. Van Dyke / F			
Referenced Requirements (Section Number, Paragraph Number, etc.):	I			<u></u>
Section 4.1.1 states that the PQM develops a schedule for Section 4.3.3 states that the Audit Plans are reviewed an audit. Section 4.2.3 states that Personnel performing audits sha Qualification and Certification of Audit Personnel.	nd approved by the L	ead Auditor pr	rior to pe	erformance of 1
	•			
FINDING – Include Specific Requirement(s) Violated: C	lassification:	Major 🗌		Minor 🛛
There was no documented evidence to show that the 20				
There was no documented evidence to show that the 200 Although the Audit Plan was prepared, it was not approve There was no documented evidence that G. Rowe, who auditor.	ed by the Lead Audi	tor with a signa	ature and	d date.
Although the Audit Plan was prepared, it was not approve There was no documented evidence that G. Rowe, who	ed by the Lead Audi	tor with a signa	ature and	d date.
Although the Audit Plan was prepared, it was not approve There was no documented evidence that G. Rowe, who	ed by the Lead Audi	tor with a signa	ature and	d date.
Although the Audit Plan was prepared, it was not approve There was no documented evidence that G. Rowe, who	ed by the Lead Audi	tor with a signa	ature and	d date.
Although the Audit Plan was prepared, it was not approve There was no documented evidence that G. Rowe, who	ed by the Lead Audi	tor with a signa	ature and	d date.
Although the Audit Plan was prepared, it was not approve There was no documented evidence that G. Rowe, who	ed by the Lead Audi	tor with a signa	ature and	d date.
Although the Audit Plan was prepared, it was not approvious There was no documented evidence that G. Rowe, who auditor.	ed by the Lead Audit served as Auditor or tion taken to correct lition in order to dete in your reply.	tor with a sign Audit 38421- the identified c rmine the exte	ature and P-08-01, condition ent of pre	d date. , was certified , You are furt eventative action
Although the Audit Plan was prepared, it was not approvious there was no documented evidence that G. Rowe, who auditor. For a <u>Major Finding</u> , you are requested to identify the act requested to investigate the cause and effect of the conditional required. The results of this review are to be considered For a <u>Minor Finding</u> , you are requested only to identify the act of the conditional sectors.	ed by the Lead Audi served as Auditor or tion taken to correct lition in order to dete in your reply. te action taken to cor	tor with a sign Audit 38421- the identified c rmine the exte rrect the identif	ature and P-08-01, condition ent of pre	d date. , was certified , You are furt eventative action
Although the Audit Plan was prepared, it was not approvious There was no documented evidence that G. Rowe, who auditor.	ed by the Lead Audit served as Auditor or tion taken to correct lition in order to dete in your reply.	tor with a sign Audit 38421- the identified c rmine the exte rrect the identif	ature and P-08-01, condition ent of pre	d date. , was certified , You are furt eventative action

Docket Number 99901334

						ket Number	99901334 Attachment 3
		C:\Documents and Se	ttings\CNict	nols'Local Settings'(Temp			Canyon AFR-17Resolution
	19	Standard Procedu	L *	orm Source			
<b>34</b>	Engineerir	ng and Construction Proje		QUALI	TY EXECU	TION PR	OCEDURE
Form Title					Revision No 0E2 /		Form No. QEP 18.01
	AUDIT	INDING REPOR			Form Revis	ay-05	Form Page 2 of 2
Audit Number:	38241-P-08	9-02	AFR N	AFR - 17		Date Issu	ed: ctober 7, 2006
		COMPLETED BY O	RGAN	IZATION AU	DITED		
Corrective Action T	aken or Proposed to	Correct Discrepancy:					
involved are no with no further No Lead Audito Project Audit 38 files and the de The information available to vie	o longer associate action required to or Certification fo 8421-P-08-001. officiency report cl n from Audit 3842	Auditor therefore, based ed with this project and w o bring resolution. In Mr. Snadjer was in the The Lead Auditor's certif losed. 21-P-08-001 and 002 has ent at this time to publish	vill not r file whe fication	eturn for 1R15 on DR-028 was has since beer documented in	outage, this issued to id obtained a the QPMS	s finding is dentify oth and placed Audit data	s considered clo ner problems wit d in the certificat abase and is
		emaining until 1R15 oute	ige beg	ins, and with n	o further au	idits schee	
In summary all Corrective Action T	18 criterion for A	remaining until 1R15 outa Appendix B have been sa and Title):	ige beg itisfied f	ins, and with n	o further au lendar year	idits scheo	
In summary all Corrective Action T	18 criterion for A	remaining until 1R15 outa Appendix B have been sa and Title):	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T	18 criterion for A	remaining until 1R15 outa Appendix B have been sa and Title):	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T	18 criterion for A	remaining until 1R15 outa Appendix B have been sa and Title):	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa	18 criterion for A	remaining until 1R15 outa Appendix B have been sa and Title):	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title):	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor	ige beg itisfied f	ins, and with ne or the 2008 cal	o further au lendar year	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: e and Title):	age beg tisfied 1 C	ins, and with ne or the 2008 cal	o further au lendar year ompletion Date 11/	idits sched e: /11/08	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: e and Title):	age beg tisfied 1	ins, and with no for the 2008 cal orrective Action Co	o further au lendar year ompletion Date 11/	idits scheo	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A	18 criterion for A Faken by (Signature a ncy:	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: e and Title):	age beg tisfied 1 C	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year ompletion Date 11/	idits sched e: /11/08	
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title):	age beg tisfied 1 C	ins, and with no for the 2008 cal orrective Action Co ate: AUDITOR Veri	o further au lendar year mpletion Date 11/	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C	ins, and with no for the 2008 cal orrective Action Co ate: AUDITOR Veri Cor	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title):	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with no for the 2008 cal orrective Action Co ate: AUDITOR Veri Cor	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet
In summary all Corrective Action T Cause of Discrepa N/A Preventative Action N/A Preventative Action N/A Correc Accepta	18 criterion for A Faken by (Signature a ncy: n Taken to Eliminate n Taken by (Signatur	remaining until 1R15 outa Appendix B have been sa and Title): QA Supervisor Cause of Discrepancy: re and Title): COMPLET ve Action Evaluation	age beg tisfied 1 C N/A ED BY	ins, and with noise the 2008 calls or the 2008 c	o further au lendar year mpletion Date 11/ 11/ fication of I rective / Pro	v/A	duled to complet



Docket Number 99901334 SGT M-09-0050 Attachment 4 Page 1 of 13

38241-PM-08-0045

#### **INTER-OFFICE CORRESPONDENCE**

Action Required: Yes 🛛 No 🗌

To:

From:

David MacDonald Charlie Nichols

Date:

November 21, 2008

Subject: Audit Number 38241-P-08-02

Please find attached for you review, consideration, and approval are the preventative actions taken covering audit findings AFR -03, and AFR-07 through AFR-12.

Please don't hesitate to contact me at 805.545.6770 with any questions.

cc: (w/attachment) H. Bourque, B. Scott

(w/o attachment) P. Helton, L. Dietrich, R. Flodman, W. Taylor, K. Strupp, K. O'Malley

File: Project File: 11.0393.f Subject File: 17.082.f Quality Records File: 18.1.2

			Form Source		
SG	Standar Engineering and Constru	rd Procedures ction Projects		TY EXECUTION PR	OCEDURE
Form Title				Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2
	AUDIT FINDING R			Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number:	38241-P-08-02	AF	R Number: AFR - 03	Date Issu	ued: October 7, 2008
	COMPLET	ED BY ORG	ANIZATION AU	DITED	,
Docume	Taken or Proposed to Correct Discrepar ntation is available electronically ded and placed in file.	-	d Client has on file	also. Copy of appro	oval
Correction Action	Taken by Bignature and Title)	L	Corrective Action Co	mulation Date:	
	fillin / MAN	V		10/30	0/2008
Cause of Discrepa	Project Engineering Mana	iger	]		
	· · ·				
	Lack of attention to detail				
	Lack of attention to detail				
. *	Lack of attention to detail				
	Lack of attention to detail				
.•	Lack of attention to detail				
Preventative Actio	Lack of attention to detail	ncy:			
Docu the ca Taylo Comp	n Taken to Eliminate Cause of Discrepain mentation exists in electronic symptopy existed from prior DCC person r as Manager will be discussed to bete by 11/20/2008.	stems betwee onnet managi with DCC and	ng files. This AFR this review will be	and all others with E documented.	3111
Docu the ca Taylo Com;	n Taken to Eliminate Cause of Discrepain mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed polete by 11/20/2008.	stems betwee onnet managi with DCC and	ng files. This AFR this review will be Leran att	and all others with E documented.	3111
Docu the ca Taylo Comp See	Taken to Eliminate Cause of Discrepant mentation exists in electronic symptopy existed from prior DCC person r as Manager will be discussed to bete by 11/20/2008.	stems betwee onnet managi with DCC and	ng files. This AFR this review will be Lefric att	and all others with E documented.	3111 47 u/19/08
Docu the ca Taylo Comp See	Taken to Eliminate Cause of Discrepar mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed oblete by 11/20/2008. L. D. O. C. M. D. J.	stems betwee onnel managi with DCC and W of (d M mager	ng files. This AFR this review will be Lefren att Date <del>11/20/</del>	and all others with E documented.	3111 47 u/19/08
Docu the ca Taylo Comp See	Taken to Eliminate Cause of Discrepar mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed oblete by 11/20/2008. L. D. O. C. M. D. J.	stems betwee onnel managi with DCC and W of (d M mager	ng files. This AFR this review will be LEFAAN Att Date 11/20/ BY AUDITOR	and all others with E documented. FC = 0 $WF\frac{12008}{1/9}$	3111 AT u/19/08 9/08
Docu the ca Taylo Comp Se Preventative Action	Taken to Eliminate Cause of Discrepar mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed oblete by 11/20/2008. L. D. O. C. M. D. J.	stems betwee onnel managi with DCC and W of (d M M nager MPLETED E	ng files. This AFR this review will be LEF ctan att Date 11/20/ BY AUDITOR Verifi	and all others with E documented.	3111 47 u/19/08 9/08 ation of
Docu the ca Taylo Com; Se Preventative Action Correc Accepta	Taken to Eliminate Cause of Discrepar mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed to blete by 11/20/2008. L. D. O. C. M. Taken by Signature and The Taken by Signature and The Taken by Signature and The Manual Manual Project Engineering Mar CO twe / Preventative Action Evalua	stems betwee onnel managi with DCC and W of (a mager DMPLETED E ation	ng files. This AFR this review will be Lef can att Date <u>11/20/</u> BY AUDITOR Verifi Corri Acceptable	and all others with E documented. Achieve WITT IIII 12008 - WITT IIII	3ill 47 u/19/08 9/08 ation of Action
Docu the ca Taylo Com; Se Preventative Action Correc	Taken to Eliminate Cause of Discrepar mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed to blete by 11/20/2008. L. D. O. C. M. Taken by Signature and The Taken by Signature and The Taken by Signature and The Manual Manual Project Engineering Mar CO twe / Preventative Action Evalua	stems betwee onnel managi with DCC and W of (a mager DMPLETED E ation	ng files. This AFR this review will be Lef can att Date 11/20/ BY AUDITOR Verifi Corre	and all others with E documented. Added WITT II/I 12008 WITT II/I	3ill 47 u/19/08 9/08 ation of Action
Docu the ca Taylo Com; Se Preventative Action Correc Accepta	Taken to Eliminate Cause of Discrepar mentation exists in electronic sy opy existed from prior DCC person r as Manager will be discussed to blete by 11/20/2008. L. D. O. C. M. Taken by Signature and The Taken by Signature and The Taken by Signature and The Manual Manual Project Engineering Mar CO twe / Preventative Action Evalua	stems betwee onnel managi with DCC and W of (d M mager DMPLETED I ation able []	ng files. This AFR this review will be Lef can att Date <u>11/20/</u> BY AUDITOR Verifi Corri Acceptable	and all others with E documented. Added WITT II/I 12008 WITT II/I	3ill 47 4/19/08 9/08 ation of Action

÷,

			Form Source	2006-SGT-Diable Canyon 09-08-0	
SGI	S Engineering and Co	tandard Procedur	rés	TY EXECUTION PR	OCEDURE
Form Title				Revision No / Status 0E2 / AFU	Form No. QEP 18:01-2
	AUDIT FINDIN	IG REPORT		Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number	38241-P-08-02		AFR Number: AFR - 07	Date Issu	ed: ctober 7, 2008
	COM	PLETED BY OI	RGANIZATION AUI	DITED	
Corrective Action Taken	or Proposed to Correct Di	screpancy:			<u></u>
	ted. There was no c		ct forms. The DV che e between the forms u		
-					
					,
Corrective Action Taken	by (Stonature and Title)		Corrective Action Co	moletion Date:	
11/4	thim ,	Ayan			·/2008
Cause of Discrepancy:	Project Engineering N	lanager			
Cause of Discrepancy.					
Lac	ck of attention to deta	il			
	,				
Preventative Action Take	en to Eliminate Cause of D	iscrepancy:		<u> </u>	
•					
This serves in the					
documented. C	Completion, will be by	11/20/2008.	will be discussed in E Pris Minar Fin S a grind Pre	NOTHER REAL	ínus No
documented. C	Completion, will be by	11/20/2008.	will be discussed in E Pris minar Fri 's a good pra m attachy	NOTHER REAL	inus no 119/08
documented. C addition DCcum	completion will be by	11/20/2008. 	en attach	CHICE WAT I	·// 9/ æ®
documented. C addition DCicum Preventative Action Toke	Completion will be by Laction in h nulation and the and the officer of the officer officer of the officer off	11/20/2008.	Prisminar Fri	14/20/2008 - in	114 AO 119/05 147 1114/02
documented. C addition DCicum Preventative Action Toke	completion will be by	11/20/2008. 	Pris minas Fri s a good pra en attachy Date	CHICE WAT I	·// 9/ æ®
documented. C addition DCicum Preventative Action Toke	Completion will be by Laction in h nulation and the and the	11/20/2008. 	Date Date	11/20/2008 in 11/20/2008 in	//9/00 147 11/19/00
documented. C addition DCCUM Preventative Action Take	Completion will be by Laction in h nulation and the and the	11/20/2008. A Gerie Manager COMPLETE	Date DBY AUDITOR	$\frac{11/20/2008}{11/20/2008} = 1.2$	1/9/00 147 11/19/00
documented. C a.d. 4: +z m D C CUM Preventative Action Take P Corrective /	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Dale Dale Dale	11/20/2008 in 11/20/2008 in	1/9/00 147 11/19/00
documented. C addition DCCUM Preventative Action Fake Corrective / Acceptable [	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. A Gerie Manager COMPLETE	Date DBY AUDITOR	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action
documented. C addition DCCUM Preventative Action Fake Corrective / Acceptable [	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Date Date Date Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Cont Acceptable	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action
documented. C addition DCCUM Preventative Action Fake Corrective / Acceptable [	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Date Date Date Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Cont Acceptable	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action
documented. C addition DCCUM Preventative Action Fake Corrective / Acceptable [	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Date Date Date Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Cont Acceptable	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action
documented. C addition DCCUM Preventative Action Fake Corrective / Acceptable [	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Date Date Date Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Cont Acceptable	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action
documented. C addition DCCUM Preventative Action Fake Corrective / Acceptable [	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Date Date Date Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Cont Acceptable	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action
documented. C a.d. 4: +z m DC CUM Preventative Action Take P Corrective /	Completion will be by Lacta m; h nutation entry Kignature and Film project Engineering M Preventative Action I	11/20/2008. W - V - V - V - V - V - V - V - V - V -	Date Date Date Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Destantion Cont Acceptable	$\frac{11/20/2008}{11/20/2008} = i J$	1/9/00 147 11/9/00 ation of Action

2

Ć

Docket Number 99901334 SGT M-09-0050 Attachment 4 Page 4 of 13

· · · · · · · · · · · · · · · · · · ·		Q1USHISIOPOIQ"EVOL	SIDE MCDALL FILEVAUDITS/2005	SGT-Disblo Carryon Cy	CH-ORVEV-	Urable Canyon AFR 08 Form.d
· · · · · · · · · · · · · · · · · · ·	-		Form Source			
SGT	Sta Engineering and Cor	andard Procedure Instruction Project		TY EXECUTIO	N PRC	CEDURE
Form Title			· · · · · · · · · · · · · · · · · · ·	Revision No / Sti OE2 / AF		Form No QEP 18.01-2
				Form Revision D 04-May-0		Form Page 2 of 2
Audit Number	38241-P-08-02		AFR Number AFR - 08	) Da	ite Issue OC	d: tober 7, 2008
,	COMPI	LETED BY OR	GANIZATION AUE	DITED		
The specification required. The di	n of Proposed to Correct Disc n cover page had no cor ifferences are editorial. w cover page would be ed.	ntent change an The document	d since it is only a title is approved by the C	e page - no furt lient. If the spe	her ac cificati	tion is on were to
				-Anna -		
		K				
Corrective Action Take	n by isopature and Title	Am	Corrective Action Cor		10/28/2	2008
	Project Engineering M	lanager				
Cause of Discrepancy:	T TOTOS MIGHTESTING IN		~			
	ken to Eliminate Cause of Disc					
however, thi documented.	tion required for this fin s error in the forms and Completion will be by	l lack of attention 11/20/2008.	n to detail will be disc	ussed in Engin	eering	and
Note the howe	is Minur Fin ver it is a Document	Jood Pra	ctice to per tarked	from the	4 (T) . V E V	avij 1-ani
Freventative Agricit Tak	rea by longinature and line;	an		with illi	108	۲۳ / ۱۰۰۰ ـ
		COMPLETER	D BY AUDITOR		<u>- u</u>	
	······································			notion of Imela		
Corrective	/ Preventative Action Ev	valuation		cation of Implei active / Prevent		
Acceptable	Unacc	ceptable []	Acceptable	Unacceptabl		Not Required
Reason.			Reason			
				·		
Evaluated by		Date	Verified by			Dute

·		O'WrensiQPDIOTEION	Form Source	2008/SGT-Diablo Canyon 10-C2-	OBiDiacio Cunyon AFR-09-RV.or
SGT	Sta Engineering and Cor	Indard Procedures	QUALIT	<b>FY EXECUTION PR</b>	OCEDURE
Form Title	······································			Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2
	AUDIT FINDING			Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number:	38241-P-08-02	AF	R Number: _ AFR - 09	Date issu	ed: ictober 7, 2008
	COMP n or Proposed to Correct Disc		ANIZATION AUE	DITED	
	38241-CALC-C-119 wa coftware Installation Tes		2008 and sent to D	ocument Control. T	itle is
Corrective Action Taker	by (Signature and Title):-	1.1.2	Corrective Action Cor	npletion Date:	
Z	Project Engineering	Mathan		8/2008	
Cause of Discrepancy:	Project Engineering	ivia ragei	L		
	· ·				
	rforms and it was misse forms and it was misse further action is require fruge person with Achieved		oftware was first us Thir was by the Pe	ed. That PEM is not Seriewed p CM i Docc	e with SGT
Preventative Action Tak	on by (Sign fure and Title)	Lan TA	m	11/19/2	2008
6	Project Engineering M	lanager .	10/28/2	008	
		COMPLETED E			
	/ Preventative Action E	 • • • • • • • • • • • • • • • •	Corre	cation of Implement ective / Preventative	Action
Acceptable [ Reason.	Unaci	ceptable 🗌	Acceptable	Unacceptable 🗌	Not Required
				·	

O ILIMATIOPDIOTEX	OMSIDEMEDIALL -FILEVAUDITSIZDO	RSGT-Diablo Carryon 09-08-0	NBURV-Diablo Canyon AFR 02 Form d
Standard Procedu Engineering and Construction Proj		TY EXECUTION I	PROCEDURE
Form Tibe		Revision No / Status 0E2 / AFU	S Form No. QEP 18.01-2
AUDIT FINDING REPOR		Form Revision Date 04-May-05	2 of 2
Audit Number: 38241-P-08-02	AFR Number. AFR - 10	Date I	ssued: October 7, 2008
	RGANIZATION AU	DITED	
Corrective Action Taken or Proposed to Correct Discrepancy:			
The page count was corrected.			
QEP lists initial forms when the QEP is first written. For SGT is exempt from using the new forms, use of the new approved by Client. Client signature page with missing s	w forms is allowed and	that is what is in t	the DCP that was
The Client signed the page they did not sign.			
Corrective Action Taken by (Signature and Title)	Corrective Action Co	•	
Project Engineering Manager		10/28/2008	
Cause of Discrepancy:			
Incorrect page count is an attention to detail error.			
Use of newer Client forms is not a discrepancy.			
The Client not signing their paper and SGT not seein	o when filing is an atte	ntion to detail erro	r
	g morthing to an orion		••
Preventative Action Taken to Eliminate Cause of Discrepancy:		<del> </del>	
No action required regarding changing of the forms.			
DCC will be reminded to validate records when proce documented. This will be completed by 11/20/2008.			
This was completed on ~ to signiff sheets for the id	the ulia	loo se	attaching
cioniff shoots for the ce	view with		
Scylin Sices in the	with with	119100	
Preventative Action Taken by (Signature and Title)	Date:		il lialor
Project Engineering Manager		08- witt 11/1 5	100 11100
COMPLETE	ED BY AUDITOR		
Corrective / Preventative Action Evaluation		cation of Impleme ective / Preventation	
Acceptable 🗍 Unacceptable 🗌	Acceptable 🗍	Unacceptable [	
Reason	Reason		
•			•
	- 1		
			· · ·
Evaluated by: Date	Verified by	·····	Date
		. ·	Jaic
	· • •		ł.

• .

ſ (

•	the second s	n Source		2-38NDiablo Cariyon AFR-11-RN
Standard P Engineering and Constructio	rocedures		IY EXECUTION P	ROCEDURE
Form Title.			Revision No / Status 0E2 / AFU	Form No. QEP 18.01-2
AUDIT FINDING REF	PORT		Form Revision Date 04-May-05	Form Page 2 of 2
Audit Number: 38241-P-08-02	AFR Nun	ber: AFR - 11	Date Is	sued: October 7, 2008
COMPLETED	BY ORGANI	ATION AUC	DITED	
Corrective Action Taken or Proposed to Correct Discrepancy:				······································
RFIs were reviewed and it was verified all responses processes for approved responses and subseque DITs (design information transmittals) where ap signatures on SGT paperwork. No corrective a	uent use in SG	work, Client	responds to SGT	by letters and
Corrective Action Taken by (Signature and Title):	h Con	ective Action Cor		3/2008
Project Engineering Manage Cause of Discrepancy:	r	·····		
Preventative Action Taken to Eliminate Cause of Discrepancy:				
Sufficient approved and documented records exis Client is on file. Client requires correspondence of RFIS. No action required to update the RFI files with the Engineers of D Documentation of (e) Weithin The	which is with the	RFI files to b	e the method they	respond to SGT
	1/h	ten a	Mach d.	9
Preventative Action Taken by (Signature and Title)	Date			3
Preventative Action Taken by (Signature and Title) Project Engineering Manager	2 Date		11/14/02 28/2008	9
Preventative Action Taken by (Signature and Title) Project Engineering Manager	LETED BY A	10/:		3
Preventative Action Taken by (Signature and Title) Project Engineering Manager	LETED BY A	10/: JDITOR Ver:fic		3 Itation of
Preventative Action Tater by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable		10/: JDITOR Verific Corre	28/2008 sation of Implemen	g tation of e Action
Preventative Action Taken by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable	LETED BY A	10/: JDITOR Verific Corre	28/2008 ation of Implemen ctive / Preventativ	g tation of e Action
Preventative Action Taken by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable		10/: JDITOR Verific Corre	28/2008 ation of Implemen ctive / Preventativ	g tation of e Action
Preventative Action Tater by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable		10/: JDITOR Verific Corre	28/2008 ation of Implemen ctive / Preventativ	g tation of e Action
Preventative Action Taken by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable		10/: JDITOR Verific Corre	28/2008 ation of Implemen ctive / Preventativ	g tation of e Action
Preventative Action Taken by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable		10/: JDITOR Verific Corre	28/2008 ation of Implemen ctive / Preventativ	g tation of e Action
Preventative Action Taken by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable Unacceptable Reason:		10/: JDITOR Ventio Corre Ceptable	28/2008 ation of Implemen ctive / Preventativ	g tation of e Action
Preventative Action Taken by (Signature and Title) Project Engineering Manager COMP Corrective / Preventative Action Evaluation Acceptable Unacceptable Reason:	LETED BY A	10/: JDITOR Ventio Corre Ceptable	28/2008 ation of Implemen ctive / Preventativ	g Itation of e Action Not Regulred

Docket Number 99901334 SGT M-09-0050 Attachment 4 Page 8 of 13

		Q \Users\QPD\QTE\Q	SUDEMCDIALL FILEVAUDITS 200	8\SGT-Diablo Cany	on 09-08-08\SI	8-Diablo Canyon AFR-DC-002 do
			Form Source			· · · · · · · · · · · · · · · · · · ·
SGF	Standard Procedures Engineering and Construction Projects QUALI			ITY EXECUTION PROCEDURE		
Form Title			- <u></u>	Revision No 0E2 /		Form No. QEP 18.01-2
				Form Revisi 04-Ma	iy-05	Form Page 2 of 2
Audit Number:	38241-P-08-02		AFR Number: AFR – 12		Date Issu O	<sup>ed:</sup> ctober 7, 2008
			RGANIZATION AUI	DITED		
Two documents i two records. Sub	n or Proposed to Correct Die dentified in audit have osequent review of spe hed" to DMS record.	had DMS record cs, calcs, and D(	CPs showed 1 calcula	ation (52.27	.55.54 Re	ev2) without
Corrective Action Take	n by (Signature and Title):		Corrective Action Co	mpletion Date:	11/11/	2008
Wilding Tryl	Project Engineering	Manager			,,	
Cause of Discrepancy.	<u></u>					
This is failure t	to follow procedure.					
	to follow procedure.					
• •					•	
	• • •					
Preventative Action Tak	en to Eliminate Cause of Di	screpancy:				
This item will b every two week e Re Sel Preventative Action Tak	e reviewed with DCC p ks and report findings t Poinced by Pa Sign of As A SSESSM en by (Signature entry fille): Project Engineering / Preventative Action E	ersonnel and do to PEM and PQM insunnel n inse att ents inte Manager COMPLETEE	1. This will start not la DCC - A Tachol Stant P Date: Date: DBY AUDITOR Verifi	ater than we	tek ending $\frac{1}{\sqrt{2}}$	g 11/28/08. Anning 8/08
Evaluated by		Dater	Venfied by:		<u></u>	Date.

	· .		· .		50 Attachment 4
<u> </u>		C:\Do	cuments and Settings/wtaylog	Wy Documents PROJECTS	Diablo/Admin/Training Attendance.doc
SG	Engineering	Standard Procedures and Construction Projects		TY EXECUTION F	PROCEDURE
Form Title				Revision No / Status 0E2 / AFU	QEP 04.01-1
	TRAINING AT	TENDANCE RECOP	<b>KD</b>	Form Revision Date 06-Sep-05	<b>1</b> of <b>1</b>
Subject: <u>A</u>	udit 38241 - All Items	, General; Specific Review o		07, AFR -10, AFF	
Location: So	GT - DCPP, Trailer #	1 Conference Room/ Novem	<i>b</i> er 17, 2008 at 0	900 Date:	17-Nov-08
Instructor: Bi	ll Taylor		````	Contact	Hours: <u>1/2</u>
	📋 Lesson Plan - P	lan Number:		·	
Method of		e / Electronic Media - Title /	Number:		
Instruction		(Attach to training record)	······	· · · · · ·	
	1	e: Audit Summary Sheet; Ha			
	NAME	SIGNATURE	ORC	SANIZATION	BADGE/EMPLOYEE NO
DIANA	Z. GAZEK	DizzGzk		5GT	1556
A.SA	V AllEN	akisa V alle	~ `	SGT	2221
KATT	FAIR	Kather Fin		56 m	2142
RICHAR	D HOUGH	fichton		SGT	4298
Owen	Matte	Qiven Michte	ک .	CT	1684
KEVIN 1	1-GUIGAN	Kin miline	- 5	47	4597
Harver	the second s	Herry John	L SO	st.	4358
	USTINCHIAN	/lourd	. 5	GT	6963
Shannor	Autray	Sw 3		GT	2336
LEANN	EBOCK	Jeg Bock	Ś	at	4300
George	Come	Mon	50	ST 1	1956
	a	,			
		· .			
		· · · · · · · · · · · · · · · · · · ·			
	· · ·			OF	3
			······································		
	· · ·				

Docket Number 99901334 SGT M-09-0050 Attachment 4

				C: Documents and Sellings	averthe skip Training Attendance.do
		Chandend Deservices	Form Source		
56	Engineering	Standard Procedures and Construction Projects	QUA	LITY EXECUTION	PROCEDURE
Form Title				Revision No / Stat	
	TRAINING AT	TENDANCE RECO	RD	0E2 / AFU Form Revision Date	QEP 04.01-1 te Form Page
				06-Sep-05	1 of 1
					EVAT IN/17/08
Subject: <u>A</u>	udit 38241 - All Items	, General, Specific Review	of AFR-03, AF	R -07 AFR -10, AF	-R -12 \$ <u>}</u>
		1 Conference Room/ Nover			17-Nov-08
Instructor: B	ill Taylor			Contac	t Hours: <u>1/2</u>
	🗌 Lesson Plan - F	Plan Number:			
Method of	·	e / Electronic Media - Title /	Number:		
Instruction	Training Outline	e (Attach to training record)			
	Other - Describ	e: Audit Summary Sheet; H	andout of Deta	iled Audit Sheets, D	Discussion at Meeting
	NAME	SIGNATURE	C	RGANIZATION	BADGE/EMPLOYEE NO
WILLIAM ,	A. FOXIV	Chlap	elV	SGT	1921
$D \rightarrow$	inbar	and lunk		SGT	23110
loshva	1 1	Infra to	Ta	SGT	4297
Houig	A Privet		Cot		1443
LAILLONG.	2		J.	561	1494
	ON KOLUNS	An O.A M	1+	· ·	4327
·	BURKHART	alpric. Hurles	ton	SGT	
KETTH HE	RNANDCZ	que		597	1425
Wilin	in TAylor	Unlin TA	,hu	SGT	1236
	, .				
			,		
-					
	<u> </u>				5
		· · · · · · · · · · · · · · · · · · ·			
		· · · · · · · · · · · · · · · · · · ·			

Docket Number 99901334 SGT M-09-0050 Attachment 4 Page 11 of 13

				I Settings Temporary Internet F	ies/OLKEA/Training Altendence.doc
SG	Engineering	Standard Procedures and Construction Projects	orm Source QUALI	TY EXECUTION PI	ROCEDURE
Form Title			<u> </u>	Revision No / Status 0E2 / AFU	Form No. QEP 04.01-1
	TRAINING AT	TENDANCE RECOR	D	Form Revision Date 06-Sep-05	Form Page 1 of 1
· · ·				KF12-04 W	HT 4/17/00
Subject: A	udit 38241 - All Items	; General; Specific Review of	AFR- 03, AFR -	071AFR -10, AFR	-12 & AFR-11
Location: S	GT - DCPP, Trailer #	1 Conference Room/ Novemb	er 17, 2008 at 0	700 Date: 1	
Instructor: <u>B</u>	Sill Taylor			Contact H	lours: <u>1/2</u>
	Lesson Plan - F	Plan Number:			<u></u>
Method of	Audiovisual Tap	pe / Electronic Media - Title / N	lumber:		
Instruction	Training Outline	e (Attach to training record)			,
	Other - Describ	e: Audit Summary Sheet; Har	dout of Detailed	Audit Sheets, Disc	cussion at Meeting
	NAME	SIGNATURE	OR	GANIZATION E	ADGE/EMPLOYEE NO
JosHu.	A MOFFERT	AMART		SET	2203
		170			
				· · · ·	
	• •				······
					· · · · · · · · · · · · · · · · · · ·
	·····				
·		······································			
					-5-
	·····			0+	
	<u> </u>				
		· · · · · · · · · · · · · · · · · · ·			·····
	<u> </u>				

(

!` ...

Docket Number 99901334 SGT M-09-0050 Attachment 4 Page 12 of 13

			nis and SettingstkpateliLoc	al Settings\Temporary Inter	net FilestOLK541Training Attendance.d
sg	Engineering	Standard Procedures and Construction Projects		TY EXECUTION	PROCEDURE
Form Title				Revision No / Statu 0E2 / AFU	
	TRAINING AT	TENDANCE RECOF	RD	Form Revision Dat 06-Sep-05	
Subject: <u>A</u> L	udit 38241 - All Items	, General; Specific Review o	AFR- 03, AFR	-07, AFR -10, AF	Cust T
•		Conference Room/ Novem		point with All	-/c-) 17-Nov-08
Instructor: Bil					t Hours: 1/2
· · · · · · · · · · · · · · · · · · ·	Lesson Plan - P	lan Number:		,	
Method of	 Audiovisual Tap	e / Electronic Media - Title /	Number:		
Instruction	· · · · · · · · · · · · · · · · · · ·	(Attach to training record)	······		•
		e: Audit Summary Sheet; Ha	ndout of Detaile	d Audit Sheets, E	Discussion at Meeting
	NAME	SIGNATURE	OR	GANIZATION	BADGE/EMPLOYEE N
KIRAN	1 PATEL	Ralati	).   s	SGT	5877
<u> </u>					
		· · · · · · · · · · · · · · · · · · ·			
		· · · · · · · · · · · · · · · · · · ·			
				<u> </u>	`
		· · · ·			
	· · ·				
,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	 		······		· · · · · · · · · · · · · · · · · · ·
	· · ·			·	
•••					
				· · · ·	
		······			
				·	
				<b>/</b>	
			4	0+	3
	· · · · · · · · · · · · · · · · · · ·			<b>.</b>	
		andream and a second			
		· · · · · · · · · · · · · · · · · · ·			
			. *	·	

Docket Number 99901334 SGT M-09-0050 Attachment 4 Page 13 of 13

	· · · · · · · · · · · · · · · · · · ·	and the second	ents and Settings/wiaylo	NDesktop/Training Attendance.do
Engineering	Standard Procedures and Construction Projects		ECUTION PR	OCEDURE
				Form No. QEP 04.01-1
TRAINING AT	TENDANCE RECOR	RD Form	Revision Date	Form Page
			KF12 - 64 1	1 of 1
udit 38241 - All Items	, General; Specific Review o	f AFR-03. AFR -07/1Á	FR-10. AFR -	12 & AP 2 / 1
GT - DCPP, Trailer #	1 Conference Room/ Novem	ber 17, 2008 at 0700	Date: 17	
Il Taylor			Contact H	ours: <u>1/2</u>
Lesson Plan - P	lan Number:			
Audiovisual Tap	e / Electronic Media - Title /	Number;		
Training Outline	(Attach to training record)			
🛛 Other - Describe	e: Audit Summary Sheet; Ha	ndout of Detailed Audi	t Sheets, Disc	ussion at Meeting
NAME	SIGNATURE			ADGE/EMPLOYEE N
(HU)exts	Block Matthe	US BOP St	EN1	
	()			
				· · · · · · · · · · · · · · · · · · ·
,				
		· · · · · · · · · · · · · · · · · · ·		· · · ·
	 			······································
			,	
			· · · · ·	- <u> </u>
		5	14	2
		1		
	TRAINING AT udit 38241 - All Items GT - DCPP, Trailer # II Taylor Lesson Plan - P Audiovisual Tap Training Outline Other - Describe NAME	Engineering and Construction Projects TRAINING ATTENDANCE RECOF Udit 38241 - All Items, General; Specific Review o GT - DCPP, Trailer #1 Conference Room/ Novem II Taylor U Lesson Plan - Plan Number: Audiovisual Tape / Electronic Media - Title / Training Outline (Attach to training record) Other - Describe: Audit Summary Sheet; Ha NAME SIGNATURE	Standard Procedures       Form Source         Engineering and Construction Projects       QUALITY EX         TRAINING ATTENDANCE RECORD       Revis         Judit 38241 - All Items, General; Specific Review of AFR- 03, AFR -07 /A       0000         Judit 38241 - All Items, General; Specific Review of AFR- 03, AFR -07 /A       0000         GT - DCPP, Trailer #1 Conference Room/ November 17, 2008 at 0700       0000         II Taylor       Items / Electronic Media - Title / Number;         Audiovisual Tape / Electronic Media - Title / Number;       Training Outline (Attach to training record)         Other - Describe: Audit Summary Sheet; Handout of Detailed Audit       NAME	Standard Procedures Engineering and Construction Projects       QUALITY EXECUTION PR         TRAINING ATTENDANCE RECORD       Revision No / Status 0E2 / AFU         Form Revision Date 06-Sep-05       No / Status 0E2 / AFU         Judit 38241 - All Items, General; Specific Review of AFR- 03, AFR -07, AFR -10, AFR - 0000       No / Status 0E2 / AFU         ST - DCPP, Trailer #1 Conference Room/ November 17, 2008 at 0700       Date: 17         II Taylor       Contact He         Lesson Plan - Plan Number:       Contact He         Audiovisual Tape / Electronic Media - Title / Number;       Contact He         Other - Describe: Audit Summary Sheet; Handout of Detailed Audit Sheets, Disc       NAME         SIGNATURE       ORGANIZATION

1

.





Docket Number 99901334 SGT M-09-0050 Attachment 5 Page 1 of 5

**INTER-OFFICE CORRESPONDENCE** 

38241-PM-08-0046

Action Required: Yes 🛛 No 🗌

To: David MacDonald

From: Charlie Nichols

Date: December 2, 2008

Subject: Audit Number 38241-P-08-02

Please find attached for you review, consideration, and approval, response to audit finding AFR - 18.

Also attached please find a revised response to AFR-05.

Please don't hesitate to contact me at 805.545.6770 with any questions.

cc: (w/attachment) H. Bourque, B. Scott (w/o attachment) P. Helton, L. Dietrich, R. Flodman, W. Taylor, K. Strupp, K. O'Malley

File: Project File: 11.0393.f Subject File: 17.082.f Quality Records File: 18.1.2

> 7207 IBM Drive, CLT-3A, Charlotte, NC 28262 Page 1 of 1

•			÷		SGT M Page 2	
SGI	Sta Engineering and Con	Indard Procedure Instruction Project	Form Source			Io Canyon AFA-18-Resolution.do
Form Title			I	Revision No 0E2 /	AFU	Form No. QEP 18.01-2
Audit Number:			AFR Number;	Form Revisi 04-Ma		Form Page 1 of 2
	38241-P-08-02	·	AFR - 1	8		ctober 7, 2008
		COMPLETE	D BY AUDITOR			
Organization / Sup Document Con			Person Contacted Vikki Allen	:	•	
Referenced Requir	ements (Section Number, Paragra	aph Number, etc.):				<u></u>
		·				· · · · · · · · · · · · · · · · · · ·
	Specific Requirement(s) Violated		issification:	Major 🛛		Minor 🗌
After reviews of Purchase Orde weeks but durin This PO was iss the vendor. Th	Specific Requirement(s) Violated if the files in DCC and an in- rs and subsequent change ing Unit 2 SGR outage only sued to Energy & Process e extent of this condition is all scale review by Audit per	terview with Ms. s have not alwa received a few. Corporation and indeterminate a	Allen (DCC Super ys been provided to It was verified that I the DCC Supervis	visor), unpric DCC. She 38241-157-f or indicated s	has receiv PO was ni she had n	of executed ved more in recent ot in the DCC file, ever ever heard of
After reviews of Purchase Orde weeks but durin This PO was iss the vendor. Th	i the files in DCC and an in rs and subsequent change ng Unit 2 SGR outage only sued to Energy & Process e extent of this condition is	terview with Ms. s have not alwa received a few. Corporation and indeterminate a	Allen (DCC Super ys been provided to It was verified that I the DCC Supervis	visor), unpric DCC. She 38241-157-f or indicated s	has receiv PO was ni she had n	of executed ved more in recent ot in the DCC file, ever ever heard of
After reviews of Purchase Orde weeks but durin This PO was iss the vendor. The not warrant a fu	the files in DCC and an in rs and subsequent change ing Unit 2 SGR outage only sued to Energy & Process e extent of this condition is ill scale review by Audit per	terview with Ms. s have not alwa received a few. Corporation and indeterminate a rsonnel.	Allen (DCC Super ys been provided to It was verified that the DCC Supervis to this time and the	visor), unpric b DCC. She 38241-157-i or indicated s nature and the	has receiv 20 was no she had n ne constr	of executed ved more in recent ot in the DCC file, ever ever heard of aint of the audit did
After reviews of Purchase Order weeks but durin This PO was iss the vendor. The not warrant a fu For a <u>Major Fin</u> requested to inv required. The r	i the files in DCC and an in rs and subsequent change ng Unit 2 SGR outage only sued to Energy & Process e extent of this condition is	terview with Ms. s have not alwa received a few. Corporation and indeterminate a rsonnel. identify the actionation ect of the conditionation the considered in	Allen (DCC Super ys been provided to It was verified that the DCC Supervis to this time and the on taken to correct ion in order to date n your reply.	visor), unpric o DCC. She 38241-157-i or indicated s nature and the nature and the the identified rmine the ext	has received was not she had not construct the construct of pre-	of executed ved more in recent ot in the DCC file, ever ever heard of aint of the audit did . You are further eventative action

•				SGT N Page	t Number 99901334 1-09-0050 Attachment 5 3 of 5 Xo Canyon AFR-18-Resolution.doc
Ser	St Engin <del>eer</del> ing and Co	andard Procedures nstruction Projects	Form Source	TY EXECUTION PR	
Form Tille		G REPORT	h	Revision No / Status 0E2 / AFU Form Revision Date	Form No. QEP 18.01-2 Form Page
Audit Number:		AF	R Number:	04-May-05 Date Issu	2 of 2
•	38241-P-08-02		AFR - 18	and the second	ctober 7, 2008
Corrective Action Take	COMF an or Proposed to Correct Dis	Crepancy:	ANIZATION AUI		
purchase orders t controls systems. The audit has bee	document control depart hat are not included in o of completed and those of all purchase orders,	document control w orders not already	ill be provided and included in docum	entered into the ap	propriate document
control by 12/19/0	8. B. (Signature and Title);		Corrective Action Co		
Cause of Discrepancy	OKA Bus	Monages.		12/19/08	
	d / or compliance with j	procedures by proje	et staff.	•	
		•			
Current project st	aken to Eliminate Cause of D aff has been trained on ced copies of purchase	the requirements fo			
Preventative Action To	ken by (Signature and Title):	1	Date:		
Preventative Action Tr		the second se		108	
	ken by (Signature and Title):	COMPLETED	12/2/ BY AUDITOR	108	
Kayl		COMPLETED	I2 21 BY AUDITOR Veri	fication of Implement	
Corrective	) K HUS. e / Preventative Action	COMPLETED	I2 21 BY AUDITOR Veri		e Action
Kayl	) K HUS. e / Preventative Action	COMPLETED Evaluation	レス (ス) BY AUDITOR Veri Cor	fication of Implement rective / Preventative	e Action
Corrective Acceptable	) K HUS. e / Preventative Action	COMPLETED Evaluation	IZZZ BY AUDITOR Veri Con Acceptable	fication of Implement rective / Preventative	e Action
Corrective Acceptable	) K HUS. e / Preventative Action	COMPLETED Evaluation	IZZZ BY AUDITOR Veri Con Acceptable	fication of Implement rective / Preventative	e Action
Corrective Acceptable	) K HUS. e / Preventative Action	COMPLETED Evaluation	IZZZ BY AUDITOR Veri Con Acceptable	fication of Implement rective / Preventative	e Action
Corrective Acceptable	) K HUS. e / Preventative Action	COMPLETED Evaluation	IZZZ BY AUDITOR Veri Con Acceptable	fication of Implement rective / Preventative	e Action
Corrective Acceptable Reason:	) K HUS. e / Preventative Action	COMPLETED Evaluation cceptable	IZZZ BY AUDITOR Veri Con Acceptable	fication of Implement rective / Preventative	e Action
	) K HUS. e / Preventative Action	COMPLETED Evaluation	IZZZ BY AUDITOR Veri Con Acceptable	fication of Implement rective / Preventative	e Action

	• · • · · · · ·		Page 4 of 5
	Form Source	monigomeny My Documen	tsiDiablo Canyon AFR-05_Completed.
Standard Procedure Engineering and Construction Project	-		PROCEDURE
Form Title	<b></b>	Revision No / Sta 0E2 / AFU	
AUDIT FINDING REPORT		Form Revision Da 04-May-05	5 1 of 2
Audit Number: 4	FR Number: AFR 05		e Issued: October 7, 2008
	BY AUDITOR		
Organization / Supplier: SGT / Diablo Canyon Power Plant SGR Project	Person Contacted: Scott Daley		
Referenced Requirements (Section Number, Paragraph Number, etc.):		· · · · · · · · · · · · · · · · · · ·	
documented and provided to the PTM.'		м.	
		·.	
FINDING - Include Specific Requirement(s) Violated: Cla	ssification:	Najor 🛛	Minor 🗌
The SGT Training Matrix – Diablo Canyon Power Plant ide QEP training for each matrix group. The DCPP SGRP – Re training required by each matrix group. In each case, training It was verified, through printouts of training performed for S Documented Reading forms for SGT QC Inspectors, that r SGT documents showing required training.	equired Training list ng on PG&E proced GT Engineering per	shows qualificat ures is not addr sonnel and Proj	lion and document essed. ject Specific
For a <u>Major Finding</u> , you are requested to identify the action requested to investigate the cause and effect of the condition	on in order to detern your reply.	nine the extent o	of preventative action
required. The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the	Auditor's Signature:		
required. The results of this review are to be considered in			
required. The results of this review are to be considered in For a <u>Minor Finding</u> , you are requested only to identify the Response DUE DATE:	Signature		Date 10/07/08

<b>*</b> -						SGT M	Number 99901	
				C.Documents and SettingsV	montoomer/My Doc	Page 5		ompleted.doc
	1			Form Source				
SI	Engi		ndard Procedure struction Project		TY EXECUT	ION PRO	OCEDURE	
Form Title					Revision No / 0E2 / /		Form No. QEP 18.	.01-2
					Form Revisio 04-Ma	y-05	Form Page 2 of 2	2
Audit Numb		-P-08-02	/ <sup>#</sup>	FR Number: AFR - 05		Date Issue	ed: ctober 7, 200	)8
	Action Taken or Propo			GANIZATION AU	DITED			
been ag assigned notice or process	reed upon to clo and dictated b n the status of th	ose out the find by PG&E and is neir training an ad and no disc	ling based on t s controlled by id any need for repancies have	Corrective Action he following: The f the Plant's databa additional training been noted. It wo	iraining in q se. Each in I or change:	uestion dividual s to proc	has been receives a c cedures. Th	daily is
Correttive	Action Taken by (Sign	isture and Title).		Corrective Action Co	maletion Date:			
N	TT Cong	Toi .	ma.	12-2				
Cause D	iśćrepanow	Mainey .	Manager_	16:6	00			
The Cau	ise of the discre	pancy was mo	pre of a misund	erstanding of how	the informa	ation was	s being con	trolled.
						•		
		· .				·		
Breugeteti	o Antion Tokon to Fil	nineto Courso of Filo						
A review	e Action Taken to Elir of the procedu es that are impo	re will be cond	lucted and chai	nges will be made	to clarify ar	nd descr	ribe any	
A review	of the procedu	re will be cond	lucted and chai	nges will be made	to clarify ar	nd descr	ribe any	
A review	of the procedu	re will be cond	lucted and chai	nges will be made	to clarify ar	nd descr	ribe any	
A review processe	r of the procedu es that are impo	re will be cond sed by our clie	lucted and chai		to clarify ar	nd descr	ribe any	
A review processe	of the procedu	re will be cond sed by our clie	lucted and chai	Date:	to clarify ar $2 - 0 $	nd descr	ribe any	
A review processe	r of the procedu es that are impo	re will be cond sed by our clie	lucted and chai	Date:		nd descr	ribe any	
A review processo Preventativ	e Action Taken by (Si	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- D BY AUDITOR Ver	2 - 0 S	nplement	tation of	
A review processo Preventativ	e Action Taken by (Si Corrective / Preve	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- D BY AUDITOR Ver	2 - 0 &	nplement	tation of	
A review processo Preventativ	e Action Taken by (Si	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- D BY AUDITOR Ver Col	2 - 0 S	nplement	tation of	lired []
A review processo Preventativ	e Action Taken by (Si Corrective / Preve	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- DBY AUDITOR Ver Cor Acceptable	2 - 0 &	nplement	tation of	lired []
A review processo Preventativ	e Action Taken by (Si Corrective / Preve	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- DBY AUDITOR Ver Cor Acceptable	2 - 0 &	nplement	tation of	lired []
A review processo Preventativ	e Action Taken by (Si Corrective / Preve	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- DBY AUDITOR Ver Cor Acceptable	2 - 0 &	nplement	tation of	lired []
A review processo Preventativ	e Action Taken by (Si Corrective / Preve	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- DBY AUDITOR Ver Cor Acceptable	2 - 0 &	nplement	tation of	lired []
A review processo Preventativ Very C Reason:	e Action Taken by (Si corrective / Preve	ignature and Title):	COMPLETEI	Date: /2 D BY AUDITOR Ver Col Acceptable Reason:	2 - 0 &	nplement	tation of Action Not Requ	lired []
A review processo Preventativ	e Action Taken by (Si corrective / Preve	ignature and Title):	lucted and char ents. COMPLETER	Date: /2- DBY AUDITOR Ver Cor Acceptable	2 - 0 &	nplement	tation of	
A review processo Preventativ Very C Reason:	e Action Taken by (Si corrective / Preve	ignature and Title):	COMPLETEI	Date: /2 D BY AUDITOR Ver Col Acceptable Reason:	2 - 0 &	nplement	tation of Action Not Requ	lired []
A review processo Preventativ Very C Reason:	e Action Taken by (Si corrective / Preve	ignature and Title):	COMPLETEI	Date: /2 D BY AUDITOR Ver Col Acceptable Reason:	2 - 0 &	nplement	tation of Action Not Requ	lired []