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AUTOMATED RECORDS MANAGEMENT SYSTEM IMPLEMENTATION

PREPARED BY: J. L. Brankey DATE 12-1-80

APPROVED BY: J. R. Ainsworth DATE 12/2/80

1.0 REFERENCES

1-A CP-QP-18.2, "Implementation of the Permanent Plant Records Management System"

FOR INFORMATION ONLY

2.0 GENERAL

2.1 PURPOSE AND SCOPE

The purpose of this Porcedure is to establish the basic definitions, operational, and interface requirements for the implementation of ARMS required in Reference 1-A at CPSES. This Procedure applies to site operations and use of the Records Management System Index (RMSI) and the Microfiche Retrieval System (MRS) subsystems of the ARMS.

2.2 TERMS AND DEFINITIONS

2.2.1 Arms

The Automated Records Management System is a computer-assisted records storage and retrieval system supplied to TUGCO by the TERA Corporation. The ARMS is comprised of the RMSI and the MRS subsystems.

2.2.2 RMSI

The Records Management System Index subsystem is a computer data base which contains index data for the project records as they are indexed into the ARMS system. The system uses a DATA General Eclipse C-330 mini-computer and associated peripherals located on site. Index data stored in the computer memories for station records will be available to all station personnel through a system of remote Cathode Ray Tube (CRT) terminals located at

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strategic locations throughout the site. In addition, CRT terminals are placed in Texas Utilities Dallas offices, connected by a telecommunications link to the on-site computer.

2.2.3 MRS

The Microfiche Retrieval System, the second ARMS subsystem, is a microfilm document distribution system. The MRS provides remote viewing capability at any of the established station microfilm libraries. Necessary microfilming facilities are located on-site.

2.3 ARMS FUNCTIONAL DESCRIPTION

The Automated Records Management System is pictorially described in Figure 1.

3.0 PROCEDURE

3.1 DATA CAPTURE

Data capture into the RMSI shall be performed by the ARMS index/technical coding group in accordance with the ARMS Coding Manual. Index data shall be captured from the target document itself.

3.2 OPERATIONS AND INTERFACING

All data capture and technical coding shall be coordinated closely by the Records Management Coordinator or his designee, as well as interface activities with Document Control Microfilm Center.

All documents that have been ARMS indexed shall be indelibly noted so on the front page of each document.

Indexing shall be accomplished in accordance with the appropriate procedure for the document type and with the ARMS Coding Manual.

Those documents to be microfilmed shall be "batched" in groups not to exceed 239 pages and shall be stamped with the microfiche/batch number and frame/page number on each page.

3.3 MICROFICHE RECORDS CONTROL

Those documents designated to be microfilmed will be available to CPSES personnel at a number of microfilm libraries throughout the site. Upon completion of a microfiche, the fiche shall be reproduced for addition to each of the MRS stations and dispersed by Microfilm Center Personnel.

Certain MRS stations will be furnished a complete microfiche library while others, depending on need, will be furnished only an inventory of the most current fiche.

3.4 CONTROL AND STORAGE OF DATABASE-BACKUP ARCHIVAL TAPE

During the last five days or the first five days of each calendar month (specific time to be determined by the Computer Operations Coordinator) at least one set of computer backup tapes shall be designated to be tested by reading them into a set of disk packs or disk pack.

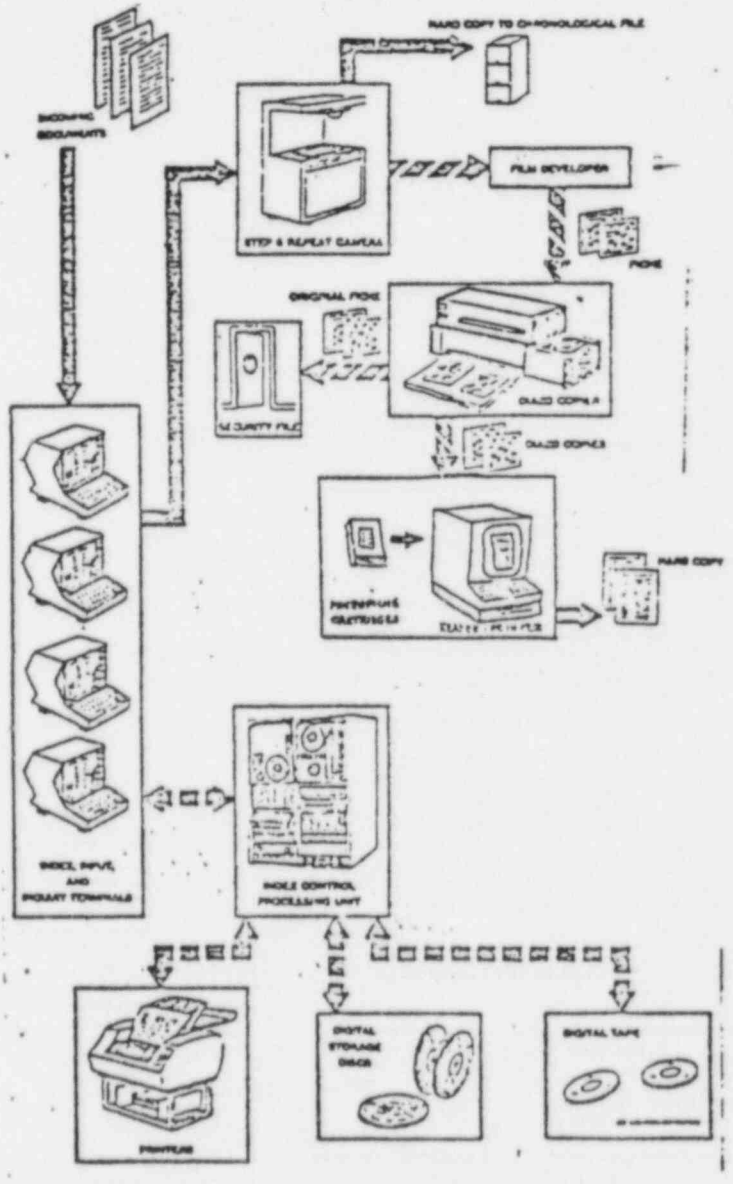
If the read-in is successful as determined by the Computer Operations Coordinator, then that set of tapes will be set aside from use and designated as the "monthly archival tape set".

The "monthly archival tape set" shall be stored, after testing, in the TUGCO Administrative Building where they will be kept in a locked device and retrievable only with the consent of the TUGCO Administrative Supervisor.

When another set of "monthly archival tapes" have been recorded and read into the backup disk and it has been determined that the backup tapes are satisfactory, then the newest or latest set shall be exchanged with the previous months archival tape set which will be re-entered into the normal rotation of database backup tape sets.

FIGURE 1

AUTOMATED RECORDS MANAGEMENT SYSTEM (ARMS)
SYSTEMATIC DIAGRAM



Procedures define the organizational structures within which the programs are implemented and delineates the authority and responsibility of the persons and organizations involved performing design, engineering, procurement, and construction activities affecting the quality of design. These procedures identify the organization interfaces, both internal and external, between the contributing organizations.

The portions of the engineering procedure which have been implemented include correspondence, drawing, document and file control, and design verification. The file control procedure establishes specific instructions for receipt, distribution, and filing of drawings and documents related to CPSES. This procedure enables TUGCO/TUSI to maintain the required accountability and retrievability of drawings and documents. The design verification procedure, which establishes and implements a system of confirmation of selected safety related items for CPSES, assures that drawings, specifications, procedures, and instructions accurately reflect the design bases, conform to the representations in the license application, meet stipulations of related codes and standards, fulfill applicable regulatory agency requirements, and implement the provisions of the TUGCO/TUSI Quality Assurance program.

The procurement procedure establishes and assures that equipment, material, or services related to nuclear safety is secured in a manner consistent with quality assurance requirements of the CPSES Quality Assurance Plan. This procedure provides for control of transitions from design or service requirements through the entire procurement cycle, including specifications, inquiries, proposals, bid evaluations, inspections, and audits.

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The audit program assures that prime contractors, sub-contractors, and vendors who provide equipment, material, and services under the control of the TUGCO QA program have within their respective organizations an adequate and functional Quality Assurance program. Additionally,

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auditing has been conducted within TUGCO/TUSI to verify the
25 implementation of this Quality Assurance program. This auditing program evaluates the effectiveness of the Quality Assurance progam for conformance with design requirements; determines whether the Quality Assurance program is in compliance with established requirements, methods, and procedures; and verifies implementation of recommended corrective action.

The CPSES QA program is effectively administered and controlled by TUGCO through close association with, supervision and audit of the contractors who perform the requirements outlined herein. The QA programs of the contractors were reviewed by TUGCO QA and/or its agents to assure that they contained adequate requirements and procedures to control the quality level.

Major responsibilities for implementation of the various QA activities included in the TUGCO QA program during design, procurement and contruction have been delegated to Gibbs & Hill and Westinghouse. These responsibilities are described in the Gibbs & Hill Project
41 Procedures Manual and in Westinghouse's WCAP 8370. B&R is responsible for QA functions relating to ASME Code work only. Primary responsibility for the construction site QA and QC programs lies with TUGCO Site QA. This QA program is organized to provide an intergrated plan under the direct control of the TUGCO Manager, QA.

17.1.3 DESIGN CONTROL

The TUGCO/TUSI Quality Assurance Plan provides for several levels of design control. These levels include the design control measures of Gibbs & Hill as the Architect-Engineer, Westinghouse as the supplier of the nuclear steam supply system, and TUSI as Texas Utilities Company's engineering service organization. Westinghouse is responsible for
6 verifying the Nuclear Steam Supply System design. Gibbs & Hill is responsible for verifying most Balance of Plant design while TUSI performs the design verification on the selected contracts in their

scope of responsibility. The design control measures of Gibbs & Hill are outlined in the Gibbs & Hill Project Procedures Manual, Westinghouse in WCAP-8370, and TUSI in TUSI's CPSES Project Procedures Manual. The verification of engineering design control measures is performed by TUGCO through review or audit. 6 41

The TUGCO/TUSI QA program requires that the prime contractors meet applicable NRC Regulatory Guide requirements for all safety-related activities. For a discussion of Regulatory Guide commitments, see sections 1A(N) and 1A(B).

The Comanche Peak QA Plan requires verification that applicable NRC Regulatory Guide requirements have been incorporated in activities affecting quality by design review, audit, and surveillance of prime contractors.

This verification assures that applicable regulatory requirements and the design bases as specified in the license application for safety-related structures, systems, and components for CPSES are correctly translated into specifications, drawings, procedures, and instructions. Audit by TUGCO assures that the prime contractor organizations' design control measures include a clear definition of design interfaces, review and approval of initial design, including changes or revisions, and that personnel performing design reviews are thoroughly familiar with the regulatory requirements and design bases described in the PSAR/FSAR and are independent of those originating the design. 4

17.1.3.1 Design Control for Preparation of Drawings

Design drawings are prepared, reviewed, and controlled per applicable project procedures. These procedures ensure that design drawings are reviewed independently for completeness, accuracy, agreement with design concepts, and possible interferences. Further review is 6

provided by engineers of related disciplines who review for consistency and compatibility with related systems and design requirements. Procedures also call for supervisory review for content and compliance. Changes to drawings or drawing input are subject to the same controls as were applicable to the original.

17.1.3.2 Engineering Specifications

The TUGCO/TUSI Quality Assurance program requires that measures be documented for the translation of applicable regulatory requirements and design bases into specifications. Written procedures require that the specification be independently reviewed for technical accuracy, completeness, conformance with applicable regulatory requirements, and overall acceptability. Additional review is provided by related disciplines to ensure coordination and by project management for overall project requirements. Written procedures also document resolution of changes to engineering specifications. Written procedures further require documentation of the reviews.

17.1.3.3 Review of Vendor Equipment Drawings, Specifications, and Procedures

Upon receipt from a manufacturer, these documents are routed through the applicable engineering disciplines to check compliance with engineering, drawings, and specifications. A controlled interface is maintained with the manufacturer to assure resolution of discrepancies. Interdiscipline and supervisory reviews of this process are performed and documented as well.

17.1.3.4 Engineering Calculations

Measures have been established that control the preparation of calculations. Written procedures outline the method of preparation to

ensure uniformity, validity of assumptions and input, as well as accuracy of results. Procedures also require review of calculations by an independent checker. Each review is documented. 9

17.1.3.5 Design Review and Verification

Safety related design activity is reviewed in accordance with a formalized and documented system. The types of review used are:

1. Checks to compare information presented on a drawing or other document with a definite figure, criterion, or design base.

2. Supervisory reviews of design work, conducted by a superior in a given discipline, of work by a project team member in that discipline.

3. Interface reviews, by personnel of one discipline, of work performed by another discipline to determine that the reviewer's discipline requirements and commitments are satisfied. 6

4. Review by QA to determine that QA requirements are included as appropriate for the item being reviewed.

Design verification to review, confirm or substantiate the design is performed to provide assurance that the design meets the specified inputs. Methods of verification include but not limited to Design Review, Alternate Calculations, and Qualification Testing.

17.1.3.6 Design and Engineering Surveillance

In order to verify that engineering and design of nuclear safety related structures, systems, and components are performed in accordance with applicable procedures these efforts are reviewed by Quality

Assurance through surveillance or audit. The scope and frequency of these reviews is commensurate with the complexity of the design and past performance.

The surveillance and audit functions are documented in written procedures.

17.1.3.7 Record Accumulation & Control

Records associated with the design activity are maintained and copies of these records stored as required. These records are audited by TUGCO QA and/or its agents. 6

17.1.4 PROCUREMENT DOCUMENT CONTROL

Appropriate requirements have been established by the TUGCO/TUSI Quality Assurance program to assure that procurement documentation is controlled and accurately reflects applicable regulatory requirements, design bases, and other appropriate requirements, such as industry codes and standards. Safety-related procurement documents and specifications require that vendors submit written quality assurance programs consistent with the importance and complexity of the material, equipment, or service procured. Such quality assurance programs are consistent with pertinent provisions of Appendix B to 10 CFR Part 50. 25

TUGCO/TUSI has satisfied these requirements as follows:

Selected review of procurement documentation for Q-listed materials, equipment, and services is performed. This review is described in 17.1.1.1.1. 25

Planned, periodic, and documented audits are performed by responsible TUGCO personnel to provide assurance that the

procurement activities of TUSI, the prime contractors, and sub-contractors are being carried out in accordance with approved procedures. These audits will be conducted as described in 17.1.18.

All procurement documents that are prepared by prime contractors on behalf of TUSI are subject to reviews and controls similar to those described in Section 17.1.3. Contracts involving equipment, material, or services that are concerned with nuclear or nuclear safety equipment, systems, or structures require Quality Assurance and Quality Control responsibilities on the part of the vendor. The responsible QA organization defines the requirements of the Vendor's QA program contents and changes thereto, and those requirements will be enumerated in each procurement specification. 6

Quality Assurance also reviews purchase orders or contracts to assure that all required Quality Assurance and Quality Control information of the procurement document, including requirements for control, maintenance, and submittal of quality records, is reflected in the purchase order and contract 6

Each contract or purchase order issued by prime contractor or by TUSI for any component, system, or structure classified as being nuclear or nuclear safety-related is referenced to Appendix B to 10 CFR Part 50 with the following clarifications of intent. 6

As outlined in his Quality Control Manual, the vendor, in addition to all other applicable requirements, is required to comply with the following requirements:

1. Inspection personnel are independent from the individual or group performing the activity being inspected.

2. Inspection procedures, instructions, and/or checklists are

provided, and they contain the identification of quality characteristics to be inspected, identification of those individuals, or the organization responsible for performing the inspection operation, criteria for acceptance or rejection, description of the method of inspection, evidence of completion and certification of inspection operation, and record of the results of the inspection operation.

3. Inspection procedures or instructions are available with necessary drawings and inspections for use prior to performing the inspection operation.

4. Each inspector is qualified and those qualifications are kept current.

5. Inspection equipment is within calibration prior to performing an inspection operation.

6. Inspection of modifications, repairs, and replacement items that are made after initial inspection are performed in accordance with the original design and inspection requirements or acceptable alternatives to verify acceptability.

6 The vendor or sub-vendor shall understand that he must submit to TUGCO and/or the prime contractor a Quality Assurance/Control Manual, the purpose of which shall be to fulfill the applicable requirements of Appendix B to 10 CFR Part 50 in regard to Quality Control. This manual 6 is subject to TUGCO's and/or the prime contractor's approval.

17.1.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Appropriate requirements have been established by the TUGCO/TUSI Quality Assurance program to assure that quality-related activities for CPSES are prescribed by documented instructions, procedures, or

drawings; accomplished in accordance with such documents; and that approved acceptance criteria are met. The responsibility for the development of the methods that assure this is delegated to the various participating organizations; however, the developed methods are subject to TUGCO audit. The TUGCO/TUSI QA program requires that measures be established by the prime contractors to assure that approved changes are promptly included into instructions, procedures, and drawings where applicable. The TUGCO/TUSI QA Plan requires that changes be reviewed for their effect on present instructions, procedures and/or drawings.

The TUGCO/TUSI QA program requires that an inspection procedure include flow charts, shop travelers or narrative description of the sequence of activities or operation for fabrication, processing, assembly, inspection, and test. Instructions shall indicate the operations or processes to be performed, type of characteristics to be measured or observed, the methods of examination, the applicable acceptance criteria and documentation requirements. The program also requires establishment of those inspection, test, and hold points from raw material through fabrication, processing, and assembly at which conformance of parts, components, and subsystems to requirements are verified. Hold points identify those inspections which are rendered impossible by subsequent operations, and those inspections must be certified complete before start of the next operation by the use of process sheets (e.g. travelers). Each process sheet shall include the date of completion of the operation or test and the signature or stamp of the operator or inspector. TUGCO QA reviews selected documentation to assure that it adequately reflects applicable quality requirements. In its review activities, TUGCO QA assures that instructions, procedures, and drawings contain appropriate quantitative (such as, dimensions, tolerances, and operating limits) or qualitative (such as workmanship samples) acceptance criteria for determining that important activities have been satisfactorily accomplished. 4 4

Through its auditing procedures, as described in 17.1.18, TUGCO

determines that quality activities are accomplished in accordance with those approved instructions, procedures, and drawings.

17.1.6 DOCUMENT CONTROL

TUGCO/TUSI has established requirements to assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel. These requirements provide that prime contractors include in their internal programs measures to assure that changes to documents will be reviewed and approved by the same organizations that performed the original review and approval. TUGCO will verify implementation of these requirements through audits of prime contractors. The CPSES QA Plan requires that changes to documents that have been reviewed and approved by TUSI organizations will be reviewed and approved by those same TUSI organizations that performed the original review and approval unless the applicant designates another organization. These requirements also provide that the documents are distributed to and used at the location where the prescribed activity is performed. The scope of these requirements applies to TUSI as well as to the prime contractors and sub-contractors. 4

TUGCO/TUSI employs within its own internal organization a control system that utilizes registering of documents requiring control, distribution, and review and approval procedures. The TUGCO/TUSI Quality Assurance Program requires design engineering and procurement documentation for all safety-related equipment which consists of specifications, drawings, PSAR/FSAR material, instructions, procedures, reports and changes thereto, and manufacturing and construction documents and records required for traceability, evidence of quality, and substantiation of the "as built" configuration be controlled. Procedures identify those individuals or groups responsible for reviewing, approving and issuing documents and revisions thereto. Where deenmed necessary, TUGCO will require that periodic document summary lists be submitted by an organization to verify the use of the proper document

or change.

The effectiveness of the participants' document control methods will be evaluated by TUGCO through reviews and audits. The reviews verify the review and approval of participating organizations' design and document control, while auditing permits TUGCO to determine the effectiveness of the system.

17.1.7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

Measures to be utilized to control purchased material, equipment, and services consist of reviews, audits, and inspections. These measures are described in the TUGCO/TUSI Quality Assurance program. | 25

Vendors who are considered by TUSI or its prime contractors for the supply of items are evaluated in advance of placing them on the vendors list. Evaluation of potential vendors and maintenance of an approved vendors list is performed by TUGCO in accordance with procedures. | 25
The evaluation involves the review of available historical data on vendor performance and capability, the review of the vendor's quality assurance program, or the results of previous shop surveys and audits. Quality Assurance Program descriptions are required to be submitted with bids for Q-listed items. The vendor to supply the material, equipment, and services is selected from the approved vendors list. If required, a pre-award survey at the bidder's facility is conducted by TUGCO quality assurance or its designee before award of contract. The vendors list is maintained by TUGCO QA in accordance with procedures which include provisions to remove vendors no longer meeting requirements. | 25 | 29 | 25

Documented, objective evidence such as certifications, chemical and physical analyses, inspection reports, test results, personnel and process qualification results, code stampings, and non-destructive test reports are required for evaluation by TUGCO/TUSI and the prime con-

tractors. This verification assures conformance to design requirements, drawings, specifications, codes, standards, regulatory requirements, and other applicable criteria. These documents are a part of the quality verification records retained at the CPSES site in accordance with Section 17.1.17.

Source inspection, when deemed necessary, is required by the applicable purchasing document. The purchasing organization requires that hold points be determined as necessary for this activity and vendors are required to give sufficient notice of approaching hold points to allow scheduling of personnel. (Where required for adequate control, both in process and final source inspections covering review of the quality verification, documentation as well as parametric examination, are performed.) An inspection document is used to establish the inspection sequence and for recording inspections results. This document also becomes part of the quality verification records. Provision is made for reporting deviations and non-conformances if any, for recommending disposition and corrective action, for re-inspection if required, and for release for shipment if appropriate. TUGCO or its prime contractor may elect to participate in selected source inspections.

TUGCO/TUSI requires that procurement documents specify that suppliers provide the quality verification package at the CPSES plant site. During the review and approval of procurement documents, the prime contractor or TUGCO/TUSI will check to assure that the above requirement is included. Audits assure that the contractor is implementing a records-management system. Equipment received on-site prior to receipt of the quality verification package is controlled as a non-conforming item. Uncontrolled installation or use of delivered components does not occur until receipt of objective evidence of the quality verification package. The quality verification package is required to be on-site prior to relying on the related equipment to perform a safety function.

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STARTUP/TURNOVER QA ACTIVITIES

PREPARED BY: Bill O. Thompson 4-16-81 DATE

APPROVED BY: R J Tolson 4/16/81 DATE

1.0 REFERENCES

1-A CPSES "Startup Program Plan"

1-B CPSES "Startup Administrative Procedures"

1-C CP-QP-2.2, "Indoctrination of Record Verification Personnel"

2.0 GENERAL

FOR INFORMATION ONLY

2.1 PURPOSE AND SCOPE

The purpose of this procedure is to establish methods for the verification of Records pertinent to those structures, systems and components within the boundaries of Turnovers designated as safety related.

2.2 AUTHORITY AND RESPONSIBILITIES

The Records Management Supervisor has been delegated authority for the administration of the quality activities governed by this procedure. QA S/T Staff personnel are responsible for implementing the requirements of this procedure and instructions supplementing this procedure.

3.0 PROCEDURE

3.1 PERSONNEL INDOCTRINATION

Personnel performing record verification functions shall be indoctrinated in accordance with the provisions in Reference 1-C. The indoctrination will provide personnel with the basic knowledge of the functional criteria and quality requirements for the Startup/Turnover Record Verification Program.

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3.2 RECORD VERIFICATION DETAILS

The details for Record Verification as outlined in the purpose of this procedure will be prescribed in documented Quality Instructions. The instructions will provide personnel with the necessary criteria and direction for the implementation of the Record Verification process.

3.3 RECORD DEFICIENCIES

All Record deficiencies identified during the Record Verification process are documented in accordance with the provisions detailed in the instructions supplementing this procedure. The Records Management Supervisor shall assure that all record deficiencies are closed out prior to fuel loading.

3.4 DOCUMENTATION OF RECORD VERIFICATION ACTIVITIES

Quality Instructions supplementing this procedure specify the documentation utilized to provide objective evidence that Record Verification has been performed for those Turnovers designated as safety-related.

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QUALITY ASSURANCE REVIEW OF SITE GENERATED PROCUREMENT DOCUMENTS

PREPARED BY: Bobby Sloemake 4/20/81 DATE

APPROVED BY: R L Gilson 4/20/81 DATE

FOR INFORMATION ONLY

1.0 REFERENCES

1-A TUGCO/TUSI CPSES QA Plan

1-B CQP-CS-2, "Procurement"

1-C CP-EP-5.0, "Procedure for Field Procurement"

1-D Brown & Root Quality Assurance Manual

1-E CP-CPM-5.1, "Field Procurement Activities"

1-F CP-QP-8.0, "Receiving Inspection"

1-G CP-QP-8.1, "Supplier Evaluation"

2.0 GENERAL

2.1 PURPOSE AND SCOPE

The purpose of this procedure is to outline the methods to be used by CPSES Site QA personnel to assure that procurement documents for safety-related items comply with the basic requirements set forth in Reference 1-A. This procedure applies to products or services procured by the CPSES Prime Contractor, Brown & Root, Inc. (B&R), that are not under the jurisdiction of the ASME Code, Section III, Division 1. Major ASME items or services are normally procured and described in Ref. 1-B. QA services for ASME items that have been delegated to B&R will be accomplished in accordance with Ref. 1-C and its implementing procedures.

2.2 RESPONSIBILITY AND AUTHORITY

The Site QA Supervisor is responsible for site generated procurement document review.

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The Quality Engineering Supervisor has been delegated authority for implementation of this procedure.

3.0 PROCEDURE

3.1 SITE PURCHASING ACTIVITIES

TUSI has established Reference 1-C and supplementing instructions which outline the measures which have been established to assure that procurement documents are controlled and comply with CPSES QA requirements. B&R has established Reference 1-E and supplementing instructions which outline the measures that have been established to assure that procurement documents are controlled and comply with CPSES QA requirements. References to the B&R Project QA Manager contained therein apply directly to ASME items whereas the responsibilities and authority for non-ASME items are as described herein. The basic flow paths for both ASME and Non-ASME items are identical.

3.2 SITE QUALITY ASSURANCE ACTIVITIES

Quality Instructions supplementing this procedure delineates the QA activities involved in review and approval of the various field procurement documents. Consistent with responsibilities and authorities outlined herein, these instructions are applicable to Non-ASME items only.

3.3 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

Measures have been established to assure that safey-related items or services comply with the procurement documents. These measures are outlined in Ref. 1-F and 1-G.

Quality Instructions supplementing this procedure delineate Site QA activities involved in the interface between TUGCO Site QA and TUGCO Dallas QA concerning release of material and request for QA audit and source inspection of materials suppliers/manufacturers.

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SIGNIFICANT CONSTRUCTION DEFICIENCIES

PREPARED BY: B. C Scott 7/20/82 DATE

APPROVED BY: R F Tolson 7/22/82 DATE

1.0 REFERENCES

1-A Title 10, Code of Federal Regulations, Part 50.55(e)

1-B CP-QP-3.0, CPSES Site Quality Assurance/Quality Control Organization

2.0 GENERAL

FOR INFORMATION ONLY

2.1 PURPOSE AND SCOPE

The purpose of this procedure is to provide a routine method for documenting and evaluating significant product related deficiencies discovered during the construction phase of the Comanche Peak Steam Electric Station (CPSES). The procedure includes measures for recognition and identification of significant deficiencies and a method for evaluating their significance with the objective of providing prompt notification to the Nuclear Regulatory Commission (NRC) as required by Reference 1-A.

2.2 RESPONSIBILITIES

The TUGCO Manager, Quality Assurance, has overall responsibility for Quality Assurance activities on CPSES and is ultimately responsible for evaluating and determining the reportability (to NRC) of significant design and construction deficiencies within the requirements of Reference 1-A. The TUGCO Site QA ~~SUPERVISOR~~ MANAGER is responsible for recognition and analysis of significant construction deficiencies and normally represents the Manager, Quality Assurance, in verbal notification to the NRC. The principal site QA/QC Staff personnel, as defined in Reference 1-B, are responsible for implementation of this procedure within their functional areas of responsibility.

2.3 DEFINITIONS

2.3.1 Reportable Deficiency

As described in Reference 1-A, a reportable deficiency is defined as a deficiency found in design or construction, which, were it to have remained incorrected, could have affected adversely the safety of operation of the Nuclear Power Plant at any time throughout the expected lifetime of the plant, and which represents:

a. A significant breakdown in any portion of the Quality Assurance Program conducted in accordance with the requirements of Appendix B; or

b. A significant deficiency in final design as approved and released for construction such that the design does not conform to the criteria and bases stated in the safety analysis report or construction permit; or

c. A significant deficiency in construction of, or significant damage to, a structure, system or component which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function; or

d. A significant deviation from performance specifications which will require extensive evaluation, extensive redesign, or extensive repair to establish the adequacy of a structure, system, or component to meet the criteria and bases stated in the safety analysis report or construction permit or to otherwise establish the adequacy of the structure, system, or component to perform its intended safety function.

2.3.2 Significant Construction Deficiencies

For purposes of this procedure, significant construction deficiencies are "product" nonconformances which may be reportable in accordance with the above definition. This includes, but is not necessarily limited to, the following types of nonconformances:

a. Product failures substantially below specified acceptance criteria;

b. Apparent product deficiencies or damage to safety-related structures, systems or components for which there is no readily obvious routine rework or repair procedure available or specified;

c. Product deficiencies discovered subsequent to final acceptance by responsible QC personnel;

d. Construction deficiencies which clearly require engineering analysis for resolution;

e. Construction deficiencies which will require further testing or evaluation in order to determine the significance of the nonconformance, including inadequate records.

3.0 PROCEDURE

3.1 REPORTING

Each functional QA/QC Manager/Supervisor shall require personnel under his technical direction to promptly verbally report "significant" construction deficiencies as defined herein to his office or in the event of his absence or unavailability, directly to the TUGCO Site QA ~~Supervisor~~. If the reported construction deficiency is classified "significant" (See Section 2.3.2) it shall be documented immediately on the Design Construction, Significant Deficiency Analysis Report (SDAR) Form, Figure 1, and then promptly hand-carried to the TUGCO Site QA ~~Supervisor~~. Routing procedures for identification and resolution of nonconformances and deficiencies shall then be implemented.

The TUGCO Site QA Supervisor will complete the Analysis and Conclusion section of the SDAR form although the functional Managers/Supervisors may also participate in this effort. The twenty-four hour clock for notification to the NRC may begin when the principal QA/QC Manager/Supervisor determines that the construction deficiency is "significant" as defined herein. Consequently, it is imperative that the form be processed in an expeditious manner.

3.2 ANALYSIS AND CONCLUSION

The Analysis section of the SDAR form includes direct quotes from Reference 1-A as well as other items that experience indicates are necessary for consideration to minimize the reporting of trivia to the NRC. By definition, Reference 1-A only requires the reporting of deficiencies which have adverse safety implication and are significant i.e. "yes" answers to parts 1 and 2 of the Analysis section of the SDAR Form. It is normally impossible to make a timely decision relative to safety aspects and thus the decision to report or not report to the NRC is often based on the significance of the deficiency. The questions depicted in subsections (a) through (i) of Part 2 are designed to reach a timely decision on reportability as well as to document the basis for deciding that the deficiency is not reportable per the provisions of Reference 1-A, i.e., a "no" answer to the Conclusion section of the SDAR Form.

3.3 PRELIMINARY NOTIFICATION

A "yes" answer to the Conclusion section of the SDAR Form will normally result in the following sequence of events:

a. Verbal notification to the TUGCO Manager, Quality Assurance, or his designee, of the nature of the deficiency and the conclusion reached;

b. Verbal notification to the Principal (Resident) NRC Inspector for CPSES or in his absence or availability directly to the NRC Region IV office in Arlington, Texas (817-465-8100).

c. Completion of the bottom portion of the SDAR Form and distribution to affected personnel, including the TUGCO Manager, Quality Assurance.

A "no" answer to Parts 1 or 2 of the form reflects the determination that the deficiency is not reportable per Reference 1-A.

To provide adequate records, record the date and time of the decisions and initial or sign the form in the space provided, then distribute and file for future reference.

3.4 NUMBERING AND FILING

A consecutive log of the SDAR forms submitted to the Site QA Supervisor is maintained by the TUGCO Site QA Secretary. This log reflects the I. D. Number shown in the upper right hand corner of the form, a brief summary of the deficiency, and a notation as to reportability. If reported a unique number is also shown on the log and in the lower right corner of the SDAR form, as follows:

CP-73-7

Unique sequential identifier
Year identified
Comanche Peak

Files, including appropriate backup information, are maintained by the TUGCO Site QA Secretary.

3.5 REVIEW OF NONCONFORMANCES

Each functional QA/QC Manager/Supervisor shall review Nonconformance Reports (NCR's), in his area of responsibility, upon issuance. This review is designed to recognize and identify significant deficiencies as defined in Paragraph 2.3.

FIGURE 1

DESIGN/CONSTRUCTION SIGNIFICANT DEFICIENCY ANALYSIS REPORT

UNIT	STRUCTURE	SYSTEM	COMPONENT	SAFETY CLASS
*	*	*	*	*

Description of Deficiency:
*

○ Design
○ Construction

*THESE ITEMS TO BE COMPLETED BY THE FUNCTIONAL QA/QC MANAGER/SUPERVISOR (DETAILS REQUIRED)

Identified by	Time	Date	TUGCO QA Notified	Time	Date	Format

ANALYSIS:

Preliminary engineering analysis indicates safety of plant operations adversely affected had deficiency come undetected. ○ YES ○ NO ○ UNKNOWN
Explain briefly:

1. Deficiency considered significant ○ YES ○ NO
   a. Generic implications on other plants ○ YES ○ NO
   b. QA Program Breakdown ○ YES ○ NO
   c. Design per SAR performance criteria ○ YES ○ NO
   d. Construction not as specified and extensive evaluation or repair required to meet design criteria. ○ YES ○ NO
   e. Construction deficiency discovered after QC acceptance ○ YES ○ NO
   f. Could deficiency have gone undetected ○ YES ○ NO
   g. System test meets SAR performance criteria ○ YES ○ NO
   h. System test results require extensive evaluation and redesign ○ YES ○ NO
   i. System test failure can be corrected by internal adjustment or replacement with standard component ○ YES ○ NO
   j. Does deficiency require testing and analysis to answer part i above ○ YES ○ NO

CONCLUSION:

Deficiency reportable under 50.55(e) ○ YES ○ NO

By: _____
Date: _____
Time: _____

NRC CONTACT	Date	Time	TUGCO REPRESENTATIVE	U.S. NUMBER

cc: B. J. Chamblee
J. T. Merritt
Functional QA/QC Manager/Supervisor

TEXAS UTILITIES GENERATING CO CPSES	PROCEDURE NUMBER	REVISION	ISSUE DATE	PAGE
	CP-QP-2.3	4	JAN 2 0 1983	1 of 8

DOCUMENTATION WITHIN QA/QC PERSONNEL QUALIFICATION FILE

PREPARED BY: [signature] 11/9/83 DATE

APPROVED BY: [signature] 1/19/83 DATE

1.0 REFERENCES

1-A CP-QP-2.1, "Training of Inspection Personnel"

2.0 GENERAL

The purpose of this Instruction is to supplement the technical training requirements of Reference 1-A by:

a. Defining typical content of a CPSES QA/QC individual's personnel training file;

b. Defining responsibility and procedure for maintenance of the QA/QC personnel file;

3.0 INSTRUCTION

3.1 INITIAL HIRE

Individuals hired for CPSES QA/QC functions by TUGCO or an integrated organization subcontractor shall be processed appropriately by the personnel office of their employer.

The new employee will receive a QA/QC Resume Draft (Figure 1). The QA or QC Secretary will assist, if necessary, by typing a finished resume for personnel file inclusion. A previously prepared resume is optional, at the discretion of the QA Supervisor, for TUGCO or contract employees. A completed resume will be maintained in the Permanent Plant Records Vault by the Training Coordinator.

VIC - The STP [redacted] number reused for a different procedure. Voided procedure numbers were reused but are ~~not~~ supposedly not known - Clyde

TEXAS UTILITIES GENERATING CO CPSES	PROCEDURE NUMBER	REVISION	ISSUE DATE	PAGE
	CP-QP-2.3	1	11-13-79	1 of 5

QUALIFICATION OF SURVEILLANCE SPECIALISTS

PREPARED BY: G Elenburg 11-12-79 DATE

APPROVED BY R. J. Tolson 11/13/79 DATE

1.0 REFERENCES

1-A CP-QP-19.2, "Site Surveillance Procedure"

2.0 GENERAL

The purpose of this procedure is to document the technical training requirements of Surveillance Specialists involved in activities prescribed by Reference 1-A. The qualification program for surveillance specialists is designed to provide assurance that personnel have appropriate technical knowledge, skill and experience to properly perform the required surveillance functions. Qualified personnel trained and certified by others will be considered for certification as CPSES QA Surveillance Specialists without additional training, on a case by case evaluation basis.

3.0 PROCEDURE

3.1 SURVEILLANCE SPECIALISTS

Surveillance specialists should have experience in and shall have satisfactorily completed a training course in site and vendor/sub-contract surveillance functions.

3.1.1 Education and Experience

To qualify for Surveillance Specialist training a person must have a high school education as a minimum and at least 2 years of experience in Nuclear QA/QC or equivalent. A degree in a technical field from an accredited college will qualify a person without the experience requirement.