EVALUATION RESEARCH CORPORATION

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COMANCHE PEAK RESPONSE TEAM

PROJECT PROCEDURE FOR ISSUE-SPECIFIC ACTION PLAN VII.c

PROCEDURE NO.: CPP-009

REVISION: 4

ISSUE DATE: 01/17/86

PERFORMANCE OF REINSPECTIONS AND DOCUMENTATION REVIEWS

PREPARED BY: _____ DATE: 1/14/86

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APPROVED BY: _____ DATE: 1/16/86
QA/QC REVIEW TEAM LEADER

1.0 PURPOSE

This procedure describes the methods to be used by QA/QC Review Team personnel to perform and document reinspections and/or documentation reviews as required by Issue-Specific Action Plan (ISAP) VII.c.

2.0 APPLICABILITY

This procedure is applicable to documentation and safety related hardware constructed and final QC accepted at Comanche Peak Units 1,2, and areas common to both units.

3.0 REFERENCES

3.1 CPP-012, "QA/QC Interface with Constructor/TUGCO."

3.2 CPP-007, "Preparation of Checklists and Data Base Reports."

3.3 CPP-008, "Preparation of Verification Packages."

3.4 CPP-006, "Sample Selection."

3.5 Evaluation Research Corporation "Surveillance Plan."

3.6 CPP-010, "Preparation of Deviation Reports."

3.7 CPP-004, "Project Working Files."

3.8 CPP-016, "Safety Significance Evaluations of Deviation Reports."

4.0 GENERAL

Qualified QA/QC Review Team personnel perform field reinspections of specific hardware items and reviews of appropriate documents in accordance with approved instructions. The results of each reinspection/review are documented on checklists and subsequently reviewed and approved.

This procedure ensures that each randomly selected item is reinspected/reviewed. Furthermore, any item which deviates from the established acceptance criteria is uniquely identified and controlled.

4.1 Responsibilities

4.1.1 QA/QC Inspection Supervisor

The QA/QC Inspection Supervisor ensures that
Verification Packages are assigned to qualified
inspectors and that inspection results are reviewed and
returned to Engineering.

4.1.2 QA/QC Lead Discipline Inspectors

The QA/QC Lead Discipline Inspectors receive and assign
Verification Packages. The Lead Inspectors review and
approve Packages, then document their transmittal in
accordance with this procedure.

4.1.3 QA/QC Inspectors

Personnel performing inspections, examinations, and/or
tests are certified in accordance with ANSI N45.2.6 and
Regulatory Guide 1.58. QA/QC Inspectors perform
reinspections and documentation reviews and prepare
Deviation Reports as required.

4.1.4 QA/QC Lead Discipline Engineer

QA/QC Lead Discipline Engineers review and approve
Verification Packages, then document their transmittal
in accordance with this procedure.

4.1.5 On-Site QA Representative

The On-Site QA Representative is responsible to conduct
Overview Inspections of appropriate items as determined
by this procedure.

4.1.6 QA/QC Records Administrator

The QA/QC Records Administrator controls Verification
Packages.

4.2 Policy

Activities performed under this procedure shall conform to the
policies contained in the latest Comanche Peak Response Team
Program Plan, ERC Management Program Plan, and ISAP VII.c.

Where an activity is designated as the responsibility of a
QA/QC Lead Discipline Inspector, or a QA/QC Lead Discipline
Engineer, or higher, it may be delegated by that individual to
an individual under his or her supervision.

5.0 PROCEDURE

4.3 Conflicts

In the case of a conflict between this procedure and the documents referenced in Section 4.2, the latter shall govern.

4.4 Definitions

None.

5.1 Verification Package Receipt

Upon receipt, the QA/QC Inspection Supervisor ensures that Verification Packages are logged and then forwarded to the responsible QA/QC Lead Discipline Inspector.

The Leads confirm that any necessary equipment and/or service requested per Reference 3.1 has been provided and assigns the package to an inspector.

5.2 Reinspections/Documentation Reviews

The responsible Inspectors perform field reinspections and documentation reviews using the checklist and instructions in the Verification Package prepared in accordance with References 3.2 and 3.3 respectively.

As required, inspection personnel denote the completion of the documents used to record the results of the reinspection /documentation review or other pertinent information by signing and dating the forms included in the Verification Package.

For the appropriate records, they also indicate the date the forms were completed in the DATE column of the Verification Package Contents form.

5.2.1 Equipment Calibration

When inspection tools and measuring devices are used for reinspections, the Inspectors:

* Use commercial off-the-shelf tools and measuring devices unless special tools or devices are specified by the Quality Instructions (QIs).

* Ensure that if a specific degree of measurement accuracy is required by the checklist instructions, appropriate measuring devices are used.

- Ensure that special measuring devices and
  devices whose indicated measurements are subject
  to change have received specified calibration.

  > NOTE: When such devices are used, record
  > on the remarks portion of the
  > checklist the device serial number
  > and the calibration due date.

5.2.2 Completion of Checklists

Inspectors certified in the discipline relative to the
attribute being verified record the condition of the
item being reinspected per the checklist (Form
CPP-007.1). The inspector enters the latest revision
designation of the QI and the numbers of any effective
Change Notices to be used as the basis for the
reinspection/documentation review in the block marked
"QUALITY INSTRUCTION." Based upon each accept/reject
criterion, the Inspector denotes whether the item is
(un)acceptable by initialing the appropriate "ACCEPT"
or "REJECT" column on the checklist and dating the
annotation.

When a condition on the item being reinspected appears
to be inconsistent with the QI criteria, the Inspector
initiates a Deviation Report (DR) in accordance with
Reference 3.4, then:

- Enters its number in the remarks column of the
  checklist.

- Files it in the Verification Package.

- Enters the DR number and "Deviation Report" on
  the Verification Package Contents form, then
  initials and dates the entry.

  > NOTE: Leave the DATE column blank, or
  > enter "N/A" when the DR is
  > superseded prior to being
  > (in)validated by the second reviewer
  > (see Reference 3.4) and indicate
  > that it is "SUPERSEDED."

When the Inspector determines that an attribute is not
applicable to the item being inspected, he or she
denotes "N/A" adjacent to the specific attribute,
describes why the attribute is not applicable, then
initials and dates the annotation.

When the inspection/review is completed, the Inspector signs and dates the "INSPECTED BY" block.

5.2.3 Completion of Data Base Reports

As required, inspectors complete Data Base Reports (Form CPP-007.2) by entering the appropriate data, then signing and dating the form.

The Inspectors forward Verification Packages with completed checklists and, if required, Data Base Reports to the QA/QC Lead Discipline Inspector for review and approval.

5.2.4 Review and Approval

5.2.4.1 QA/QC Lead Discipline Inspector

The QA/QC Lead Discipline Inspector reviews the Verification Packages to ensure that reinspection/documentation review results are clear, accurate, and complete.

Upon the completion of each satisfactory review, the Lead signs and dates the checklist in the appropriate block and forwards it to the responsible QA/QC Lead Discipline Engineer via the QA/QC Inspection Supervisor.

The QA/QC Lead Discipline Inspectors document the transmittal in a memorandum which includes, as applicable, the:

* Verification Package Number.

* Inspector's Initials.

* Deviation Report Numbers.

* Date the reinspection/documentation review was completed.

A copy of the transmittal is sent to the Coordinating Engineer.

5.2.4.2 QA/QC Lead Discipline Engineer

The QA/QC Lead Discipline Engineer reviews Verification Packages to ensure that the reinspection/documentation reviews were conducted in accordance with the correct issue of the QI and to evaluate the need for any further reinspection.

Moreover, upon the completion of reinspections/ documentation reviews for any populations/work activities, the QA/QC Lead Discipline Engineer ensures that a sufficient number of every attribute (see Reference 3.4) was verified.

Should the Lead Discipline Engineer determine that further reinspection is necessary, he or she immediately advises the QA/QC Inspection Supervisor in order to prevent release of any necessary service/equipment, then provides Supplemental Inspection Instructions in accordance with Reference 3.3.

Subsequent reinspections and/or reviews with appropriate instructions are conducted, reviewed, and approved the same as the original.

> NOTE: Should there be insufficient data for any attributes, additional reinspections/documentation reviews shall be performed to obtain the required data.

The Lead Discipline Engineer reviews the results to ensure that they are consistent with any other QA/QC reinspections/reviews of the same items. For example, should any QA/QC reinspections/reviews reveal that the item deviates from a requirement, the Engineer confirms that it was previously and adequately reported.

Should a result be inconsistent, the Engineer advises the On-Site QA Representative by memorandum. Accordingly, the On-Site QA Representative ensures that any reported inconsistencies are evaluated for inclusion in the Overview Inspection Program. (Ref. 3.5)

> NOTE: A statement by the Engineer relative to the review, whether the results are consistent or inconsistent, shall be evident in the Verification Package. Furthermore, memorandums which serve to advise the On-Site QA Representative of an inconsistency is retained in the applicable Verification Packages.

The Lead Discipline Engineer processes any Deviation Report in accordance with Reference 3.6 and indicates the date it was (in)validated in the DATE column on the Verification Package Contents form.

7

Upon the completion of each satisfactory
review, the Lead signs and dates the
Verification Package Contents form, then
forwards the complete package to the QA/QC
Records Administrator.

QA/QC Lead Discipline Engineers document the
transmittal in a memorandum which includes
the Verification Package Number.

Copies of the transmittal are sent to the
Coordinating Engineer.

5.2.5 Distribution and Control

Upon receipt of Verification Packages reviewed and
accepted by the Lead Discipline Engineer, the Records
Administrator distributes copies of the Data Base
Reports to the QA/QC Hardware Collective Evaluation
Engineer and maintains the Verification Package file
(marked VII.c-5C-1).

The Records Administrator also maintains Superseded
Verification Packages in the file (marked VII.c-5C-1).

5.4 Revision

Should it be necessary to make a change to a Verification
Package that would result in the selection and reinspection
/review of a new item, the cognizant individual prepares a
memorandum addressed to "Distribution" and provides a
reasonable explanation regarding the change. The memorandum
notes the affected Verification Package number. Copies of the
memorandum are forwarded to the individuals noted for
distribution, i.e., the QA/QC:

* Engineering Supervisor

* Lead Discipline Engineer

* Discipline Engineer

* Coordinating Engineer

* Records Administrator

Upon distributing or receiving the memorandum, the responsible
QA/QC Discipline Engineer randomly selects another item in
accordance with Reference 3.4, then prepares another
Verification Package, in accordance with Reference 3.3, which
includes the memorandum.

The Responsible QA/QC Discipline Engineer ensures that the appropriate Verification Package Content form is marked "SUPERSEDED. REFER TO (New Verification Package Number)" and that the package is controlled by the QA/QC Records Administrator.

Otherwise, the cognizant individual shall make any innocuous changes to Verification Packages in accordance with Reference 3.7 and ensure that any affected Data Base Reports are distributed to the QA/QC Hardware Collective Evaluation Engineer.

> NOTE: Any changes to DRs and Safety Significance Evaluations are made in accordance with References 3.6 and 3.8 respectively.

6.0 ATTACHMENTS

None