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BEOAM VOLUME II

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NONCONFORMING MATERIAL, PARTS OR COMPONENTS

15.1 PURPOSE

This section establishes the requirements and methods used within the Boston Edison Company to document and control nonconforming materials, parts, and components to prevent their inadvertent installation or use. Included are requirements and methods to identify and segregate nonconforming items, provide for their disposition, and notify affected organizations.

This section also establishes requirements and methods to document and control conditions adverse to quality other than nonconforming items (hardware). Such conditions include deficiencies noted by QAD during audits, reviews, inspections and surveillances; and program, procedure, and documentation problems identified by any BECo personnel for any activity governed by this QA Program. Conditions noted during normal, in-process review or monitoring before final approval/acceptance of a document or activity are considered part of the process, and are not subject to the reporting requirements herein. However, problems identified after completion of the specified process shall be included.

15.2 REQUIREMENTS

15.2.1 All materials, parts, or components which do not conform to specified requirements shall be documented as follows:

15.2.1a All nonconforming materials, parts, or components identified by QAD as a result of required installation, and other inspections shall be documented on Nonconformance Reports (NCR). Any nonconformance noted by QAD in a portion of the operating plant not within the scope of the required inspection shall be documented as required in b below.

All nonconforming materials, parts, or components identified by QAD as a result of required receipt inspections shall be documented on a Stores Claim. In the event a nonconformance reported on a Stores Claim cannot be resolved without an engineering evaluation, an NCR shall be initiated. Also, if a nonconforming item on a Stores Claim is withdrawn for use, an NCR shall be initiated.

Nonconforming items identified on an NCR or items for which a Stores Claim has been initiated shall be clearly identified with a Nonconformance Tag or Stores Claim tag.

- 15.2.1b Nonconforming materials, parts, or components identified during operation, maintenance, or surveillance testing are documented and reported via a Failure and Malfunction Report (F&MR). Documentation in the Control Room Log and on Shift Turnover Sheets, and tagging, shall be performed as appropriate to ensure effective control.
- 15.2.1c Nonconforming materials, parts, or components noted by QAD during auditing or surveillance monitoring shall be recorded on F&MRs unless they are more appropriately addressed as part of a condition adverse to quality, as described in Paragraph 15.2.2.
- 15.2.2 Other conditions adverse to quality shall be documented as follows:
- 15.2.2a BECo deficiencies identified by QAD shall be identified on Deficiency Reports (DR) which shall be processed according to Section 18.
- 15.2.2b In lieu of a DR, a Management Corrective Action Request (MCAR) may be used to report and resolve conditions adverse to quality involving process or policy issues which affect more than one department and for which management attention and direction is required. This application of the MCAR is further described in Section 18. An MCAR is also used as an escalation document to bring to management attention and to resolve significant conditions adverse to quality. The use of the MCAR as an escalation document is described in Section 16.
- 15.2.2c A Potential Condition Adverse to Quality Report (PCAQ) is issued to resolve suspected or actual conditions adverse to quality, if not reported on DRs, NCRs, MCARs, or F&MRs.
- 15.2.2d A Supplier Finding Report (SFR) is issued to report and resolve conditions adverse to quality which are identified during a supplier audit, supplier survey, or source inspection of a supplier. The SFR shall be processed according to Section 18.
- 15.2.3 Nonconforming items identified on an NCR shall be physically segregated from conforming items and controlled to prevent installation or inadvertent use. Installed nonconforming items shall be identified, and the status of the affected system, component, or structure shall be controlled to prevent inadvertent use of the nonconforming item. Any nonconforming item may not be declared operable (as defined by the PNPS Technical Specifications) until the NCR disposition is

approved, implemented, and verified by QAD, and the Nonconformance Tag is removed.

- 15.2.3a Tagged nonconforming items not yet installed shall be placed in a segregated and controlled storage area designated for this purpose.

When physical segregation is not practical, for example with large items which are stored in place, suitable means, such as roping off the area, shall be used to clearly indicate the nonconforming status.

- 15.2.3b Nonconforming items which, because of their makeup and intended use, cannot readily be returned to a conforming state (such as chemicals, weld rod, concrete, etc.) shall not be released for installation. If the nonconformance can be corrected after installation, the item may be released for installation if authorized by the Plant Manager or the Planning and Outage Department Manager. Technical justification for the installation, including the limits on examination, testing, or inspection activities that can be performed on the structure, system, or component with the nonconforming item installed, shall be prepared and made part of the NCR documentation.

To prevent the inadvertent installation and use of a tagged nonconforming item, the Plant Manager and the Planning and Outage Department Manager shall ensure that the work control processes shall prohibit the closure of the work document until the Nonconformance Tag is cleared and removed.

- 15.2.3c Nonconformance Tags shall only be removed by Quality Assurance Department personnel, and only after satisfactory resolution of the NCR. Stores Claim tags are removed by Stores.

- 15.2.3d The Quality Assurance Department shall keep records of all unresolved nonconformances and monitor Station activities to assure that:

1. Tags have not been removed or altered on items still classified as nonconforming.
2. Unauthorized personnel have not modified the segregation or use requirements on tags.
3. Activities have not been conducted that violate requirements specified on tags or in this program.

- 15.2.4 Nonconforming items identified on an F&MR shall be further identified and the status of the system controlled by appropriate log entries, shift turnover information, and tags. PNPS Technical Specifications shall govern operation.
- 15.2.5 All nonconforming items identified on an NCR shall be reviewed for acceptance (use-as-is), rejection (scrap, salvage, or return-to-vendor), repair, or rework according to appropriate department procedures. Repaired and reworked items shall be re-inspected for acceptability using the original criteria. Equivalent criteria may be used if reconciliation to the original criteria has been justified by the Nuclear Engineering Department. All rework or repair shall be performed using approved procedures. All dispositions of nonconforming items shall be properly documented.
- 15.2.5a The Station Organization is responsible for the evaluation and disposition of identified nonconformances. "Rework" dispositions that require a special process (welding, heat treating, non-destructive testing, etc.) shall be approved by the Quality Assurance Department.
- 15.2.5b The Nuclear Engineering Department shall approve and document their evaluations of and justifications for "accept" or "repair" dispositions. The Quality Assurance Department shall then approve "accept" or "repair" dispositions which affect the quality assurance requirements associated with the nonconforming item. When the Nuclear Engineering Department changes a "repair" disposition to "rework," the Quality Assurance Department shall approve the "rework" disposition if it requires a special process to restore an item.
- 15.2.5c When required by Purchase Order or contract, suppliers working under their own BECo approved QA Programs shall submit nonconformances with the disposition "accept as is" or "repair" to BECo for approval. The cognizant NED discipline group shall review the supplier's disposition and its justification; this review and approval may be documented directly on the supplier's report. NED shall assign a BECo control number to each such report. As an alternative, NED may request QAD to issue a BECo NCR to cover the report. NED shall notify the supplier of BECo's approval.
- 15.2.5d The Quality Assurance Department is responsible for assuring NCR dispositions are implemented and inspected for acceptability of rework and repair actions.

- 15.2.6 All nonconforming items identified on an F&MR shall be reviewed and a disposition provided according to appropriate Station Organization procedures. The Maintenance Request (MR) process shall provide the necessary controls to ensure PNPS Technical Specifications are met. Actions taken shall be recorded on the F&MR with reference to the related MRs.
- 15.2.7 Conditions adverse to quality reported on the PCAQ shall include actual or suspected errors in controlled documents issued by one department for use outside the department; actual or suspected failures to comply with any applicable rule, regulation, order, or license of the NRC; and any other actual or suspected condition adverse to quality not reported on the F&MR, NCR, DR, or MCAR.