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PART IV

BECHTEL POWER CORPORATION DIVISION DETAILED PROCEDURES

SECTION 17

INTERFACE CONTROL FOR INTERORGANIZATIONAL PROCESSES

17.1 PURPOSE AND SCOPE

This procedure provides for:

- a. The identification, investigation, and correction of project procedural interface concerns
- b. The review of Bechtel department procedures [e.g., administrative services, procurement, project engineering, construction, quality assurance, quality control (for ASME activities), procurement supplier quality, etc] for compatibility at points of interface, both with each other and with Consumers Power Company (CPCo) procedures
- c. A process to maintain procedural compatibility at points of interface between Bechtel organizations and between Bechtel and CPCo

The principal emphasis of this effort will be directed toward:

- a. Procedures that appear on the Bechtel Project Quality Program Document List (QPDL)
- b. CPCo procedures that interface with procedures on the QPDL
- c. Procedures that govern the Midland Project Quality Assurance Department (MPQAD)

17.2 DEFINITIONS

17.2.1 Approval - An act of endorsing or adding positive authorization, or both.

17.2.2 Coordinate - To bring into a common action, movement, or condition. (Coordination is performed to ensure that procedures of various Bechtel and CPCo organizations that touch on or make up a process allow the work to flow in a consistent manner.)

17.2.3 Disconnect - For this procedure, this definition refers to conflicting and/or missing direction that is or

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should be contained in the procedures of two or more organizations and prevents or hinders a consistent work flow.

17.2.4 Integrate - To form or blend into a unit; to incorporate into a larger unit.

17.2.5 Phase I - Phase I is the investigative portion of this program, developed to correct potential procedural interface problems that have been identified and entered on the Steering Committee Action Item List (SCAIL) (see Exhibit IV-17-1).

17.2.6 Phase II - Phase II is the process and procedural review portion of this program, designed to ensure consistency at points of interorganizational procedure interface (see Exhibit IV-17-2).

17.2.7 Procedure - A document that specifies or describes how an activity is to be performed. It may include methods to be employed, equipment or materials to be used, and sequence of operation.

17.2.8 Procedure Interface Steering Committee (PISC) - The PISC is composed of designated representatives or members of the project team.

17.2.9 Process - Procedures from various organizations united by some interaction or interdependence to achieve a specific goal through consistency of effort.

17.2.10 Project Team Members - For the purpose of this procedure, the project team members are the functional heads of project organizations (reference Project Procedures Manual, Parts I and II).

17.3 RESPONSIBILITIES

17.3.1 Project Manager - Responsible for ensuring implementation of this procedure.

17.3.2 Project Team Members - Members of the Midland project team are responsible for:

- a. Providing the required manpower to staff this effort
- b. Ensuring that the cooperation necessary to implement this program is present at appropriate levels within their organizations
- c. Informing employees within their organizations of the contents of this procedure.

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d. Informing the PISC about:

- 1) Interorganizational process/procedural disconnects as they are recognized
- 2) Major process inefficiencies
- 3) Circumstances that could warrant process investigation and correction

e. Coordinating procedures in accordance with Section 17.4.3

17.3.3 Quality Assistant - The quality assistant reports to the project manager and is responsible for administering this program through the PISC. The quality assistant serves as chairman of the PISC, and supervises the Phase I and Phase II teams.

17.3.4 Procedure Interface Steering Committee

17.3.4.1 The PISC meets periodically as required to:

- a. Disposition process concerns
- b. Review the list of significant processes/procedures
- c. Determine which significant processes will undergo interface review
- d. Review Phase I investigation and Phase II review reports
- e. Develop general corrective action plans and scope for the corrective action team (CAT)
- f. Appoint CAT members
- g. Monitor detailed corrective action plans

17.3.4.2 The PISC assists the corrective action team as required.

17.3.4.3 The quality assistant is responsible for maintaining the necessary files for this effort.

17.3.5 Phase I - Phase I investigators are responsible for:

- a. Identifying procedures that formulate the process under investigation
- b. Determining whether there are missing procedures (e.g., organizations that have unproceduralized interfaces with the process under investigation)

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- c. Determining the disconnects associated with the process concern under investigation
- d. Providing the PISC with a written report of the investigation including:
 - 1) Work practices and/or processes that have changed without the corresponding procedures being revised
 - 2) Areas where additional training may be beneficial
 - 3) Practices that result in unnecessary time delays or quality concern
 - 4) Process disconnects and inefficiencies
- e. Coordinating with the corrective action team during development of the detailed corrective action plan.

17.3.6 Phase II Reviewers - The Phase II reviewers are responsible for:

- a. Identifying quality-related interorganizational processes
- b. Developing a list of procedures organized by process
- c. Developing a list of significant processes
- d. Performing process/procedure interface reviews (see Sections 17.4.2 and 17.4.3) and reporting process/procedure interface concerns to the PISC
- e. Coordinating with the assigned corrective action team
- f. Reviewing detailed correction action reports

17.3.7 Corrective Action Team - The CAT is responsible for:

- a. Developing and implementing a detailed corrective action plan
- b. Ensuring that procedures are generated to achieve compatibility at points of interface and maintain process efficiency
- c. Coordinating with the investigative team

17.4 PROCEDURE

The project management quality assistant will contact MPQAD

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if a process incompatibility that could create a nonconforming condition is identified.

17.4.1 Phase I

17.4.1.1 Steering Committee Action Item List

- a. Source - A project management review identified the original process interface concerns that make up Revision 0 of the SCAIL. Additional process concerns will be added to the list when approved by the PISC.
- b. Contents - The SCAIL format allows, as a minimum, areas for recording the following information:
 - 1) The subject of the process being investigated
 - 2) The procedures that make up the process
 - 3) A description of the concern
 - 4) The assigned priority level
 - 5) A guideline of proposed actions and schedule
 - 6) A general corrective action plan
 - 7) The assigned investigator's name and telephone extension
 - 8) The corrective action team members' names and telephone numbers
- c. Control - The SCAIL is controlled by the project management quality assistant and is dated and revised numerically. New concerns are recorded on a process concern form until being added to the SCAIL.
- d. Priority Categories
 - 1) Category 1 - Indicates a significant concern that requires immediate attention. Category 1 items shall include problems that could impact process control and/or hardware. The PISC shall notify the project manager and the PQAE/MPQAD during disposition of Category 1 concerns.
 - 2) Category 2 - Assigned to high-priority items that require attention
 - 3) Category 3 - Reserved for concerns of moderate priority

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- e. The SCAIL action guidelines, schedule sections, and the general corrective action plans are developed during review of the concern report by the PISC.

17.4.1.2 New Process Concerns

- a. Midland project team members shall ensure that communication responsibilities outlined in Section 17.3.2.d are met.
- b. Members of the PISC:
 - 1) Receive notifications of process concerns
 - 2) Determine whether immediate action is necessary
 - 3) Schedule a meeting of the PISC through the chairman if necessary, or
 - 4) Bring the concern to the next meeting

17.4.1.3 Procedure Interface Steering Committee - The PISC:

- a. Reviews and discusses all new process concerns and decides whether or not to add them to the SCAIL. If a concern is added to the SCAIL, Items b through h below are performed as appropriate.
- b. Assigns a priority to the concern
- c. Reviews investigative and review reports and develops a general corrective action plan
- d. Assigns members to the CAT
- e. Monitors the work of the CAT
- f. Assists the CAT as required
- g. Closes the action item when all actions contained in the detailed corrective action plan are complete
- h. Retains records

17.4.1.4 Investigative Team

- a. Investigators shall be granted reasonable access to and full cooperation from personnel within the affected organizations during their investigations.
- b. Investigations will generally involve one or more of the following:
 - 1) Identification of all procedures that form the process

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- 2) Review of the procedures
 - 3) Flow diagram of the entire process as necessary
 - 4) Determination of whether every affected organization is covered procedurally
 - 5) Monitoring of the process to determine whether current work practices are consistent with procedures
 - 6) Identification of process inefficiencies
 - 7) Recommendation of additional training when appropriate
- c. Investigators will develop a report of their investigations and, when requested, meet with the PISC to discuss their concerns and conclusions.
- d. Investigators will support the CAT as appropriate.

17.4.1.5 Corrective Action Team

- a. Composed of one member from each affected organization.
- b. The CAT receives a general corrective action plan and scope from the PISC.
- c. A meeting or series of meetings is held to develop a detailed corrective action plan that, when implemented, will result in a fully integrated and efficient system. The CAT shall coordinate the plan with the cognizant investigator or reviewer before submitting it to the PISC for review.
- d. When the plan is developed and agreed upon, it shall be transmitted to the PISC chairman via an agreement signed by each member of the CAT.
- e. The CAT shall immediately proceed with procedure development and/or revision according to the agreed-upon plan.
- f. The CAT shall proceed with corrective action until the procedures are issued. During the review of the detailed corrective action plan and/or the draft procedures, the PISC or project management may choose to provide additional direction to the CAT.

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17.4.2 Phase II

17.4.2.1 Master Process/Procedure List - The process/procedure review team, using the QPDL for reference, will identify quality-related interorganizational processes and the procedures that formulate them. A list of processes/procedures shall be developed.

17.4.2.2 Significant Process/Procedure List - The process/procedure review team will review the processes. The review shall, as a minimum, consider how the process affects hardware, the interdepartmental interfaces involved in the process, and the difficulty of the interfaces. Processes that are determined to be "significant" shall be added to a significant process/procedure list. This list shall be controlled by the project management quality assistant.

17.4.2.3 Process Interface Review - Certain of the processes that appear on the significant process/procedure list will be reviewed in depth to ensure that there is compatibility at points of interface and to identify process inefficiencies.

- a. PISC - The PISC determines which processes that appear on the significant process/procedure list shall be reviewed.
- b. Process/Procedure Review Team - The process/procedure review team performs the review and identifies concerns to the PISC via a written report. The review will consist, as a minimum, of the following:
 - 1) Review of the affected procedures
 - 2) Development of an interface flow diagram if necessary
 - 3) Walkdown of the process
 - 4) Development and submittal of a review report
- c. Process Interface Concerns - Process interface concerns shall be handled in the same manner as described in Section 17.4.1.

17.4.3 Maintaining Interface Compatibility

17.4.3.1 Significant Process/Procedure List Distribution - The procedure sponsors (Bechtel and CPCo) should be made aware of the significant process/procedure list. Its distribution shall include the functional project heads of

nuclear operations, testing, MPQAD, PQAE, construction, engineering, licensing, soils, procurement, and administrative services.

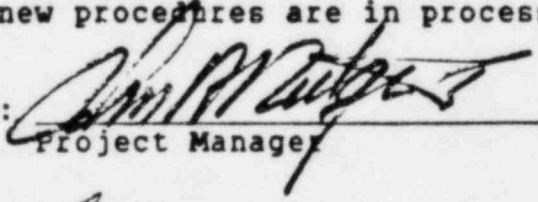
17.4.3.2 Procedure Revisions - Midland project organizational procedures manuals (Bechtel and CPCo) shall include requirements to:

- a. Coordinate new and revised QA program implementing procedures with other Bechtel or Consumers Power Company organizations whose implementing procedures may as a result require a revision or new procedure to complete or be compatible with the process. The significant process/procedure list should be consulted to determine other organizations that may be affected.
- b. Notify the project management quality assistant if the significant process/procedure list is inaccurate or incomplete

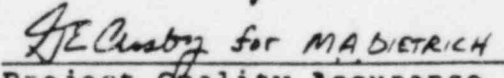
17.4.3.3 Monthly Procedures Status Summary - Bechtel and CPCo project organizations generating QA program procedures shall require in their procedures that a monthly procedures status summary be submitted to the quality assistant. The summary shall list those procedures planned for issue or revision and shall include:

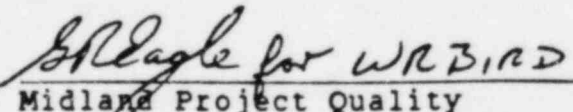
- a. Procedure designator
- b. Projected revision number
- c. Procedure title
- d. Sponsor (i.e., individual responsible for procedure development or revision)
- e. Brief status description

If no procedural revisions or new procedures are in process, the report is unnecessary.

Approved by: 

Project Manager


Project Quality Assurance
Engineer

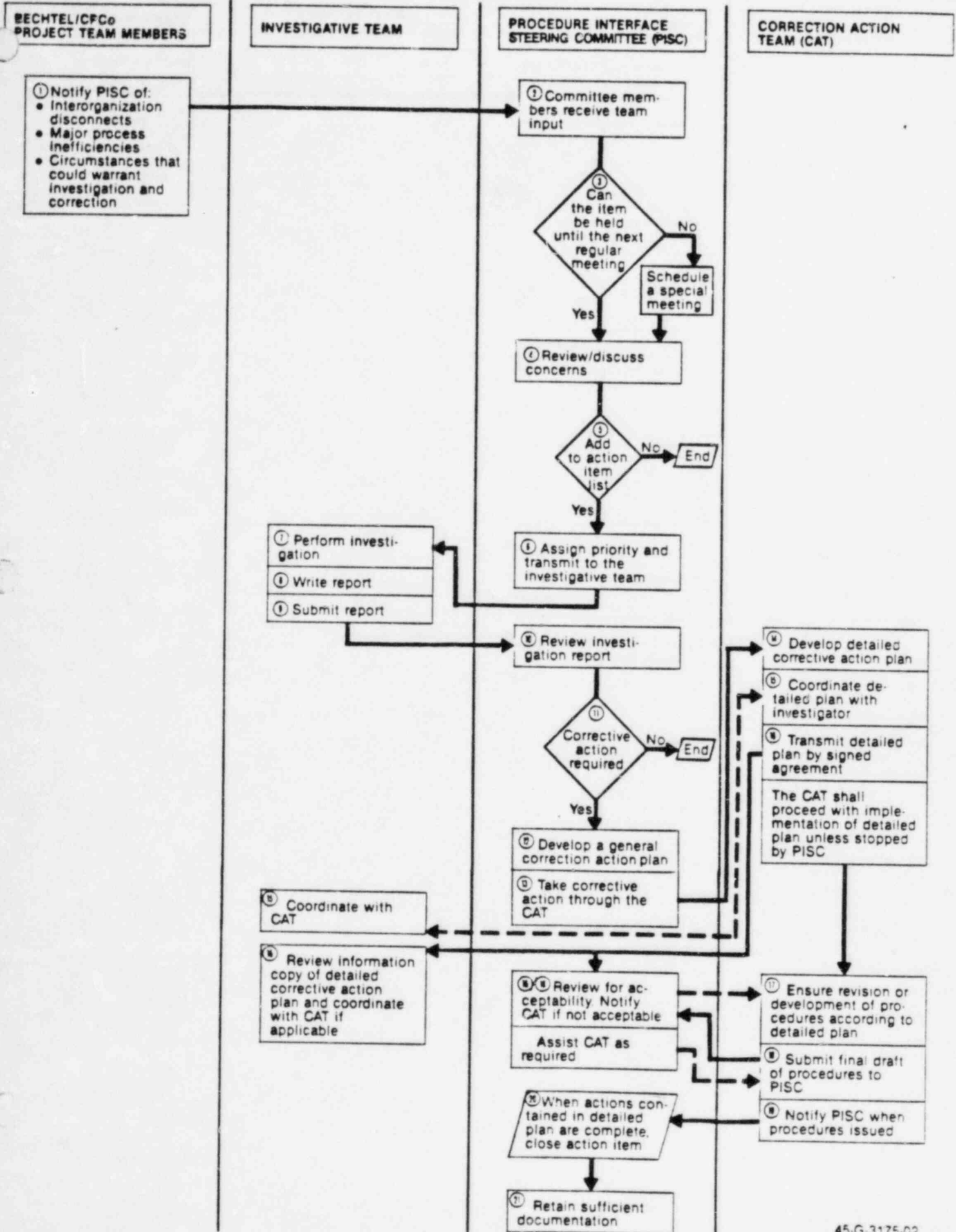

Midland Project Quality
Assurance Department

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Exhibit IV-17-1
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PHASE I PROCESS PROCEDURE INVESTIGATION AND CORRECTION



PHASE II PROCESS/PROCEDURE REVIEW AND CORRECTION

