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William J. Cahill, Jr. Executive Vice President December 19, 1990

Mr. George Bynog
Director and Chief Inspector
Texas Department of Licensing and Regulation
Boiler Division
E. O. Thompson State Office Building
P. O. Box 12157, Capitol Station
Austin, Texas 78701

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DUCKET NO. 50-446
CPSES UNIT 2 CODE CONTROL PROGRAM MANUAL UPDATE

Gentlemen:

Enclosed is a copy of an update to the CPSES, ASME Section III, Division 1 Code Control Program documents for incorporation into Texas Department of Licensing and Regulation Controlled Manual Number CCPM-15. Please insert the updated procedures into your controlled copy as per the attached instructions.

Should any questions arise regarding this submittal, please contact H. A. Marvray at (214) 812-8296.

Sincerely.

William J. Cahill, Jr.

Roger D. Walker

Manager of Nuclear Licensing

HAM/vld Attachment Enclosure

c - Mr. R. D. Martin, Region IV Resident Inspectors, CPSES (3) Mr. J. W. Clifford, NRR Document Control Desk

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Remove

Table of Contents, Revision 3 Table of Contents, Revision 4
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PREPARED	DATE: 12/17/90			
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THIS SEC	TION ACCEPTED BY EBASCO A	UTHORIZ	ZED INSPECTION	AGENCY:
	Coventon	etr.	N	ov: 14, '90.

AUTHORIZED SIGNATURE

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1.0 MANUAL CONTENTS

- 1.1 This Manual establishes the policy and responsibilities for performing the Code Control Group (CCG) overview and coordination of ASME Section III Code work at Comanche Peak Steam Electric Station (CPSES) Unit 2. This Manual contains the essential requirements for CCG activities which verify the Project Code compliance. Additional elements are contained in CCG Project Procedures described in this Section which are subordinate to and implement the requirements of this Manual. In all cases, when a conflict exists between this Manual and a CCG Project Procedure, this Manual shall govern.
- 1.2 This Manual shall be submitted to EBASCO's Authorized Inspection Agency (AIA) for Code Control Program activities for review and acceptance prior to its implementation.
- 1.3 Each Manual shall have a Table of Contents which identifies the following:
 - 1.3.1 Section numbers and their titles.
 - 1.3.2 Current approved revision of each section and mandatory implementation date.
 - 1.3.3 Current change(s) to the latest revision and their dates.

2.0 MANUAL REVISIONS

- 2.1 The Project Quality Assurance Program Manager (PQAPM) is responsible for the preparation, distribution and control of this Manual. New or revised sections to be incorporated into this Manual shall be drafted in the same general format as this Manual. Significant alterations to this Manual shall be identified as "Revisions" and shall incorporate previous nonsignificant alterations issued as "Changes" (see Paragraph 3.0), if any, to the superseded revision.
- 2.2 The initial issue shall be identified as Revision O and each subsequent revision shall be consecutively number for each section of the Manual.

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- 2.3 Revisions within a page or section shall be denoted by placing a vertical bar in the right hand margin adjacent to the line(s) within the text containing revisions. The revision bar indicators of previous revisions shall be removed.
- 2.4 New or revised sections shall be reviewed and approved in the same manner as required for the original issuance of the Code Control Program (CCP) Manual.
- 2.5 The PQAPM's approval of new or revised sections shall be indicated by an approval signature on the section cover sheet. The Corporate Quality Programs Organization approval of new or revised sections shall be indicated by the approval signature of the EBASCO Director Quality Assurance on the cover sheet of each section. Approval signatures need not be dated since they will be obtained prior to the date identified on the cover sheet.
- The PQAPM shall submit a copy of new or revised sections to the TU Electric Director Nuclear Overview and the TU Electric Chief Engineer for concurrence as denoted by their signatures on the cover sheet of each section. Concurrence signatures need not be dated since they will be obtained prior to the date identified on the cover sheet.
- 2.7 The POAPM shall submit a copy of new or revised sections to EBASCO's Authorized Nuclear Inspector Supervisor (ANIS) for review and acceptance prior to issue. ANIS acceptance is indicated by signature and date on the cover sheet of each section. Implementation of new or revised sections may occur upon receipt and, unless otherwise stated, is required on the date identified on the cover sheet which shall not be later than sixty days after ANIS acceptance.
- 2.8 All Manual sections shall be maintained in a historical file. The file shall commence at the time of initial issuance of the Manual and continue through completion of Code Control Program (CCP) activities.

3.0 MANUAL CHANGES

3.1 "Changes" are considered to be nonsignificant alterations when they meet each of the following conditions:
3.1.1 The change does not modify CCP responsibilities

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- 3.1.2 The change does not modify the program
- 3.1.3 The change clarifies or adds information
- 3.2 The PQAPM shall be responsible for issuance of Change Notices to sections of this Manual as needed, in the following manner:
 - 3.2.1 Each change shall be consecutively numbered for each section of the Manual and noted on a Change Notice (CN).
 - 3.2.2 The Change Notice shall list the changes for the section and shall have attached the replacement pages of the section text.
 - 3.2.3 Each change shall be approved for issue by the PQAPM as indicated by signature on the Change Notice. Changes do not require approval by the EBASCO Director Quality Assurance nor do they require concurrence from the TU Electric Director Nuclear Overview or the TU Electric Chief Engineer.
 - 3.2.4 Changes within a page or section shall be denoted by placing a vertical bar in the right hand margin adjacent to the line(s) within the text containing the change(s). The letters "CN" followed by the respective change number shall be placed on the right hand side of the change bar. Change bar indicators shall be placed inside of revision bar indicators.
 - 3.2.5 Changes do not require ANIS acceptance and are forwarded to EBASCO's ANIS through normal Manual distribution. EBASCO's ANIS verifies that the change is a non-significant alteration as defined in this Section and documents this verification as part of signing the transmittal which acknowledges receipt of his controlled copy of the change(s). The ANIS addresses any concerns regarding the changes(s) to the PQAPM by annotating the transmittal (see Exhibit 15.5).

4.0 VAPIANCES TO MANUAL EXHIBITS

The exhibits shown in Section 15 of this Manual are to be considered typical. The information shown is the minimal information required by the Authorized Nuclear Inspector (ANI).

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5.0 CONTROL AND MANUAL DISTRIBUTION

- 5.1 The CCG shall determine the distribution of this Manual. Manual control actions shall include the following:
 - 5.1.1 Assigned Manuals shall indicate manual holder's name and manual number.
 - 5.1.2 A distribution list indicating the names of the individuals to whom the Manual has been assigned shall be maintained.
 - 5.1.3 Manual holders shall sign and return the accompanying transmittal acknowledging receipt and custody of the assigned Manual (see Exhibit 15.5).
- 5.2 New, revised or changed Manual sections shall distributed in the following manner:
 - 5.2.1 Each new, revised or changed section shall be issued to Manual holders using a transmittal (see Exhibit 15.5). Manual holders shall return the transmittal with their signature and date acknowledging receipt and inclusion of the issued material in their Manuals, as well as the destruction of all superseded material.
 - 5.2.2 A new Talbe of Contents will be issued for each Revision and Change Notice. Manual holders shall recheck the contents of the Manual aganist the revised Table of Contents and request any missing material (Exhibit 15.5).
- 5.3 The CCG shall follow up past-due receipt acknowledgments. For each receipt acknowledgment not received within thirty days of transmittal, a notice shall be sent informing the individual that the receipt acknowledgment is overdure. If receipt acknowledgment has not been received within fifteen days of the past-due notice, appropriate action will be initiated to obtain receipt acknowledgment prior to elapse of the sixty-day implementation period.

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6.0 IMPLEMENTING PROCEDURES

- 6.1 CCC Project Procedures will be developed by the PQAPM to establish controls for CCG activities which implement the requirements of this Manual. The PQAPM shall provide for the control and distribution of these procedures to those personnel requiring them and shall maintain an historical file and a list of procedure holders. Procedure issuance shall be controlled in accordance with the CCG Project Procedure governing the preparation, issuance and control of CCG Project Procedures. Procedures shall be verified against a current Table of Contents by the procedure holder, with acknowledgment to the PQAPM when requested.
- 6.2 CCG Project Procedures shall be approved by the PQAPM. The approval shall be documented by signature. Subsequent to approval by the PQAPM, CCG Project Procedures shall be submitted to TU Electric QA for review and approval.

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1.0 GENERAL

- 1.1 The Project Quality Assurance Program Manager (PQAPM) for Code Control Group (CCG) activities is responsible for overviewing the activities of the various organizations performing Code work at Comanche Peak Steam Electric Station (CPSES) Unit 2, to establish an additional level of assurance of compliance with Project Code commitments. This overview shall include reviews of activities that have been and are currently being performed. The reviews will identify and take credit for those activities which meet the needs of this Program. Overview of these activities will ensure continued satisfaction of the requirements of this Program. The reviews will also identify any activities requiring increased emphasis to assure compliance with Project Code commitments. These reviews shall be documented in accordance with methods described in this Section.
- 1.2 Nonconformance Reports (NCRs), Deficiency Reports (DRs), and TU Evaluation (TUE) Forms are initiated, dispositioned and implemented by various organizations at CPSES in accordance with their Quality Assurance (QA) Programs and implementing procedures. All NCRs, DRs and TUEs are numbered and tracked in accordance with CPSES procedures.
 - 1.2.1 TUEs are used (as NCRs were formerly used) to report and resolve hardware conditions which do not conform with applicable engineering or Code requirements. Stone & Webster Engineering Corp. (SWEC), Westinghouse, Bechtel and Impell provide the engineering dispositions for activities within their respective scopes of work when the TUE or prior existing NCR affects engineering requirements. Brown & Root provides dispositions for TUEs and prior existing NCRs which do not require engineering disposition.
 - 1.2.2 TUEs are used (as DRs were formerly used) to report and resolve procedural and/or programmatic deficiencies. Responsible organizations (as defined in 1.2.1) provide disposition(s) for TUEs and prior existing DRs affecting their activities.

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- 1.2.3 TUEs are used (as Corrective Action Requests were formerly used) to report and resolve programmatic/repetitive conditions which require evaluation and action beyond that required for individual nonconformances or deficiencies. These conditions require a determination of cause, an evaluation of generic implications, corrective action, and preventive action.
- 1.3 Changes affecting engineering and design requirements shall be overviewed as required by Section 6 of this Manual.

2.0 GCG REVIEWS OF ENGINEERING/DESIGN DISPOSITIONS FOR NONCONFORMANCES

- 2.1 Code-related TUE and NCR dispositions which affect engineering and design requirements at CPSES Unit 2 shall be overviewed by the PQAPM to establish confidence that the dispositions contain sufficient information pertaining to the Code, method of testing, inspection, and documentation to establish compliance with the Project Code commitments. TUE and NCR dispositions which do not affect engineering and design requirements shall be subject to CCG surveillance in accordance with this Section.
- 2.2 The PQAPM shall verify that dispositioned TUEs and NCRs have been satisfactorily closed and incorporated (when appropriate) into engineering documents.

3.0 CCG SURVEILLANCE OF NONCONFORMANCE AND DEFICIENCY PROCESSING

- 3.1 The PQAPM shall perform surveillance activities on the TUE, NCR and DR processing activities of the various CPSES organizations in accordance with Sections 6 and 8 of this Manual, as applicable.
- 3.2 The surveillance activ ty will cover those TUEs, NCRs and DRs which do not affect eng neering and design requirements to assure:
 - Compliance with QA program and implementing procedures of the implementing organization.
 - · Project Code commitment implementation.
 - Engineering and design requirements have not been affected.

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- 3.3 As a part of CCG surveillance of nonconformance and deficiency processing activities, the PQAPM may determine that previous CPSES reviews performed on TUEs, NCRs and DRs which do not affect engineering and design requirements satisfy attributes of this Program.
 - 3.3.1 If previous reviews satisfy the needs of the Program, the PQAPM shall document the decision including a justification to provide evidence that these reviews were sufficient for the purposes of the Program. This documentation shall be maintained in accordance with Section 7 of this Manual.
 - 3.3.2 If the needs of this Program are not satisfied by previous activities, the PQAPM shall perform additional surveillance.

4.0 OVERVIEW REPORTING

The results of CCG surveillances/overviews conducted in accordance with this Section, including unsatisfactory conditions, shall be documented on a Surveillance Report, Exhibit 15.6 and controlled in accordance with CCG Project Procedures. Unsatisfactory conditions identified by CCG shall be assigned for resolution by the responsible organization in accordance with established CPSES procedures. If at the time of Surveillance Report issuance an unsatisfactory condition is not resolved by the responsible organization in a manner acceptable to the CCG, the CCG shall initiate, as appropriate, a Surveillance Observation Form (SOF), Exhibit 15.6 and/or a TUE in accordance with the applicable CCG Project Procedure.