

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

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1.0 SCOPE

- 1.1 This procedure provides the site method for initiating, dispositioning, controlling and closing both Major and Minor Nonconformance Reports (NCRs) and Deficiency Reports (DRs). Contractors and Startup shall meet all requirements of this procedure except as noted in the appropriate appendices.

2.0 PURPOSE

- 2.1 The purpose of this procedure is to assure that conditions not conforming with design requirements such as failures, malfunctions, deficiencies, deviations and defective material and equipment are identified, evaluated, dispositioned, processed and closed in a controlled and expeditious manner. The dispositioned nonconforming condition shall result in a document that provides all the required design verified technical information necessary for implementation.

3.0 REFERENCES

- 3.1 UE&C FACP-2, Handling of Contractor Incident Interface Reports
- 3.2 GEDP-0046, Response to Potential Significant Deficiencies
- 3.3 9763-RM-1, Instruction for Site Records Management System
- 3.4 ASP-9, Repairs and Modifications to NPT Stamped Items
- 3.4 QP-1, Trailing
- 3.6 QP-2, Corrective Action
- 3.7 JP-3, Stop Work
- 3.8 TPI-11, Work Requests
- 3.9 TP-23, Project Reference Manual
- 3.10 UE&C QA-15, Nonconforming Material, Parts or Components
- 3.11 AP-48, Home Office Review and Issue of Significant Deficiencies [10CFR50.55(e)]
- 3.12 Pullman Procedures XV-2, Procedure for Handling NCRs

4.0 GENERAL

4.1 Responsibilities

Any organization or person may report a nonconforming condition by initiating a Contractor Problem Report (CPR).

Personnel performing quality functions shall initiate NCRs. Any organization may initiate a DR. (Titles shown below are positions or applicable designees.)

- 4.1.1 The Construction Director and Project Construction QA Manager shall be responsible for overall implementation of this procedure.
- 4.1.2 The Director of Engineering and Licensing shall have overall responsibility for all engineering activities.
- 4.1.3 The Engineer (UE&C) shall be responsible for completing, reviewing and approving the disposition of Major nonconformances on the Nonconformance Report/Deficiency Report Form (Attachment 1) and shall provide all design information necessary to implement the disposition. The engineer shall also assure that Major NCRs/DRs received for disposition are controlled and resolved in a timely manner and/or justify "Accept-As-Is" or "Repair" condition.
 - 4.1.3.1 Project Engineering Manager (PEM) shall have overall responsibility for personnel providing dispositions for Major NCRs/DRs including responses for Potential Significant Deficiencies.
 - 4.1.3.2 Discipline Engineering Manager (DEM) shall be responsible for the overall quality of dispositions of Major NCRs/DRs provided by his discipline, including evaluating and responding to Potential Significant Deficiencies.
 - 4.1.3.3 Discipline Office Supervisor (DOS) and/or Discipline Field Supervisor (DFS) shall be responsible for assignment of qualified personnel for their respective disciplines to disposition Major NCRs/DRs in a timely manner and the overall technical and administrative quality of these dispositions.
 - 4.1.3.4 Engineering Administrator - Office Group (EA/OG)/Field Group (EA/FG) - shall be responsible for receiving, logging, tracking, status monitoring and distributing (for disposition) Major NCRs/DRs within the engineering organization. The group shall also be responsible for entering the disposition status from the NCRs/DRs into the Change Document Tracking System, as necessary. They shall transmit the dispositioned original Major NCR/DR to the applicable Contractor's QA/QC organization with a copy to the Contractor, Central Data Entry Group and the Records Management Group.
 - 4.1.3.5 Records Management Group - shall be responsible for standard distribution of Major NCRs/DRs after dispositioning and to maintain files of all NCRs/DRs including revision.

4.1.4 Site Contractors (Applies to all groups issuing NCRs/DRs. See Paragraph 4.0).

4.1.4.1 The Contractor's QA/QC organization shall be responsible for preparing and approving the description of the nonconformance/ deficiency, processing and closing NCRs. The Contractor's QA/QC Group shall also log DRs as an administrative function.

4.1.4.2 The Contractor's construction group shall be responsible to perform the required action in accordance with the approved disposition of the NCR. Construction personnel shall also be responsible for initiating and performing required action in accordance with the approved disposition of the DR and verifying the completion of the disposition.

4.1.4.3 The Contractor shall be responsible for dispositioning Minor NCRs/DRs and their distribution.

4.1.5. The Project Construction Quality Assurance Manager shall be responsible for implementation of the Site QC Program. He shall assure compliance to this procedure through his Audit/Surveillance organization.

4.1.6 Westinghouse - The Westinghouse site representative (working with the DOS/DFS) shall review and disposition those NCRs which affect Westinghouse equipment. The Westinghouse representative shall provide any special instructions on the NCR.

4.1.7 Central Data Entry Group (CDEG) - The CDE operators are responsible for entering bulk data and modification sheets into the CDT system.

4.2 Definitions

4.2.1 Nonconformance/Deficiency - A deficiency in characteristics, documentation or procedure which renders the quality of an item unacceptable or indeterminate after final acceptance inspection. Examples of nonconformance include: physical defects, test failures, incorrect or inadequate documentation or deviation from prescribed processing, inspection or test procedures.

Note 1: Unsatisfactory items and conditions identified during the course of an inspection or surveillance which the work can be corrected using an approved procedure shall not be a NCR/DR condition. When an approved procedure is not available, the nonconformance shall be documented on an NCR/DR form for disposition. All nonconformances found after final acceptance inspection require an NCR/DR form to be submitted.

Note 2: An inspection of a completed portion of an item or activity

that is not scheduled to be inspected again is a final acceptance inspection.

General inspection of an entire system, item or equipment, i.e., walkdowns inspections and so-called final inspection do not qualify as a final acceptance inspection within the context of this procedure.

4.2.2 Nonconformance Report (NCR) - A document which identifies a safety related and/or ASME code discrepant condition involving a material, part, component, service or activity. A nonconformance shall be classified either Major or Minor.

4.2.2.1 Minor Nonconformance - A safety related discrepancy which can be resolved by the Contractor using one of the following dispositions. UE&C Engineering disposition is not required.

Note: A deficiency that is found during in-process inspection or final acceptance inspection (as described in Paragraph 4.2.1, Notes 1 and 2) that can be repaired to an approved procedure shall be documented on an In-process/Final Acceptance Inspection Report. With the exception of specific surface conditions permitted by Project specifications, documents or procedures, discrepant conditions identified on ASME Section III Code stamped components shall be documented as a Major NCR. A deficiency that is found after final acceptance inspection that can be repaired by an approved procedure shall be documented on an NCR/DR form.

- a. Restoration
- b. Scrap (Return to UE&C warehouse)
- c. Return to supplier (Contractor supplied material only)
- d. Documentation deficiencies with the exception of customer supplied material.

4.2.2.2 Major Nonconformance - A safety related discrepancy which does not meet the Minor nonconformance criteria. UE&C Engineering evaluation and disposition is required. All ASME Section XI repairs, except for maintenance, shall be considered Major nonconformances.

4.2.3 Deficiency Report (DR) - A document which identifies a non-safety related discrepant condition involving a material, part, service or component and activities, which shall be classified either as Major or Minor.

- 4.2.3.1 Minor Deficiency - A non-safety related discrepancy which can be resolved by Contractor using one of the following dispositions. UE&C Engineering disposition is not required.
- a. Restoration
 - b. Scrap (return to UE&C warehouse)
 - c. Return to supplier (Contractor supplied material only)
 - d. Documentation deficiencies with the exception of customer supplied material requirements.
- 4.2.3.2 Major Deficiency - A non-safety related discrepancy which does not meet the Minor deficiency criteria. UE&C Engineering evaluation and disposition is required.
- 4.2.4 Design Documents - Drawings, specifications, vendor foreign prints, calculations and related documents (e.g., NCR, ECA) pertaining to the permanent plant design.
- 4.2.5 Affected Documents - Design documents covering the component specifically modified by the NCR/DR disposition.
- 4.2.6 Reference Documents - Related documents which are not modified by the NCR/DR.
- 4.2.7 Change Document Tracking (CDT) System - CDT is a computerized system for tracking the status of design changes. For further details see TP-23, Project Reference Manual.
- 4.2.8 Accept-As-Is - Disposition by Engineering indicating that the discrepancy is within the requirements of the applicable codes and does not affect safety, performance and maintainability and that the item under consideration can be used for its intended purpose. This disposition must be substantiated by data provided on the NCR/DR.
- 4.2.9 Repair - A nonconforming material disposition which permits the reprocessing of material to bring it into an acceptable condition in conformance with the applicable codes but which still departs from original requirements. Complete repair instructions, must be provided on the NCR/DR. Repairs utilizing ASME Section XI shall be in accordance with the ASP-9 program.
- 4.2.10 Reject - A nonconforming material disposition used when an item is unsuitable for its intended purpose and when it is not economically feasible to repair it.

- 4.2.11 Restoration - The process by which an item is made to conform to original requirements by completion or correction.
- 4.2.12 Return to Supplier/Vendor - A disposition indicating that the item is to be returned to the Supplier for repair or replacement.
- 4.2.13 Limited Work Authorization (LWA) is utilized to request movement, or other limited activities on a controlled basis to nonconforming construction items which are on HOLD.
- 4.2.14 Potential Significant Deficiency [10CFR50.55(e)] - Deficiency found in design and construction, which, were it to have remained uncorrected, could have adversely affected the safety of operation of the nuclear power plant at any time throughout the expected lifetime of the plant. For additional details, see Attachment 4.
- 4.2.15 Nonconformance Review Board (NRB) - An advisory board to assist Engineering in evaluating and dispositioning NCRs as requested.
- 4.2.16 Project Quality Trending Program - A single, project-wide trending program which includes NCR/DR input.
- 4.2.17 Contractors - Includes Startup Test Department (STD), UE&C, YAEC and all other site Contractors.
- 4.2.18 Field Work Complete - This is a computer status which indicates that the work required by the disposition of the NCR/DR is complete, and that the responsible QA/QC personnel have verified and accepted the completed work for those NCRs requiring QC acceptance. This status is to track when all field work is accomplished and accepted, making the NCR/DR condition "Field Complete."
- 4.2.19 Closed NCR - This is a computer status which indicates that the three following conditions have been met:
- a. The NCR has been dispositioned.
 - b. The NCR/DR is "Field Complete."
 - c. All required affected documents have been incorporated.
- 4.2.20 Hold Tag - A status tag (See Attachment 7) attached to items that are nonconforming and documented on an NCR beyond which no work shall be performed unless otherwise permitted by this procedure.
- 4.2.21 Final Acceptance Inspection - A phase of construction/fabrication during which items, activities, or documents are in the completion stages of a specific portion of work.
- 4.2.22 Item Identity - Method used to identify items such as cable reel

number, instrument, valve and equipment numbers, pipe spool and pipe line numbers or heat code numbers.

4.2.23 Contractor Problem Report (CRP) - A CPR replaces the "Contractor Incident Interface Report" and handles the following:

- a. Nonconforming/Deficient Conditions suspected in another discipline area.
- b. Damage to a work item which is the responsibility of another contractor.
- c. A vehicle for non-quality construction personnel to report a nonconforming condition to the applicable quality organization.

4.3 Attachments

- 4.3.1 Attachment 1 - Nonconformance Report (NCR)/Deficiency Report (DR) Form and Continuation Sheet (2 sheets)
- 4.3.2 Attachment 2 - Preparation of Nonconformance Report Form (4 sheets)
- 4.3.3 Attachment 3 - Flow Chart No. 1, Requirements for Providing Disposition to NCR/DR
- 4.3.4 Attachment 4 - Flow Chart No. 2, Processing Potential Significant Deficiencies (2 sheets)
- 4.3.5 Attachment 5 - Limited Work Authorization (LWA)
- 4.3.6 Attachment 6 - LWA Completion and LWA Tag
- 4.3.7 Attachment 7 - Hold Tag and Instructions, Startup Test Department (STD) Status Indicator
- 4.3.8 Attachment 8 - Contractor Problem Report
- 4.3.9 Attachment 9 - Manual Number Assignment Sheet
- 4.3.10 Attachment 10 - Design Change Document Modification Sheet
- 4.3.11 Attachment 11 - Nonconformance Report Partial Release Sheet

4.4 Appendices

The appendices specify unique activities of the listed Contractors who will utilize other procedures for those activities.

- 4.4.1 Appendix A - UE&C

- 4.4.2 Appendix B - Startup
- 4.4.3 Appendix C - Pullman-Higgins
- 4.4.4 Appendix D - PTL

5.0 PROCEDURE

5.1 Initiating NCRs/DRs

- 5.1.1 When a potential nonconforming condition is identified on a safety related, Seismic 1, Seismic 1A, upgrade B31.1 or ASME Section III Code system or component, the discrepant condition shall be evaluated to determine if an NCR is applicable. When the deficiency is identified as requiring an NCR, it shall be evaluated to determine the classification, Major or Minor, as defined in Section 4.0 of this procedure, and for reportability under 10CFR50.55(e).

NOTE: The reporting of an item under 10CFR50.55(e) does not impose a further requirement to report under 10CFR21 or vice versa. 10CFR21 reporting is for items (defects) involving a "substantial safety hazard". If further guidance is needed refer to NUREG-0302, Rev. 1.

- 5.1.2 The applicable QA/QC personnel shall prepare an NCR by completing the form (Attachment 1) in accordance with Attachment 2.
- 5.1.3 When a potential nonconforming condition is identified on a non-safety-related system or component, the discrepant condition shall be evaluated to determine if a DR is applicable. When the deficiency is identified as requiring a DR, it shall be evaluated to determine the classification as Major or Minor.
- 5.1.4 Site personnel shall prepare a DR by completing the form (Attachment 1) in accordance with Attachment 2.
- 5.1.5 NCR/DR Number Assignment

- 5.1.5.1 NCR/DR numbers shall be controlled and issued from two locations. Pullman-Higgins QA shall issue P-H NCR/DR numbers. UE&C QC shall issue NCR/DR numbers for all other contractors and STD. The activity shall be called NCR/DR Numbers Control. The personnel issuing the NCR/DR numbers shall be called the NCR/DR Numbers Controller.

- a. UE&C and P-H QA managers will assign and train an adequate number of personnel to assure person assigned to NCR/DR Numbers Control will be available at all times. However, the number of personnel authorized as NCR/DR number controllers will be as limited as possible.

5.1.5.2 The NCR/DR numbers shall sequentially consist of:

- a. first two digits - contractor ID;
- b. a sequential number - per contractor ID;
- c. The last digit shall be a capital alpha to denote the revision. The initial issue shall be alpha Character "A".

NOTE: Contractor Sequential Number Indicates Initial
ID from Log Issue (Revision)
45 - 123 - A

5.1.5.3 The controllers shall maintain an NCR log and a DR log for each contractor or discipline designation. The log shall have columns for each of the following:

- a. NCR or DR numbers;
- b. initiator's name;
- c. BIP;
- d. building;
- e. unit;
- f. system;
- g. description
- h. major/minor;
- i. date closed;
- j. controller's initials - the controller shall enter his/her initials in this space only after the copy from CDT has been received.

5.1.5.4 In order for the initiator to obtain an NCR/DR number, the following information shall be given to the controller:

- a. initiator's group code;
- b. type - NCR or DR;
- c. major or minor;
- d. initiator's name;
- e. BIP
- f. building;
- g. unit;
- h. system;
- i. description.

Following logging the information, the controller will issue the NCR or DR number.

5.1.5.5 When the NCR/DR is issued, an additional copy will be sent to CDEG for inputting to CDT.

- a. After the CDEG has entered the NCR/DR information into CDT, CDEG will return the hard copy to the originating controller.

b. The controller shall enter on the log that the NCR/DR copy was returned by initialling in the appropriate column in the log.

5.1.5.6 The person requiring a revision to an existing NCR/DR will contact the NCR/DR Number Controller and provide the number of the existing NCR/DR. The controller will enter the revision level and the date of revision into the "Date Closed" column of the log adjacent to the initial entry, which indicates that the initial NCR/DR has been revised. The controller shall then enter the revised NCR/DR into the log in accordance with Paragraph 5.1.5.3. The initial issued NCR/DR will be stamped or marked "Revised" and processed in the same manner as a void NCR/DR. The revised NCR/DR shall be processed in the same manner as the original issue.

NOTE: CDT is a tracking process which will record the following pertaining to an NCR/DR:

1. NCR/DR number and the information in Paragraph 5.1.5.4.
2. Disposition date, key words, reference documents and affected documents.
3. Date closed and status change.

5.1.6 NCR/DR

5.1.6.1 The discrepant condition (either Major or Minor) shall be described on the NCR/DR with sufficient information to permit evaluation of the condition by the group providing the disposition.

5.1.6.2 The Contractor shall submit the original NCR/DR form for a Major nonconformance/deficiency to the applicable discipline EA/OG or EA/FG for processing. He may provide a recommended solution for a major discrepant condition on a continuation sheet (Page 2 of Attachment 1). Any discrepant identified by the Contractor as a potential 10CFR50.55(e) violation shall be promptly forwarded to Engineering Administration for processing per Flow Chart 2, Attachment 4.

5.1.6.3 Minor NCRs/DRs shall be processed in accordance with Attachment 3.

5.1.6.4 Each Contractor QA/OC organization shall obtain NCR/DR numbers from the applicable NCR/DR Numbers Control Group. The Numbers Control Group shall maintain a log that will

control and monitor the status of individual NCRs/DRs from inception through closure; however, the CDT system will be considered the official site control and status of NCRs/DRs.

- 5.1.6.5 The Control Data Entry Group will, on a scheduled and/or demand basis, provide a listing of NCR/DR status sorted by Initiator's Group Code.

5.2 Cause for Use of the Contractor Problem Report (CPR)

- 5.2.1 Damage to items (nonconforming/deficient condition) which is the responsibility of another contractor or if a contractor discovers a suspected nonconformance/deficiency in another discipline area of responsibility, he shall report it to the applicable Contractor's QA/QC organization via CPR for evaluation.
- 5.2.2 Non-Quality (Construction and/or Engineering) personnel shall report nonconforming conditions to the applicable quality organization via CPR.
- 5.2.3 Nonconforming conditions for equipment which has been turned over to STD but has not been "N" stamped shall be handled as follows:
- 5.2.3.1 Nonconformance reports shall be issued by the "N" and "NA" Certificate Holders for the ASME System until they are "N" stamped.
- 5.2.3.2 At the time of initiation of an NCR on "Turned-Over" ASME System, the initiator shall notify the Startup Manager/Designee of the NCR's origination. This notification may be by telephone, with the notifier documenting the telecon in the description section of the NCR. The telecon must denote the authorized STD representative's name and the date of notification.
- 5.2.3.3 Prior to placement of a "Hold" tag on the nonconforming condition, a STD Startup Indicator (Attachment 7) must be placed on the NCR tag by either STD or the applicable QA/QC group. The status indicator will be considered STD's acknowledgement that they have been notified.
- 5.2.3.4 Upon receipt of notification, STD shall implement TPI-23 for personnel or equipment protection as required for the nonconforming condition.
- 5.2.4 The issuing group shall establish a log that is adequate to verify that the CPR was closed by the applicable contractor. This verification shall take place upon the return of the closed CPR.
- 5.2.5 The applicable Contractor's QA/QC organization shall control each

CPR received. He shall maintain a working file of the item through completion/closure and forward a copy of each closed CPR to the initiator.

- 5.2.6 Nonconforming conditions for equipment which does not require "N" stamping and has been turned over to STD shall be handled as follows:
- 5.2.6.1 The person that discovers a nonconformance shall report it to Startup Quality Control via a Contractor Problem Report (CPR) (see Attachment 9).
- 5.2.6.2 Startup Quality Control shall sequence and control each CPR received. SOC shall maintain a working file of the item through completion/closure and forward a copy of each closed CPR to the initiator.
- 5.3 Work Affecting Hardware Under the Jurisdiction of Start-up
- 5.3.1 Contractor personnel shall not perform work associated with NCR/DR dispositions affecting hardware under the jurisdiction of the STD unless written authorization has been obtained in accordance with TPI-11, Work Requests.
- 5.3.2 The STD shall have the option of performing work on dispositioned NCRs/DRs in accordance with TPI-11. Work to be performed on nonconforming conditions for equipment which has been turned over to STD but has not been "N" stamped will be assigned to the responsible certificate holder in accordance with TPI-11.
- 5.4 Maintaining Status of Nonconforming Conditions (NCRs)
- 5.4.1 Tagging & Segregation
- 5.4.1.1 Nonconforming conditions shall be tagged by the responsible, initiating organization with the contractor's appropriate Hold tag (Attachment 7). The Hold tag shall only be removed by the responsible QA/QC organization.
- NOTE: Hold tags are applicable to both Major and Minor NCRs.
- 5.4.1.2 When practical, nonconforming items shall be stored in a segregated area to prevent their inadvertent use or installation until the disposition is accomplished. When it is not practical to separate an item because of its physical size or when there is concern that the item or its identification could be lost, the item shall be clearly tagged to prevent its inadvertent use.

5.4.2 Limited Work Authorization (LWA/Repair Tag)

LWA's or repairs are initiated by the Contractor who is requesting to perform controlled limited activities on a non-conforming item.

- 5.4.2.1 Implementation of disposition work may not proceed on non-conforming conditions without issuance of a LWA or Repair Tag based upon receipt of an approved NCR disposition which includes specific detailed direction (a "LWA Request Form" is not required). A copy of the dispositioned NCR shall be available in the general area of the disposition implementation and is QA/QC's authorization to issue the LWA or Repair Tag.
- 5.4.2.2 Testing and component use by Startup Test Department may proceed on non-conforming items, without issuance of a LWA Tag/Form or dispositioned NCR/DR, if the NCR/DR has been evaluated by STD and determination has been made by STD that testing or component use will not effect the nonconforming condition or cause further degradation of the item.
- 5.4.2.3 Nonconforming items requested to be moved out of the Receiving Storage areas while on "Hold" status, or work requested to be performed on nonconforming items or conditions which have not yet been dispositioned and items on "Hold" which require work other than that specified on the NCR disposition, shall be tagged with a LWA tag, adjacent to the Hold tag, before the item or condition can be moved or otherwise processed on a limited controlled basis. Prior to tagging, a "Limited Work Authorization Request (Attachment 5) shall be initiated and approved. The LWA Request shall clearly identify the reason and any limitations or precautions. The individual responsible for the disposition of the NCR/DR shall approve and list the limitations and/or precautions on the LWA. The applicable QA/QC Manager shall review and issue the LWA to the requesting party. The original LWA will be logged and controlled by QA/QC. Copies shall be attached to the original NCR/DR when required.
- 5.4.2.4 A LWA can be issued to cover more than one (1) NCR.

5.5 Providing Dispositions to NCRs/DRs

5.5.1 Major NCRs/DRs

- 5.5.1.1 Engineering Administrator, Office Group or Field Group, shall upon receipt of a Major NCR/DR from the responsible organization, log, assign and distribute it to the DOS or DFS for evaluation. The EA/OG or EA/FG shall maintain copies of all unanswered Major NCRs/DRs.

- 5.5.1.2 Upon receipt of a Major NCR, the Discipline Office Supervisor (DOS)/Discipline Field Supervisor (DFS) shall evaluate the discrepant condition for potential 10CFR50.55(e) in accordance with instructions provided in Attachment 4, Flow Chart No. 2.
- 5.5.1.3 The DOS/DFS shall provide dispositions to NCRs/DRs to assure compatibility with design requirements. The DOS/DFS shall evaluate the NCR/DR for generic implications and retrofit requirements.
- 5.5.1.4 The DOS/DFS will determine when interface with vendor/supplier (such as Westinghouse) is required for NCR/DR dispositions and shall obtain any required approvals.
- 5.5.1.5 The DOS/DFS will interface with the other engineering disciplines /groups and UE&C QA for NCR/DRs dispositioned "Return to Vendor" and/or the Startup Test System Test Engineer (STE), as needed, and shall obtain any required reviews.
- 5.5.1.6 For ASME Section XI repairs, the requirements of ASP-9 shall be implemented. The DEM shall notify YAEC Engineering of development of a repair program as described in ASP-9.
- 5.5.1.7 The DOS/DFS shall attach to the NCR/DR any sketches, letters, telephone conversation memos or written information. Calculations shall be referenced, as design justification etc., when they are a necessary part of the disposition. As pages are added to the NCR, each sheet shall be identified to reflect the correct sequential page number, starting with Attachment 1 numbered as Page 1 of _____. The total quantity of included pages shall be the second number. As pages are added by different groups in processing the NCR/DR, the total quantity of "included pages" will be changed accordingly by lining out the second number and correcting the quantity to reflect the "new" total number of pages. Each page shall additionally be identified with NCR/DR report type and number.

5.5.2 Minor NCRs/DRs

- 5.5.2.1 The designated Contractor person shall disposition the Minor NCR/DR utilizing the definitions in Paragraphs 4.2.2.1 and 4.2.3.1, respectively.
- 5.5.2.2 Upon completion and approval of the disposition, a copy of the NCR/DR shall be sent to the appropriate supervisor for implementation.

5.6 Distribution of Dispositioned NCRs/DRs

5.6.1 Major NCRs/DRs

5.6.1.1 EA/OG or EA/FG will transmit the dispositioned original Major NCR/DR to the applicable Contractor's QA/QC organization with a copy to the Contractor for implementation and one to the Records Management Group for distribution.

5.6.1.2 The Records Management Group shall make all distribution of the Major NCRs/DRs.

5.6.2 Minor NCRs/DRs

5.6.2.1 Minor NCRs/DRs shall be distributed as deemed necessary by each Contractor organization after disposition. A copy will be forwarded to CDEG for entry into CDT and an information copy will be distributed to the applicable UE&C Engineering discipline. *Manual must address new distribution*

5.6.2.2 Upon closure of the minor NCR/DR, a copy shall be distributed to CDEG for entry into CDT and others as deemed necessary by each contractor organization.

5.7 5.6.2.3 Responsibility of Contractor - after closure
5.7 Responsible Contractor and Construction and QA/QC Organization

5.7.1 The Contractor, upon receipt of dispositioned NCRs, shall implement the disposition in accordance with applicable site procedures. Work will not proceed beyond the hold tag until the applicable Contractor QA/QC personnel has affixed a LWA/Repair Tag to the nonconforming item. The Contractor's construction copy of the dispositioned NCR shall be available at the work location.

5.7.2 Upon receipt of the dispositioned NCR, the Contractor QA/QC Manager will immediately review the NCR disposition in detail. Conditions requiring corrective action shall be handled in accordance with QP-2. If significant problems are found that violate code or quality requirements he shall issue a Stop Work Order (SWO) in accordance with QP-3. The SWO will not be lifted until the issue(s) are resolved. Minor problems will be resolved by interfacing with the applicable parties.

5.7.3 The Records Management Group shall transmit a copy of the dispositioned NCR to the ANI. The ANI's signature of the transmittal shall be his acknowledgement of receipt.

5.8 Partial Releases on NCRs/DRs

5.8.1 Those NCRs/DRs which list multiple nonconforming conditions/deficiencies may require a partial signoff to release the corrected and accepted portion of the NCR. An example would be as follows:

5.8.1.2 Twenty six (26) valves put on hold due to several deficiencies. Some of the valves may require rework and some may be "accept-as-is". Those valves which were dispositioned "accept-as-is" could be released by QA to avoid construction delays.

5.8.2 Partial releases shall be documented (Attachment 11) until the entire NCR/DR can be signed off and accepted as complete.

NOTE: At present, CDT will not status "Partial Releases." CDEG will enhance the program to include "Partial Releases."

5.9 NCR/DR Revisions

5.9.1 Technical changes shall be made by revising the NCR/DR, using a capital letter next to the number. Subsequent revisions shall be noted by changing the revision letter to the next higher letter. Any "Closed" or "Voided" NCRs/DRs shall not be reopened or revised. If changes are necessary, a new NCR/DR shall be issued which references the original NCR/DR number.

5.9.2 When revision to the NCR/DR disposition is necessary, the DOS/DFS shall revise the disposition of the previous issue of the NCR/DR and request the initiating organization to process the new revision using the same controls as used on the previous issue. The initiating organization may initiate a revision of the NCR/DR when deemed necessary.

5.9.3 Each NCR/DR revision shall be complete and will supersede prior revisions. All contents of the superseded NCRs/DRs which are still valid, shall be included in the revised NCR/DR.

5.9.4 Changes shall be clearly identified by "clouding" the change. "Clouds" identifying prior revisions may be left on the NCR/DR. Each cloud will be identified with a Delta revision letter next to the cloud.

5.9.5 Any non-technical changes to an NCR/DR which correct administrative/typographical errors (Reference Documents, Keywords) or added information shall be documented on a Design Change Document Modification Sheet (Attachment 10) and forwarded to the Centralized Data Entry Group (CDEG) for entry into CDT. CDEG will forward the Design Change Document Modification Sheet to the holder of the original NCR/DR for attachment to the original NCR/DR and need not be distributed.

NOTE: The Design Change Document Modification Sheet shall not be used for changes to the Affected Documents section of the NCR/DR.

5.10 Void NCR/DR

5.10.1 If it is required to void an NCR/DR, it shall be stamped or marked "VOID". The reason for voiding the NCR/DR shall be stated on the NCR/DR and signed by those authorized persons (or their designees) that have previously reviewed the NCR/DR. The number assigned to a voided NCR/DR shall not be reused. The voided NCR/DR shall be distributed to each person (or designees) who had previously reviewed the NCR/DR prior to it being voided. The originating organization QA/QC Manager shall forward a copy to CDEG to update CDT and forward a copy of the void NCR/DR to the person that originated the NCR/DR. If the NCR/DR had been dispositioned by Engineering and distributed, the NCR/DR shall be revised, marked "VOID" and processed in the same manner as the previous issue. "Issue Date" space must be filled in.

Lack of
Interface
with ANI

5.11 Revising Affected Documents

5.11.1 Criteria

NCRs/DRs shall list all affected documents, however, only NCRs/DRs listing the following "Affected Documents" shall be incorporated on design documents. Incorporation shall be within 60 days from the NCR/DR issue date. The NCR/DR shall be referenced on the affected document when the change is incorporated.

- a. Building General Arrangement Drawings showing Equipment Locations
- b. Process and Instrumentation Diagrams
- c. Loop and Logic Diagrams
- d. Electrical One Line Diagrams
- e. Specifications (safety related only)
- f. Electrical Schematics
- g. CASP
- h. Set Point Data List (Dwg M-500376)
- i. Computer I/O List (Dwg M-510004)
- j. Standard Instrument Schedule (Dwg M-510000)

5.11.2 The CDT System will list all Affected Documents (see TP-23).

5.11.3 On a quarterly basis, the PEM shall provide to the Director of Engineering and Licensing an assessment of unincorporated NCRs/DRs exceeding the 60 day criteria.

5.12 Nonconformance Review Board (NRB)

5.12.1 The NRB will assist engineering, when requested, in evaluating and dispositioning NCRs.

5.12.2 The NRB is comprised of representatives from:

- a. UE&C Project Field QC. The Project Field QC Manager serves as chairman.
- b. UE&C Site Engineering - Site Engineer.
- c. UE&C Construction Discipline Superintendent.
- d. Westinghouse Representative - when NSSS items are involved.
- e. YAEC - Field QA.
- f. Others - As necessary for technical assistance or upon request.
- g. The Project Owner's Construction Management Organization will be given the option to attend meeting.

5.12.3 Convening the Board

The board chairman will convene the board when:

- a. Requested by a member of the NRB.
- b. Requested by engineering to assist in evaluation of an NCR for potential 10CFR50.55(e).
- c. Requested by engineering for a NCR or DR that is complicated and requires clarification.
- d. Requested by Engineering to evaluate recurring nonconformance trends which requires discussion for immediate corrective action to be taken by the Contractors.

5.12.4 The Authorized Nuclear Inspector (ANI) is not a member of the NRB but may participate as an observer at his option. The NRB chairman shall notify the ANI of the date and time of the meeting.

5.12.5 It is the responsibility of the chairman to maintain the records for the board. This includes, but is not limited to, the notes of meetings that will clearly reflect the board's recommendation.

5.13 Field Work Complete of NCR/DR (Field Closeout of NCRs/DRs)

5.13.1 NCRs

5.13.1.1 When the disposition has been implemented the responsible Contractor supervisor shall sign and date the original NCR in the "Work Completed" block.

5.13.1.2 The QA/QC Group will verify that the work has been completed per the NCR disposition.

5.13.1.3 If the inspection is satisfactory, the NCR will be closed by signing and dating in the appropriate block, checking the "Field Work Complete" block, and noting it in the NCR Log.

5.13.1.4 The QA/OC Group will send a copy to CDEG for entry into CDT.

5.13.1.5 If the verification process results in an unsatisfactory finding, the QA/OC Group shall notify the applicable construction-designated person of the result of the inspection.

5.13.1.6 The process described in Paragraphs 5.13.1.1 and 5.13.1.2 shall be repeated.

5.13.1.7 If the items fail the inspection for a second time, the QA/OC Manager will notify the applicable Project/Construction Manager for resolution.

5.13.1.8 "Field Closed" original NCRs shall be processed per Paragraph 9.1.

5.13.2 DRs

5.13.2.1 When the disposition of the DR has been implemented and verified by construction, the Contractor's responsible supervisor shall sign and date the original DR in the "Work Completed" block, and check off the "Field Work Complete" block.

5.13.2.2 The QA/OC Group shall mark N/A in the reinspection block and note the action in the DR Log.

5.13.2.3 A copy of the closed DR shall be forwarded to the CDEG for entry into the CDT.

5.13.2.4 The original DR shall be processed per Paragraph 7.1.

5.13.3 Contractors who obtain NCR/DR numbers from the UE&C Numbers Control Group shall forward a copy of the NCR/DR to the UE&C Numbers Controller once the NCR/DR is "Field Work Complete".

5.13.4 The applicable Numbers Controller shall be responsible for logging the Field Closed status into their manual log.

5.14 Closing of NCR/DR - The NCR/DR will be automatically closed by CDEG when the three following conditions are met:

- a. The NCR/DR has been dispositioned.
- b. The "Field Work Complete" block is checked on the NCR/DR.

c. The affected documents are incorporated as required.

6.0 TRENDING PROGRAM

The Project Quality Trending Program requires input from NCRs/DRs. NCRs/DRs will be trended in accordance with Procedure No. QP-1.

7.0 RECORDS/INFORMATION MANAGEMENT SYSTEM (IMS)

7.1 Field closed NCRs/DRs, including voided NCRs/DRs, shall be processed by the initiating organization in accordance with RM-1, "Instructions for Site Records Management System."

APPENDIX A

UE&C

1. UE&C shall comply with this procedure for initiation of DRs and shall comply with UE&C QA-15 for initiation of NCRs.
2. UE&C QA-15 incorporates all the essential elements of ASP-3.

APPENDIX B

Startup Test Department

- 1.0 An item determined to be potentially reportable by STD shall be documented on a Nonconformance Report/Deficiency Report in accordance with this procedure.
- 2.0 Major nonconformances shall be documented on a "Nonconformance Report/Deficiency Report" in accordance with this procedure.
- 4.0 Minor nonconformances do not have to be documented on a "Nonconformance Report/Deficiency Report" providing one of the following conditions is met:
 - 4.1 The nonconformance may be resolved by complying with Startup Test Department, Test Program Instruction No. 11, Work Requests (TPI-11), and
 - 4.1.1 The item or component can be restored to its original configuration shown on the design documents using existing procedures, or
 - 4.1.2 The item can be scrapped and replaced with another component of identical type and function, or
 - 4.1.3 The item can be returned to the supplier for replacement of identical type and function under the original purchase order.
 - 4.2 The nonconformance may be resolved using Startup Test Department Test Program Instruction No. 64, Test Performance (TPI-64) for test failures and inadequate test procedure documentation.
 - 4.3 The nonconformance may be resolved using Startup Test Department Test Program Instruction No. 63, Field Changes (TPI-63) for deviations from prescribed test procedures.

APPENDIX C

Pullman-Higgins

1. Pullman shall comply with Pullman procedure XV-2 for ASME and XV-2 NNS for B31.1 applications.
2. The above mentioned Pullman procedures will incorporate the essential elements of ASP-3.

APPENDIX D (Pittsburg Testing Laboratory)

All of the requirements of ASP-3 will be adhered to with the exception of the following:

1. Off-Site Services will be controlled by existing PTL procedure QC-CRN-1.
2. The responsibilities designated in Paragraphs 3.4.1 and 3.4.2 will be the responsibilities of the PTL Site Manager.

Sheet _____ of _____

MAJOR KING

NONCOMFORMANCE REPORT (NCR)
(1) NUMBER _____ Rev.
 DEFICIENCY REPORT (DR)

CONTRACTOR USE
Bldg. Unit System Turnover Isolation ANSI B.31.1 Pot. Sig. Inf.
(2) 0 1 2 Y N (3) 10CFR50.55(e)
ASME Sec. _____ Cl. _____ Other _____

Description _____

Prepared By: _____ (6) Approved By: _____ (7)

Title	Org.	Name	Date	Title	Name	Date
Responsibility:	Acceptable	Designation	Repair per	(8)		
<input type="checkbox"/> Reject <input type="checkbox"/> Other, see below Action to be taken by _____						

(10) KEYWORDS (11)

REFERENCE DOCUMENTS (12)

TYPE	NUMBER	REV

AFFECTED DOCUMENTS (13)

TYPE	NUMBER	DATE	REV

INTERDISCIPLINE REVIEW (14)

GROUP	INITIAL	DATE

REQUIRED APPROVALS PRIOR TO IMPLEMENTATION TO DISPOSITION: (15)
VESTIMOROSE

Title	Signature	Date

YASC

Title	Signature	Date

ISSUE DATE _____ (16)

WORK COMPLETED: _____ (17)

Title	Signature	Date

PREPARED BY: _____ (15)

Title	Signature	Date

CHECKED BY: _____

Title	Signature	Date

APPROVED BY: _____

Title	Signature	Date

Rejected: _____ (18)

1st Time Initials _____ 2nd Time Initials _____
OCE

ACCEPTED: _____

Title	Signature	Date

Field Work Complete (19)

White - SA/OCE, Green - Engineering, Yellow - Contractor, Pink - OCE, Gold - EM

Page _____ of _____

NONCONFORMANCE/DEFICIENCY REPORT CONTINUATION SHEET # _____

KEYWORDS											

REFERENCE DOCUMENTS												
TYPE	NUMBER										REV	

AFFECTED DOCUMENTS												
TYPE	NUMBER										SHEET	REV

Description: (This information will not be fed into the CDT system. This space is only to further clarify the condition).

Disposition Continued: (This information will not be fed into the CDT system. This space is only to further clarify the condition).

PREPARATION OF NONCONFORMANCE REPORT/DEFICIENCY REPORT

The numbers used in these instructions are the same as the numbers shown on the sample form, Attachment 1.

1. REPORT TYPE/NUMBER

Indicate the type of report being dispositioned (NCR or DK) (Major or Minor). The first two digits (Contractor ID) are the Contractor Discipline Codes. The next six characters are the NCR/DR numbers which are assigned by CDT. The last position is alpha for revision level. The initial issue shall be "A". The preparer shall obtain a number from the applicable NCR/DR Numbers Control Group upon preparation of the NCR/DR.

Block indicated "Contractor Use" is reserved for use by the initiating contractor.

2. BUILDING, UNIT AND SYSTEM

Insert Codes (Unit 1 or 2). If an NCR/DR applies to a both Units 1 and 2, indicate Unit 0. If the NCR/DR applies to a building common to both units, check block 0. If the NCR/DR applies to additional systems, list the others as Keywords. Codes shall be identical to those delineated in TP-34. Indicate whether the NCR has been turned over to STD (Yes or No).

3. CODE DESIGNATION

Mark the applicable box to show code designation.

4. POTENTIAL SIGNIFICANT DEFICIENCY 50.55(e)

Check box if evaluation results in this finding or if questionable. If box is checked, see Flow Chart 2, Attachment 4. If box is not checked the NCR/DR has been evaluated and a "significant deficiency" was not identified.

5. NONCONFORMANCE/DEFICIENCY DESCRIPTION

The allowable quantity of letters that can be input into CDT is delineated in this space; therefore, provide a concise description of the nonconformance/deficiency. Identify the part of the structure affected (i.e., "El. 6'-0"). If further description is necessary, add the information on a continuation sheet under the heading "Description". Additionally provide item identity in this area. If there is not enough space, provide the identity on the NCR/DR continuation sheet.

6. PREPARED BY

The preparer shall sign name, show title and print name and date.

7. REVIEW AND APPROVAL OF NONCONFORMANCE/DEFICIENCY

The applicable Contractors QA organization shall prepare and approve the description of the nonconformance/deficiency. The approver shall sign name, show title and print name and date.

8. DISPOSITION

Check applicable disposition action. Those Major NCRs dispositioned "Return to Vendor" shall include UE&C QA review for inclusion of QA requirements. QA shall initial in "interdiscipline review" block to indicate review. Include more than one Contractor when applicable in the "Action to be Taken by" block.

9. ACTION TO BE TAKEN BY

It is the Engineer's responsibility to assign the responsible Discipline/Contractor for implementation of the Disposition.

10. DISPOSITION SPACE

The disposition to the nonconformance shall be provided and must be concise, accurate, and complete. Technical justification shall be included as applicable. The NCR/DR disposition shall be reviewed for generic implications and retrofit requirements. If more space is required, additional sheets shall be added. See Paragraph 5.4.1.7. Major NCRs dispositioned "Return to Vendor" (Repair/Replacement) shall list the QA requirements under the Engineer's disposition or as a continuation of the disposition.

11. KEYWORDS

Add Keywords which provide means of retrieving data from CDT. Also, keywords are to be used to identify types of problems dispositioned for use in the NCR/DR Trending Program. Add BIP(s). (See TP-34.)

12. REFERENCE DOCUMENTS

List Reference Documents and latest revision number.

13. AFFECTED DOCUMENTS

List all design documents and latest revision number covering the component specifically modified by the NCR/DR disposition. Both Units 1 and 2 documents shall be listed, if applicable.

14. INTERDISCIPLINE REVIEW

Interdiscipline review shall be performed by all groups and listed. The discipline reviewer shall initial and date the box indicating acceptance of

the proposed disposition as it affects his work. Review/Approval may be obtained via telephone if both parties agree. The initials of the reviewer/approver shall be printed in the space followed by the initials of preparer if telephone approval is obtained. All "Interdiscipline Review" initials must be on the form prior to release of the dispositioned NCR/DR to the Contractor.

15. REQUIRED SIGNATURES

Major NCRs/DRs

The preparer and checker of the disposition print their names, sign, and date for UE&C Engineering. A "UE&C Approver" reviews the design, prints his name, signs, and dates the disposition. If Westinghouse or YAEC (for Section XI) review is required, an approval signature and date shall be obtained after required UE&C reviews have been completed. All "Required Signatures" must be on form prior to the release of the dispositioned NCR/DR to the Contractor.

Minor NCRs/DRs

The applicable Contractor personnel shall print name and date and sign the disposition of Minor NCRs/DRs similar to the manner required for "Responsibilities for UE&C Engineering", listed below.

Responsibilities of UE&C Engineering

The following personnel working under the supervision of DOS/DFS shall complete the Major NCR/DR disposition.

a. UE&C Preparer

- 1) Prepares NCR/DR disposition and includes all attachments to comply with requirements of this procedure.
- 2) Inspects specific site location as required to resolve the nonconformance.
- 3) Consults as needed with Contractor/Construction Management and other available sources, both in Field and Home Office, to develop solution.
- 4) Reviews or provides technical solution and technical justification to nonconformance based on a complete investigation of nonconformance. Prepares calculations and sketches as required.
- 5) Reviews the NCR/DR for generic implications and retrofit requirements.
- 6) Completes list of Reference Documents.
- 7) Completes list of Affected Documents and Keywords.
- 8) Lists Interdiscipline Reviewers and any other reviewers.

b. UE&C Checker

- 1) Determines that sufficient detail work has been completed to support solution and is included as attachment to the NCR/DR.
- 2) The checker provides the independent design verification and the technical adequacy of the solution and justification. This includes any associated calculations, and verifies that all data entered on the NCR/DR form and attachments are complete and accurate in accordance with ANSI N45.2.11.

- 3) Reviews the NCR/DR for generic implications and retrofit requirements.
- 4) Verifies that the required interdisciplinary and other group reviews are correctly listed on the NCR/DR and have been satisfactorily performed.

c. UE&C Approver

- 1) Reviews the technical content of the solution.
- 2) Satisfies himself that disposition is in accordance with good engineering practices.
- 3) Satisfies himself that preparer and checker have been correctly selected to perform the engineering work.
- 4) Determines that work is necessary and that project schedule is not unduly affected.
- 5) Determines that solution is generally consistent with that provided for similar types of questions.

16. ISSUE DATE

Show date NCR/DR issued for working disposition.

17. WORK COMPLETED

Contractors Construction Supervisor shall sign and date the line to signify the disposition has been completed. DRs are considered complete at this time, and the contractors construction supervisor shall check off the "Field Work Complete Block."

18. INSPECTION

NCRs - Contractor's QA/QC Group shall sign space for reinspection and acceptance block and list Inspection Report Numbers. See Paragraphs 5.13.1.5 thru 5.13.1.7 for unacceptable inspections.

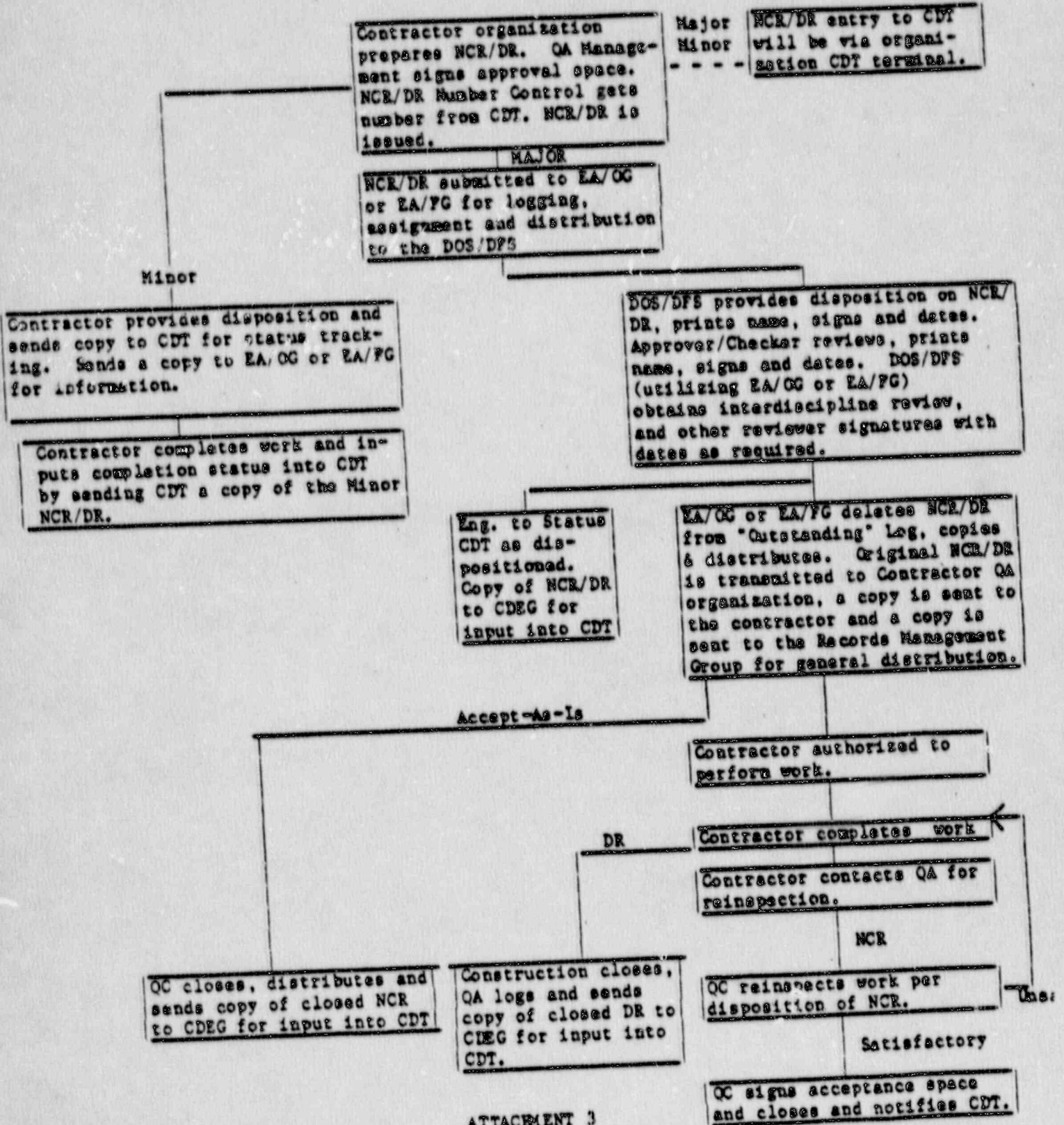
DRs - The QA/QC Group shall N/A this block and initial and date.

19. FIELD WORK COMPLETE

Check this block when the required work per the DR disposition has been complete and signed off or this block will be checked by the applicable QA/QC organization once an NCR disposition has been verified and accepted.

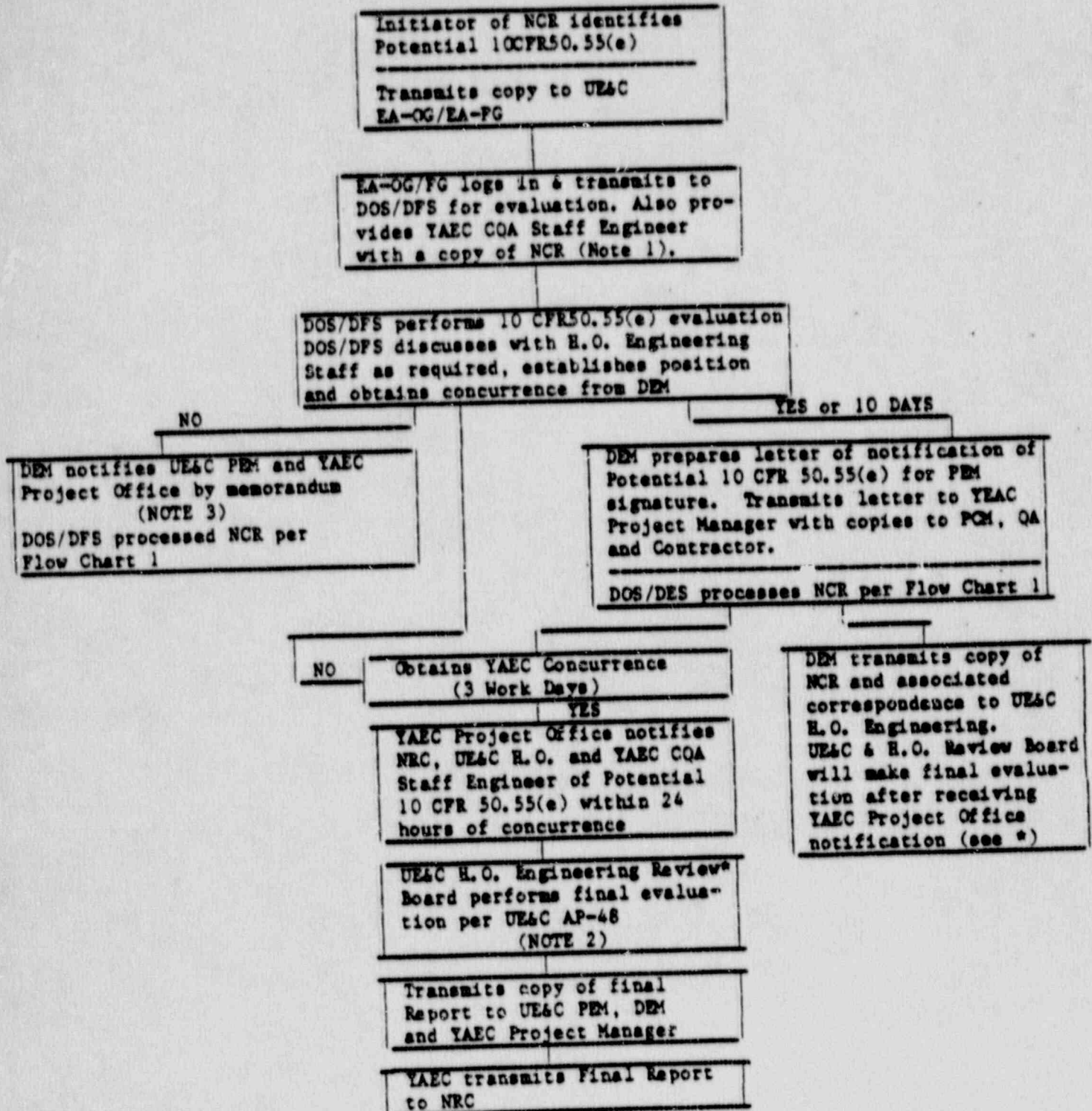
FLOW CHART NO. 1

REQUIREMENTS FOR PROVIDING DISPOSITION TO NCR/DR



FLOW CHART NO. 2

PROCESSING POTENTIAL SIGNIFICANT DEFICIENCIES - 10CFR50.55(e)



FLOW CHART NO. 2

NOTES

- NOTE 1: Upon receipt of NCRs which have been identified as either potential 10 CFR 50.55(e) the EA-OG-FG shall log-in and transmit the NCR to DOS/DPS for evaluation and disposition. Also provide YAEC COA Staff Engineer with copy of NCR. A ten (10) day evaluation period shall commence from the date of log-in by the EA-OG/FG. If the evaluation can not be completed within ten (10) calendar days from the date of log-in by the EA-OG/FG, the NCR must be reported as a potential 10 CFR 50.55(e) item to the YAEC Project Manager.
- NOTE 2: Home Office Engineering Review Board shall, within twenty-five (25) days from the date that the potential 50.55(e) items are reported by YAEC to the NCR, conduct a follow-up review and when the item is resolved a Final Report shall be written by the Review Board for transmittal to YAEC, PEM and DEM.
- NOTE 3: The DEM prepares a memorandum for review and approval by PEM to the Director of Engineering and Licensing (DEL) stating the technical justification/rationale used in the non-reportability determination.

LIMITED WORK AUTHORIZATION REQUEST NO.

--	--	--	--	--	--	--	--

 Rev.

Related RCB No. _____	Rev. No. _____	
Spec/Div. _____	P. O./Contractor _____	
Reason for LWA request & intended work to be performed:		

Requested by: _____

Organization	Title	Signature	Date
--------------	-------	-----------	------

Restrictions and/or Precautions:

Approved by: _____

Organization	Title	Signature	Date
--------------	-------	-----------	------

Balance for Limited Use:

Status of item(s) has been reviewed including all RCBs covering the item(s). Inspection Hold Points shall not be bypassed and work shall not progress beyond the following point to permit accessibility to the item(s):

LWA denied for the following reason:

Organization	Title	Signature	Date
--------------	-------	-----------	------

ACTION COMPLETED

Signature	Title	Organization	Date
-----------	-------	--------------	------

LWA CLOSED by verification of ACTION COMPLETED OR RCB CLOSED-RCB # _____


Signature	Title	Date
-----------	-------	------

LWA COMPLETION

NOTE: Contractor may use his own tag which status "Limited Work" DE "Repair" to a non-conforming/deficient condition.


1. QA shall assign the LWA number
2. Initiator shall list the related NCR
3. The initiator shall list related drawings and specifications
4. The initiator shall fill in the Contractor PO number or discipline, as appropriate
5. The initiator shall fill in the key words
6. The initiator shall fill in the reason for request and the organization requesting the request
7. Initiator for LWA shall have individual responsible for disposition of NCR approve and list the limitations and precautions, as applicable
8. QA/QC Manager shall approve and issue
9. The LWA requestor shall sign ACTION COMPLETE when the work stipulated on the LWA is complete
10. Signature of QA/QC person verifying ACTION COMPLETE
11. If the ACTION COMPLETE block is not signed off prior to NCR closure, the LWA will be closed based on the NCR closure

LWA TAG

 United engineers & constructors inc	
LIMITED WORK AUTHORIZATION	
LWA NO. _____	①
ITEM _____	②
_____	SAMPLE
QC _____	③
_____	DATE _____
SIGNATURE	
TO BE ATTACHED OR REMOVED BY QA PERSONNEL ONLY	

- 1 LWA Tag No.
- 2 Item identify and limits of activities
- 3 QC Personnel responsible for tag placement

TAGS

FORM 882	 United Engineers & CONSTRUCTORS INC.	NCR No. _____
	HOLD	
	R/O No. ① _____	TAG No. ③ _____
	ITEM _____	② _____
	P/O No. _____	④ _____
QC _____	⑤ _____	
SIGNATURE _____ DATE _____		
TO BE ATTACHED OR REMOVED BY QA PERSONNEL ONLY		

SAMPLE

NOTE: Contractor may use his own hold tag.

- 1 Receiving inspection report or quality inspection report
- 2 Item number and/or description of exact NCR condition (condensed)
- 3 Hold Tag number assigned to "Hold"
- 4 P/O No. when used for receiving or location coordinates for use in field
- 5 Signature of responsible QC Inspector/Engineer and date

STD Status Indicator

THIS EQUIPMENT
UNDER START UP
JURISDICTION

← BLUE

CONTRACTOR PROBLEM REPORT		CPE No. _____
Item Identification:	Location:	Sht. _____ of _____ BTPF
Description of Problem:		
Generated By: _____ Signature Date		
Evaluation:		
The following action has been taken:		
DISCREPANCIES:		
<input type="checkbox"/> NCR No.		
<input type="checkbox"/> DT No.		
<input type="checkbox"/> R/A		
Approved By: (QA Manager- NCR's) (Construction-DR's)		
_____ Title Signature Date		

MANUAL NUMBER ASSIGNMENT SHEET

CHANGE DOCUMENT TRACKING (ADD A DESIGN CHANGE DOCUMENT)

CHANGE DOCUMENT TYPE: _____

CHANGE DOCUMENT GROUP: _____

CHANGE DOCUMENT NUMBER: _____

CHANGE DOCUMENT REV.: _____

INITIATOR INITIALS: _____

DATE INITIATED: _____ (MM DD YY FORMAT)

BIP NUMBER: _____

BUILDING: _____

AFFECTED UNIT: _____ (0, 1, or 2)

SYSTEM: _____

CHANGE DOCUMENT DESCRIPTION (2 LINES, 60 CHARACTERS EACH, MAXIMUM):

DESIGN CHANGE DOCUMENT MODIFICATION SHEET

NOT TO BE USED FOR CHANGE TO THE AFFECTED DOCUMENT SECTION
 CHANGE DOCUMENT TO BE MODIFIED:

TYPE	GROUP	NUMBER	REV

SECTION I. (TRANSACTION "MDCD")
 FILL IN ONLY THOSE FIELDS THAT ARE AFFECTED

INITIATOR

DATE INITIATED _____ DATE REQUIRED _____

BIP NUMBER _____

BUILDING _____ UNIT _____ SYSTEM _____

RESP. CONTR.	ADD/DEL	RESP. CONTR.	ADD/DEL

SECTION II (TRANSACTIONS "MULTS" AND/OR "MULTS")
 MULTIPLE BIPS, SYSTEMS OR BUILDINGS

BIPS	A/D	SYSTEMS	A/D	ELDGS	A/D

SECTION III (TRANSACTIONS "AREP AND/OR "MREP")
 REFERENCE DOCUMENTS (DRAWINGS, ETC.)

TYPE	NUMBER	SHEET	APP REV	ACTION (A,M,D)	NEW APP REV

DESIGN CHANGE DOCUMENTS

TYPE	NUMBER	ACTION (A,D)

NOTE: AFTER ENTRY INTO CDT, CDEC IS TO FORWARD THIS SHEET TO _____ (holder of original NCR/DR)

Page _____ of _____
NCR # _____
DR # _____

NONCONFORMANCE REPORT

PARTIAL RELEASE SHEET # _____

<u>Item ID</u>	<u>Action Completed Signature-Title Date</u>	<u>Reinspected & Accepted By QA Dept. Rep. - Title-Date</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

INTERIM PROCEDURE CHANGE

PROCEDURE NUMBER ASP-3 REVISION NUMBER 1 IPC NUMBER 2

1. JUSTIFICATION:

Changes made to satisfy ANI concerns (prior to implementation of procedure)

2. AFFECTED PARAGRAPHS:

5.1.5.3.e
5.7.3

AFFECTED ATTACHMENTS:

Attachment 1 (page 1 of 2)
Attachment 2 (page 4 of 4)

3. EXISTING REQUIREMENTS:

Reference existing procedure.

4. CHANGE SYNOPSIS:

Changes definition of "closed" to "field work complete", provides definition of responsibilities for ANI concurrence of ASME related NCRs.

5. INSTRUCTIONS:

Remove and replace Table of Contents (1 and 11). and pages 9, 15, 25 and 30 of 40.

Initiated by:	<u>Roland P. Guille</u>	<u>Manager Cont. Audit/Eng.</u>	<u>12-20-74</u>
	Signature	Title	Date
Approved by:	<u>Director of Engineering and Licensing</u>	<u>[Signature]</u>	<u>12/21/74</u>
	Director of Engineering and Licensing	Signature	Date
Approved by:	<u>Project Construction QA Manager</u>	<u>[Signature]</u>	<u>12/21/74</u>
	Project Construction QA Manager	Signature	Date
Approved by:	<u>Construction Director</u>	<u>[Signature]</u>	<u>12/21/74</u>
	Construction Director	Signature	Date

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5.1.5.2 The NCR/DR numbers shall sequentially consist of:

- a. first two digits-contractor ID;
- b. a sequential number - per contractor ID;
- c. The last digit shall be a capital alpha to denote the revision. The initial issue shall be alpha Character "A".

NOTE: Contractor Sequential Number Indicates Initial
 ID from Log Issue (Revision)

45	-	123	-	A
----	---	-----	---	---

5.1.5.3 The controllers shall maintain an NCR log and a DR log for each contractor or discipline designation. The log shall have columns for each of the following:

- a. NCR or DR numbers
- b. initiator's name
- c. BIP
- d. building
- e. unit
- f. system
- g. description
- h. major/minor
- i. date field work complete
- j. controller's initials - the controller shall enter his/her initials in this space only after the copy from CDT has been received.

5.1.5.4 In order for the initiator to obtain an NCR/DR number, the following information shall be given to the controller:

- a. initiator's group code;
- b. type - NCR or DR;
- c. major or minor;
- d. initiator's name;
- e. BIP
- f. building;
- g. unit;
- h. system;
- i. description.

Following logging the information, the controller will issue the NCR or DR number.

5.1.5.5 When the NCR/DR is issued, an additional copy will be sent to CDEG for inputting to CDT.

- a. After the CDEG has entered the NCR/DR information into CDT, CDEG will return the hard copy to the originating controller.

5.6 Distribution of Dispositioned NCRs/DRs

5.6.1 Major NCRs/DRs

5.6.1.1 EA/OG or EA/FG will transmit the dispositioned original Major NCR/DR to the applicable Contractor's QA/QC organization with a copy to the Contractor for implementation and one to the Records Management Group for distribution.

5.6.1.2 The Records Management Group shall make all distribution of the Major NCRs/DRs.

5.6.2 Minor NCRs/DRs

5.6.2.1 Minor NCRs/DRs shall be distributed as deemed necessary by each Contractor organization after disposition. A copy will be forwarded to CDEG for entry into CDT and an information copy will be distributed to the applicable UE&C Engineer discipline.

5.6.2.2 Upon closure of the minor NCR/DR, a copy shall be distributed to CDEG for entry into CDT and others as deemed necessary by each contractor organization.

5.7 Responsible Contractor and Construction and QA/QC Organization

5.7.1 The Contractor, upon receipt of dispositioned NCRs, shall implement the disposition in accordance with applicable site procedures. Work will not proceed beyond the hold tag until the applicable Contractor QA/QC personnel has affixed a LWA/Repair Tag to the nonconforming item. The Contractor's construction copy of the dispositioned NCR shall be available at the work location.

5.7.2 Upon receipt of the dispositioned NCR, the Contractor QA/QC Manager will immediately review the NCR disposition in detail. Conditions requiring corrective action shall be handled in accordance with QP-2. If significant problems are found that violate code or quality requirements he shall issue a Stop Work Order (SWO) in accordance with QP-3. The SWO will not be lifted until the issue(s) are resolved. Minor problems will be resolved by interfacing with the applicable parties.

5.7.3 The ANI concurrence of ASME related NCRs is the responsibility of the ASME N Type Certificate Holders and this responsibility shall be defined in their ASME programs.

5.8 Partial Releases on NCRs/DRs

5.8.1 Those NCRs/DRs which list multiple nonconforming conditions/deficiencies may require a partial signoff to release the corrected

Sheet _____ of _____

NONCONFORMANCE REPORT (NCR) MAJOR MINOR
 (1) NUMBER _____ Rev. _____
 DEFICIENCY REPORT (DR)

CONTRACTOR USE

Bldg. Unit System Turnover Seismic I ANSI B.31.1 Poten. Sig. Def.
 (2) (3) (4) (5) (6) (7) (8) 10CFR50.55(a)
 ASME Sec. _____ Cl. _____ Other _____

Description _____

Prepared By: _____ (6) Approved By: _____ (7)

Title	Org.	Name	Date	Title	Name	Date
Disposition:	<input type="checkbox"/>	Accept-as-is	<input type="checkbox"/>	Restoration	Repair per	
(8)	<input type="checkbox"/>	Reject	<input type="checkbox"/>	Other, See below	Action to be taken by	

(10)
 KEYWORDS
 (11)

REFERENCE DOCUMENTS

TYPE	NUMBER (12)	REV

AFFECTED DOCUMENTS (13)

TYPE	NUMBER	SHEET	REV

INTERDISCIPLINE REVIEW (14)

GROUP	INITIAL	DATE

REQUIRED APPROVALS PRIOR TO IMPLEMENTATION TO DISPOSITION: (15)
 WESTINGHOUSE

Title _____ Signature _____ Date _____

YABC

Title _____ Signature _____ Date _____

ISSUE DATE _____ (16)

WORK COMPLETED: _____ (17)

Title _____ Signature _____ Date _____

PREPARED BY: _____ (15)

Title _____ Signature _____ Date _____

CHECKED BY: _____

Title _____ Signature _____ Date _____

APPROVED BY: _____

Title _____ Signature _____ Date _____

Rejected: _____ (18)

1st Time Initials _____ 2nd Time Initials _____

OCE OCE

ACCEPTED: _____

Title _____ Signature _____ Date _____

Field Work Complete

- 3) Reviews the NCR/DR for generic implications and retrofit requirements.
- 4) Verifies that the required interdisciplinary and other group reviews are correctly listed on the NCR/DR and have been satisfactorily performed.

c. UE&C Approver

- 1) Reviews the technical content of the solution.
- 2) Satisfies himself that disposition is in accordance with good engineering practices.
- 3) Satisfies himself that preparer and checker have been correctly selected to perform the engineering work.
- 4) Determines that work is necessary and that project schedule is not unduly affected.
- 5) Determines that solution is generally consistent with that provided for similar types of questions.

16. ISSUE DATE

Show date NCR/DR issued for working disposition.

17. WORK COMPLETED

Contractor's Construction Supervisor shall sign and date the line to signify the disposition has been completed. DRs are considered complete at this time, and the contractor's construction supervisor shall check off the "Field Work Complete Block."

18. INSPECTION

NCR's

Contractor's QA/QC Group shall sign the space for reinspection and acceptance block and list Inspection Report Numbers (see Paragraphs 5.13.1.5 thru 5.13.1.7 for unacceptable inspections). Once an acceptable inspection has been verified and signed off by the QA/QC group, the inspector shall check off the "Field Work Complete" block.

DRs

The Construction Supervisor shall N/A this block. The person responsible for signing off the "Work Complete" block will check the Field Work Complete block when the required work per the DR disposition has been completed.

2

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

INTERIM PROCEDURE CHANGE

PROCEDURE NUMBER ASP-3 REVISION NUMBER 1 IPC NUMBER 3

1. JUSTIFICATION:

Per request of the Functional Managers.

2. AFFECTED PARAGRAPHS:

None

AFFECTED ATTACHMENTS:

3. EXISTING REQUIREMENTS:

Existing "Effective Date" is shown as 1/12/85.

4. CHANGE SYNOPSIS:

Changes effective date of procedure implementation to 1/21/85.

5. INSTRUCTIONS:

PEN & INK CHANGE: Cross out 1/12/85 in the Effective Date block. Enter 1/21/85 as the new effective date. Initial and date the change.

Initiated by:	<u>C.F. Esposito</u> Signature	Procedure Mgmt Group Supvr.	<u>1/7/85</u> Date
Approved by:	Director of Engineering and Licensing	<u>J.D. Vincent</u> Signature	<u>1/7/85</u> Date
Approved by:	Project Construction QA Manager	<u>Richard P. Gullette</u> Signature	<u>1/7/85</u> Date
Approved by:	Construction Director	<u>[Signature]</u> Signature	<u>1/7/85</u> Date

1/21/85
 J.D. Vincent
 R.P. Gullette
 [Signature]

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

INTERIM PROCEDURE CHANGE

PROCEDURE NUMBER ASP-3 REVISION NUMBER 1 IPC NUMBER 4

1. JUSTIFICATION:

To delete the Minor DR, to add direction for NCRs originated under previous system and to make numerous clarifications.

2. AFFECTED PARAGRAPHS:(See attached page for continuation) AFFECTED ATTACHMENTS:

3.1-3.13	4.1.3.4	4.2.1-4.2.23	5.1.5.6	Appendices A, B, C and D
4.1	4.1.3.5	4.3.9	5.1.6.3	Attachments: 2 (Sheets 1,2,3 & 4)
4.1.3	4.1.4	4.3.10	5.2.3.3	3
4.1.3.1	4.1.4.1	4.4	5.2.7	4 (Sheets 1 and 2)
4.1.3.2	4.1.4.2	5.1.1	5.4	6
4.1.3.3	4.1.4.3	5.1.5.5	5.4.1.1	7
4.1.3.4	4.1.5	5.1.5.5 b	5.4.2-5.4.2.3	9, 10

3. EXISTING REQUIREMENTS:

Refer to existing procedure

4. CHANGE SYNOPSIS:

Deletes Minor DR, adds direction for NCRs & CIIRs originated under previous system, pages renumbered where necessary, references renumbered, previous Attachment 9 deleted and Attachments 10 and 11 renumbered to 9 and 10, and numbers small clarifications.

5. INSTRUCTIONS:

Remove and replace Table of Contents (both pages) and entire procedure.

Initiated by: Roland P. Gaultette Signature Eng. QA Audit/Engineering Title 1-11-85 Date

Approved by: Director of Engineering and Licensing [Signature] Signature 1.11.85 Date

Approved by: Project Construction QA Manager [Signature] Signature 1/11/85 Date

Approved by: Construction Director [Signature] Signature 1/11/85 Date

TW
1/11/85
FWB
1-11-85

2. AFFECTED PARAGRAPHS, Continued

- 5.5.1
- 5.5.1.1
- 5.5.1.6
- 5.5.2-5.5.2.2
- 5.6-5.6.2.2
- 5.7
- 5.7.1
- 5.7.3
- 5.8.1
- 5.8.2
- 5.9.1
- 5.9.5
- 5.10.1
- 5.11.1
- ~~5.11.1.1~~
- 5.13
- 5.13.1.2
- 5.13.1.3
- 5.13.1.4
- 5.13.1.5
- 5.13.1.8
- 5.13.2.1
- 5.13.2.2
- 5.13.2.3
- 5.13.3
- 5.13.4
- ~~5.14~~ 5.14
- 7.1

CL
1-11-85

CL 1-11-85

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1.0 SCOPE

- 1.1 This procedure provides the site method for initiating, dispositioning, controlling and closing both Major and Minor Nonconformance Reports (NCRs) and Deficiency Reports (DRs). Contractors and Startup shall meet all requirements of this procedure except as noted in the appropriate appendices.

2.0 PURPOSE

- 2.1 The purpose of this procedure is to assure that conditions not conforming with design requirements such as failures, malfunctions, deficiencies, deviations and defective material and equipment are identified, evaluated, dispositioned, processed and closed in a controlled and expeditious manner. The dispositioned nonconforming condition shall result in a document that provides all the required design verified technical information necessary for implementation.

3.0 REFERENCES

- 3.1 GEDP-0046, Response to Potential Significant Deficiencies
- 3.2 9763-RM-1, Instruction for Site Records Management System
- 3.3 ASP-9, Repairs and Modifications to N Stamped Items
- 3.4 QA-15, Nonconforming Material, Parts or Components
- 3.5 QP-1, Trending
- 3.6 QP-2, Corrective Action
- 3.7 QP-3, Stop Work
- 3.8 TPI-11, Work Requests
- 3.9 TP-23, Project Reference Manual
- 3.10 AP-48, Home Office Review and Issue of Significant Deficiencies [10CFR50.55(1)]
- 3.11 Pullman Procedure XV-2, Procedure for Handling NCRs
- 3.12 SQCP-15-1 - Control of Nonconforming Items
- 3.13 PTL QC-CNR-1 - Control and Reporting Nonconformances

1R
4

4.0 GENERAL

4.1 Responsibilities

Any organization or person may report a nonconforming condition by initiating a Contractor Problem Report (CPR).

Personnel performing quality functions (QA, QC, Field Engineers, etc.) shall initiate NCRs. Any organization may initiate a DR. (Titles shown below are positions or applicable designees.)

- 4.1.1 The Construction Director and Project Construction QA Manager shall be responsible for overall implementation of this procedure.
- 4.1.2 The Director of Engineering and Licensing shall have overall responsibility for all engineering activities.
- 4.1.3 The Engineer (UE&C) shall be responsible for completing, reviewing and approving the disposition of Major nonconformances on the Nonconformance Report/Deficiency Report Form (Attachment 1) and shall provide all design information necessary to implement the disposition. The Engineer shall also assure that Major NCRs and DRs received for disposition are controlled and resolved in a timely manner and justify "Accept-As-Is" or "Repair" dispositions.
- 4.1.3.1 Project Engineering Manager (PEM) shall have overall responsibility for personnel providing dispositions for Major NCRs and DRs including responses for Potential Significant Deficiencies.
- 4.1.3.2 Discipline Engineering Manager (DEM) shall be responsible for the overall quality of dispositions of Major NCRs and DRs provided by his discipline, including evaluating and responding to Potential Significant Deficiencies.
- 4.1.3.3 Discipline Office Supervisor (DOS) and/or Discipline Field Supervisor (DFS) shall be responsible for assignment of qualified personnel for their respective disciplines to disposition Major NCRs and DRs in a timely manner and the overall technical and administrative quality of these dispositions.
- 4.1.3.4 Engineering Administrator - Office Group (EA/OG)/Field Group (EA/FG) - shall be responsible for receiving, logging, tracking, status monitoring and distributing (for disposition) Major NCRs and DRs within the engineering organization. The group shall also be responsible for entering the disposition status from Major NCRs and DRs into the Change Document Tracking System. They shall transmit dispositioned original Major NCRs and DRs as described in Paragraph 5.6.1.
- 4.1.3.5 Records Management Group - shall be responsible for standard distribution of Major NCRs and DRs after dispositioning and to maintain files of all NCRs/DRs including revisions.

4.1.4 Site Contractors (Applies to all groups issuing NCRs/DRs. See Paragraph 4.1).

4.1.4.1 The Contractor's QA/QC organization shall be responsible for preparing and approving the description of the nonconformance/deficiency, processing and and field completion of NCRs. The Contractor's QA/QC Organization shall also log DRs as an administrative function.

4.1.4.2 The Contractor's construction organization shall be responsible to perform the required action in accordance with the approved disposition of the NCR. Construction personnel shall also be responsible for initiating and performing required action in accordance with the approved disposition of the DR and verifying the completion of the DR disposition.

4.1.4.3 The Contractor shall be responsible for dispositioning Minor NCRs and their distribution.

4.1.5. The Project Construction Quality Assurance Manager shall be responsible for implementation of the Site QA/QC Program. He shall assure compliance to this procedure through his Audit/Surveillance organization.

4.1.6 Westinghouse - The Westinghouse site representative (working with the DOS/DFS) shall review and disposition those NCRs which affect Westinghouse equipment. The Westinghouse representative shall provide any special instructions on the NCR.

4.1.7 Central Data Entry Group (CDEG) - The CDE operators are responsible for entering bulk data and modification sheets into the CDT system.

4.2 Definitions

4.2.1 Accept-As-Is - A disposition by Engineering indicating that the discrepancy is within the requirements of the applicable codes and does not affect safety, performance and maintainability, and that the item under consideration can be used for its intended purpose. This disposition must be substantiated by data provided on the NCR/DR.

4.2.2 Affected Documents - Design documents covering the component specifically modified by the NCR/DR disposition.

4.2.3 Change Document Tracking (CDT) System - CDT is a computerized system for tracking the status of design changes. For further details see TP-23, Project Reference Manual.

4.2.4 Contractors - Includes Startup Test Department (STD), UE&C, YAEC and all other site Contractors.

4.2.5 Contractor Problem Report (CPR) - A CPR replaces the "Contractor Incident Interface Report" and handles the following:

- a. Nonconforming/Deficient Conditions suspected in another discipline area.
- b. Damage to a work item which is the responsibility of another contractor.
- c. A vehicle for non-quality (non QA/QC) construction personnel to report a nonconforming condition to the applicable quality organization.

4.2.6 Deficiency Report (DR) - A document which identifies a discrepant condition involving non-safety related materials, parts, services, components or activities.

4.2.6.1 Minor deficiencies in non-safety related items, which can be resolved by Contractor using one of the following dispositions are not required to be documented on a Deficiency Report and do not require disposition by UE&C Engineering.

- a. Restoration
- b. Scrap (return to UE&C warehouse)
- c. Return to supplier (Contractor supplied material only)
- d. Documentation deficiencies with the exception of Owner-supplied material requirements.

NOTE: Minor deficiencies in non-safety related items shall be identified and tracked using the PCS program. The Contractor construction organization shall determine the manner in which minor deficiencies in non-safety related items will be corrected.

4.2.6.2 Major deficiencies in non-safety related items which cannot be resolved using one of the dispositions in Paragraph 4.2.3.1 shall be documented by the Contractor construction organization on a Deficiency Report. UE&C Engineering

evaluation and disposition of Deficiency Reports is required.

- 4.2.7 Design Documents - Drawings, specifications, vendor foreign prints, calculations and related documents (e.g., NCR, ECA) pertaining to the permanent plant design.
- 4.2.8 Field Work Complete - This is a computer status which indicates that the work required by the disposition of the NCR/DR is complete, and that the responsible QA/QC personnel have verified and accepted the completed work for those NCRs requiring QC acceptance. This status is to track when all field work is accomplished and accepted, making the NCR/DR condition "Field Complete."
- 4.2.9 Final Acceptance Inspection - A phase of construction/fabrication during which items, activities, or documents are in the completion stages of a specific portion of work.
- 4.2.10 Hold Tag - A status tag (See Attachment 7) attached to items that are nonconforming and documented on an NCR beyond which no work shall be performed unless otherwise permitted by this procedure.
- 4.2.11 Item Identity - Method used to identify items such as cable reel number, instrument, valve and equipment numbers, pipe spool and pipe line numbers or heat code numbers.
- 4.2.12 Limited Work Authorization (LWA) is utilized to request movement, or other limited activities on a controlled basis to nonconforming construction items which are on HOLD.
- 4.2.13 Nonconformance/Deficiency - A deficiency in characteristics, documentation or procedure which renders the quality of an item unacceptable or indeterminate after final acceptance inspection. Examples of nonconformances include: physical defects, test failures, incorrect or inadequate documentation or deviation from prescribed processing, inspection or test procedures.

Note 1: Unsatisfactory items and conditions which can be corrected at the time of inspection or during subsequent in-process activities in accordance with approved procedures are not required to be documented on an NCR/DR. When an approved procedure is not available, the nonconformance shall be documented on an NCR/DR form for disposition. All nonconformances identified after final acceptance inspection shall be documented on an NCR/DR form.

Note 2: An inspection of a completed portion of an item or activity that is not procedurally required to be inspected again shall be considered to be a final acceptance inspection. General inspection of an entire system, item or equipment, i.e., walkdown inspections and other so-called final inspections do not qualify as a final acceptance inspection within the context of this procedure.

4.2.14 Nonconformance Report (NCR) - A document which identifies a safety related and/or ASME Code discrepant condition involving a material, part, component, service or activity. A nonconformance shall be classified either Major or Minor.

4.2.14.1 Minor Nonconformance - A safety related discrepancy which can be resolved by the Contractor using one of the following dispositions. UE&C Engineering disposition is not required.

Note: A deficiency that is found during in-process inspection or final acceptance inspection (as described in Paragraph 4.2.1, Notes 1 and 2) that can be corrected in accordance with an approved procedure shall be documented on an inspection report. With exception of the correction of specific surface conditions permitted by Project specifications, documents or procedures, discrepant conditions identified on ASME Section III Code stamped components shall be documented as a major NCR. A deficiency that is found after final acceptance inspection that can be repaired by an approved procedure shall be documented on an NCR/DR form.

- a. Restoration
- b. Scrap (Return to UE&C warehouse)
- c. Return to supplier (Contractor supplied material only)
- d. Documentation deficiencies, except the following which must be documented on a Major NCR:
 - 1) Owner-supplied material/items, and
 - 2) Missing inspection records required by specification and/or code(s) which cannot be regenerated by re-inspection, i.e., missing process sheets on which in-process inspections required by the ASME Code were documented but attributes requiring inspection are no longer accessible.

4.2.14.2 Major Nonconformance - A safety related discrepancy which does not meet the Minor nonconformance criteria. UE&C Engineering evaluation and disposition is required. All ASME Section XI repairs and replacements except for maintenance, shall be considered Major nonconformances.

4.2.15 Nonconformance Review Board (NRB) - An advisory board to assist Engineering in evaluating and dispositioning NCRs as requested.

- 4.2.16 Potential Significant Deficiency [10CFR50.55(e)] - Deficiency found in design and/or construction, which, were it to have remained uncorrected, could have adversely affected the safety of operation of the nuclear power plant at any time throughout the expected lifetime of the plant. For additional details, see Attachment 4.
- 4.2.17 Project Quality Trending Program - A single, project-wide trending program which includes NCR/DR input.
- 4.2.18 Reference Documents - Related documents which are not modified by the NCR/DR.
- 4.2.19 Reject - A disposition used when a nonconforming item is unsuitable for its intended purpose and when it is not economically feasible to repair it.
- 4.2.20 Repair - A disposition which permits the reprocessing of a nonconforming item to bring it into an acceptable condition in conformance with the applicable codes but which still departs from original requirements. Complete repair instructions, must be provided on the NCR/DR. Repairs utilizing ASME Section XI shall be in accordance with the ASP-9 program.
- 4.2.21 Restoration - The process by which an item is made to conform to original requirements by completion or correction. Replacements using ASME Section XI shall be in accordance with the ASP-9 program.
- 4.2.22 Return to Supplier/Vendor - A disposition indicating that the item is to be returned to the Supplier for repair or replacement.
- 4.3 Attachments
- 4.3.1 Attachment 1 - Nonconformance Report (NCR)/Deficiency Report (DR) Form and Continuation Sheet (2 sheets)
- 4.3.2 Attachment 2 - Preparation of Nonconformance Report Form (4 sheets)
- 4.3.3 Attachment 3 - Flow Chart No. 1, Requirements for Providing Disposition to NCR/DR
- 4.3.4 Attachment 4 - Flow Chart No. 2, Processing Potential Significant Deficiencies (2 sheets)
- 4.3.5 Attachment 5 - Limited Work Authorization (LWA)
- 4.3.6 Attachment 6 - LWA Completion and LWA Tag
- 4.3.7 Attachment 7 - Hold Tag and Instructions, Startup Test Department (STD) Status Indicator
- 4.3.8 Attachment 8 - Contractor Problem Report

- 4.3.9 Attachment 9 - Design Change Document Modification Sheet
- 4.3.10 Attachment 10 - Nonconformance Report Partial Release Sheet

4.4 Appendices

The appendices specify unique activities of the listed Contractors who will utilize other procedures for implementation of their nonconformance programs.

- 4.4.1 Appendix A - UE&C
- 4.4.2 Appendix B - Startup
- 4.4.3 Appendix C - Pullman-Higgins
- 4.4.4 Appendix D - PTL

5.0 PROCEDURE

5.1 Initiating NCRs/DRs

5.1.1 When a potential nonconforming condition is identified on a safety related, Seismic I, Seismic IA, upgrade B31.1 or ASME Section III Code system or component, the condition shall be evaluated to determine if an NCR is applicable. When the condition is identified as requiring an NCR, it shall be evaluated to determine the classification, Major or Minor, as defined in Section 4.0 of this procedure, and for reportability under 10CFR50.55(e) and 10CFR21.

NOTE: The reporting of an item under 10CFR50.55(e) does not impose a further requirement to report under 10CFR21 or vice versa. 10CFR21 reporting is for items (defects) involving a "substantial safety hazard" and shall be performed in accordance with each Contractor's applicable procedure(s). If further guidance is needed refer to NUREG-0302, Rev. 1.

- 5.1.2 The applicable QA/QC personnel shall prepare an NCR by completing the form (Attachment 1) in accordance with Attachment 2.
- 5.1.3 When a potential nonconforming condition is identified on a non-safety-related system or component, the condition shall be evaluated to determine if a DR is applicable.
- 5.1.4 Site personnel shall prepare a DR by completing the Form (Attachment 1) in accordance with Attachment 2.

5.1.5 NCR/DR Number Assignment

5.1.5.1 NCR/DR numbers shall be controlled and issued from two locations. Pullman-Higgins QA shall issue P-H NCR/DR numbers. UE&C QC shall issue NCR/DR numbers for all other contractors and STD. The activity shall be called NCR/DR Numbers Control. The personnel issuing the NCR/DR numbers shall be called the NCR/DR Numbers Controller.

- a. UE&C and P-H QA managers will assign and train an adequate number of personnel to assure person assigned to NCR/DR Numbers Control will be available at all times. However, the number of personnel authorized as NCR/DR number controllers will be as limited as possible.

5.1.5.2 The NCR/DR numbers shall sequentially consist of:

- a. first two digits-contractor ID;
- b. a sequential number - per contractor ID;
- c. The last digit shall be a capital alpha to denote the revision. The initial issue shall be alpha Character "A".

NOTE:	Contractor	Sequential Number	Indicates Initial
	ID	from Log	Issue (Revision)
	45	123	A

5.1.5.3 The controllers shall maintain an NCR log and a DR log for each contractor or discipline designation. The log shall have columns for each of the following:

- a. NCR or DR numbers
- b. initiator's name
- c. BIP
- d. building
- e. unit
- f. system
- g. description
- h. major/minor
- i. date field complete

j. controller's initials - the controller shall enter his/her initials in this space only after the copy from CDT has been received.

5.1.5.4 In order for the initiator to obtain an NCR/DR number, the following information shall be given to the controller:

- a. initiator's group code
- b. type - NCR or DR
- c. major or minor
- d. initiator's name
- e. BIP
- f. building
- g. unit
- h. system
- i. description

Following logging the information, the controller will issue the NCR or DR number.

5.1.5.5 When the NCR/DR is initiated by Contractor QA/QC, an additional copy will be sent to CDEG for inputting to CDT. 104

- a. After the CDEG has entered the NCR/DR information into CDT, CDEG will return the copy to the originating controller.
- b. The controller shall enter on the log that the NCR/DR copy was returned by initialling in the appropriate column in the log. (The copy may be subsequently discarded.) 104

5.1.5.6 The person requiring a revision to an existing NCR/DR will contact the NCR/DR Number Controller and provide the number of the existing NCR/DR. The controller will enter the next revision level and the date of revision into the "Date Field Complete" column of the log adjacent to the initial entry, which indicates that the initial NCR/DR has been revised. The controller shall then enter the revised NCR/DR into the log in accordance with Paragraph 5.1.5.3. The initial issued NCR/DR will be stamped or marked "Revised" and processed in the same manner as a void NCR/DR. The revised NCR/DR shall be processed in the same manner as 104

NOTE: CDT is a tracking process which will record the following pertaining to an NCR/DR:

1. NCR/DR number and the information in Paragraph 5.1.5.4.
2. Disposition date, key words, reference documents and affected documents.
3. Date "field complete" and status change.

5.1.6 NCR/DR

5.1.6.1 The discrepant condition shall be described on the NCR/DR with sufficient information to permit evaluation of the condition by the group providing the disposition.

5.1.6.2 The Contractor shall submit the original NCR/DR form for a Major nonconformance/deficiency to the applicable discipline EA/OG or EA/FG for processing. He may provide a recommended solution for a major discrepant condition on a continuation sheet (Page 2 of Attachment 1). Any discrepancy identified by the Contractor as a potential 10CFR50.55(e) violation shall be promptly forwarded to Engineering Administration for processing per Flow Chart 2, Attachment 4.

5.1.6.3 Minor NCRs shall be processed in accordance with Attachment 3.

5.1.6.4 Each Contractor QA/QC organization shall obtain NCR/DR numbers from the applicable NCR/DR Numbers Control Group. The Numbers Control Group shall maintain a log that will control and monitor the status of individual NCRs/DRs from inception through field completion; however, the CDT system will be considered the official site control and status of NCRs/DRs.

5.1.6.5 The Control Data Entry Group will, on a scheduled and/or demand basis, provide a listing of NCR/DR status sorted by Initiator's Group Code.

5.2 Cause for Use of the Contractor Problem Report (CPR)

5.2.1 Damage to items (nonconforming/deficient condition) which is the responsibility of another contractor or if a contractor discovers a suspected nonconformance/discrepancy in another discipline area of responsibility, he shall report it to the applicable Contractor's QA/QC organization via CPR for evaluation.

5.2.2 Non-Quality (Construction and/or Engineering) personnel shall report nonconforming conditions to the applicable quality organization via CPR.

- 5.2.3 Nonconforming conditions for equipment which has been turned over to STD but has not been "N" stamped shall be handled as follows:
- 5.2.3.1 Nonconformance reports shall be issued by the "N" and "NA" Certificate Holders for the ASME System until they are "N" stamped.
 - 5.2.3.2 At the time of initiation of an NCR on "Turned-Over" ASME System, the initiator shall notify the Startup Manager/ Designee of the NCR's origination. This notification may be by telephone, with the notifier documenting the telecon in the description section of the NCR. The telecon must denote the authorized STD representative's name and the date of notification.
 - 5.2.3.3 Prior to placement of a "Hold" tag on the nonconforming condition, a STD Status Indicator (Attachment 7) must be placed on the Hold tag by either STD or the applicable QA/QC organization. The status indicator will be considered STD's acknowledgement that they have been notified. IR
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 - 5.2.3.4 Upon receipt of notification, STD shall implement TPI-23 for personnel or equipment protection as required for the nonconforming condition.
- 5.2.4 The issuing group shall establish a log that is adequate to verify that the CPR was closed by the applicable contractor. This verification shall take place upon the return of the closed CPR.
- 5.2.5 The applicable Contractor's QA/QC organization shall control each CPR received. He shall maintain a working file of the item through completion/closure and forward a copy of each closed CPR to the initiator.
- 5.2.6 Nonconforming conditions for equipment which does not require "N" stamping and has been turned over to STD shall be handled as follows:
- 5.2.6.1 The person that discovers a nonconformance shall report it to Startup Quality Control via a Contractor Problem Report (CPR) (see Attachment 8).
 - 5.2.6.2 Startup Quality Control shall sequence and control each CPR received. SQC shall maintain a working file of the item through completion/closure and forward a copy of each closed CPR to the initiator.
- 5.2.7 Processing of Open CIIRs Generated Prior to Effective Date of ASP-3 - Open CIIRs generated prior to the effective date of this procedure (as shown on the Cover Page) shall continue to be processed in accordance with the last revision of Engineering and Contractor procedures that was in effect prior to the revision which initially incorporated the requirements of ASP-3. However, if it should IPC
4

become necessary to revise one of these previously CIIRs after the effective date of ASP-3, a new CPR shall be initiated and processed in accordance with the provisions of ASP-3 and the superceded CIIR closed accordingly.

5.3 Work Affecting Hardware Under the Jurisdiction of Start-up

- 5.3.1 Contractor personnel shall not perform work associated with NCR/DR dispositions affecting hardware under the jurisdiction of the STD unless written authorization has been obtained in accordance with TPI-11, Work Requests.
- 5.3.2 The STD shall have the option of performing work on dispositioned NCRs/DRs in accordance with TPI-11. Work to be performed on nonconforming conditions for equipment which has lifts been turned over to STD but has not been "N" stamped will be assigned to the responsible certificate holder.

5.4 Maintaining Status of Nonconforming Items (NCRs)

5.4.1 Tagging & Segregation

- 5.4.1.1 Nonconforming items shall be tagged by the responsible, initiating organization with the contractor's appropriate Hold tag (Attachment 7). The Hold tag shall only be removed by the responsible QA/QC organization.

NOTE: Hold tags are applicable to both Major and Minor NCRs.

- 5.4.1.2 When practical, nonconforming items shall be stored in a segregated area to prevent their inadvertent use or installation until the disposition is accomplished. When it is not practical to separate an item because of its physical size or when there is concern that the item or its identification could be lost, the item shall be clearly tagged to prevent its inadvertent use.

5.4.2 Limited Work Authorization

A Limited Work Authorization Request (Attachment 5) is initiated by the Contractor who is requesting to perform controlled limited activities on a nonconforming item.

- 5.4.2.1 Nonconforming items requested to be moved out of the receiving and storage areas while on "Hold" status, work requested to be performed on nonconforming items or conditions which have not yet been dispositioned and items on "Hold" which require work other than that specified on the NCR disposition, shall be tagged with an LWA tag, adjacent to the Hold tag, before the item or condition can be moved or otherwise processed on a controlled limited basis. Prior to tagging,

a Limited Work Authorization Request (Attachment 5) shall be initiated and approved. The LWA Request shall clearly identify the reason and any limitations or precautions. The individual responsible for the disposition of the NCR/DR shall approve and list the limitations and/or precautions on the LWA Request. The applicable QA/OC Manager shall approve and issue the approved LWA Request to the originator. The original LWA Request will be logged and controlled by QA/OC. Copies shall be attached to the original NCR/DR.

5.4.2.2 Testing and component use by Startup Test Department may proceed on nonconforming items, without issuance of an LWA Tag/Request Form or dispositioned NCR/DR, if the NCR/DR has been evaluated by STD and determination has been made by STD that testing or component use will not effect the nonconforming condition or cause further degradation of the item.

5.4.2.3 An LWA can be issued to cover more than one (1) NCR.

5.5 Providing Dispositions to NCRs/DRs

5.5.1 Major NCRs and DRs

5.5.1.1 Engineering Administrator, Office Group or Field Group, shall upon receipt of a Major NCR or DR from the responsible organization, log, assign and distribute it to the DOS or DFS for evaluation. The EA/OG or EA/FG shall maintain copies of all uncorrected Major NCRs and DRs.

5.5.1.2 Upon receipt of a Major NCR, the Discipline Office Supervisor (DOS)/Discipline Field Supervisor (DFS) shall evaluate the discrepant condition for potential 10CFR 50.55(e) in accordance with instructions provided in Attachment 4, Flow Chart No. 2.

5.5.1.3 The DOS/DFS shall provide dispositions to NCRs/DRs to assure compatibility with design requirements. The DOS/DFS shall evaluate the NCR/DR for generic implications and retrofit requirements.

5.5.1.4 The DOS/DFS will determine when interface with vendor/supplier (such as Westinghouse) is required for NCR/DR dispositions and shall obtain any required approvals.

5.5.1.5 The DOS/DFS will interface with the other engineering disciplines/groups, and UE&C QA for NCR/DRs dispositioned "Return to Vendor" and/or the Startup Test System Test Engineer (STE), as needed, and shall obtain any required reviews.

5.5.1.6 For ASME Section XI repairs and replacements, the requirements of ASP-9 shall be implemented. The DEM shall notify YAEC Engineering of development of a repair program as described in ASP-9. 1A
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5.5.1.7 The DOS/DFS shall attach to the NCR/DR any sketches, letters, telephone conversation memos, or written information. Calculations shall be referenced, as design justification, etc., when they are a necessary part of the disposition. As pages are added to the NCR, each sheet shall be identified to reflect the correct sequential page number, starting with Attachment 1 numbered as Page 1 of _____. The total quantity of included pages shall be the second number. As pages are added by different groups in processing the NCR/DR, the total quantity of "included pages" will be changed accordingly by lining out the second number and correcting the quantity to reflect the "new" total number of pages. Each page shall additionally be identified with NCR/DR report type and number.

5.5.2 Minor NCRs

5.5.2.1 The designated Contractor person as defined in Contractor procedures shall disposition the Minor NCR utilizing the definitions in Paragraphs 4.2.2.1 and 4.2.3.1, respectively. 1A
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5.5.2.2 Upon completion and approval of the disposition, a copy of the NCR shall be sent to the appropriate supervisor for implementation. 1A
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5.6 Distribution of Dispositioned NCRs/DRs

5.6.1 Major NCRs and DRs

5.6.1.1 EA/OG or EA/FG will transmit dispositioned original Major NCRs and DRs to the applicable Contractor's QA/QC organization and one copy of the NCR/DR to the applicable contractor, Central Data Entry Group and the Records Management Group. 1A
4

5.6.1.2 The Records Management Group shall distribute Major NCRs and DRs.

5.6.2 Minor NCRs

5.6.2.1 Minor NCRs shall be distributed as deemed necessary by the responsible Contractor organization after disposition. This distribution shall include, as a minimum, a copy to CDEG for entry into CDT and an information copy to the applicable UE&C Engineering discipline.

- 5.6.2.2 Upon field completion of the Minor NCR, a copy shall be distributed to CDEG for entry into CDT and others as deemed necessary by the responsible Contractor organization. IR
4

5.7 Implementation of NCR Dispositions

- 5.7.1 The Contractor, upon receipt of dispositioned NCRs, shall implement the disposition in accordance with applicable site procedures. Work will not proceed beyond the hold tag until the applicable Contractor QA/QC personnel has affixed a LWA/Repair Tag to the nonconforming item. The Startup Test Department shall implement NCR dispositions via the Work Request without the issuance of an LWA or Repair Tag (see Appendix B, Note 3.0). The Contractor's construction copy of the dispositioned NCR shall be available in the general area of the disposition implementation. IR
4
- 5.7.2 Upon receipt of the dispositioned NCR, the Contractor QA/QC Manager will immediately review the NCR disposition in detail. Conditions requiring corrective action shall be handled in accordance with QP-2. If significant problems are found that violate code or quality requirements he shall issue a Stop Work Order (SWO) in accordance with QP-3. The SWO will not be lifted until the issue is resolved. Minor problems will be resolved by interfacing with the applicable parties. IR
4
- 5.7.3 The ANI concurrence of dispositions for ASME related NCRs is the responsibility of the ASME N Type Certificate Holders and this responsibility shall be defined in their ASME programs. IR
24
10/85

5.8 Partial Releases on NCRs/DRs

- 5.8.1 Those NCRs/DRs which list multiple nonconforming conditions/deficiencies may require a partial signoff to release the corrected items for which field work has been completed and accepted. IR
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Example: Twenty six (26) valves put on hold due to several deficiencies. Some of the valves may require rework and some may be "accept-as-is". Those valves which were dispositioned "accept-as-is" could be released by QA to avoid construction delays. IR
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- 5.8.2 Partial releases shall be documented on the Nonconformance Partial Release Sheet (Attachment 10) until the entire NCR/DR can be signed off and accepted as complete. IR
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NOTE: At present, CDT will not maintain status of "Partial Releases." CDEG will enhance the program to include "Partial Releases."

5.9 NCR/DR Revisions

- 5.9.1 Technical changes shall be made by revising the NCR/DR, using a

capital letter next to the number (see Paragraph 5.1.5.2). Subsequent revisions shall be noted by changing the revision letter to the next higher letter. "Field Complete" or "Voided" NCRs/DRs shall not be reopened or revised. If changes are necessary, a new NCR/DR shall be issued which references the original NCR/DR number. (104
1A4

- 5.9.2 When revision to the NCR/DR disposition is necessary, the DOS/DFS shall revise the disposition of the previous issue of the NCR/DR and request the initiating organization to process the new revision using the same controls as used on the previous issue. The initiating organization may initiate a revision of the NCR/DR when deemed necessary.
- 5.9.3 Each NCR/DR revision shall be complete and will supersede prior revisions. All contents of the superseded NCRs/DRs which are still valid, shall be included in the revised NCR/ DR.
- 5.9.4 Changes shall be clearly identified by "clouding" the change. Clouds identifying prior revisions may be left on the NCR/DR. Each cloud will be identified with a Delta revision letter next to the cloud.
- 5.9.5 Any non-technical changes to an NCR/DR which correct administrative/typographical errors (Reference Documents, Keywords) or added information shall be documented on a Design Change Document Modification Sheet (Attachment 9) and forwarded to the Centralized Data Entry Group (CDEG) for entry into CDT. CDEG will forward the Design Change Document Modification Sheet to the holder of the original NCR/DR for attachment to the original NCR/DR. Distribution of the Design Change Document Modification Sheet is not required. Changes made in this manner shall not be considered as a formal revision to the NCR. R
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NOTE 1: The Design Change Document Modification Sheet shall not be used for changes to the Affected Documents section of the NCR/DR.

NOTE 2: In lieu of using the Design Change Document Modification Sheet, the dispositioner may make minor corrections to information on the original NCR/DR during the disposition cycle by lining through the incorrect entry, entering the corrected information and initialing and dating adjacent to the correction. R
4

If the correction requires extensive changes to the NCR/DR disposition, the NCR/DR shall be returned to the initiator along with a statement of the problem that is signed and dated by the dispositioner.

5.10 Voiding NCRs/DRs

- 5.10.1 If it is required to void an NCR/DR, it shall be stamped or marked "VOID". The reason for voiding the NCR/DR shall be stated on the NCR/DR and signed by each authorized person (or designee) who had R
4

previously reviewed the NCR/DR. The number assigned to a voided NCR/DR shall not be reused. The originating organization QA/QC Manager shall forward a copy to CDEG to update CDT and forward a copy of the void NCR/DR to the person that originated the NCR/DR. If the NCR/DR had been dispositioned by Engineering and distributed, the NCR/DR shall be revised, marked "VOID" and processed in the same manner as the previous issue. The "Issue Date" space must be filled in. 124

5.11 Revising Affected Documents

5.11.1 Criteria

NCRs/DRs shall list all affected documents, however, only NCRs/DRs listing the following "Affected Documents" shall be incorporated on design documents. Incorporation shall be within 60 days from the NCR/DR disposition issue date. The NCR/DR shall be referenced on the affected document when the change is incorporated. 124

- a. Building General Arrangement Drawings showing Equipment Locations
- b. Process and Instrumentation Diagrams
- c. Loop and Logic Diagrams
- d. Electrical One Line Diagrams
- e. Specifications (safety related only)
- f. Electrical Schematics
- g. CASP
- h. Set Point Data List (Dwg M-500376)
- i. Computer I/O List (Dwg M-510004)
- j. Standard Instrument Schedule (Dwg M-510000)

5.11.2 The CDT System will list all affected documents (See TP-23).

5.11.3 On a quarterly basis, the PEM shall provide to the Director of Engineering and Licensing an assessment of unincorporated NCRs/DRs exceeding the 60 day criteria.

5.12 Nonconformance Review Board (NRB)

5.12.1 The NRB will assist engineering, when requested, in evaluating and dispositioning NCRs.

5.12.2 The NRB is comprised of representatives from:

- a. UE&C Project Field QC. The Project Field QC Manager serves as chairman.
- b. UE&C Site Engineering - Site Engineer.
- c. UE&C Construction Discipline Superintendent.
- d. Westinghouse Representative - when NSSS items are involved.
- e. YAEC - Field QA.
- f. Others - As necessary for technical assistance or upon request.
- g. The Project Owner's Construction Management Organization will be given the option to attend meeting.

5.12.3 Convening the Board

The board chairman will convene the board when:

- a. Requested by a member of the NRB.
- b. Requested by engineering to assist in evaluation of an NCR for potential 10CFR50.55(e).
- c. Requested by engineering for a NCR or DR that is complicated and requires clarification.
- d. Requested by Engineering to evaluate recurring nonconformance trends which requires discussion for immediate corrective action to be taken by the Contractors.

5.12.4 The Authorized Nuclear Inspector (ANI) is not a member of the NRB but may participate as an observer at his option. The NRB chairman shall notify the ANI of the date and time of the meeting.

5.12.5 It is the responsibility of the chairman to maintain the records for the board. This includes, but is not limited to, the notes of meetings that will clearly reflect the board's recommendation.

5.13 Field Completion NCR/DR

5.13.1 NCRs

5.13.1.1 When the disposition has been implemented the responsible Contractor supervisor shall sign and date the original NCR in the "Work Completed" block.

5.13.1.2 The Contractor QA/QC Organization will verify that the work has been completed per the NCR disposition.

- 5.13.1.3 If the inspection is satisfactory, the Contractor QA/QC shall document acceptance of the NCR signing and dating in the "Accepted" block, checking the "Field Work Complete" block and noting it in the NCR Log. QA/QC acceptance of NCRs that have been dispositioned "Accept As Is" shall be documented in the same manner, except that no reinspection is required. | 100
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- 5.13.1.4 The Contractor QA/QC Organization will send a copy to CDEG for entry into CDT. | 100
4
- 5.13.1.5 If the inspection is unsatisfactory, the Contractor QA/QC Organization shall notify the applicable construction-designated person of the results of the inspection. | 100
4
- 5.13.1.6 The process described in Paragraphs 5.13.1.1 and 5.13.1.2 shall be repeated.
- 5.13.1.7 If the items fail the inspection for a second time, the QA/QC Manager will notify the applicable Project/Construction Manager for resolution.
- 5.13.1.8 "Field Complete" original NCRs shall be processed per Paragraph 7.1. | 100
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- 5.13.2 DRs
- 5.13.2.1 When the disposition of the DR has been implemented and verified by construction, the Contractor's responsible supervisor shall sign and date the original DR in the "Work Completed" block, check off the "Field Work Complete" block and indicate "N/A" in the "Accepted" block. | 100
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- 5.13.2.2 The DR shall be forwarded to the Contractor QA/QC organization who shall update the DR status in the DR log. | 100
4
- 5.13.2.3 A copy of the "Field Complete" DR shall be forwarded to the CDEG for entry into the CDT. | 100
4
- 5.13.2.4 The original DR shall be processed per Paragraph 7.1. | 100
4
- 5.13.3 Contractors who obtain NCR/DR numbers from the UE&C Numbers Control Group shall forward a copy of the NCR/DR to the UE&C Numbers Controller once the NCR/DR is "Field Complete". | 100
4
- 5.13.4 The applicable Numbers Controller shall be responsible for logging the "Field Complete" status into their manual log. | 100
4

5.14 Processing of Open NCRs/DRs Generated Prior to the Effective Date of ASP-3

Open NCRs/DRs generated prior to the effective date of this procedure (as shown on the Cover Page) shall continue to be processed in accordance with the last revision of Engineering and Contractor procedures that was in effect prior to the revision which initially incorporated the requirements of ASP-3. However, if it should become necessary to revise one of these previously generated NCRs/DRs after the effective date of ASP-3, a new NCR/DR shall be initiated and processed in accordance with the provisions of ASP-3 and the superceded NCR/DR closed accordingly.

6.0 TRENDING PROGRAM

The Project Quality Trending Program requires input from NCRs/DRs. NCRs/DRs will be trended in accordance with Procedure No. QP-1.

7.0 RECORDS/INFORMATION MANAGEMENT SYSTEM (IMS)

7.1 "Field Complete" NCRs/DRs, including voided NCRs/DRs, shall be processed by the initiating organization in accordance with RM-1, "Instructions for Site Records Management System."

APPENDIX A

UE&C

1. UE&C shall comply with UE&C QA-15 for initiation of NCRs.
2. UE&C QA-15 shall incorporate the essential elements of ASP-3.

IP

APPENDIX B

Startup Test Department

- 1.0 An item determined to be potentially reportable by STD shall be documented on a Nonconformance Report/Deficiency Report in accordance with this procedure.
- 2.0 Major nonconformances shall be documented on a "Nonconformance Report/Deficiency Report" in accordance with this procedure.
- 3.0 The disposition of nonconformances that require field work shall be implemented using a Work Request. The Work Request shall be used in lieu of issuing an LWA Tag or Repair Tag as a status indicator.
- 4.0 Minor nonconformances do not have to be documented on a "Nonconformance Report/Deficiency Report" providing one of the following conditions is met:
 - 4.1 The nonconformance may be resolved by complying with Startup Test Department, Test Program Instruction No. 11, Work Requests (TPI-11), and
 - 4.1.1 The item or component can be restored to its original configuration shown on the design documents using existing procedures, or
 - 4.1.2 The item can be scrapped and replaced with another component of identical type and function, or
 - 4.1.3 The item can be returned to the supplier for replacement of identical type and function under the original purchase order.
 - 4.2 The nonconformance may be resolved using Startup Test Department Test Program Instruction No. 64, Test Performance (TPI-64) for test failures and inadequate test procedure documentation.
 - 4.3 The nonconformance may be resolved using Startup Test Department Test Program Instruction No. 63, Field Changes (TPI-63) for deviations from prescribed test procedures.

APPENDIX C

Pullman - Higgins

1. Pullman shall comply with Pullman procedure XV-2 for ASME and XV-2 NNS for B31.1 applications.
2. The above mentioned Pullman procedures shall incorporate the essential elements of ASP-3. | 1/24

APPENDIX D

Pittsburg Testing Laboratory

All of the requirements of ASP-3 will be adhered to with the exception of the following:

1. Off-Site Services will be controlled by existing PTL procedure QC-CRN-1.
2. The responsibilities designated in Paragraphs 4.1.4.1 and 4.1.4.2 will be the responsibilities of the PTL Site Manager.

112
y

Sheet _____ of _____

MAJOR MINOR

NONCONFORMANCE REPORT (NCR) (1) NUMBER _____
 DEFICIENCY REPORT (DR) Rev. _____

CONTRACTOR USE

Eldg. Unit System Turnover Seismic 1 ANSI B.31.1 Poten. Sig. Def.
 0 1 2 Y N (2) ASME Sec. _____ Cl. _____ Other _____
 (3)

Description _____

Prepared By: _____ (6) Approved By: _____ (7)

Title	Org.	Name	Date	Title	Name	Date
Disposition:	<input type="checkbox"/>	Accept-as-is	<input type="checkbox"/>	Restoration	Repair per	
(8)	<input type="checkbox"/>	Reject	<input type="checkbox"/>	Other, See below	Action to be taken by	

(10)
 KEYWORDS
 (11)

#	U	P	U	P

REFERENCE DOCUMENTS

TYPE	NUMBER (12)	REV

AFFECTED DOCUMENTS (13)

TYPE	NUMBER	SHEET	REV

INTERDISCIPLINARY REVIEW (14)

GROUP	INITIAL	DATE

REQUIRED APPROVALS PRIOR TO IMPLEMENTATION TO DISPOSITION: (15)
 WESTINGHOUSE

Title	Signature	Date

YAEC

Title	Signature	Date

PREPARED BY: (15)
 Title _____ Signature _____ Date _____
 CHECKED BY:
 Title _____ Signature _____ Date _____
 APPROVED BY:
 Title _____ Signature _____ Date _____

ISSUE DATE _____ (16)

WORK COMPLETED: _____ (17)

Title	Signature	Date

Rejected: (18)

1st Time Initials _____
 OCE

2nd Time Initials _____
 OCE

ACCEPTED:

Title	Signature	Date

Field Work Complete

Page _____ of _____

NONCONFORMANCE REPORT CONTINUATION SHEET # _____

KEYWORDS	
#	
#	
#	
#	
#	

AFFECTED DOCUMENTS			
TYPE	NUMBER	SHEET	REV
#			
#			
#			
#			

Description: (This information will not be fed into the CDT system. This space is only to further clarify the condition).

Disposition Continued: (This information will not be fed into the CDT system. This space is only to further clarify the condition).

PREPARATION OF NONCONFORMANCE REPORT/DEFICIENCY REPORT

The numbers used in these instructions are the same as the numbers shown on the sample form, Attachment 1.

1. REPORT TYPE/NUMBER

Indicate the type of report being dispositioned (NCR [Major or Minor] or DR). The Major/Minor blocks shall not be completed for DRs. The first two digits (Contractor ID) are the Contractor Discipline Codes. The next six characters are the NCR/DR numbers which are assigned by CDT. The last position is alpha for revision level. The initial issue shall be "A". The preparer shall obtain a number from the applicable NCR/DR Numbers Control Group upon preparation of the NCR/DR.

Block indicated "Contractor Use" is reserved for use by the initiating contractor.

2. BUILDING, UNIT AND SYSTEM

Insert Codes (Unit 1 or 2). If an NCR/DR applies to both Units 1 and 2, indicate Unit 0. If the non-conformance/deficiency applies to both units, check block 0. If the change applies to additional systems, list the others as Keywords. Codes shall be identical to those delineated in TP-23. Indicate whether the NCR has been turned over to STD (Yes or No).

3. CODE DESIGNATION

Mark the applicable box to show code designation.

4. POTENTIAL SIGNIFICANT DEFICIENCY 50.55(e)

Check box if evaluation results in this finding or if questionable. If box is checked, see Flow Chart 2, Attachment 4. If box is not checked the NCR/DR has been evaluated and a "significant deficiency" was not identified.

5. NONCONFORMANCE/DEFICIENCY DESCRIPTION

The allowable quantity of letters that can be input into CDT is delineated in this space; therefore, provide a concise description of the nonconformance/deficiency. Identify the part of the structure affected (i.e., "El. 6'-0"). If further description is necessary, add the information on a continuation sheet under the heading "Description". Additionally provide item identity in this area. If there is not enough space, provide the identity on the NCR/DR continuation sheet.

6. PREPARED BY

The preparer shall sign name, show title and print name and date.

7. REVIEW AND APPROVAL OF NONCONFORMANCE/DEFICIENCY

The applicable Contractors QA organization shall prepare and approve the description of the nonconformance/deficiency. The approver shall sign name, show title and print name and date.

8. DISPOSITION

Check applicable disposition action. Those Major NCRs dispositioned "Return to Vendor" shall include UE&C QA review for inclusion of QA requirements. QA shall initial in "interdiscipline review" block to indicate review. Include more than one Contractor when applicable in the "Action to be Taken by" block.

9. ACTION TO BE TAKEN BY:

It is the Engineer's responsibility to assign the responsible Discipline/Contractor for implementation of the Disposition.

10. DISPOSITION SPACE

The disposition to the nonconformance shall be provided and must be concise, accurate, and complete. Technical justification shall be included as applicable. The NCR/DR disposition shall be reviewed for generic implications and retrofit requirements. If more space is required, additional sheets shall be added. See Paragraph 5.5.1.7. Major NCRs dispositioned "Return to Vendor" (Repair/Replacement) shall list the QA requirements under the Engineer's disposition or as a continuation of the disposition.

11. KEYWORDS

Add Keywords which provide means of retrieving data from CDT. Also, keywords are to be used to identify types of problems dispositioned for use in the NCR Trending Program. Add BIP(s). (See TP-23.)

12. REFERENCE DOCUMENTS

List Reference Documents and latest revision number.

13. AFFECTED DOCUMENTS

List all design documents and latest revision number covering the component specifically modified by the NCR/DR disposition. Both Units 1 and 2 documents shall be listed, if applicable.

14. INTERDISCIPLINE REVIEW

Interdiscipline review shall be performed by all groups and listed. The discipline reviewer shall initial and date the box indicating acceptance of

the proposed disposition as it affects his work. Review/Approval may be obtained via telephone if both parties agree. The initials of the reviewer/approver shall be printed in the space followed by the initials of preparer if telephone approval is obtained. All "Interdiscipline Review" initials must be on the form prior to release of the dispositioned NCR/DR to the Contractor.

15. REQUIRED SIGNATURES

Major NCRs and DRs

The preparer and checker of the disposition print their names, sign, and date for UE&C Engineering. A "UE&C Approver" reviews the design, prints his name, signs, and dates the disposition. If Westinghouse or NHY (for Section XI) review is required, an approval signature and date shall be obtained after required UE&C reviews have been completed. All "Required Signatures" must be on form prior to the release of the dispositioned NCR/DR to the Contractor.

Minor NCRs

The applicable Contractor personnel shall print name and date and sign the disposition of Minor NCRs similar to the manner required for "Responsibilities for UE&C Engineering", listed below.

Responsibilities of UE&C Engineering

The following personnel working under the supervision of DOS/DFS shall complete dispositions for Major NCRs and for DRs.

a. UE&C Preparer

- 1) Prepares NCR/DR disposition and includes all attachments to comply with requirements of this procedure.
- 2) Inspects specific site location as required to resolve the nonconformance.
- 3) Consults as needed with Contractor/Construction Management and other available sources, both in Field and Home Office, to develop solution.
- 4) Reviews or provides technical solution and technical justification to nonconformance based on a complete investigation of nonconformance. Preparer calculations and sketches as required.
- 5) Reviews the NCR/DR for generic implications and retrofit requirements.
- 6) Completes list of Reference Documents.
- 7) Completes list of Affected Documents and Keywords.
- 8) Lists Interdiscipline Reviewers and any other reviewers.

b. UE&C Checker

- 1) Determines that sufficient detail work has been completed to support solution and is included as attachment to the NCR/DR.
- 2) The checker provides the independent design verification and the technical adequacy of the solution and justification. This includes any associated calculations, and verifies that all data entered on the NCR/DR form and attachments are complete and accurate in accordance with ANSI N45.2.11.

- 3) Reviews the NCR/DR for generic implications and retrofit requirements.
- 4) Verifies that the required interdisciplinary and other group reviews are correctly listed on the NCR/DR and have been satisfactorily performed.

c. UE&C Approver

- 1) Reviews the technical content of the solution.
- 2) Satisfies himself that disposition is in accordance with good engineering practices.
- 3) Satisfies himself that preparer and checker have been correctly selected to perform the engineering work.
- 4) Determines that work is necessary and that project schedule is not unduly affected.
- 5) Determines that solution is generally consistent with that provided for similar types of questions.

16. ISSUE DATE

Show date NCR/DR issued for working disposition.

17. WORK COMPLETED

Contractor's Construction Supervisor shall sign and date the line to signify the disposition has been completed.

18. INSPECTION

NCR's

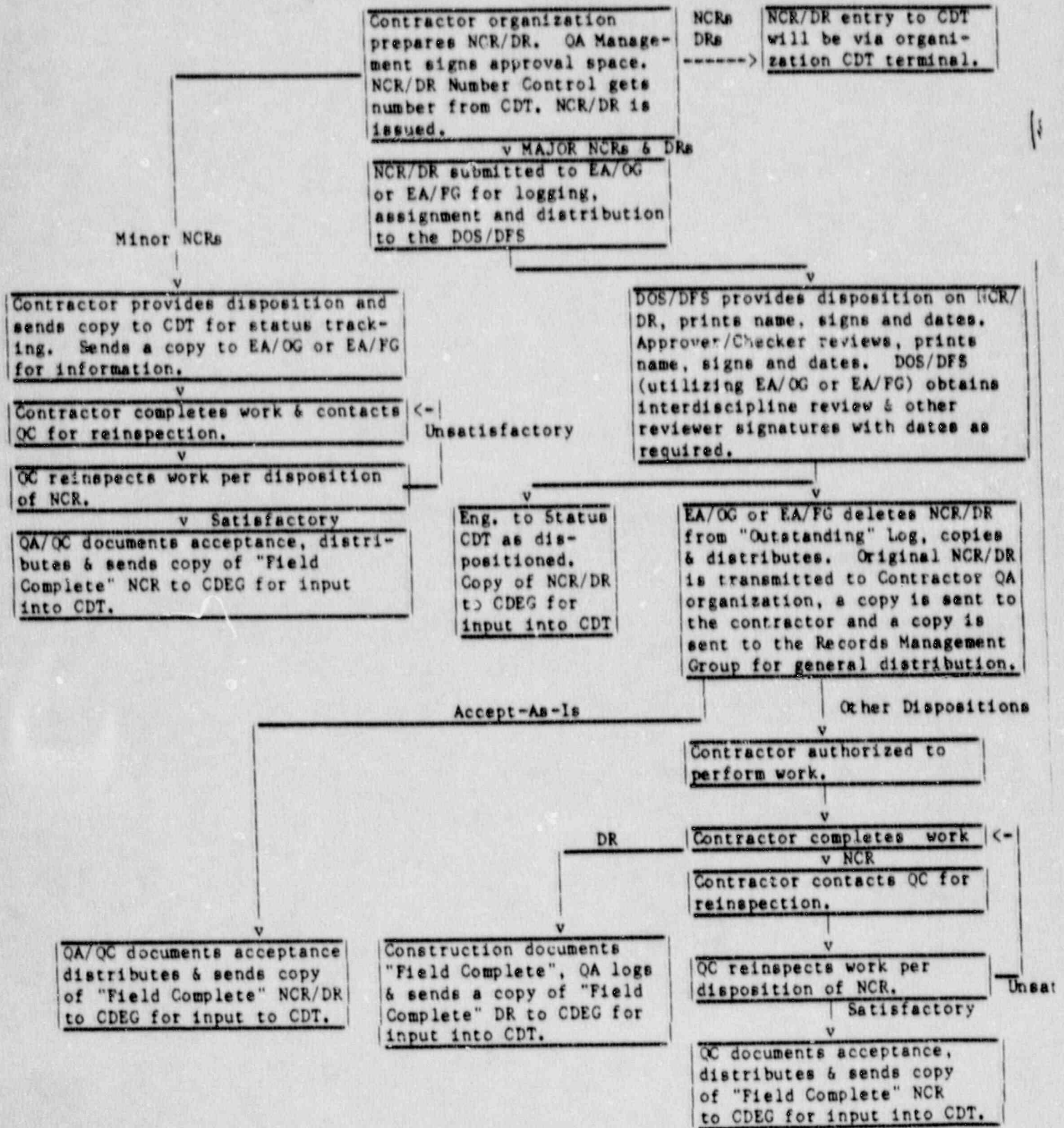
Contractor's QA/QC Group shall sign the space for reinspection and acceptance block and list Inspection Report Numbers (see Paragraphs 5.13.1.5 thru 5.13.1.7 for unacceptable inspections). Once an acceptable inspection has been verified and signed off by the QA/QC group, the inspector shall check off the "Field Work Complete" block. QA/QC acceptance of NCRs that have been dispositioned "Accept As Is" shall be documented in the same manner except that no inspection report numbers shall be noted.

DRs

The Construction Supervisor shall "N/A" in the "Accepted" block. The person responsible for signing off the "Work Complete" block will check the "Field Work Complete" block when the required work per the DR disposition has been completed.

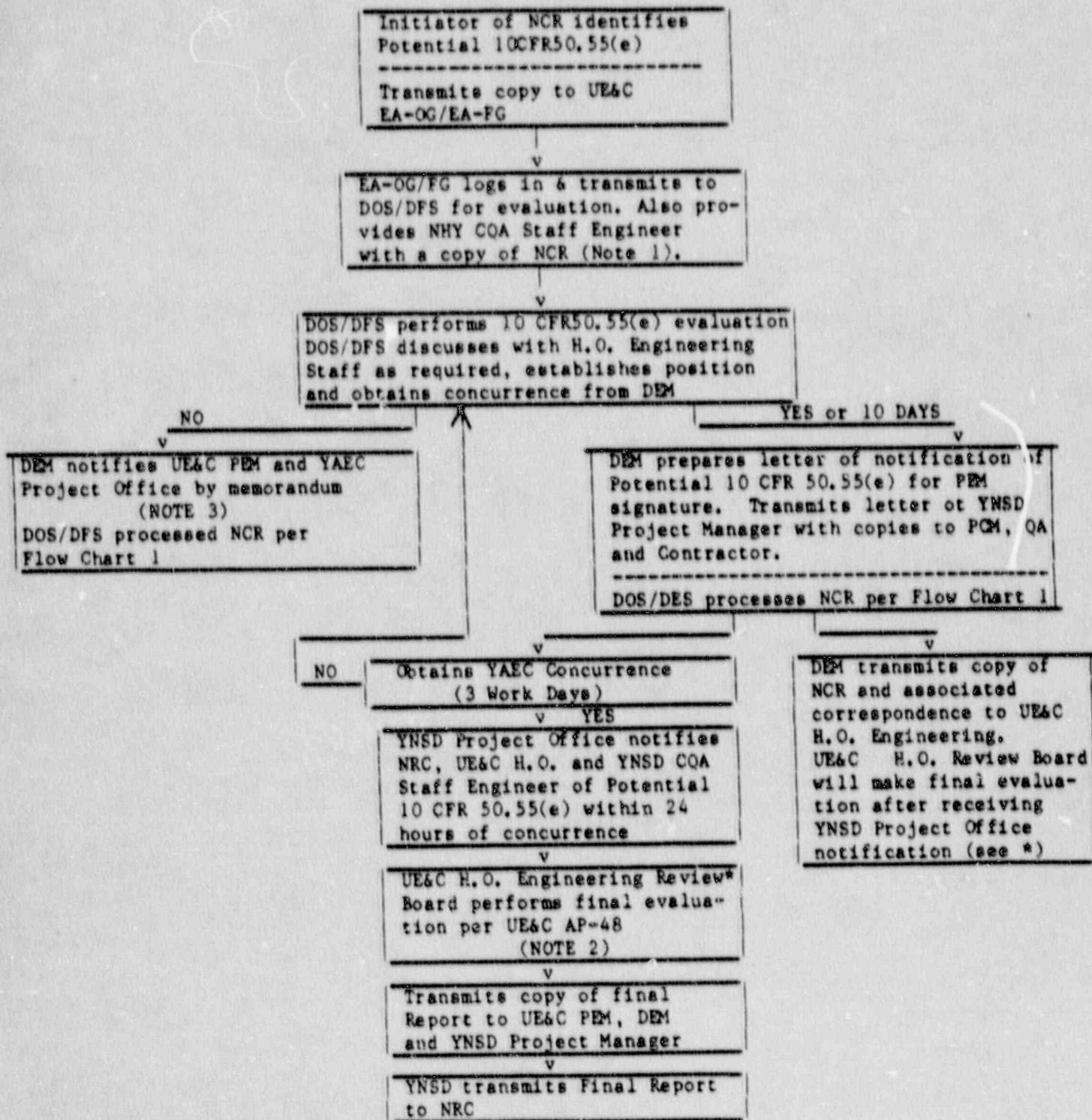
FLOW CHART NO. 1

REQUIREMENTS FOR PROVIDING DISPOSITION TO NCR/DR



FLOW CHART NO. 2

PROCESSING POTENTIAL SIGNIFICANT DEFICIENCIES - 10CFR50.55(e)



FLOW CHART NO. 2


NOTES

- NOTE 1: Upon receipt of NCRs which have been identified as a potential 10 CFR 50.55(e) the EA-OG-FG shall log-in and transmit the NCR to DOS/DFS for evaluation and disposition. Also provide NHY COA Staff Engineer with copy of NCR. A ten (10) day evaluation period shall commence from the date of log-in by the EA-OG/FG. If the evaluation can not be completed within ten (10) calendar days from the date of log-in by the EA-OG/FG, the NCR must be reported as a potential 10 CFR 50.55(e) item to the YAEC Project Manager. 10
- NOTE 2: Home Office Engineering Review Board shall, within twenty-five (25) days from the date that the potential 50.55(e) items are reported by YNSD to the NCR, conduct a follow-up review and when the item is resolved a Final Report shall be written by the Review Board for transmittal to YNSD, PEM and DEM. 10
- NOTE 3: The DEM prepares a memorandum for review and approval by PEM to the Director of Engineering and Licensing (DEL) stating the technical justification rationale used in the non-reportability determination.

LWA COMPLETION

1. Contractor QA shall assign the LWA number
2. Initiator shall list the related NCR
3. The initiator shall list related drawings and specifications
4. The initiator shall fill in the Contractor PO number or discipline, as appropriate
5. The initiator shall fill in the key words
6. The initiator shall fill in the reason for request and the organization requesting the request
7. Initiator for LWA shall have individual responsible for disposition approval of the corresponding NCR approve and list the limitations and precautions, as applicable
8. Contractor QA/OC Manager shall approve and issue
9. The LWA requestor shall sign ACTION COMPLETE when the work stipulated on the LWA is complete
10. Signature of Contractor QA/OC person verifying ACTION COMPLETE
11. If the ACTION COMPLETE block is not signed off prior to NCR field completion, the LWA will be closed based on the NCR field completion

LWA TAG


	
United engineers & constructors, inc.	
LIMITED WORK AUTHORIZATION	
LWA NO.	① _____
ITEM	② _____
QC	③ _____
SIGNATURE	_____
DATE	_____
TO BE ATTACHED OR REMOVED BY QA PERSONNEL ONLY	

1 LWA Tag No.

2 Item identify and limits of activities

3 Contractor QC Personnel responsible for tag placement

NOTE: Contractor may use his own tag to maintain status "Limited Work" to a nonconforming/deficient condition.

FORM 8871	 United engineers & CONSTRUCTORS, INC.	NCR No. _____
	HOLD	
	RIR No. _____ ①	TAG No. _____ ③
	ITEM: _____ ②	
	P/O No. _____ ④	
QC _____ ⑤	DATE _____	
SIGNATURE TO BE ATTACHED OR REMOVED BY QA PERSONNEL ONLY		

SAMPLE

NOTE: Contractor may use his own hold tag.

- 1 Receiving inspection report or quality inspection report
 - 2 Item number and/or description of exact NCR condition (condensed)
 - 3 Hold Tag number assigned to "Hold"
 - 4 P/O No. when used for receiving or location coordinates for use in field
 - 5 Signature of responsible Contractor QC Inspector/Engineer and date
- | 2

STD Status Indicator

THIS EQUIPMENT
UNDER START UP
JURISDICTION

<-----BLUE

CONTRACTOR PROBLEM REPORT		CPR No. _____
Item Identification:	Location:	Sht. _____ of _____ PIP # _____
Description of Problem:		
Generated By: _____		
		Signature _____ Date _____
Evaluation:		
		Signature _____ Date _____
The following action has been taken:		
<p style="text-align: center; margin: 0;">DISCREPANCIES:</p> <p><input type="checkbox"/> NCR No.</p> <p><input type="checkbox"/> Dr No.</p> <p><input type="checkbox"/> N/A</p>		
Approved By:		
(QA Manager- NCR's) (Construction-DR's)		
		Title _____ Signature _____ Date _____

DESIGN CHANGE DOCUMENT MODIFICATION SHEET

CHANGE DOCUMENT TO BE MODIFIED:			
TYPE	GROUP	NUMBER	REV

SECTION I. (TRANSACTION "MDCD")
FILL IN ONLY THOSE FIELDS THAT ARE AFFECTED

INITIATOR

DATE INITIATED				DATE REQUIRED			
BID NUMBER							
BUILDING		UNIT		SYSTEM			
RESP. CONTR.	ADD/DEL	RESP. CONTR.	ADD/DEL				

SECTION II (TRANSACTIONS "AMULTS" AND/OR "MULTS")
MULTIPLE BIPS, SYSTEMS OR BUILDINGS

BIPS	A/D	SYSTEMS	A/D	BLDGS	A/D

SECTION III (TRANSACTIONS "AREF AND/OR "XREF")
REFERENCE DOCUMENTS (DRAWINGS, ETC.)

TYPE	NUMBER	SHEET	APP REV	ACTION (A,M,D)	NEW APP REV

DESIGN CHANGE DOCUMENTS

TYPE	NUMBER	ACTION (A,D)

NEW HAMPSHIRE YANKEE/SEABROOK PROJECT

INTERIM PROCEDURE CHANGE

PROCEDURE NUMBER ASP-3 REVISION NUMBER 1 IPC NUMBER 5

1. JUSTIFICATION:

To allow NCRs/DRs that were documented prior to the implementation date of ASP-3 and that require revision to retain the original NCR/DR number and revision numbering system.

2. AFFECTED PARAGRAPHS:

AFFECTED ATTACHMENTS:

5.1.6.4
5.14

3. EXISTING REQUIREMENTS:

See existing procedure.

4. CHANGE SYNOPSIS:

This change allows NCRs/DRs to retain their original NCR/DR numbers and revision numbering system when revised after the ASP-3 implementation date.

5. INSTRUCTIONS:

Remove and replace the Table of Contents (page 1 only) and Pages 11 and 21 of 40.

Initiated by:	<u>Roland E. Guillelte</u>	<u>Asst QA Manager</u>	<u>1-24-85</u>
	Signature	Title	Date
Approved by:	Director of Engineering and Licensing	<u>M. J. Carr</u>	<u>1.30.85</u>
		Signature	Date
Approved by:	Project Construction QA Manager	<u>George L. Kelly</u>	<u>1/28/85</u>
		Signature	Date
Approved by:	Construction Director	<u>[Signature]</u>	<u>1/30/85</u>
		Signature	Date

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NOTE: CDT is a tracking process which will record the following pertaining to an NCR/DR:

1. NCR/DR number and the information in Paragraph 5.1.5.4.
2. Disposition date, key words, reference documents and affected documents.
3. Date "field complete" and status change. | IPC
4

5.1.6 NCR/DR

- 5.1.6.1 The discrepant condition shall be described on the NCR/DR with sufficient information to permit evaluation of the condition by the group providing the disposition. | IPC
4
- 5.1.6.2 The Contractor shall submit the original NCR/DR form for a Major nonconformance/deficiency to the applicable discipline EA/OG or EA/FG for processing. He may provide a recommended solution for a major discrepant condition on a continuation sheet (Page 2 of Attachment 1). Any discrepancy identified by the Contractor as a potential 10CFR50.55(e) violation shall be promptly forwarded to Engineering Administration for processing per Flow Chart 2, Attachment 4.
- 5.1.6.3 Minor NCRs shall be processed in accordance with Attachment 3. | IPC
4
- 5.1.6.4 Each Contractor QA/QC organization shall obtain NCR/DR numbers from the applicable NCR/DR Numbers Control Group. The Numbers Control Group shall maintain a log that will control and monitor the status of individual NCRs/DRs from inception through field completion. | IPC
5
- 5.1.6.5 The Control Data Entry Group will, on a scheduled and/or demand basis, provide a listing of NCR/DR status sorted by Initiator's Group Code.

5.2 Cause for Use of the Contractor Problem Report (CPR)

- 5.2.1 Damage to items (nonconforming/deficient condition) which is the responsibility of another contractor or if a contractor discovers a suspected nonconformance/discrepancy in another discipline area of responsibility, he shall report it to the applicable Contractor's QA/QC organization via CPR for evaluation.
- 5.2.2 Non-Quality (Construction and/or Engineering) personnel shall report nonconforming conditions to the applicable quality organization via CPR.

5.14 Processing of Open NCRs/DRs Generated Prior to the Effective Date of ASP-3 4

NCRs/DRs (including NRFs) generated prior to the effective date of this procedure (as shown on the Cover Page) shall continue to be processed in accordance with the last approved revision of the Engineering/Contractor procedure that was in effect prior to the implementation date of ASP-3. However, if it is necessary to revise the nonconforming/deficient condition of an NCR/DR which was generated prior to the implementation date of ASP-3, the NCR/DR shall be revised and processed in accordance with the provisions of ASP-3 with the exception that the previous NCR/DR number will be retained and the revision shall be elevated to the next higher number. 5

6.0 TRENDING PROGRAM

The Project Quality Trending Program requires input from NCRs/DRs. NCRs/DRs will be trended in accordance with Procedure No. OP-1.

7.0 RECORDS/INFORMATION MANAGEMENT SYSTEM (IMS)

7.1 "Field Complete" NCRs/DRs, including voided NCRs/DRs, shall be processed by the initiating organization in accordance with RM-1, "Instructions for Site Records Management System." 4



SEABROOK STATION
Field Office
P.O. Box 700
Seabrook, N.H. 03874

bcc: AM Ebner
EH Case w/a
CH Heckscher
SBF File
Contractor File
Document Control
TG Mudge w/a

PA Ruh
HB Roberts

APRIL 29, 1985

SBF-9011
SBC-F-20

No Response Required

Public Service of New Hampshire
New Hampshire Yankee Division
P. O. Box 700
Seabrook, NH 03874

Attention: G. R. Gram, Construction Director

Gentlemen:

Public Service of New Hampshire
New Hampshire Yankee Division
Seabrook Station
Submittal of New Hampshire Yankee Procedure

Enclosed is the following approved New Hampshire Yankee Procedure:

<u>NHY</u> <u>Procedure</u>	<u>Title</u>	<u>Rev. #</u>	<u>Issue Date</u>
ASP-3	NONCONFORMANCES	2	04-29-85

Should you have any questions regarding this approved New Hampshire Yankee Procedure, please contact us.

Very truly yours,

A. R. Walker
Project Construction Manager

ARW/KMM/kmm

Enclosures

cc: CM Wiley w/a
RJ DeLoach w/a
JW Singleton