1.0 PURPOSE

1.1 The purpose of this chapter is to establish requirements and responsibilities for the identification, documentation, evaluation, resolution, control and reporting of deficiencies.

2.0 SCOPE

2.1 This chapter applies to deficiencies discovered in items, services and activities under the scope of the Operations Quality Assurance Plan and the reporting of items to the Nuclear Regulatory Commission (NRC) in accordance with Title 10 Code of Federal Regulations.

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 10CFR50, Appendix B

4.2 10CFR21, Reporting of Defects and Noncompliance

4.3 10CFR50.72, Immediate Notification Requirements for Operating Nuclear Power Reactors

4.4 10CFR50.73, Licensee Event Report System

4.5 South Texas Project Electric Generating Station (STPEGS) Technical Specifications

4.6 OQAP Chapter 14.0, Records Control

5.0 REQUIREMENTS

5.1 All personnel working under the jurisdiction of the Operations Quality Assurance Plan are responsible for reporting identified deficiencies to appropriate management for resolution in accordance with approved procedures.

5.2 Procedures shall be developed for the control of items, services or activities which do not conform to

established requirements. These procedures shall provide for the following:

5.2.1 Identification and documentation of the deficient condition.

5.2.2 Identification of the requirements, source, or reference information being violated

5.2.3 Notification of responsible management.

5.2.4 Control of the deficient item or activity by tagging, segregation, administrative controls, or other appropriate means to prevent inadvertent installation, use, or continuation of the deficient activity and removal of such controls when the item is returned to service or availability.

5.2.5 Resolution and/or disposition approved by authorized personnel prior to closing out the nonconformance documentation and restoring the item to normal service.

5.2.5.1 Material nonconformance disposition categories are:

- o "Use-as-is"
- o "Reject"
- o "Rework" in accordance with documented procedures
- o "Repair" in accordance with documented procedures

5.2.5.2 "Use-as-is" and "repair" disposition of nonconforming items shall be approved and justified in writing by Engineering.

5.2.5.3 Evaluations shall be performed to ascertain recurrence control measures.

5.2.3 Documentation of the corrective action taken.

5.2.7 Review and/or verification of the corrective action by Nuclear Assurance, as appropriate.

5.2.8 Reinspection of repaired and reworked items shall be to criteria as stringent as those applied to the original work. Reinspection results are documented on inspection reports or other work process control documents.

5.2.9 Installation of nonconforming material, parts, and components may be performed after the effect of their installation has been evaluated and the installation approved by Plant Management and Engineering. Nonconforming items which may not be installed are those which, because of their makeup and intended use, cannot be repaired or reworked after being installed and those which, if installed and later removed, would degrade that system, structure, or component. Once installed, nonconforming items are not energized, used, or placed in service until the action required by the disposition, including reinspection, has been completed or an engineering evaluation has been prepared to justify the intended use of the nonconforming item. QA-002

5.2.10 Nonconformances identified on installed items will be evaluated for operability. QA-002

5.2.11 Disputes over corrective action are normally resolved by Plant Management. Should this resolution not be satisfactory, the parties may elevate the matter to higher management for resolution.

5.3 Procedures shall provide the following administrative controls of deficiencies:

5.3.1 Unique identification and numbering of deficiencies.

5.3.2 Preparing and maintaining status reporting of deficiencies.

5.3.3 Actions to be taken to assure timely corrective action on deficiencies.

5.4 Procedures which identify and track deficiencies shall require management review of each report to determine if the condition is significant. For significant conditions adverse to quality, the cause of the condition and the corrective action taken to preclude repetition shall be documented and reported to appropriate levels of management.

5.5 Measures shall be established for review and evaluation of deficiencies for reportability to the NRC as required by Reference 4.1, 4.2, 4.3, and 4.4, as appropriate.

5.6 The authority to stop work has been assigned to the General Manager, Nuclear Assurance for any activity being performed by company personnel or contractors which do not conform to established requirements.

5.7 Measures shall be established for the evaluation and trending of plant deficiencies. The results of these reviews and analyses are reported to the affected organization and executive management, and are audited by the QA organization on a biannual basis. Significant adverse trends shall be handled in accordance with this chapter.

6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.6.

7.0 ATTACHMENTS

7.1 None

results of these assessments will be transmitted to the Group Vice President, Nuclear.

5.8 Procedures shall be developed to control Nuclear Assurance site surveillance activities. Site surveillances shall be used to observe and verify that quality-related activities are accomplished in accordance with prescribed procedures.

5.9 A surveillance schedule shall be developed to ensure adequate coverage of quality-related activities.

5.9.1 The frequency of site surveillances is based upon the complexity of the activity, importance of the activity, and magnitude of discrepancies noted during previous audits or surveillances.

5.9.2 Unscheduled site surveillances may be performed to accommodate changes in plant conditions or systems.

5.10 Scheduled site surveillances are performed using a surveillance checklist. The surveillance checklist shall be prepared using applicable procedures, specifications, codes, and regulatory requirements for source requirements.

5.11 Site surveillance results are documented, and a summary of surveillances and evaluation of surveillance findings shall be prepared and transmitted to responsible management.

5.12 Nonconforming equipment, components, parts, materials, activities or documentation identified during an audit or site surveillance shall be documented in accordance with Reference 4.4.

5.13 Personnel performing surveillances shall be trained and qualified in accordance with Reference 4.2.

6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.5.

7.0 ATTACHMENTS

7.1 None