



To: Kim White
cc: Cynthia Padilla
Michele Gutman
Tom Rodack

Date: July 22, 2013

From: Regulatory Compliance
Tel: (412) 374-4643
Fax: (724) 720-0754

LTR-RC-13-36

Subject: **Response to Notice of Violation 99901426/2013-201**

Attached please find the response to the subject violation.

James A. Gresham, Manager,
Regulatory Compliance

Attachment

Notice of Violation 99901426/2013-201

- A. Title 10 of the Code of Federal Regulations (10 CFR) Part 21, Section 21.21(a)(1), "Notification of failure to comply or existence of a defect and its evaluation," states, in part, "Each individual, corporation, partnership, dedicating entity, or other entity subject to the regulations in this part shall adopt appropriate procedures to evaluate deviations and failures to comply to identify defects and failures to comply associated with substantial safety hazards as soon as practicable, and, except as provided in paragraph (a)(2) of this section, in all cases within 60 days of discovery, in order to identify a reportable defect or failure to comply that could create a substantial safety hazard, were it to remain uncorrected."

Contrary to the above, as of May 8, 2013, Western Zirconium failed to adopt appropriate procedures to evaluate deviations and failures to comply associated with substantial safety hazards as soon as practicable and, except as provided in paragraph (a)(2) of this section, in all cases within 60 days of discovery. Specifically:

1. Westinghouse Policy/Procedure WEC 21.0, "Identification and Reporting of Conditions Adverse to Safety," Revision 4.1, dated October 21, 2008, was not an appropriate procedure to ensure evaluation of deviations and failures to comply associated with substantial safety hazards within 60 days of discovery. As a result, Westinghouse failed to perform timely evaluation for Issue Report Corrective Action Plan (CAP) #08-231-M033. CAP #08-231-M033 was initiated on August 18, 2008, for four lots of Global Nuclear Fuel (GNF) Zr2 bar that failed grain size test and metallography test for atypical grains. Westinghouse Issue Review Committee evaluated CAP #08-231-M033 and concluded that the issue potentially represents a significant defect or noncompliance adverse to safety on August 20, 2008, which first identified the existence of a deviation. Westinghouse completed its evaluation of this deviation in a letter to file (LTR-RCPL-08-220) on December 10, 2008, which was 112 days after the date of discovery.

This issue has been identified as Violation 99901426-2013-201-01.

Response:

1. The reason for the violation or, if contested, the basis for disputing the violation or severity level:

WEC 21.0 Revision 4.1 which was in effect at the time of the Part 21 investigation of CAP IR 08-231-M033 did not contain a specified time frame for the discovery phase if the Part 21 process. As 10CFR21 does not prescribe a period of time for Discovery, Westinghouse does not believe that the lack of a specific period for the discovery phase in WEC 21.0 Revision 4.1 was in conflict with the regulation. The phrase "completion of documentation" as used in 10CFR21 is subject to diverse interpretations. The NRC has discussed possible rule changes with the industry to clarify the point of discovery. The NRC noted in Reference 1 that discovery is not always at the first initiation of an issue report and that the point of discovery can vary within a program.

However, Westinghouse has subsequently added requirements to WEC 21.0 to limit the time for Discovery. The NRC issued a notice of nonconformance to Westinghouse based on an inspection in the fall of 2008. (NRC Inspection Report No. 05200006/2008-201, Notice of Nonconformance. [Accession Number ML090500732]) In response to that nonconformance Westinghouse modified procedures to address timeliness of Discovery. This is described in a letter dated February 3, 2009 from Robert Sisk, Westinghouse to Juan Peralta, Chief Quality and Vendor Branch 1, "WEC Response to NRC Inspection Report No. 05200006/2008-201, Notice of Nonconformance." This change to our procedures occurred after the incident cited.

2) The corrective steps that have been taken and the results achieved:

As noted above, Westinghouse Policy/Procedure WEC 21.0 "Identification and Reporting of Conditions Adverse to Nuclear Safety" was revised to impose a 30 calendar-day limit on the discovery phase.

3) The corrective steps that will be taken:

No further action.

4) The date when full compliance will be achieved:

The Westinghouse procedure is compliant with 10CFR21.

Reference:

1. Letter from Victor Hall (NRC) to Kerri Kavanagh (NRC), "Summary of May 30, 2013, Category 3 Public Meeting to Discuss Evaluating and Reporting Topics from the Draft Regulatory Basis to Clarify the Requirements of Title 10 of the Code of Federal Regulations, Part 21," June 21, 2013 [Accession Number ML13172A093]



Western Zirconium LINE STOP PROCEDURE

PROCEDURE COVER PAGE

List required approvers of document (titles only)

Chem Ops Manager	Fab Ops Manager
PA Manager	HR Manager
Controller	EPT Manager
EHS Manager	CI Manager
Author / Owner – Continuous Improvement – Dan Egbert	

List actual names and a back-up for each in e-mail to ETAPs administrator when sending procedure.

List department positions (titles only) of those required to read this document
(See WZ-DC-01 for list of departments)

All WZ	

Training Required:

- Read Once a Year
- Read every 2 years
- Read every 3 years
- Read document once
- Extended training (Contact Training Department)

Does this procedure contain a form?

- Yes
- No

**Western Zirconium
LINE STOP PROCEDURE****1 Scope:**

- 1.1. This procedure describes the general policy on "Line Stops". It is used to document and resolve safety, environmental, quality, mechanical, technical, manufacturing, and procedural issues encountered during processing, testing and inspecting of Western Zirconium (WZ) internal and final products.

2 Policy:

- 2.1. Line Stops prevent further work when a safety, quality, equipment, documentation, environmental, or process defect has been identified.
- 2.2. After a Line Stop, the defect and what was done to resolve it is documented.
- 2.3. A line stop may be written when an employee is unsure of a process and the procedures don't provide the needed guidance.
- 2.4. Line stops apply to processing, testing and inspection of WZ products.

2.5. All line stops shall be entered into CAPs at least as a Fix / Trend.

3 Applicability

- 3.1. This procedure applies to all WZ employees, and contractors

4 Definitions:**4.1. Safety Line Stops:**

- 4.1.1. Immediate potential for harm to the safety or health of an individual

Western Zirconium LINE STOP PROCEDURE

- 4.1.2. Imminent environmental release.
- 4.2. Material Line Stops:
 - 4.2.1. Affect specific pieces or batches of material.
 - 4.2.2. Material which does not meet work standard or traveler requirements.
 - 4.2.3. Handled as described in *WZP13-CNM WZ Policy for Control of Nonconforming Material*
- 4.3. Process Line Stops:
 - 4.3.1. Line stops that affect an entire process.
 - 4.3.2. A process may be considered the output of one department or one process within a department, i.e., Reduction; the manufacture of one product, i.e., channel strip manufacture; or a cell or linked set of process operations, i.e., Planer Cell.
- 4.4. Equipment Line Stops:
 - 4.4.1. Affect the operation of a specific piece of machinery or equipment used in a process.
- 4.5. Documentation Line Stops:
 - 4.5.1. Line stops that affect the specific item that is applicable to the documentation.
 - 4.5.2. Documentation includes, but is not limited to, material (i.e., Work Standards), equipment (i.e., Operating Procedures) and processes (i.e., Travelers).

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LINE STOP PROCEDURE**

4.6. Working Line Stops.

4.6.1. A working line stop is initiated when a process can be continued during a line stop.

4.6.2. Working line stops are not generally allowed for safety line stops but may be used if appropriate interim actions are approved by the EHS Department.

4.6.3. Work may continue during a line stop as a working line stop under the following conditions.

4.6.3.1. When the course of action is agreed upon by the initiator of the line stop and the affected department management.

4.6.3.2. When necessary to investigate possible root causes,

4.6.3.3. When necessary to test the adequacy of corrective actions,

4.6.3.4. Further processing will correct the observed conditions with a minimum of additional operations or rework.

4.6.4. In the event that the requested working line stop does not meet the above risk criteria, the working line stop will require the Plant Managers approval to continue.

4.7. Incident Reporting System or IRS- The Western Zirconium electronic Incident Reporting System accessible through the Western Zirconium home intranet page.

5 **References:**

5.1. Western Zirconium Plant "*Human Performance Tools Handbook*":

6 **Responsibilities:**

Template #: WZ-DC-01 C F01

Revision 05

Parent Document #: WZ-DC-01 C

Revision 05

Copy printed @ 7/18/2013 10:36 AM. Copy is invalid at the end of the shift. Please destroy.

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6.1. Plant Manager:

- 6.1.1. Ensure that systems for controlling, preparing, reviewing, approving and distributing line stops are established at WZ.

6.2. Continuous Improvement (CI) / Training Manager:

- 6.2.1. Manager will be responsible for implementation of the program.
- 6.2.2. The Line Stop procedure was rolled out to all employees with the HuP tools and will continue to be provided to all new plant employees as part of the New Hire Orientation training.

6.3. Department Managers / Supervisors:

- 6.3.1. Responsible to notify affected employees when a line stop is placed into effect.
- 6.3.2. Will determine and implement the necessary actions for resolution and release of the line stop and the adequacy of those actions.
- 6.3.3. Will include, as appropriate, the involvement of other departments (Process Engineering, Quality Engineering, Mechanical Engineering, EH&S and Maintenance).
- 6.3.4. Area management releases the line stop after implementing corrective actions and conferring with the employee who initiated the line stop. This includes releasing and closing the Line Stop in the IRS.

6.4. Employee who initiated the Line Stop:

- 6.4.1. Responsible to communicate the line stop to his / her supervisor, enter the Line Stop into the IRS, and work with area management to resolve the issue.

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LINE STOP PROCEDURE**

6.4.2. When the area management has determined the necessary actions for resolution and release of the line stop the employee should be consulted and approve of the planned actions.

6.4.3. The line stop may be released by the department managers / supervisors if the employee who initiated the line stop is not on the plant site per concurrence of initiator.

6.4.4. The employee shall be consulted and approve of the actions taken upon their return.

6.5. All employees:

6.5.1. Employees shall use the line stop tool to prevent product defects, equipment damage or safety/environmental events.

6.5.2. When a line stop is initiated all employees must comply with the requirements of the line stop.

7 **Attachments:**

7.1. None. Line Stop Form has been replaced with the electronic form filled out electronically in the Incident Reporting System found on the WZ home intranet page.

8 **Procedure:**

8.1. A line stop may be initiated by any WZ employee who observes a condition which may be detrimental to continued processing, continued machine operation, safety of an individual or final product quality or the environment.

8.2. Once a problem or concern is noticed, employee shall initiate a Line Stop by:

8.2.1. In the IRS Line Stop tab, complete all necessary information.

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- 8.2.1.1. Reason for the Line Stop: Detailed reason of the Line Stop and Why.
- 8.2.1.2. Recommendations to correct the problem: List all recommendations that may help the department resolve the issue.
- 8.2.1.3. Actual corrective action taken to restart the line: Add as many details as possible.
- 8.2.1.4. Additional corrective actions to prevent re-occurrence: **The Supervisor, Manager or designee will enter the Line Stop into CAPs.**
- 8.2.1.5. A Line Stop ID# is automatically created when the Line Stop form is saved. This ID# will be used to sort and record the Line Stop in the Incident Reporting System.
- 8.2.1.6. Click the "Save, Send, and Print Report" button. The Line Stop has now been saved, sent to the Near Miss / Injury / Incident and Fire distribution list required below, and printed.
- 8.2.2. Upon successful submittal of a Line Stop in the IRS the Line Stop Form will automatically print to that computer's default printer. A copy of the completed Line Stop Form shall be placed at the work location.
- 8.2.3. All necessary Safety, Quality and Production notifications must be implemented.
- 8.3. The initiator is responsible to document the line stop in accordance with this procedure and notify the department management of the line stop.
 - 8.3.1. The initiating area management is responsible to notify the appropriate departments being affected or in any way involved in the Line Stop.
 - 8.3.2. Copies of the filled out Line Stop form are sent out automatically via the IRS to the "NFBU – WZ Near Miss / Injury / Incident / Fire Dist List", found in Microsoft Outlook Address Book.

Western Zirconium LINE STOP PROCEDURE

- 8.4. The affected process may be resumed only after the line stop is resolved and documented on the line stop form.

- 8.5. Concurrence of initiator.
 - 8.5.1. The initiator of the line stop must be consulted regarding corrective actions unless otherwise noted by the initiator on the line stop.

 - 8.5.2. Should concur with the actions taken to resolve the line stop and the decision to continue / restart the line. An attempt must be made to contact the initiator if the restart is to occur after the end of the initiator's shift if not otherwise noted by the initiator on the line stop.

 - 8.5.3. This concurrence will be documented.

 - 8.5.4. If the initiator feels confident that by entering this Line Stop into CAPs it will be resolved to initiator's satisfaction, then the initiator may sign the concurrence.

 - 8.5.5. If the initiator does not concur, the line stop will be referred to the next level of management.

 - 8.5.6. This may continue until the Plant Manager is involved. In this case, the Plant Manager will make the final decision as to the adequacy of the actions and the continuing / restarting of the line.

- 8.6. All actions, resolution and closure of the line stop will be documented on the Line Stop Form, and entered into the applicable Line Stop report in the IRS. Once the line stop form is filled out completely and closed, it will be turned in to the affected department manager.

- 8.7. The affected department will retain all documentation as required in the department Records Flow Schedule.

**Western Zirconium
LINE STOP PROCEDURE****CONTROLLED DOCUMENT RECORD OF REVISIONS****SECTION DESCRIPTION OF CHANGE AND BRIEF REASON FOR CHANGE****Revision 2**

Line Stop Form Added the specific equipment or part of the process that is being line stopped. Also added section for identifying type of line stop.

Per CAPs issue: # 08-249-M029

Revision 3

Line Stop Form Deleted the original form
The form that is generated by the IRS will be used.

3.7 Added IRS to the Definitions

4.3.4 Added clause to the Supervisor's responsibilities

4.4.1 Added clause to the Employee's responsibilities

5 Changed the procedure to incorporate the new Line Stop module of the IRS

Revision 4

Added

8.2.1.5 A Line Stop ID# is automatically created when the Line Stop form is saved. This ID# will be used to sort and record the Line Stop in the Incident Reporting System.

Clerical error: 8.2.1.6 referred to 5.3.2 – changed this to words instead of a reference number.

Western Zirconium LINE STOP PROCEDURE

Revision 5

2.5 **All line stops shall be entered into CAPs at least as a Fix / Trend.**

Removed: **Line stops dealing with documentation defects will be left up to the manager's discretion.**

8.2.1.4 **Additional corrective actions to prevent re-occurrence: The Supervisor or Manager will enter the Line Stop into CAPs.**

The CAPs issue number is 13-176-M055.03. Reason for revision, clarification that all Line Stops will be put in CAPS



STATION MEETING - STANDARDIZED WORK SHEET

pg 1 of 1



GROUP	DEPARTMENT	PROCESS NAME	STATION MEETING
Work Seq. #	Plant	Station Meeting	WORK ELEMENT
1	General Guidelines		
2	Prepare for Meeting		
3	Start Meeting		
4	SAFETY/Hulp Topic		
5	Event Clock Review		
6	Voice of the Customer		
7	Focus on the Value Adders		
8	Weekly Review on Mondays		
9	Linstop Review on Wednesdays		
10	CAP's Issue Review Meeting		
11	Meeting Tangibles		
12	Any waste elimination opportunities identified? Achieved?		
13	Safety Wrap up		

The purpose of the station meeting is to: * Update Plant Status Tactical, not Strategic!
* Provide support to the value adders

KEY POINTS

Keep meeting, brief - 30 minutes max. Start on time - 09:30 every day.
Strive for an environment of crisp, two way communication

No problem solving

Attack issues, not people

All participants use standard meeting etiquette, including phones silenced

Meeting to be held in the administration bldg lunchroom in front of the VMC (Visual Mgmt Center)

Product line manager to post their information on the board prior to the start of the meeting

Meeting starts on time with all participants in attendance, in assigned seats, and prepared

Person responsible reports on a Safety/Hulp Topic for the day's meeting

Plant Event Clock Status

Record appropriate data on Performance Center

Responsible manager gives update and status of event

Any immediate action items required? (Accountability Board)

Review Action Tracking for customer issues

Review Linstops / Learning Clock Status / Production Status / WIP / Plans / Needs

Product Assurance

Flat Products

Round Products

Melting

Reduction / Chlorination

Separations

MX

Engineering / HR / Finance / ABM / Production Control

Safety / Supply Chain / Environmental

Information Systems / Plant Manager / CI-Training

Review assignments due. Make assignments from today's meeting

Review "Open Linstop Report/Plant" - Highlight status and plans to close, Assure all line stops are entered into CAP's

Review CAP's issues and assign significance and issue Owner

* Was everyone on time?

* Was every area represented?

* Was the standard adhered to?

* Did the meeting end on time?

Person responsible reports on a Waste Elimination Topic for the day's meeting

R+ opportunity

Final Safety thought of the day

Issue Report (# 13-177-M008)

Significance: Fix/Trend

Issue Owner: Paul W Bachman/EC/ESBU/WEC/US

Status: 19. Corrective Actions in Progress / Assignees: Paul W Bachman (IssueOwner)

Red labels designate required fields.

→designates a Quality Record Field per QA 17.1

Issue Due Date: 27-Jul-2013

Originator Input - Part 1

Origination	
→Originator:	Clifford R Mann
Originator Phone No.:	801-732-2274
Date First Submitted to CAM:	06/26/2013
→Submitted on behalf of:	<input checked="" type="radio"/> Self <input type="radio"/> Other

Originator's Organization	
→Business Unit:	NFBU
→Organization Level 2:	US Fuel
→Organization Level 3:	Western Zirconium Plant
→Originator's Group:	NF - WZ - Operations\Flat Products
→Manager's Location:	Ogden UT
→Originator's Office Location:	Ogden UT
Initial CAM Assigned:	Cynthia L Padilla/EC/ESBU/WEC/US; Michael V Morris/EC/ESBU/WEC/US; Abbie Waggoner/EC/ESBU/WEC/US

Issue Description	
→Issue Title:	Procedures do not exist and/or do not reflect best practice for the machining of Swage dies. Line Stop #8100, EE-5, PA-3
→What is the condition, concern or incident?	Procedures do not exist and/or do not reflect best practice for the machining of Swage dies.
→Where did it happen?	Bar Cell
→When did it happen?	4/24/2013
→What are the Consequences? Describe	Can not make Swage dies safely.
→Have immediate actions been taken or are any underway? →If "Yes", Describe	<input checked="" type="radio"/> Yes <input type="radio"/> No Removed operating procedure BW-OP2013. Develop procedures for the use of the Chevalier and Bryant grinders.
→Additional information:	This CAPs issue is being created to satisfy CAPs # 13-133-M055.01 which is Line Stops for Flat Products have not been entered into CAPs.
→Recommended Resolution:	Experimental Operating procedure for the die grinders will be used. Any changes to the new procedure will be evaluated and within the next few weeks a new Operating Procedure to replace the experimental procedure will be written and issued covering any changes which may be needed.

CAM/IRC Clarification of Originator's Issue Description

CAM/IRC Clarifications	
New Comment:	

	→Comments Log:
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Originator Input - Part 2

Initial Safety Assessment	
→Does this issue potentially represent a condition adverse to nuclear safety pursuant to the requirements of Westinghouse Policy / Procedure WEC-21.0 or WEC-22.2?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> I don't know Optional explanation of a No response:
→Is this issue related to the environment, radiation, health, industrial safety, security, or transportation of hazardous or radiological materials?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> I don't know Optional explanation of a No response:
→Does this issue involve an occupational injury or concern related to personnel safety?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> I don't know Optional explanation of a No response:

Suggested Significance Level	
Significance Level:	<input type="radio"/> SCAR <input type="radio"/> High <input type="radio"/> Suggestion for Improvement <input type="radio"/> Medium <input type="radio"/> Operational Experience <input checked="" type="radio"/> Fix/Trend
QA/QC Controlled?:	<input type="radio"/> Yes <input type="radio"/> No *By choosing yes, this issue will become QA Controlled
EH&S Controlled?:	<input type="radio"/> Yes <input type="radio"/> No *By choosing yes, this issue will become EH&S Controlled

Suggested Responsible Organization	
Suggested Issue Owner:	Paul W Bachman/EC/ESBU/WEC/US <input checked="" type="checkbox"/>

Issue Owner Contact Request	
I want the Issue Owner to contact me to discuss the planned issue resolution:	<input type="radio"/> Yes <input checked="" type="radio"/> No

Supplementary Originator/CAM Input

Supplementary Information	
→Issue Raised By:	<input checked="" type="radio"/> Employee <input type="radio"/> Regulatory Agency <input type="radio"/> Customer <input type="radio"/> Internal QA <input type="radio"/> Supplier <input type="radio"/> Trending <input checked="" type="checkbox"/> Hourly Raised
→Background:	
→Impacted Documents, System Component, etc.:	
→Affected Customer(s):	
→Affected Unit(s):	
→Affected Supplier(s):	
Improvement Plan #:	

Related Audit/Surveillance Information	
→Audit/Surveillance Finding?	<input type="radio"/> Yes <input checked="" type="radio"/> No

ITAAC Information	
Is this an ITAAC issue?	<input type="radio"/> Yes <input checked="" type="radio"/> No

IT Information	
Is this a computer or network problem?	<input type="radio"/> Yes <input checked="" type="radio"/> No

Organization-Specific Information	
WZ Ingot Number:	
BPIP/BTP Objective Owner:	
BPIP/BTP Initiative Owner:	

Originator Issue Descriptions Attachments

→Attachments:

General Comments

General Comments	
New Comment:	
→Comments Log:	

IRC Input/Issue Assignment

Issue Review Committee Input	
Final Issue Title:	Procedures do not exist and/or do not reflect best practice for the machining of Swage dies. Line Stop #8100, EE-5, PA-3
IR Meeting Number:	WZ-13-178
Responsible Business Unit:	NFBU
Responsible Organization Level 2:	US Fuel
Responsible Organization Level 3:	Western Zirconium Plant
Responsible Functional Group:	NF - WZ - Operations\Flat Products
Responsible Manager's Location:	Ogden UT
Corrective Actions Manager:	Cynthia L Padilla/EC/ESBU/WEC/US, Michael V Morris/EC/ESBU/WEC/US, Abbie Waggoner/EC/ESBU/WEC/US
Corrective Actions Director:	Cynthia L Padilla/EC/ESBU/WEC/US, Michael V Morris/EC/ESBU/WEC/US

Final Significance Level	
→Significance Level (not editable):	<input type="radio"/> SCAR <input type="radio"/> High <input type="radio"/> Suggestion for Improvement <input type="radio"/> Medium <input type="radio"/> Operational Experience <input checked="" type="radio"/> Fix/Trend
→Quality Impact:	<input type="radio"/> Condition Adverse to Quality (CAQ) <input type="radio"/> Significant Condition Adverse to Quality (SCAQ) <input checked="" type="radio"/> Neither
QA/QC Controlled?:	<input type="radio"/> Yes <input type="radio"/> No *By choosing yes, this issue will become QA Controlled
EH&S Controlled?:	<input type="radio"/> Yes <input type="radio"/> No *By choosing yes, this issue will become EH&S Controlled
Issue Owner:	Paul W Bachman/EC/ESBU/WEC/US

Issue Review Committee Safety Assessment	
Attention - If any Issue Review Committee Assessment response is set to Yes prior to leaving State 05, a notification will be sent to the appropriate contact when the IR leaves State 05. If any response is changed to Yes after leaving State 05, information regarding the authorization of the change will be required and a notification will be sent to the appropriate contact when the IR is next saved or advanced.	
→Does this issue potentially represent a condition adverse to nuclear safety pursuant to the requirements of Westinghouse Policy / Procedure WEC-21.0 or WEC-22.2?	<input type="radio"/> Yes <input checked="" type="radio"/> No Required explanation if different than Originators Yes or No response:
→Is this issue related to the environment, radiation, health, industrial safety, security, or transportation of hazardous or radiological materials?	<input type="radio"/> Yes <input checked="" type="radio"/> No Required explanation if different than Originators Yes or No response:
→Does this issue involve an occupational injury or concern related to personnel safety?	<input type="radio"/> Yes <input checked="" type="radio"/> No Required

	explanation if different than Originators Yes or No response:
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CAM/IRC Attachments

→Attachments:

CAM/IRC Comments

Comments on Issue Resolution	
New Comment:	
→Comments Log:	

Trending Data – Event Codes

Cost of Poor Quality	
SAP Project/Task Number: /	Cost of Poor Quality to Date:

Delivered Deficiency	
Is this a deficiency in a product, service, or field activity, tied to a contractual/purchase order obligation that was delivered to an external customer or supplier? (Deficiency: Delivered incomplete or containing error(s), or product non-conformances .. for documents, error(s) that change the interpretation of the document or require reissuance of the document). (Delivered to: manufactured product at the customer site; WEC approved document in the customer's possession or technical document marked Certified for Construction; field activity performed on the customer site that negatively impacts customer.)	<input type="radio"/> Yes <input checked="" type="radio"/> No

Affected Customers, Units and Supplier	
→Affected Customer(s):	
Affected Unit(s):	
→Affected Supplier(s):	

Products & Services (1 required, max 3 rows)

Products & Services (max. 3 rows)	
1.	Absent Absent
2.	

Consequences (1 required, max 3 rows)

Consequences (max. 3 rows)	
1.	SAT02 Internal Management Dissatisfaction
2.	

Elements (1 required, max 3 rows)

Elements 3 rows (max.			
1.	Element Being Coded	Deficient Item or Process Code	Deficiency Code
	procedure	PP/Mas/Mag Processes/Procedures Mfg & Service	Doc/acc Document Issue Accuracy/Completeness

		Machining & Grinding	
		Local Event Code	
		EE-5 NF - Existing Equipment - Line Stop	
2.	Element Being Coded	Deficient Item or Process Code	Deficiency Code
	procedure		
		Local Event Code	
		PA-3 NF - Procedure Adherence - Procedure Problem	
3.	Element Being Coded	Deficient Item or Process Code	Deficiency Code
		Local Event Code	

Issue Closure Summary

Actions Taken	
	→Immediate Actions: Removed operating procedure BW-OP2013. Develop procedures for the use of the Chevalier and Bryant grinders.
	→Additional Justification for Closure: <input type="checkbox"/> None

No Commitments Initiated

Conclusions	
→Justification for Closure:	<input type="radio"/> No immediate or corrective actions taken – Trend Only <input type="radio"/> Completed Actions with objective evidence provided above in Immediate Actions Taken, the Commitments list or Additional Justification fields
Date Closed:	
Issue Owners Summation:	
QA Record Retention:	<input type="radio"/> Nonpermanent <input type="radio"/> Lifetime

Additional Information	
Additional Keywords for Searching:	
Lessons Learned:	
→Disposition of Material:	<input type="radio"/> Use as is <input type="radio"/> Scrap <input type="radio"/> Repair <input type="radio"/> Meets Requirements <input type="radio"/> Rework
→Affected Customer(s):	
→Affected Unit(s):	
→Affected Supplier(s):	

Comments on Issue Closure	
→Comments Log:	

Issue Closure Attachments	
Attachments:	

IR Closure Checklist