

Seabrook QA Program  
Description for Corrective  
Action. Contained in FSAF  
depot. This description  
applies to design and  
construction.

17.1.1.16 Corrective Action

YAEC and their contractors, WRD and UE&C, have developed programs for the control and implementation of corrective action for all safety-related activities.

The WRD program for the control and implementation of corrective action is detailed in WCAP-8370 and the UE&C program is detailed in UEC-TR-001. The YAEC program is contained in the Seabrook Station Quality Assurance Manual.

a. Identification and Correction

The Seabrook Station Quality Assurance Program requires that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

b. Corrective Action Program

The corrective action program requires that conditions adverse to quality be promptly identified, the cause be determined, corrective action be taken to preclude repetition, and verification be made that these actions have been implemented in accordance with specified requirements. It is required that deficiency reports be systematically analyzed to determine the need for corrective action and that the condition, cause, and corrective action taken be reported to the appropriate level of management. Records are maintained to verify that these corrective action measures have been implemented.

c. Documentation

Identification of the significant condition adverse to quality and the need for corrective action identified during YAEC audits are documented. A report of the adverse condition is reported to the appropriate levels of management, including those of YAEC, WRD and UE&C, as applicable. The circumstances surrounding the adverse condition, the action necessary to correct the condition, and the measures taken to preclude repetition are determined and documented by the organization responsible for implementing the needed corrective action. If the specified corrective action affects design of structures, systems, or equipment, concurrence must be obtained from the organization that established the original design criteria.

d. Follow-Up

Follow-up action is taken by organizations reporting deficiencies to verify that specified corrective action is properly implemented

and the results forwarded to appropriate levels of management including WRD and UE&C, as applicable. Completed items are closed out and the documentation maintained.

Conditions adverse to quality, requiring stop work action, are acted upon by the YAEC Quality Assurance Manager or his delegates in accordance with established procedures.

e. Reporting Deficiencies

Significant deficiencies, as defined by 10CFR50.55(e), are reported to the NRC Office of Inspection and Enforcement by the YAEC Project Manager in accordance with this regulation.

f. Audits

WRD and UE&C perform audits and surveillance on their own operations and those of their vendors to assure compliance with these requirements.

YAEC, through a system of planned audits of WRD, UE&C, and selected vendors, and a program of internal audits of YAEC departments assures their conformance to the program requirements.

17.1.1.17 Quality Assurance Records

WRD and UE&C are responsible for the collection of all quality assurance records generated within the scope of their responsibilities and submittal of these records to YAEC prior to fuel loading. The quality assurance records and the required storage and retrieval system are designed to fulfill the requirements of ANSI 45.2.9 "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants", with the exception that the records storage facility at the plant site is not tornado proof. The Startup Test Group is responsible for the control of records associated with the initial test program and for the transfer of all relevant data in accordance with Project procedures.

The WRD program providing for collection, storage and maintenance of quality records is described in WCAP-8370 and the UE&C program is described in UEC-TR-001.

a. Objective Evidence

The programs require that records documenting evidence of quality of items and activities include operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance, and material analyses. The records include closely related data such as qualification of personnel, procedures, and equipment. Other documents retained include drawings, specifications, procurement documents, special process and