SOUTHERN CALIFORNIA EDISON COMPANY
TOPICAL REPORT SCE-1-A CHANGE NOTICE

Change Notice Number: 30

Affected Amendment: 11

Affected Pages: 17.1-37, 17.1-38, 17.1-39, 17.2-43, 17.2-44, 17.2-45, 17.2-46, 17.2-47

Description of Change:

(1) The process for control of nonconformances discovered during Engineering Construction Project (ECP) activities is revised to be consistent with Station operations nonconformance control program.

(2) The responsibilities for nonconformance disposition approvals are being revised to reflect greater engineering involvement.

(3) References to reportability actions have been updated to reflect current requirements.

Reason for change (including basis for concluding that the change satisfies the criteria of 10CFR50, Appendix B, and the quality assurance program commitments previously accepted by the NRC):

The nonconformance process controls are being revised to reflect a consistent process for handling nonconformances discovered at the Station. The process continues to satisfy the requirements of 10CFR50, Appendix B, Criterion XV.

Change ____ does _X_ does not reduce commitments previously accepted by the NRC.

Approvals:

R M Rosenblum
Manager of Quality Assurance

Kenneth P Baskin
Vice President

Date Submitted to NRC: March 21, 1989

0576Q

17.1.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

17.1.15.1 Scope

This subsection describes the measures utilized by SCE to control materials, parts, or components that do not conform to established requirements.

17.1.15.2 Nonconforming Materials, Parts, or Components

The measures used to control nonconforming items are described by written procedures. These procedures are prepared and implemented by cognizant SCE organizations performing the work of controlling nonconformances. The SCE Quality Assurance Organization conducts periodic audits to assure proper implementation of the procedures and the effectiveness of the nonconformance controls.

Deviations pertaining to a characteristic of a material, component, system or structure, from those specified in the design documents are treated as nonconformances. Procedures for processing and controlling nonconforming items contain the following requirements:

- Measures to identify the nonconforming item.
- Measures to document the nonconforming item, including cause and corrective action.
- Measures to segregate the nonconforming item from acceptable items, where possible | 11CN30
- Method to review and disposition the nonconforming item, including approval authority.
- Method of notification to the affected organizations.
- Method for evaluating deviations to determine if reportable under the requirements of 10CFR50.55(e) or 10CFR21. | 11CN30

Nonconformances are documented on a Nonconformance Report (NCR), which is initiated by responsible SCE personnel when a nonconforming item is discovered at a jobsite. NCR's contain the item's identification, description of the nonconformance, cause, dispositioning activities, inspection requirements, corrective action, approval signatures, and the organizations notified of the nonconformance. An SCE nonconformance log / system is maintained and indicates the status of each nonconforming item. | 11CN30

Nonconforming items are segregated from acceptable items, where possible, and maintained in a controlled area until properly dispositioned. Nonconforming items discovered after installation of the item are not used until final disposition of the nonconformance and associated disposition implementation. Stamps or tags are utilized to identify the

nonconformance as described in Subsection 17.1.4. Nonconforming items may be dispositioned Accept-As-Is, repair, rework, or Reject.

An Engineering Review Process is utilized to provide approval of dispositions associated with nonconforming items discovered at the jobsite where SCE is responsible for the work or where SCE technical review of the nonconformance is required. An SCE Engineering Review Board (ERB) is established on each project for Accept-As-Is and repair dispositions and is comprised of the following members who must unanimously concur on the disposition:

- Quality Assurance Organization (QAO) Supervisor, or designee.
- Project Engineer, or designee. 11CN30
- SCE Project Engineer or Site Nuclear Engineering Supervisor or designee
- Supplier design representative, where supplier design is involved.

When unanimous agreement cannot be reached among ERB members, the disposition will be determined jointly by the Manager, Quality Assurance, and the Project Manager. The Vice President, Nuclear Engineering, Safety and Licensing shall assign the disposition for a nonconformance when normal processes fail to reach a decision. 7

For Reject and Rework dispositions, the approval of the following individuals is required:

- QAO Supervisor, or designee. 11CN30
- SCE Project Engineer or Site Nuclear Engineering Supervisor or designee

Nonconforming items may be authorized for conditional use either prior to or after installation, providing the following conditions, as applicable, have been met:

- The NCR specifically describes the activity.
- The allowed activity does not constitute actual use in the sense that the item could be called upon to perform its safety-related function of actually preventing or mitigating the consequences of postulated accidents that could cause undue risk to the health and safety of the public. 4
- The nonconforming condition will not adversely affect the allowed activity or implementation of the disposition. 9

17.1.15.2 (continued)

- o Identification and traceability of the item is maintained. | 4

- o The authorization is approved by the same ERB members required for the disposition approval.

Depending on contract scope of work assignments, an A-E may be required to implement a similar Engineering Review Process and formulate an (ERB) to work in conjunction with the SCE (ERB). Interface procedures are developed by both participating organizations in this event.

When the nonconformance report disposition specifies a rework or repair, these actions are accomplished in accordance with approved procedures, drawings, and instructions. The cognizant SCE or A-E quality assurance organization representative verifies that acceptance of the dispositioned nonconforming item is completed by reinspection according to methods initially used. When reinspection methods differ from those initially used, methods at least equal to the original inspection are employed. Items are designated as nonconforming, and are so identified, until repair or rework and the required inspections are satisfactorily performed. | 4

Rejected or scraped items are promptly removed from the jobsite work areas. The status of these items is displayed by appropriate tags. The cognizant SCE or A-E quality assurance organization person verifies the proper use of these tags. | 3

The SCE or A-E design organization responsible for the affected design document reviews and approves Accept-As-Is dispositions for design impact. For an approved disposition, the responsible design organization must issue a written justification for the deviation from the design document or revise the design document in accordance with applicable requirements.

NCR's and associated inspection records are forwarded to the CDM Center for retention purposes. Nonconformance data are periodically analyzed by the SCE Quality Assurance Organization to establish quality trends. The results of these analyses are reviewed by the Manager, Quality Assurance, for possible corrective action and referred to the Vice President, Nuclear Engineering, Safety and Licensing, when a potential serious condition is determined. Deficiencies identified by 10CFR50.55(e) or 10CFR21 are reported to the NRC by the Manager, Quality Assurance. | 5 | 7 | 11CN30

A-E's and suppliers must provide nonconformance controls that are equivalent to the controls set forth herein. The four options to disposition nonconformances as described in this subsection are required to be identified, or a suitable alternative scheme used. Nonconformances dispositioned Accept-As-Is or repair by suppliers must be made part of the | 1-421.11

17.2.15 NONCONFORMING MATERIALS, PARTS OR COMPONENTS

17.2.15.1 Scope

This subsection describes the measures utilized by SCE to control materials, parts, or components that do not conform to established requirements.

17.2.15.2 Nonconforming Materials, Parts or Components

The measures used to control nonconforming Safety-Related items are described by written procedures. These procedures are prepared and implemented by cognizant SCE organizations delegated the work of controlling nonconformances. The SCE Quality Assurance Organization conducts periodic audits to assure proper implementation of these procedures and effectiveness of the nonconformance controls.

Deviations pertaining to a characteristic of a material, component, system or structure, from those specified in the design documents are treated as nonconformances. Procedures for processing and controlling nonconforming items contain the following requirements:

- Measures to identify the nonconforming item including criteria for when to issue a Nonconformance Report (NCR). | 7
- Measures to document the nonconforming item, including cause and corrective action.
- Measures to segregate the nonconforming item from acceptable items, where possible | 11CN30
- Method to review and disposition the nonconforming item, including approval authority.
- Method of notification to the affected organizations.
- Method for evaluating deviations to determine if reportable under the requirements of 10CFR50.55(e), 10CFR21, 10CFR50.72, 10CFR50.73 or the Technical Specifications. | 11CN30

17.2.15.2.1 Station and Engineering and Construction Project (ECP) Activities | 11CN30

When a nonconforming item is discovered at the Station, an NCR and/or a work order document, as appropriate, will be generated by SCE personnel in accordance with procedural requirements. Rework/reject dispositions for plant equipment will normally be controlled by the work order document process. | 10CN16

Nonconformance documentation contains the item's identification, description of the nonconformance, dispositioning activities,

inspection requirements, approval signatures, and the organizations notified of the nonconformance. Cause and corrective action are also documented. An SCE nonconformance reporting log/system is maintained and indicates the status of each nonconforming item. | 10 CN#16

Nonconforming items are segregated from acceptable items, where possible, and maintained in a controlled area until properly dispositioned. Nonconforming items discovered in installed items are evaluated to determine their operability as defined by the Technical Specifications and use is controlled until final disposition of the nonconformance and associated disposition implementation. | 7 CN#6

Stamps or tags are utilized to identify the nonconformance as described in Subsection 17.2.14. Nonconforming items may be dispositioned Accept-As-Is, repair, rework, or Reject.

An Engineering Review Process (ERP) is utilized to provide approval of dispositions associated with nonconforming items. For the dispositioning of nonconformances, the following approvals are required: | 5

Repair or Accept-As-Is Dispositions

- Quality Assurance Organization (QAO) Supervisor or designee
- Station Technical Manager or designee
- Cognizant Station Functional Manager (Maintenance, Operations, Health Physics, etc.) for non-ECP activities. | 11CN30
- SCE Project Engineer or Site Nuclear Engineering Supervisor or designee for ECP activities

Reject or Rework Dispositions

- QAO Supervisor or designee
- Cognizant Station Functional Manager (Technical, Maintenance, Operations, Health Physics, etc) or designee for non-ECP activities.
- SCE Project Engineer or Site Nuclear Engineering Supervisor or designee for ECP activities

Nonconforming items may be authorized for conditional use prior to implementation of the final NCR disposition providing the following conditions have been met: | 10 CN#16

- The NCR describes the conditional use.

- o Use of the item is controlled such that the safety functions of the system are not adversely affected.

10CN16

- o Identification and traceability of the item is maintained.
- o The authorization is approved by the same ERP members required for the disposition approval.

When the nonconformance disposition specifies a rework or repair, these actions are accomplished in accordance with approved procedures, drawings and instructions. SCE quality assurance organization personnel verify acceptability of reworkand repair dispositioned nonconforming items by reinspection according to methods initially used. When reinspection methods differ from those initially used, methods at least equal to the original inspection are employed. The responsible work organization manager is responsible for assuring that rework and repair activities are accomplished in accordance with approved procedures, drawings, and instructions. Items are designated as nonconforming and are so identified until rework or repair and the required inspections are satisfactorily performed. 11CN30

Rejected or scraped items are promptly removed from the station work areas. The status of these items is displayed by appropriate documentation . Quality Assurance Organization personnel verify the proper disposition of these items. 10 CN#16

The SCE design organization responsible for the affected design document reviews and approves Accept-As-Is and Repair dispositions for design impact. 5

For an approved disposition, the responsible design organization must issue a written justification for the deviation from the design document or revise the design document in accordance with applicable requirements.

When the participants in the Engineering Review Process cannot agree, the final disposition is made by the Manager of Quality Assurance. Significant nonconformances of unusual complexity or involvement are submitted to the Vice President, Nuclear Engineering, Safety and Licensing for resolution. 10 CN#16 7

NCR's, work order documentation and associated inspection records are forwarded to the CDM Center for retention purposes. Nonconformance data are periodically analyzed by the SCE Quality Assurance Organization to establish quality trends. The results of these analyses are reviewed by the Manager of Quality Assurance, for possible corrective action and referred 10 CN#16

17.2.15.2.1 (Continued)

to the Vice President, Nuclear Engineering, Safety and Licensing, when a potentially serious condition is indicated. Deficiencies identified by 10CFR50.55(e) or 10CFR21 are reported to the NRC prior to issuance of the operating license by the NRC. Thereafter, deficiencies are reported to the NRC in accordance with Technical Specification requirements, 10CFR21, 10CFR50.72 or 10CFR50.73. | 7 CN#6 | 11CN30

| 11CN30

17.2.15.2.2 Contractor and Supplier Activities

Nonconformances in onsite contractor work are controlled by SCE in accordance with Paragraph 17.2.15.2.1.

Nonconformances dispositioned Accept-As-Is or repair by off-site suppliers must be made part of the inspection records and forwarded to the responsible engineering organization for review and assessment. The responsible SCE engineering organization approves these dispositions for SCE procured items. | 11CN30

Conditions adverse to quality discovered by SCE personnel at a jobsite, contractor's manufacturing facility or design office, or supplier's manufacturing facility, are processed as described in Subsection 17.2.16. | 10 CN#16

17.2.16 CORRECTIVE ACTION

17.2.16.1 Scope

This subsection describes the measures utilized by SCE to assure that corrective action is promptly identified and implemented when conditions adverse to quality are determined to exist.

17.2.16.2 Corrective Action

As described in Subsection 17.2.15, nonconformance and corrective action associated with material, parts, or components are controlled at a jobsite by the nonconformance reporting system. Additionally, a system for initiating corrective action associated with conditions adverse to quality is controlled by the SCE Quality Assurance Organization by means of written procedures. This system implements corrective action system forms to document conditions adverse to quality discovered by SCE personnel at the SCE General Office or jobsite, at A-E's design offices, and at NSSS Suppliers and other suppliers' facilities. This corrective action documentation is also used for hardware problems discovered at NSSS Supplier or other suppliers' facilities. Procurement specifications may specify the requirement for SCE approval of nonconforming hardware disposition if discovered by SCE at a supplier's facility. 11CN30 10CN#20

The corrective action documentation provides for item or system identification, description of the adverse condition, cause of the condition, corrective action to resolve problem, and the corrective action to prevent recurrence as appropriate to the problems identified.

Corrective action documentation is promptly initiated with a request for corrective action directed to the responsible organization as a result of review, inspection, audit or surveillance activities.

The responsible organization to which corrective action documentation is directed determines the cause of the adverse condition, the action taken to resolve the problem, and the action to be taken to prevent recurrence as appropriate to the problems identified. They also provide dates for implementation of the corrective action where appropriate. The corrective action documentation is returned to the responsible SCE Quality Assurance Organization Supervisor for review and concurrence. Revised corrective action documentation is requested if corrective action proposed is unacceptable. Follow-up reviews, inspections, audits, or surveillance are performed by SCE personnel to verify corrective action implementation. Significant conditions adverse to quality, 10CN#20