

THE BABCOCK & WILCOX COMPANY
 ADMINISTRATIVE MANUAL
 POLICIES AND PROCEDURES

NUMBER
 NPG-1707-01 (Rev 6)

SECTION

SUBJECT

QUALITY STANDARDS

PROCESSING OF SAFETY CONCERNS

I. APPLICABILITY

ALL NPGD PERSONNEL

II. PURPOSE

To describe the method for identifying, processing and reporting safety concerns in NPGD-supplied components, systems and services as required by NRC regulations (e.g., 10CFR21, 10CFR50, etc.).

The processing of corrective action shall be via the appropriate procedure, e.g., CI/A, FCA, etc.

III. EFFECTIVITY

All safety concerns identified after the issue date of this procedure. Safety concerns identified prior to the issue date of this procedure may be processed in accordance with this procedure.

IV. REFERENCES

+ 1716-A1 - Policy for Reporting of Defects and Noncompliance as Required by 10CFR21

V. FORMS PROCESSED (See Forms Section Manual)

BWNP-20208 - Preliminary Report of Safety Concerns (PSC)

VI. GENERAL

A. Safety concern categories are listed below:

1. Significant Deficiency - 10CFR50, Section 50.55, paragraph (e), requires holders of construction permits (NPGD customers) to promptly report to the NRC significant deficiencies found in the design and construction of nuclear power plants affecting the safe operation of the plant. It is NPGD's responsibility to promptly report to its customers holding construction permits each such deficiency in NPGD's scope of supply so that they in turn may report it to the NRC in a timely fashion. NPGD shall also advise the owners of operating plants utilizing NPGD-supplied equipment of applicable significant deficiencies.

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VI. GENERAL (cont'd.)

A.1 (cont'd.)

DEFINITION OF SIGNIFICANT DEFICIENCY

Deficiencies to be reported in accordance with this procedure are those deficiencies found in the design, manufacture, fabrication, installation, construction, testing and inspection which, were they to have remained uncorrected, could have adversely affected the safe operation of the plant at any time throughout the expected life-time of the plant.

In addition to the above, the deficiency must also be the result of one or more of the following:

- a. A significant breakdown in any portion of the quality assurance program;
- b. A significant deficiency in final designs approved and released for construction;
- c. A significant deficiency in the construction of, or significant damage to, a structure, system or component requiring corrective action involving extensive effort;
- d. A significant deviation from performance specifications requiring corrective action involving extensive effort.

Refer to 10CFR50.55, paragraph (e), for published regulations.

- 2. Substantial Safety Hazard - 10CFR21 requires that the directors and responsible officers of organizations that construct, own, operate or supply components or services of a facility or engage in an activity that is licensed or otherwise regulated by the NRC inform the Commission if they obtain information reasonably indicating that such facility, activity, or basic delivered component or service fails to comply with regulatory requirements relating to Substantial Safety Hazards or contains a defect which could create a Substantial Safety Hazard. Corporate policy 1716-A1 defines the directors and responsible officers.

NOTE: Delivered is defined as receipt and final acceptance by a purchaser or his agent from a supplier. When 10CFR21 is applied, the purchaser and supplier may be at any level or tier of procurement.

DEFINITION OF SUBSTANTIAL SAFETY HAZARD

A loss of safety function to the extent that there is a major reduction in the degree of protection provided to public health and safety for any licensed facility or activity.

Appropriate criteria to be used in determining the existence of a potential Substantial Safety Hazard include:

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VI. GENERAL (cont'd.)

A.2 (cont'd.)

- a. Moderate exposure to, or release of, licensed material;
- b. Major degradation of essential safety-related equipment;
- c. Major deficiencies involving design, construction, inspection, test or use of licensed facilities or material.

Refer to 10CFR21 for published regulations.

3. Miscellaneous Reportable Item - Other regulations, contractual obligations and NPGD practices require that safety related concerns, as defined below, be documented and reported. Miscellaneous Reportable Items reported to the NRC shall also be reported to the affected NPGD customers.

DEFINITION OF MISCELLANEOUS REPORTABLE ITEM

The following are defined as Miscellaneous Reportable Items:

- a. Required changes in plant technical specifications which result from modifications in NPGD calculation methods and which reduce the operating safety margins as described in the technical specification bases.
 - b. Revisions to Emergency Core Cooling System (ECCS) analyses that result in calculated fuel clad temperature variations. See 10CFR50, Appendix K, for reportable variations.
- B. Reporting of safety concerns by NPGD personnel is not required if NPGD has documented evidence that the concern is adequately known to the affected NPGD customers in the case of potential significant deficiencies, or is adequately known to the NRC in the case of potential substantial safety hazards.
 - C. Recurrence of a previously reported safety concern shall be reported as a new safety concern.
 - D. Once issued, a PSC may be rescinded by the originator documenting the basis in a memo to the Manager, Licensing, and attaching supporting documentation as necessary. The originator's manager shall indicate concurrence on the memo. Appropriate action shall be taken by the Manager, Licensing.

VII. RESPONSIBILITIES FOR REPORTING

All NPGD personnel are assigned the responsibility of originating form BWNP-20208 for potential safety concerns suspected of falling within the definitions given in Section VI above.

VIII. PROCEDURE

Refer to flowchart, Exhibit A, for the procedure to process safety concerns.

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