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SUBJECT: Responds to NRC ltr re violation noted in insp rept
50-263/93-13. Corrective actions: Initiated nonconformance
rept NCR 92-072.

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August 13, 1993

10 CFR Part 2
Section 2.201


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MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Reply to a Notice of Violation Contained in NRC Inspection
Report No. 50-263/93013 Concerning Processing of Nonconforming Materials

Pursuant to the provisions of 10 CFR Part 2, Section 2.201, our reply to the notice of violation contained in your letter of July 15, 1993 is provided as Attachment A. Four specific examples were identified in the violation, and each example is addressed individually in our response.

This letter contains no new commitments, nor does it modify any prior commitments. Please contact Terry Coss, Sr Licensing Engineer, at (612) 294-1449 if you have any questions or wish further information concerning this matter.


D D Antony
Vice President
Nuclear Generation

c: Regional Administrator, Region III, NRC
Senior Resident Inspector, Monticello Site, NRC
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Attachment A: Reply to Notice of Violation

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PDR ADOCK 05000263
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JCO

REPLY TO NOTICE OF VIOLATION

Violation (Severity Level IV (Supplement I))

Summary

Our response for each of the examples cited in the Notice of Violation concerning processing of nonconforming materials is provided below. The dominant factor for this violation (as specifically identified for the examples below) was that documentation errors were allowed to exist subsequent to release of the material for use. The material was considered as acceptable for its intended application based on the documentation available. The operability of equipment utilizing the material was never in question as a result of the documentation errors which existed.

Example a.

"10 CFR 50, Appendix B, Criteria XVII, required, in part, that sufficient records shall be maintained to furnish evidence of activities affecting quality. The records shall include at least the following:... tests... and material analysis. Inspection and test records shall, as a minimum, identify ... the results, the acceptability, and the action taken in connection with any deficiencies noted.

Contrary to the above, the licensee did not maintain records of the acceptability of tests and material analysis of roll pins evaluated per M-CGE-108 on March 21, 1991, an activity affecting quality."

Reason for the Violation

The cause of Example (a) of the Violation was cognitive personnel error. Commercial Grade Evaluation M-CGE-108 had not been properly maintained as a controlled record by being included in the Records Management System. As a result, when it was discovered that the cover sheet was missing from the copy of M-CGE-108 which had been stored with the purchase order package, the status of the document (i.e., approved or unapproved) and the attached Supplemental Engineering Evaluation could not be confirmed.

Corrective Action Taken and Results Achieved

1. On September 30, 1992, Nonconformance Report NCR 92-072 was initiated to identify that an approved copy of M-CGE-108 could not be found. The disposition for NCR 92-072 resulted in the preparation of Material Requirements Evaluation (MRE)-068, which

documents the acceptability of the roll pins. MRE-068 has been entered into the site record management system and will be maintained as a controlled record.

2. A previously planned audit, scheduled for June of 1993, of the procurement process was expanded in scope and number of auditors assigned to include the areas of Technical and Quality Requirements, Requisition Processing, Receipt Inspection, Material Control, Use of Approved Suppliers, Document Control/Records, and Training and Qualification. In addition, a specific review of other Commercial Grade procurements was performed to determine if there were other CGEs that had not been entered into the site records management system. The audit, which was conducted by the Nuclear Quality Department, included a sample of 45 commercial grade procurement packages. In each case, the packages reviewed contained the necessary documentation in the form of a CGE, MRE, or an approved Engineering Evaluation, or the parts were in the Quality Assurance Hold area awaiting completion of one of the above mentioned evaluations. No problems were identified, and the auditors concluded that the procurement program was effective.
3. In parallel with the above independent audit, the Materials Engineering Group reviewed all commercial grade procurement from May 1, 1989 to the present. 155 commercial grade procurement packages were reviewed. In each case, packages reviewed contained the necessary documentation in the form of a CGE, MRE or an approved Engineering Evaluation or the parts were in the Quality Assurance Hold area pending completion of one of the above mentioned evaluations. No problems were identified.
4. Personnel responsible for the creation and revision of the MRE/CGE/Engineering Evaluations have been instructed concerning their responsibilities with respect to records management and control of these documents.

Corrective Action to be Taken to Avoid Further Violation

No additional corrective actions are planned at this time. The actions described above are considered sufficient to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example b.

"10 CFR 50, Appendix B, Criteria XVI, required, in part, that

measures shall be established to assure that conditions adverse to quality, such as ... nonconformances are promptly identified and corrected.

Contrary to the above, the fact that the approval of M-CGE-108 for an evaluation conducted on March 21, 1991, was missing, a condition adverse to quality, was not identified until September 30, 1992, and was not corrected until June 25, 1993."

Reason for the Violation

The reason for Example (b) of the Violation consisted of several contributing causes. One contributing cause is the same as the cause of Example (a) (cognitive personnel error - failure to include M-CGE-108 in the site records management system). Another contributing cause for this example was deficiencies in the Receipt Inspection Discrepancy Report (RIDR) process, which allowed the material to be released before M-CGE-108 was signed and furthermore allowed the lack of a signed cover sheet to remain uncorrected for an excessive period of time. A third contributing cause was that the RIDR process was replaced by the Nonconformance Report (NCR) process during this time period, further complicating the handling of this issue due to the process transition taking place.

Under the RIDR process which was in effect at the time the roll pins were initially received, the pins were considered technically acceptable once the Supplemental Engineering Evaluation (which was prepared as an attachment to M-CGE-108) was completed and it was then permissible to release the material to stock. As required, the RIDR remained open pending receipt of a reviewed and approved copy of M-CGE-108 for the file, however, the process was deficient in that it did not include an effective tracking mechanism to ensure this action was completed in a timely manner.

The Nonconformance Report (NCR) process that is currently in place became effective in July of 1992. This new process replaced the RIDR process, and at that time the Quality Control Receipt Inspector began closing out any remaining open RIDRs by initiating replacement NCRs based on the new process requirements. The RIDR for the roll pins was still open because a signed copy of M-CGE-108 had never been entered in the site records management system. NCR 92-072 was written on September 30, 1992 to supersede the open RIDR and documented the fact that a signed M-CGE-108 had not been issued.

The roll pins had been previously released for use under the old RIDR process based on the Supplemental Engineering Evaluation, which concluded the material was acceptable for use, thus the person writing

the NCR was not concerned over the whereabouts of the material. The lack of a signed copy of the cover sheet of M-CGE-108 was considered an administrative oversight and it was believed that resolution of the issue could be accomplished on a routine basis. Because of the outage workload, NCR 92-072 had two extensions written. The first extension was written for the actions to be completed by April 30, 1993 while the second extension was written for the actions to be completed by July 1, 1993.

Corrective Action Taken and Results Achieved

The corrective actions described for Violation Example (a) apply to this example as well.

In addition, as discussed above, the RIDR process is no longer used to identify problems at receipt inspection. The current NCR process does not allow for the procurement package to remain open indefinitely without specific disposition and tracking, nor will it permit material to be released for use without proper authorization. When an NCR is written, an initial response is required within a set amount of time and remaining actions are then tracked until closure. When the required actions are completed, the actions are verified by the Nuclear Quality Department and the NCR is closed.

Corrective Action To Be Taken To Avoid Further Violation

No additional corrective actions are planned at this time. The actions described above are considered sufficient to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example c.

"10 CFR 50, Appendix B, Criteria XV, required, in part, that measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation.

Contrary to the above, on September 30, 1992, the licensee discovered that there was no approval of M-CGE-108 to verify that 4KV breaker roll pins conformed to requirements. However, the parts were not segregated to prevent inadvertent installation. Some of the parts had already been installed and some additional parts were installed in January of 1993. Again on March 3, 1993, licensee personnel discovered that the parts were not segregated as expected. No action was taken to determine if the parts had

been installed until June 4, 1993, and no action was taken to segregate the remaining parts until June 25, 1993."

Reason for the Violation

The cause of Example (c) of the Violation was a deficiency in the RIDR process, which allowed the material to be released even though a completed copy of M-CGE-108 was not available in the site record management system. However, it must be recognized that under the requirements of the old RIDR process the roll pins had been properly determined acceptable prior to their release. Accordingly, there was no need to segregate the roll pins or otherwise restrict their use prior to resolution of NCR 92-072. The NCR was not classified as being a significant condition adverse to quality and the personnel involved in investigation and closeout of the NCR concluded this work could be completed on a routine basis.

Corrective Action Taken and Results Achieved

1. On June 25, 1993, a sample of the roll pins was brought to the laboratory that had done the original hardness testing. A second sample from the same lot was taken to another laboratory for an independent analysis. All of the testing done at the original test laboratory resulted in artificially low hardness values that were subsequently attributed to problems with the testing methodology used. The samples brought to the independent laboratory were found to have a hardness test pass rate sufficient to accept the entire lot. In addition to the hardness test, a Double Shear Test was performed which confirmed that the independent lab's hardness tests were an accurate indication of the material properties.
2. NCR 93-216, which had been written as a follow-on to NCR 92-072 to document that some of the roll pins had been installed, was upgraded to "significant" by site management. The remaining roll pins from the lot in question were placed in the Quality Assurance Hold Area pending final resolution of this issue. The actions required for closure were completed, the NCR was reviewed and approved by the Operations Committee, the NCR was closed, and the roll pins were released from the Quality Assurance Hold Area.

Corrective Action To Be Taken To Avoid Further Violation

No additional corrective actions are planned at this time. The actions described above are considered sufficient to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.

Example d.

"10 CFR 50, Appendix B, Criteria XVI, required, in part, that measures shall be established to assure that conditions adverse to quality, such as ... nonconformances are promptly identified and corrected. Monticello Administrative Work Instruction 4AWI-10.01.01, "Nonconformances" was one of the procedures developed to meet that requirement. Section 4.1.4 of 4AWI-10.01.01 required that problems that represent a personnel safety or equipment operability concern, violate any state, federal or NRC commitment, are contrary to the Updated Safety Analysis Report or Technical Specifications, or may cause further damage or a future reportable event shall be verbally reported to the Shift Supervisor/Shift Manager immediately.

Contrary to the above, parts for which an approved commercial grade evaluation did not exist were discovered to be installed in safety related breakers on June 4, 1993, a condition adverse to quality that called into question the operability of the breakers. The Shift Supervisor or Shift Manager was not informed until June 25, 1993."

Reason for the Violation

The cause of Example (d) of the Violation was deficiencies in the Receipt Inspection Discrepancy Report (RIDR) process, which allowed the material to be released before M-CGE-108 was signed and furthermore allowed the lack of a signed cover sheet to remain uncorrected for an excessive period of time. Further details regarding the deficiencies of the RIDR process are described in Example (b) above. The original NCR 92-072 and the follow-up NCR 93-216 were not identified as being having operability concerns as the RIDR process had previously addressed operability concerns via the Supplemental Engineering Evaluation. The NCRs were processed to resolve the documentation concerns called out in the original RIDR.

Corrective Action Taken and Results Achieved

1. As an enhancement, an administrative change was made to the NCR process to obtain an engineering superintendent's co-signature on all NCRs for installed items to ensure that operability had been considered and proper notifications made.

2. As an enhancement, the Site Nuclear Quality Group has screened all outstanding NCRs for unresolved operability concerns with site engineering support. No operability concerns were identified.

Corrective Action To Be Taken To Avoid Further Violation

No additional corrective actions are planned at this time. The actions described above are considered sufficient to avoid further violations.

Date When Full Compliance Will Be Achieved

Full compliance has been achieved.