

ILLINOIS POWER COMPANY

CLINTON POWER STATION

RECORD VERIFICATION PROGRAM PLAN

REVISION 2

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1.0 OBJECTIVE

The purpose of this Illinois Power Company program is to verify the acceptability of QA records applicable to the Clinton Power Station.

NOTE

These records may be in the custody of either IP or BA organizations.

2.0 SCOPE

The main features (elements), of the QA Records Verification Program are described in this section, while the organization and responsibilities are covered in Section 5.0.

2.1 The Records Verification Program (hereafter referred to as the "program") will apply to QA records for safety-related, fire protection, and augmented class D systems or structures as follows:

- ° Baldwin Associates' construction/fabrication/installation work documentation packages
- ° Site generated or maintained purchase order documentation packages, including associated receiving inspection and vendor data packages.

2.2 IPC QA will conduct a QA records surveillance program to verify the adequacy of the BA program. IPC QA will use the same criteria as BA uses in conducting their review program.

2.3 Description of BA QA Documentation Final Review Program.

2.3.1 Reviews will be scheduled and conducted in time frames to support scheduled hardware turnovers. However, if necessary, reviews and resolution of deficiencies may proceed beyond the hardware turnover date.

2.3.2 The Startup organization will provide lists of equipment and travelers included in each turnover.

2.3.3 The BA Senior QA Engineer (Document Reviewer) will request the documents be transmitted from the BA vault to the BA QA/DRG for review.

2.3.4 Records will be itemized and logged out of the BA vault for use by the QA/DRG in their work area. While in this area, when not being reviewed, the records will be stored in locked fire-proof file cabinets.

- 2.3.5 Each record, record package, or traveler will be assigned to an appropriate Quality Assurance Engineer (QAE) for review according to the QAE's area of expertise.
- 2.3.6 Each type of record package such as purchase order or traveler will be reviewed using applicable final review checklists.
- 2.3.7 A computer generated Record Status Report will be maintained to reflect the current status of records in the review cycle.
- 2.3.8 Installed equipment will be field checked on a surveillance basis to determine if the equipment is traceable back to the documentation. This may be performed under a separate plan (e.g., IP Overinspection).
- 2.3.9 Documentation review and the equipment field checks for traceability will be performed by personnel who are trained and qualified in the required specialities.
- 2.3.10 Record deficiencies found during the review process will be documented and routed to the appropriate discipline for action. Records that have been corrected will be routed back to QA/DRG for re-review. Documentation problems that remain unresolved will be added to the turnover exception list and tracked as part of the Plant Startup punchlist. The BA/DRG will trend deficiencies utilizing an inhouse computerized system. The system will be able to provide a printout of resolved and unresolved items to ensure total accountability.
- 2.3.11 As records are reviewed and found acceptable, they will be stamped accordingly.
- 2.3.12 After final review has been completed, IP will be notified that the records are available for their review.
- 2.3.13 The final step in the BA QA documentation review program is to return the records to the BA vault for storage and subsequent transfer to IPC, or to transfer records directly to IP.
- 2.3.14 The BA/DRG will interface with the BA Field Verification Group for field verification. The purpose of the interface is to assure that field verification is performed in conjunction with the ongoing overinspection activity.
- 2.4 Description of IPC QA Records Surveillance Program.
 - 2.4.1 After QA records have been reviewed and accepted by the BA/DRG, they will be reviewed by IP QA on a surveillance basis.

- 2.4.2 The purpose of this review is to evaluate the adequacy of the BA QA Documentation Final Review Program independently on a continuing basis.
- 2.4.3 The QA records will be reviewed using the same criteria, as delineated in the BA final review checklists. Additional criteria may be used to assess BA/DRG adherence to their governing procedures.
- 2.4.4 The IPC QA surveillance program will consist of approximately twenty (20) percent of all quality documentation reviewed by Baldwin Associates. A trend analysis program will determine the need to increase or decrease the percentage of records reviewed by IPC.
- 2.4.5 The IPC QA surveillance program will be conducted by personnel who are trained and qualified. The training program will be formalized and documented.

3.0 DEFINITIONS

- 3.1 Acceptability - The records as presented are legible, completely filled out and identifiable to the item involved. Requirements identified in the purchase specification and applicable codes and standards have been met. All documentation discrepancies have been resolved and the records are ready for transfer to Illinois Power Company.
- 3.2 Accountability - The process of verifying that documentation required by codes, specifications and procedures is identifiable and retrievable.
- 3.3 Documents - Collective term used to describe all written or pictorial information that provides evidence of what and how an activity was accomplished.
- 3.4 Documents Repository - An area designated for the protective storage (lockable fire-proof cabinets with a rating of 1 hour at 350°) of BA records while in the QA final review status. The Document Repository shall function as an extension of the BA Vault, and the storage, control of and access to records shall be in accordance with applicable procedures.
- 3.5 Field Verification - The process of verifying documentation against the equipment actually installed in the field.
- 3.6 Final Review Checklists - Detailed lists of requirements used to assist the reviewer to determine the acceptability of the different types of QA records and record packages. The checklists also define the kind of QA records required by applicable procedures, codes, standards, and design specifications for each type of equipment installed on safety related, fire protection and augmented class D systems.

- 3.7 QA Document Review Group (QA/DRG) - A staff of technically qualified personnel who perform the BA QA final review of records.
- 3.8 QA/DRG Handbook - A compilation of information to assist the QA final review personnel to perform their assigned tasks.
- 3.9 QAT - A lesson plan consisting of lesson objectives, references, instructional aids, lesson outline and additional information.
- 3.10 Quality Assurance (QA) Record - Those completed documents which furnish documentary evidence of the quality of items and of activities affecting quality.
- 3.11 Record Deficiency - Any record which contains a nonconformance or departure of a characteristic from specified requirements.
- 3.12 Surveillance - A scheduled or unscheduled review or observation of an activity, process, or product and associated objective evidence to verify that certain actions have been or are being accomplished in accordance with applicable requirements.
- 3.13 Training Qualification Requirements (TQR) - A specific listing of training/instruction requirements, practical demonstration requirements, examination requirements and other requirements for a given job assignment.
- 3.14 Traveler Packet ("traveler") - A group of documents in packet form containing individual traveler forms, inspection reports and information sheets which document Construction, Quality Control, and Technical Services activities for a defined portion of fabrication and/or installation.

4.0 TASK DESCRIPTIONS

4.1 The BA Documentation Final Review Program.

The initial implementation was completed through Baldwin QA procedures and a series of instructions, (BQAIs). These instructions, which were described in Revision 1 of this plan, have been incorporated into Baldwin Associates Procedures (BAPs).

4.1.1 Qualification and Certification of QA Documentation Final Review Personnel.

Documentation review personnel will be trained as Level I, II, and III QA Engineers and certified to the requirements

of the BA QA Training Manual. The requirements discussed below were formerly described in BQA 184.

The three levels of qualification for QA Engineers (Final Document Review) are as follows:

Level I

- ° A high school graduate (or GED equivalent) and six (6) months of quality-related experience, or
- ° Completion of college level work leading to an Associate Degree in a related discipline plus three months of quality-related experience.

Level II

- ° High school graduate (or GED equivalent) plus one (1) year of satisfactory performance as Level I in the examination of documents to applicable codes, standards, and procedures, or
- ° High school graduation (or GED equivalent) plus three (3) years of quality-related experience, or
- ° Completion of college level work leading to an Associate Degree in a related discipline plus one (1) year of quality-related experience, or
- ° Four-year college graduation plus six months of quality-related experience.

Level III

- ° High school graduate (or GED equivalent) plus six (6) years of satisfactory performance as a Level II in the examination of documents to applicable codes, standards, and procedures, or
- ° High school graduation (or GED equivalent) plus ten (10) years of quality-related experience, or high school graduation plus eight (8) years of quality-related experience, with at least two (2) years as Level II, and with at least two (2) years associated with nuclear facilities-or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or
- ° Completion of college level work leading to an Associate Degree and seven (7) years of quality-related experience, with at least two (2) years of this experience associated with nuclear facilities-or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or

- ° Four-year (4) college graduation plus five (5) years of quality-related experience, with at least two (2) years of this experience associated with nuclear facilities-or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

Qualification of document review personnel will be determined by written examination, and practical demonstration. The examination and practical demonstration will be documented.

Training of document review personnel will consist of periodic and supplemental training conducted by the Lead QAE, on-the-job training, and mandatory reading and will be documented.

General and specific examinations will be administered for certification purposes. A Proficiency and Performance Evaluation Record will be completed prior to Level I and II certifications. QA/DRG personnel will have a performance appraisal and will be re-examined and re-certified biennially.

- 4.1.2 The BA QA final review will be conducted using checklists derived from applicable procedures, instructions, codes, standards and specifications.

The total number of checklists and categories of checklists may increase or decrease as the needs are better defined.

- 4.1.3 The organizational structure for the BA/DRG is as shown in Attachment 1.

- 4.1.4 Job descriptions for the BA/DRG positions are as follows:

- a. Lead Quality Assurance Engineer
(Document Review) Level III

Duties:

- ° Address and evaluate problems and discrepancies outside QAE's range of responsibility or expertise.
- ° Assist and coordinate efforts of methodology of evaluation of travelers and/or documents and establish base line requirements of acceptability.
- ° Interface with other disciplines concerning documentation discrepancies for resolution in a timely and orderly manner.

- ° Perform traveler and/or document review.
- ° Supervise those personnel assigned by the Senior QA Engineer (Document Review).
- ° Responsible for the thorough and accurate documentation review performed by those persons under his/her supervision.
- ° Assist Senior QA Engineer (Document Review) as directed.

Qualification Required:
Education/Experience Requirements

- ° Must meet applicable standards for certification as defined in BA QA Training Manual, plus prior supervisory experience in a similar work related field.

b. Quality Assurance Engineer
(Documentation) Level II

Under general supervision of Lead QAE (Document Review), Level III, responsible for performing final review of safety related documentation for nuclear power plant construction.

QAE will perform reviews of records in accordance with checklists derived from project requirements documents. Results of review will be documented on the document exception list, signed/initialed by the QAE, and incorporated into the document as part of the final record.

Work is subject to review by Lead QAE (Document Review), however the QAE is expected to work independently and must be familiar with documentation requirements for a variety of disciplines including piping, supports, welding, electrical, civil/structural, and associated components.

The QAE must meet applicable standards for certification as defined in BA QA Training Manual.

c. Quality Assurance Engineer
(Documentation) Level I

Under close supervision of QAE, Level II, a Level I QAE will assist in performing final documentation review of safety related records for nuclear power plant construction.

The Level I QAE will review records in accordance with checklists derived from project requirements documents.

A Level I QAE will refer non-conforming conditions or documentation discrepancies to a Level II QAE for interpretation when required. Results of review will be documented on checklists and/or exception reports, signed or initialed by the QAE, and incorporated in the document as part of the final record.

The QAE must meet applicable standards for certification to QAE Level I as defined in the BA QA Training Manual.

d. QA/DRG Technical Assistant

Duties:

Assigned to QA for purpose of providing technical assistance to QA Engineers performing final review of hardware and software (documents, records, drawings) prior to turnover to the owner.

Technical assistants are expected to have a working knowledge of applicable regulations and procedures. Duties will include but are not limited to the following:

- ° Performs initial review of Travelers and/or documents for readiness to review.
- ° Prepares and inserts review forms.
- ° Evaluates QA Final Review Document Exception List (DEL FORM) for the complete review.
- ° Maintain control over records, including Travelers, and other documents to insure preservation and protection in accordance with applicable procedures and instruction while undergoing final documentation review.
- ° Assists QAEs as directed/required.

Qualifications:

- ° High school graduate or equivalent plus two years related experience, or
- ° Two years college plus six (6) months related experience.

e. Senior QA Engineer
(Document Review)

- ° Senior QA Engineer (Document Review) reports directly to the Assistant QA Manager for program direction and operation.

- ° Responsible for development and implementation of final documentation review program.
- ° Recruit and train required staff of Quality Assurance Engineers (Document Review) Technical Assistants, and clerical support personnel needed to perform the job.
- ° Develop qualification standards, establish OJT and other training plans and provide for examination and testing of personnel as a prerequisite for certification to perform assigned duties.
- ° Develop necessary procedures to establish the program, and work instructions, including forms, checklists, handbooks, and related matters to accomplish the specific tasks necessary so that the final review process will assure satisfactory results.
- ° Will assure that access to, and correction, or addition to the records is in full compliance with applicable records management and records control procedures.
- ° Supervises Lead QAE and staff of Quality Assurance Engineers (Document Review), Technical Assistants, and clerical personnel; evaluates performance, approves leave and overtime requirements, and adjusts working hours as required.
- ° Responsible for planning, scheduling, and organizing the work; and for coordinating with other departments such as Engineering, Quality Control, Technical Services, and Illinois Power Company.
- ° Identify and report any and all documentation discrepancies, and coordinate with appropriate organizations/disciplines for their resolution.

4.1.5 Recruiting of personnel for the BA/DRG is ongoing. A discussion of resources appears in section 6.0.

4.1.6 The BA Senior Engineer (Document Review) will prepare schedules for final review of vaulted and in-process records.

4.2 Task Description- IPQA Record Surveillance Program

4.2.1 Description of IP QA Record Surveillance Procedure, QAP-117.02

- 4.2.1.1 The surveillance program will coincide with the completion of reviews by BA/DRG on an ongoing basis and will support project schedules.
- 4.2.1.2 Record surveillance will consist of an approximate twenty percent sample of records reviewed by BA/DRG. Random sampling techniques will be used.
- 4.2.1.3 Record surveillance will be performed by record reviewers trained, qualified and certified to specified requirements.
- 4.2.1.4 Records selected for surveillance will be maintained and stored in a manner to preclude record deterioration.
- 4.2.1.5 A computerized tracking program will be utilized to reflect the status of records reviewed in the surveillance program. The system will be able to provide a printout of resolved and unresolved record deficiencies to ensure total accountability.
- 4.2.1.6 Record deficiencies found during the review process will be documented and routed to BA for resolution. Records that have been corrected will be routed back to the IP surveillance group for final acceptance.
- 4.2.1.7 Trending of record deficiencies will be conducted by IP QA using a computerized system.
- 4.2.1.8 IP QA Review stamps will be used to provide objective evidence within the record package that the surveillance review was performed.
- 4.2.2 The IP record surveillance will be conducted using checklists derived from applicable procedures, instructions, codes, standards and specifications.

The total number, and categories, of checklists may increase or decrease as the needs are better defined.

4.2.3 Description of IP Training and Qualification Program.

- 4.2.3.1 Record surveillance personnel will be trained, qualified and certified as Level I, Level II, and Level III record reviewers.
- 4.2.3.2 Level III Record Reviewers require the following:
 - a. High school graduate (or GED equivalent) plus six (6) years of satisfactory performance as a Level II Records Reviewer or equivalent, or
 - b. High school graduate (or GED equivalent) plus ten (10) years of related documentation experience; or

high school graduate plus eight (8) years of related documentation experience, with at least two (2) years as a Level II Records Reviewer, and with at least two (2) years associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility, or

- c. Completion of college level work leading to an Associate Degree plus seven (7) years of related documentation experience, with at least two (2) years of this experience associated with nuclear facilities - or if not, at least sufficient training to be acquainted with the relevant quality assurance aspects of a nuclear facility.

4.2.3.3 Level II requires the individuals to be a high school graduate (or GED equivalent) and have one year of satisfactory performance as a Level I record reviewer; or high school diploma (or GED equivalent) and three years related documentation experience; or completion of college level work leading to an associate Degree in a related discipline plus one year related documentation experience; or four year college graduate plus six months of related documentation experience.

4.2.3.4 Level I requires the individuals to have two years of related documentation review or high school diploma (or GED equivalent) and six months related documentation experience; or completion of college level work leading to an Associate degree in a related discipline plus three months related documentation experience.

4.2.3.5 Qualification and training of record review personnel will be determined by the training and qualification requirements (TQRs) as established for Levels I, II and III.

4.2.3.6 Training of record review personnel will be documented.

4.2.3.7 Record review personnel will be re-examined and re-certified biennially.

4.2.4 The organizational structure for the IP Record Surveillance Group is as shown in Attachment 3.

4.2.5 Position titles and responsibilities for the Records Review Group are as follows:

- a. Records Coordinator
(Level III Record Reviewer)

Duties:

- ° Direct record review personnel.

- Interface with other departments/disciplines to resolve record deficiencies.
- Develop training and qualification requirements for record review personnel.
- Coordinate review of specifications, procedures and code documents for quality requirements and development of checklists.
- Coordinate and update computer tracking programs.

Required Qualifications:

- Education and experience requirements necessary to certify Level III to ANSI N45.2.6-1978.

b. Level II Record Reviewer

Duties:

- Review specifications, procedures and code documents for quality requirements.
- Assist Level I record reviewers.
- Develop checklists to be used for record surveillance.
- Identify record deficiencies and follow through until closeout.
- Perform record reviews in accordance with checklist requirements.
- Provide data for update of record surveillance information on the computer tracking system.

Required Qualification:

- Individual must meet applicable standards for certification as defined in ANSI N45.2.6-1978 for Level II.

c. Level I Record Reviewer

Duties:

- Perform record reviews in accordance with checklist requirements.
- Identify record deficiencies and follow through until closeout.

- ° Provide data for update of record surveillance data in the computer tracking system.

Required Qualifications:

- ° Individual must meet applicable standards for certification as defined in ANSI N45.2.6-1978 for Level I.

d. Records Engineer

Duties:

- ° Review specifications, procedures and code documents for quality requirements.
- ° Assist Level I and Level II record reviewers.
- ° Develop checklists to be used for record surveillance.
- ° Expedite record problem closeouts.
- ° Expedite development or improvement of computerized systems as required.

Required Qualifications:

- ° Individual must meet applicable standards for certification as defined in ANSI N45.2.6-1978 for Level II.

5.0 RESPONSIBILITIES

- 5.1 The IP Manager Quality Assurance has overall responsibility for the development and implementation of the program.
- 5.2 The BA Manager of Quality and Technical Services has the responsibility for development and implementation of the program for BA.
- 5.3 The IP Nuclear Records Supervisor is responsible for coordinating and interfacing with the BA Document Records Center personnel, Sargent & Lundy, other IP organizations and IP contractors, as shown in Attachment 2, as necessary to support the needs of the program. The IP Nuclear Records Supervisor is also responsible for keeping upper management informed of status and problems that arise and propose corrective action.

6.0 RESOURCE REQUIREMENTS

The resource requirements needed to implement the Records Verification Program have expanded to the following levels:

- ° BA - 157 people as of August 1, 1984.
- ° IP - 32 people as of August 1, 1984.

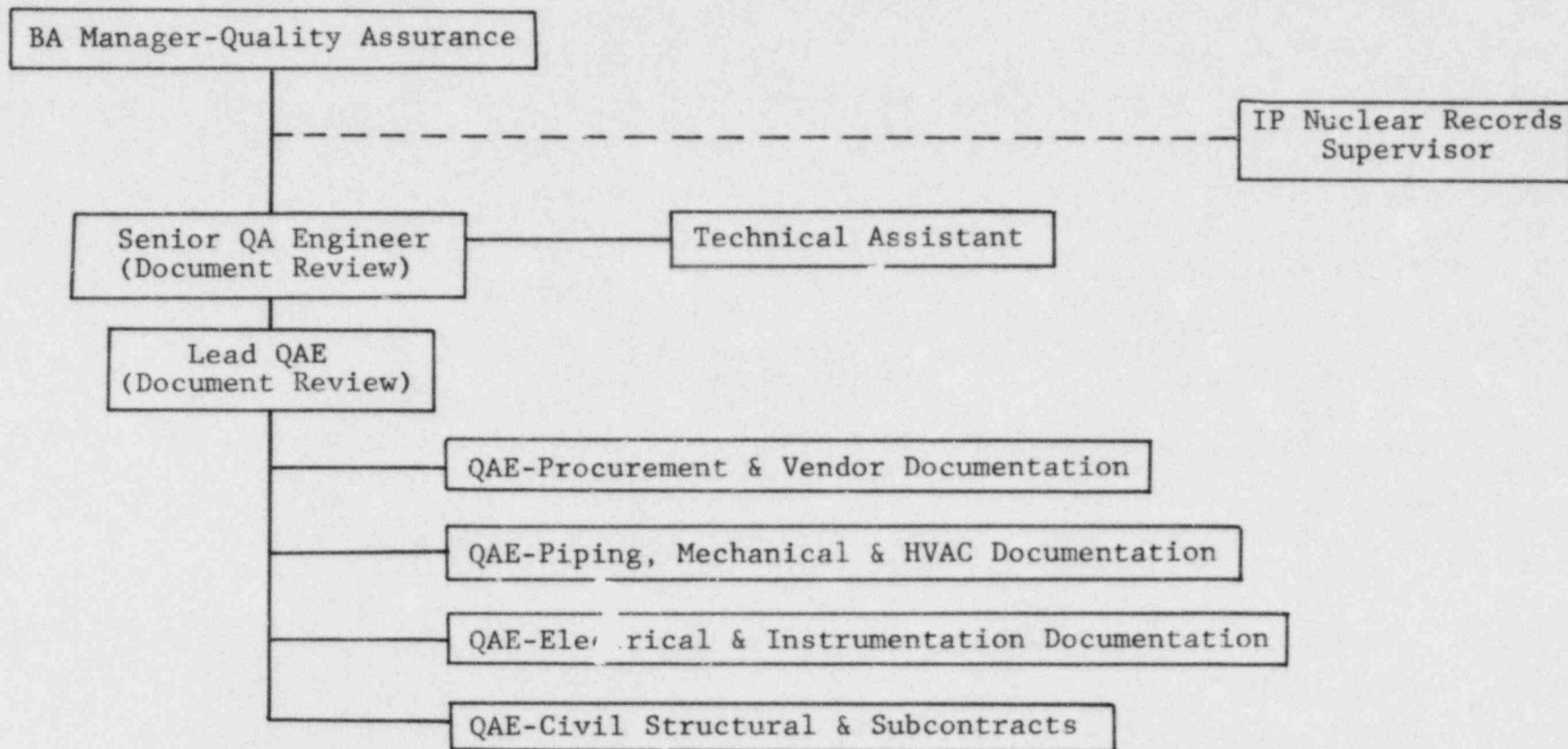
Needs will continue to be assessed and levels will change accordingly.

7.0 ATTACHMENTS

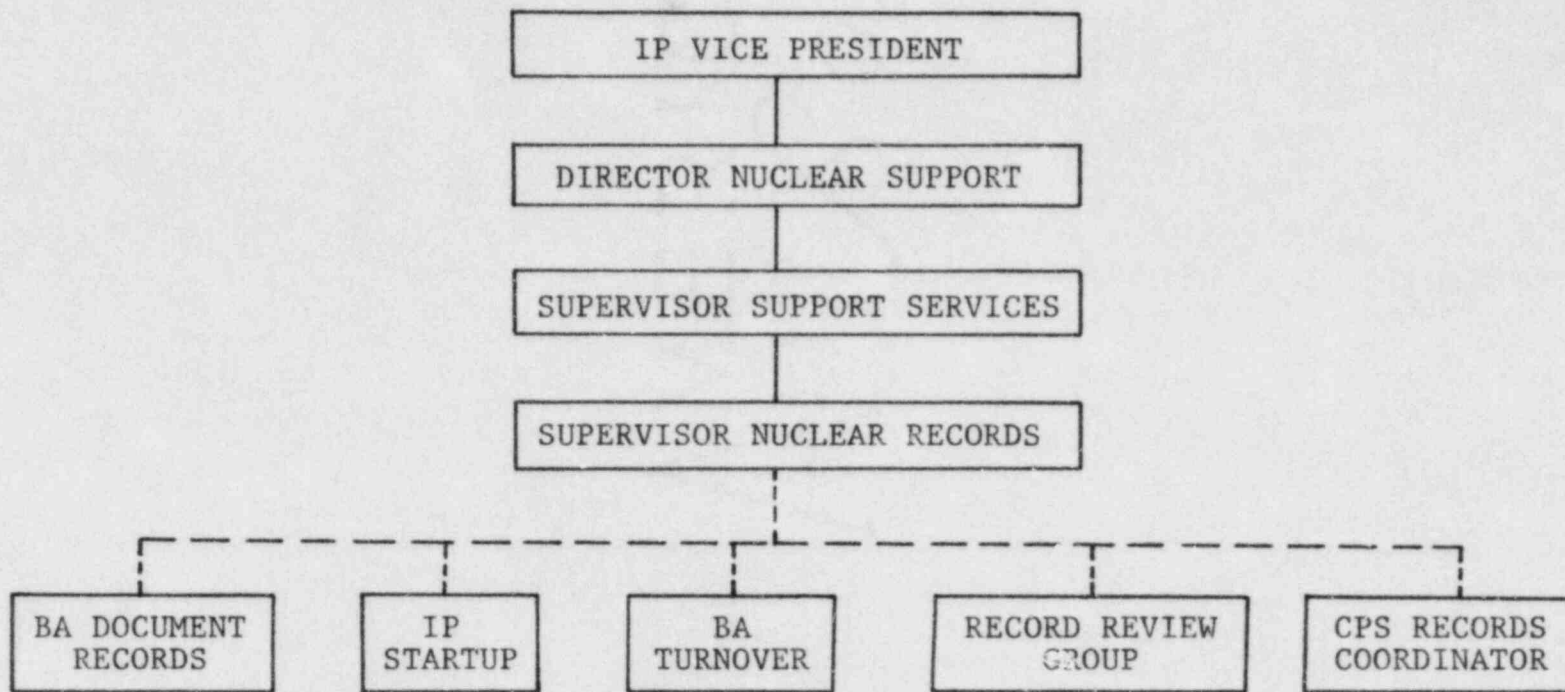
- 7.1 Attachment 1 - Baldwin Associates Document Review Group Organization Chart
- 7.2 Attachment 2 - Site Records Management Interface Structure
- 7.3 Attachment 3 - IPQA Record Review Group Organization Chart

(MISC)

BALDWIN ASSOCIATES
DOCUMENT REVIEW GROUP



SITE RECORDS MANAGEMENT INTERFACE STRUCTURE



IPQA RECORD REVIEW GROUP ORGANIZATION CHART

