

# REVISION HISTORY Nuclear Engineering Procedure

PROCEDURE NUMBER NEP-232	PROCEDURE REVISION
E. J. Gschwender	DATE 9/11/89

DESCRIPTION

All - The procedure provides a method for the performance and documentation of EQ walkdowns. Revision 0 applies only to those EQ walkdowns performed as part of the Environmental Qualification Enhancement Program. The applicability of the procedure will be expanded upon completion of Environmental Qualification Enhancement Program or at an earlier date if so directed by EQ Project Manager. The program is designed to provide corrective action implementation as part of an NRC commitment.

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#### 1. PURPOSE

The purpose of this procedure is to provide environmental qualification walkdown criteria to establish an accurate and fully documented as-built configuration for environmentally qualified components.

#### 11. SCOPE

This procedure applies to plant equipment identified as within the score of the IDCFR50.49 Environmental Qualification Program at Crystal River Unit 3. Until such time that this procedure is revised, the walkdown and associated documentation/corrective action activities are limited to the 10CFR50.49 Environmental Qualification Ennancement Program.

## III. APPROVAL AND REVISIONS

This procedure becomes effective as of the date reflected in the upper right hand corner of this form.

Approved for Issue - Manager. Nuclear Engineering Assurance

8/31/89

Approved for Issue Director, Da Nuclear Operations Engineering Projects

#### IV. REFERENCE DOCUMENTS

- See Reference Index Regulatory Requirements 4, 7, 11, 14, 42, 1. 48
- 2. See Reference Index - FPC Documents - 1, 7
- Nuclear Engineering Procedure 222 "Qualification for Equipment in 3. the Scope of 10CFR50.49"

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## V. ACTIONS AND RESPONSIBILITIES

### A. GENERAL

- The Director, Nuclear Operations Engineering and Projects, is responsible for the overall administration of the Environmental Qualification (EQ) program. The Manager, Site Nuclear Engineering Services, is responsible for designating the EQ Supervisor who will supervise the routine daily activities of the EQ Group. The Manager, Nuclear Electrical/L&C Engineering, is responsible for designating the EQ Supervisor for the EQ Enhancement Program.
- The EQ Supervisor is responsible for routine daily activities 2. performed by the FO Group. With respect to equipment walkdown verification, the EQ Supervisor must assign the individuals qualification documents to review environmental for configuration acceptance requirements and those individuals to perform the field verification. The EQ Supervisor shall maintain an EQ walkdown log and must be consulted in the evaluation of any identified field waikdown discrepancies and assure notification is made to the appropriate organization for resolution of discrepancies. The EJ Supervisor is also responsible for ensuring the performance of follow-up walkdowns to verify corrective action has resolved the identified discrepancies.
- Nuclear Engineering Managers must provide support to the Manager, Site Nuclear Engineering Services, to assist in the conduct of walkdowns and resolution of nonconformances upon request.
- The Modifications Projects Group Project Manager is responsible for walkdown coordination.
- B. DETERMINATION OF THE NECESSITY TO PERFORM AN EQ WALKDOWN AND VERIFICATION PROCESS
  - An EQ walkdown shall be performed on identified EQ equipment as determined by the EQ Supervisor.
  - 2. The EQ Supervisor shall determine the necessity of performing the walkdown and shall establish the walkdown boundaries (identify the equipment and supporting equipment to be walked down). The EQ Supervisor shall assign a Design Engineer and Verification Engineer to review the EQ test reports, instruction manuals and other applicable documentation to develop the walkdown acceptance criteria per the Exhibit 1 and

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Exhibit 2 Instructions (Parts A and B of Exhibit 1 and Part A of Exhibit 2 shall be completed, as applicable). The EQ Supervisor shall forward the walkdown package (Exhibit 1) to the Modifications Projects Group Project Manager to coordinate the walkdown.

- 3. The EQ Supervisor shall ensure the walkdown is conducted by a Design Engineer and Verification Engineer. The Design Engineer and Verification Engineer shall complete Part C of Exhibit 1 and Part B of Exhibit 2. The Modifications Projects Group Project Manager shall be responsible for walkdown coordination including ALARA considerations, work request prenaration (if required), obtaining the required clearances and obtaining craft support.
- 4. An EQ walkdown may be required to address issues raised by NRC IE Notices, vendor bulletins, 10CFR21 reports or upon the discretion of the EQ Supervisor. If required, the walkdown must be performed as described in Section V.B. and V.C.
- C. DOCUMENTATION OF PLANT CONFIGURATION
  - Once the acceptance criteria is understood, the Design Engineer and Verification Engineer shall visually verify the as-built configuration per the Exhibit 1 and Exhibit 2 Instructions and compare the as-built configuration to the acceptance criteria.
  - The verification of the as-built configuration is an inspection. If the Design Engineer or Verification Engineer identify any discrepancies between the plant configuration and the qualified configuration, the discrepancy shall be evaluated. The discrepancy shall be recorded utilizing Exhibit
    The EQ Supervisor must be consulted to assist in determining if the discrepancy adversely affects compliance with 10CFR50.49.

NOTE:

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Immediate corrective action may be made on raceway items during the walkdown provided the corrective action is performed on equipment <u>not</u> within the scope of 10CFR50.49. Such action shall be documented using Exhibit 2.

3. Identified discrepancies as recorded on Exhibit 3 shall be assigned to either the Nuclear Operations Maintenance Department or Site Nuclear Engineering Services (SNES), as determined by the EQ Supervisor, for resolution. However; all discrepancies which adversely affect compliance with 10CFR50.49

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must be sent to SNES for resolution. Resolution may include corrective action via a Work Request, MAR, DCN or other plant work authorization mechanism and the generation of a nonconformance document according to respective departmental procedures.

- Items identified as discrepancies shall be tracked as "open items" by the EQ Supervisor.
- Upon notification of completion of corrective action, the EQ Supervisor shall ensure the correct EQ configuration has been installed via a follow-up walkdown.
- D. RECORDS MAINTEMANCE

Upon completion of Exhibits 1, 2, and 3 by the Easign Engineer and Verification Engineer, the walkdown package is returned to the EQ Supervisor. The EQ Supervisor shall review Part C of Exhibit 1. Part B of Exhibit 2, and Exhibit 3 of the walkdown package and sign wath part indicating the adaquaty of the information and compliance with the exhibit instructions. The EQ Supervisor maintains a copy of the walkdown package, and transmits the original to Records Management with a copy to the Manager, Nuclear Electrical/18C Engineering.

## VI. INTERPRETATION CONTACT

Manager, Nuclear Engineering Assurance



EQUIPMENT QUALIFICATION WALKDOWNS

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#### EXHIBIT 1 Page 1 of 12

#### INSTRUCTIONS FOR COMPLETING THE DOCUMENTED CONFIGURATION FOR 10CFR50.49 EQUIPMENT CHECKLIST

This form is a means to verify the plant as-built configuration meets the EQ requirements specified in EQ test reports, instruction manuals, regulatory notices, and FPC analyses. Exhibit 1 is designed to allow the addition of necessary sheets. For instance, if one page for Section 2.0 does not provide sufficient space to record the instruction manual information, additional Section 2.0 sheets may be added to the welkdown package. Exhibit sections applicable to a specific welkdown must be identified in the appropriate section on page one of Exhibit 1. Non-applicable sections should be discarded or NA'd.

## 1.0 IDENTIFICATION OF EQUIPMENT TO BE FIELD VERIFIED (Exhibit 1. Part A)

The assigned Design Engineer must complete Exhibit 1. Part A, and the assigned Verification Engineer must vorify the accuracy of the information recorded per the references utilized. The assigned Design Engineer shall obtain a Walkdown Package Number from the log maintained by the EQ Supervisor.

1.1 Block A.1 and A.2. The assigned Design Engineer shall review the electrical circuit of the "end device" in the 10CFR50.49 program. A loop diagram must be developed from the applicable electrical drawings, raceway schedules, termination sheets, and block diagrams. Each discrete component in the block diagram must be identified (such as junction boxes, terminations, pull boxes, splices, penetrations, cables, end devices, etc.) back to the entrance to the control complex. Block A.2 shall be utilized to document each discrete component identified, the manufacturer/model number of the discrete component and the applicable sections of Exhibit 1 to be utilized. Pull boxes (no terminations) and condulets are to be verified not to contain splices, using Exhibit 2.

NOTE: The purpose of the loop diagram is to identify any ancillary components and/or electrical splices.

Partial loop walkdowns may be performed to address specific concerns related to individual end devices or loop components. In this case, the full loop diagram must indicate which portions of the loop shall be verified by walkdown. This is accomplished by indicating the boundaries of the walkdown with dashed lines and indicating the walkdown is a partial walkdown in Block A.2. Only the discrete components to be walked down are recorded in Block A.2.

Ref: V.B.

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- 1.2 Block A.3 The references utilized to generate the loop diagram must be recorded in Block A.3.
- 1.3 Block A.4 Any notes required must be recorded in Block A.4.
- 1.4 Signatures The assigned Design Engineer shall sign Part A signifying the loop diagram is an accurate block diagram based on the References of Block A.5. The assigned Verification Engineer shall sign Part A signifying the information recorded is accurate based on the References of Block A.3. Should the assigned Verification Engineer not concur with the recorded information, the information in question shall be discussed with the assigned Design Engineer and resolved. The EQ Supervisor shall sign Part A signifying Exhibit 1, Part A, is complete per this procedure.

## 2.0 DEVELOPMENT OF ACCEPTANCE CRITERIA (Exhibit ), Part B)

2.1 The assigned Design Engineer shall complete Exhibit 1, Part B, and the assigned Verification Engineer shall verify the accuracy of the information recorded per the references utilized.

For each discrete component identified in Exhibit 1 (Block A.2) excluding pull boxes and condulets which contain no terminations (Exhibit 2 to be utilized), acceptance criteria shall be prepared prior to the walkdown. The walkdown package number and the discrete component description shall be recorded at the top of each page.

As a minimum, the applicable walkdown acceptance criteria shall be developed based on the documents listed below as applicable:

- Environmental qualification test report(s).
- b. Vendor instruction manual information.
- c. Applicable NRC Information Notices, Circulars, and Bulletins.
- Vendor Qualification Package including any analyses performed allowing alternate configurations.

Exhibit 1, Part B, is divided into sections to address each of the above documents. The applicable document(s) shall be identified in the appropriate blank provided. If additional space is required for listing the documents, the "Notes" sections shall be utilized.

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2.2	The a require qualif	bove documents shall be reviewed ements unique to the applicable disc ication requirements include, but are	to identify rete component. not limited to:	qualification Examples o
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2.3	Block utilize Enginee 10CFR50 locatio	1.B.1 - Location Information. Bloc ed to document the location specified to aring Procedure 222, "Qualification f 0.49," checklist or EQ Master List Dat on utilized in the EQ analysis.	ck 1.B.1 of Par by the CR-3 EQ pro for Equipment in tabase). This 10	t B shall b ogram (Nuclea the Scope o ocation is th
2.4	Block 1 record manufac has bee "Qualif List, t	.B.2 - Nameplate Data. Block 1.B.2 ( any nameplate data important in estat turer, model number, serial number, en previously identified per Nuclea fication for Equipment in the Scope of the CMIS database, etc.	of Part B shall to insulation class r Engineering P of 10CFR50.49,"	be utilized t cation such a s, etc. whic rocedure 222 the EQ Maste
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### INSTRUCTIONS FOR COMPLETING THE DOCUMENTED CONFIGURATION FOR 10CFR50.49 EQUIPMENT CHECKLIST

- Equipment mounting orientation requirements.
- b. Required electrical interfaces.
- Utilization of specific materials for gaskets, torque switches, jumper wiring, etc.
- d. Utilization of specific identifiable lubricants.
- e. Utilization of drain holes, plugs or relief valves.
- 2.6 In addition to the above environmental qualification requirements, the following typical general housekeeping concerns should be addressed:
  - Equipment mounting configuration secure and electrical terminations exhibit good workmanship.
  - b. Apparent degradation due to aging such as cracks, britileness, pitting, or softening of cables, terminal blocks, contacts, lubricants, gaskets, etc. Aging related degradation shall be identified as a discrepancy on Exhibit 3.
  - c. Moisture intrusion, excessive lubricant leakage or corrogion.
  - d. Missing labels (nameplates, plant ID tags) and general cleanliness.
- 2.7 The assigned Design Engineer shall sign the bottom of each page of Fart B indicating all applicable test reports, instruction manuals and regulatory documents have been reviewed and the EQ equipment configuration requirements extracted. The assigned Verification Engineer shall sign the bottom of each page of Part B indicating the referenced test reports, instruction manuals, and regulatory documents have been reviewed and the EQ equipment configuration requirements extracted. Upon completion of Part 3 by the assigned Design Engineer and Verification Engineer. the EQ Supervisor shall sign the bottom of each page of Part B indicating the section has been completed per this instruction.

#### 3.0 DOCUMENTATION OF PLANT CONFIGURATION

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3.1 The Design Engineer and Verification Engineer assigned to perform the walkdown must fully understand the recorded acceptance criteria prior to the conduct of the walkdowns. Should the Design Engineer or Verification Engineer have any questions, the EQ Supervisor must be contacted for clarification. Once the acceptance criteria is understood, the Design Engineer and Verification Engineer shall perform the field verification



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walkdown utilizing the acceptance criteria previously recorded in Exhibit 1, Part B. From each acceptance criterion specified in the completed Part B, the Design Engineer shall record the plant as-built configuration in Part C. In most instances, an "acceptable" or "unacceptable" response will be adequate. Occasions may arise where amplifying information may be required. The Verification Engineer shall independently verify the Part C information recorded by the Design Engineer. Should the Verification Engineer not concur with the information recorded, the Design Engineer and Verification Engineer shall resolve the information in question prior to proceeding to Exhibit 3.

- 3.2 The Design Engineer shall sign the bottom of each page of Part C indicating he has visually verified the information recorded. The Verification Engineer shall sign the bottom of each page of Part C indicating he has visually independently verified the information recorded by the Design Engineer.
- 3.3 If directed by the EQ Supervisor each discrete component must be photographed and the photograph must be attached to the walkdown package. Each photograph must be uniquely identified to the discrete component, walkdown package number, and dated.
- 3.4 Upon completion of the walkdown, the Design Engineer shall identify any discrepancies between the Part B acceptance criteria and the as-built configuration documented in Part C by recording the discrepancies utilizing Exhibit 3. If no discrepancies are identified, "None" shall be recorded. The Verification Engineer shall perform the same comparison and ensure all discrepancies are identified. Any discrepancies shall be evaluated in consultation with the EQ Supervisor. Discrepancies which adversely affect compliance with 10CFR50.49 shall be specifically identified.
- 3.5 Identified discrepancies as recorded on Exhibit 3 shall be assigned to either the Nuclear Operations Maintenance Department or Site Nuclear Engineering Services (SNES), as determined by the EQ Supervisor. However; all discrepancies which adversely affect compliance with 10CFR50.49 must be sent to SNES for resolution. Resolution may include corrective action via a Work Request, MAR, DCN or other plant work authorization mechanism and the generation of a nonconformance document according to respective

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## INSTRUCTIONS FOR COMPLETING THE DOCUMENTED CONFIGURATION FOR 10CFR50.49 EQUIPMENT CHECKLIST

departmental procedures. Notification to Nuclear Operations Maintenance shall be made via Interoffice Correspondence and via Engineering Question to Site Nuclear Engineering Services.

- 3.6 Items identified as discrepancies shall be treated as "open items" by the EQ Supervisor.
- 3.7 The EQ Supervisor shall review and sign Exhibit 1, Part C indicating that the walkdown was conducted per this procedure.
- 3.8 Upon notification of completion of corrective action, the EQ Supervisor shall ensure the correct EQ configuration has been installed via follow-up walkdown.

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	INSTRUCTIONS FOR COMPLETING TH AND CONDULET VERIFICATION WAL	HE PULL BOX KDOWN FORM	
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3.0 The a and refer revie	ssigned Verification Engineer shall re Part A to ensure the information r ences given. The EQ Supervisor shal w and completion of Part A per these	eview the introdu ecorded is accu 1 sign Part A i instructions.	nctory section rate per the ndicating hi
4.0 The D scope walkd locat gaske compl ident Docum docum Discy shall	esign Engineer shall complete Part B specified. Part B of Exhibit 2 sl own of each pull box identified in Par ion, and a verification that the cov t and all screws. The condulet sum eted by the Design Engineer and assign ified in the circuit of concern (not ented Configuration for 10CFR50.49 Ec ented as a discrepancy on the 10CFR epancy Form (Exhibit 3). If no discr be utilized and "None" chall be record	of Exhibit 2 per hall be used to t A with regards wer was re-insta mary statement previously docu quipment, Exhibit 50.49 Equipment repancies are not rded.	the walkdow document th to each box' lled with th shall also th Any splice mented in th t 1) shall th Configuration ted, Exhibit

5.0 The Verification Engineer shall independently verify the information recorded by the Design Engineer. Should the Verification Engineer not concur with the information recorded, the Design Engineer and Verification Engineer shall recolve the information in question.

The EQ Supervisor shall sign Part B signifying the form is complete per this procedure.

Ref: V.B.



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