

Ensuing attempts by both the Production and Quality departments at resolving QAD's comments were unsuccessful, and, on April 27, 1987, the draft Revision 27 was submitted to the site Safety Review Board (SRB) for resolution.

The SRB met on May 8, 1987, and, as indicated in the Procedure Development Form (PDF) for Revision 27, determined that NG-AV-115 would have to be revised to reflect the reduced level of QAD involvement in procedures and procedure changes before Revision 27 to AD-1805 could be approved and issued. The PDF was not signed by the QAD Director at this time because the requisite changes had not been made to NG-AV-115. The draft Revision 27 with SRB comments and the PDF without the QAD Director's signature were returned to the site Technical Support Group for continuing coordination of the revision process. On May 13, 1987, the Technical Support Manager signed the Revision 27 cover sheet indicating that the revision was ready for issuance. The Plant Manager also signed the cover sheet on May 13, approving its issuance and implementation. This signature process was reperformed on May 19, 1987. The second signatures by the Plant and Technical Support Managers were not required, and their purpose could not be determined. At the time of both signings, NG-AV-115 still required QAD approval of the revision. This approval had not been obtained as indicated by the lack of the QAD Director's approval signature. The failure to obtain required QAD Director approval prior to issuance of Revision 27 to AD-1805 was a violation of existing controlling procedures and was contrary to 10 CFR 50, Appendix B, Criterion V (346/88004-01(DRP)).

- (b) During the interviews conducted regarding the circumstances surrounding the inappropriate approval and issuance of Revision 27 to AD-1805, the following pertinent information was identified:
- i. The Technical Support Manager signed the cover sheet on May 13, 1987, based on verbal confirmation that all comments had been resolved.
  - ii. The Plant Manager signed the cover sheet on May 13, 1987, believing that the SRB had resolved QAD comments. He further stated that at the time he signed the cover sheet, he was unaware that a prerequisite revision to NG-AV-115 was required.

- iii. On May 13, 1987, during the administrative processes supporting implementation of Revision 27 to AD-1805, including updating the T&PI, the fact that QAD had not approved the revision was brought to the attention of the Document Control (DC) Group, which was responsible for further processing and distribution, and the Systems and Procedures (S&P) Group, responsible for updating the T&PI. DC returned the procedure to Technical Support for resolution of this discrepancy prior to distribution.
- iv. On May 14, 1987, an S&P Group supervisor signed the PDF with the notation to proceed with processing without QA concurrence.
- v. Technical Support determined that QAD was not prepared to accept the necessary changes to NG-AV-115 to support implementation of Revision 27 to AD 1805.

Based on the results of interviews as discussed above, the lack of QA approval had been identified to at least three organizations assigned key functions in the procedure implementation process. Notwithstanding, Revision 27 to AD-1805 was issued on May 19, 1987.

- (c) On May 19, 1987, QAD discovered that Revision 27 to AD-1805 was issued without its approval. Further attempts to resolve the concerns with Technical Support failed and, on June 26, 1987, QAD issued Potential Condition Adverse to Quality Report (PCAQR) 87-0322. This PCAQR was still open at the time of the inspection. A memorandum proposing escalation to a Management Corrective Action was prepared by the Director, QAD, on August 6, 1987. The purpose of this memorandum was to bring this issue to the attention of the Nuclear Group Vice President for resolution. This memorandum was not issued. The failure to take prompt and effective corrective action for the identified violation is a violation of 10 CFR 50, Appendix B, Criterion XVI (50-346/88004-02(DRP)).
  - (d) QAD indicated during interviews that it is currently reviewing all procedures and changes issued under Revision 27 to AD-1805 to ensure that quality requirements were not deleted from site procedures. To date, no safety issues have been identified.
- (2) Conclusions: Based on the above information, the following conclusions were reached:
- (a) The changes made to AD-1805 by Revision 27 reduced the level of QAD involvement in the procedure control process.