WELDING PROJECT TVA PROJECT PROCEDURE NO. _____ TITLE: _____ EVALUATION & ANALYSIS OF EMPLOYEE CONCERNS in. REVISION RO R1 R2 R3 R4 **R5** DATE 2/3/86 JUR UQ PREPARED JR SPS, APPROVED 395, 438, Nacs APPROVED Vloan

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8609050150 860903 PDR ADOCK 05000327 P PDR

PROJECT PROCEDURES

WP-03 .

EVALUATION & ANALYSIS OF EMPLOYEE CONCEENS

1. PURPOSE

This procedure establishes the method for evaluating, condensing, and determining the relevancy of welding-related Employee Concerns.

This procedure also describes the evaluation methods for addressing Employee Concerns.

2. SCOPE

All Employee Concerns furnished to the Welding Project (WP) are included in the scope of this document. Activities addressed:

- Review and grouping to determine specific problems and issues in an effort to condense these concerns.
- 2.2 Development of trends for the overall TVA welding program.
- 2.3 Engineering evaluation of each concern to determine relevancy to program, procedures, or hardware.
- 2.4 Those Employee Concerns determined to be applicable to Sequoyah Nuclear Plant (SQN) shall have Evaluation Reports initiated as described in this procedure.

3. DISCUSSION

The Evaluation Report results represent engineering evaluations of potential generic problem issues. The evaluation of these issues are to be accomplished by review and analysis of:

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- 1. Programs, procedures, and polices.
- 2. The review of applicable implementation audit elements.
- 3. The review of applicable independent reinspection results.
- 4. REFERENCES

Employee Concerns Task Group (ECTG) Program Manual

5. DEFINITIONS

None

6. RESPONSIBILITIES

OC Project Engineer is responsible for all activities within the scope of this procedure.

7. PROCEDURE

- 7.1 Review and categorize each Employee Concern "K-Form" into specific problem and disposition categories assuming each concern is a statement of fact.
- 7.2 Assimilate these categorizations into the WP data base for overall analysis and evaluation of the welding program.
- 7.3 Evaluate each Employee Concern to determine if it is relevant to program, ______ procedures, or hardware.
- 7.3.1 Employee Concerns which are not found relevant to program, procedures, or hardware will not require further reviews or action by WP. A statement of justification will be prepared for each Employee Concern determined to be in this category.
- 7.3.2 Employee Concerns found to be relevant to program, procedures, or hardware will be assimilated and filed as follows for further action by WP:
- 7.3.2.1 Program
- 7.3.2.1.1 Welding
- 7.3.2.1.2 Overall QA
- 7.3.2.2 Procedures
- 7.3.2.2.1 Electrode Control
- 7.3.2.2.2 Inspection
- 7.3.2.2.3 Welder Training
- 7.3.2.2.4 Inspector Training
- 7.3.2.2.5 Process Control
- 7.3.2.2.6 Reinspection Criterion
- 7.3.2.2.7 Others as Necessary

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7.3.2.3 Hardware

- 7.3.2.3.1 Specific equipment, systems, and components which are identified.
- 7.3.2.3.2 Equipment, systems, and components which are not specifically identified.
- 7.3.3 Employee Concerns will also be grouped by specific problem areas to condense them into specific families of problems. ALL PLANTS
- 7.4 Evaluation Reports for Employees Concerns which apply to SQN shall be prepared as follows:
 - 7.4.1 Each Employee Concern (EC) or group of ECs will be evaluated by WP personnel individually assuming each statement made by the concern is a valid observation.
 - 7.4.2 These statements will be assimilated or grouped, if possible, into specific issues and analyzed both individually and collectively to develop issues.
 - 7.4.3 Each issue will be analyzed against the requirements of the applicable QA program which could affect the issue. These issues will be evaluated in relation to policies, reinspections, audits, NSRS/QTC/ERT Investigation Reports, and other revelant information to determine the impact of the issue on the quality of the plant.
 - 7.4.4 The results of the information revelant to the issue will be used to develop a report which is to include the following:
 - Statement of scope of evaluation report (list all Employee Concerns 7.4.4.1 applicable).
 - Statement of issue(s) addressed by the concern(s). 7.4.4.2
 - 7.4.4.3 Statement of substantiation or nonsubstantiation.
 - 7.4.4.4 Statement of compliance to program.
 - 7.4.4.5 Statement of suitability for service.
 - 7.4.4.6 Indication of need for reinspection.
 - 7.4.4.7 Justification for substantiation or nonsubstantiation.
 - 7.4.4.8 Justification for suitability for service evaluation.
 - 7.4.4.9 Recommendation for closure or corrective action.

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7.4.4.10 Closure statement.

- 7.5 The report will be initiated and checked by WP personnel and will receive a QA review by the WP DQA representative.
- 7.6 Completed reports will be forwarded from the Welding Project Manager to the Welding Task Group Manager for review and processing in accordance with the Employee Concerns Task Group Program Manual.

8. DOCUMENTATION

Employee Concerns Evaluation Reports shall be maintained in accordance with the Employee Concerns Task Group Program Manual

9. ATTACHMENTS

Attachment A - Cover Sheet for for Employee Concern Report

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EMPLOYEE CONCERN REPORT

Attachment A Page 1 of 1

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I. Concern Number(s) considered

II. Issue involved_____

VIII. Closure____

III. Substantiated or nonsubstantiated______
IV. Effect on hardware/program______

V. Justify IV above ______
VI. Recommendations/corrective action ______
VII. Reinspection needed: Y _____ N _____

Report Analysis

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SEQUOYAH WELD PROJECT REPORT NUMBER	(GENERIC) EMPLOYEE CONCERN NUMBER	ISSUE	ECTG ACTION
WP-04-SQN	IN-85-406-003 • IN-85-134-002 IN-85-007-001	Availability of Weld Inspection Tools	Not substantiated. No action required. CLOSED
WP-OS-SQN	IN-85-339-005 PH-85-012-X03	Duct Installation and Documentation	Substantiated as it re- lates to the duct being too close to walls to weld and as to welding and attendant inspection from the in-side of the duct (IN-85-339-005). Not substantiated as to not having a program (PH-85-012-X03). No hardward deficiencies exist. <u>CLOSED</u>
WP-06-SQN	IN-85-476-004 IN-85-981-001 WI-85-081-007 WI-85-041-002	Training and Certification of Construction Welding Inspectors	Not substantiated by WP. These concerns closed based on the existing program and Bechtel SQN Implementation Audits, Key Elements 6.0, 7.0, 8.0, 11.0, and 17.0. CLOSED
WP-07-SQN	IN-85-706-001 XX-85-045-001	Welder Training Program For Construction and Nuclear Operations	Not substantiated. These concerns closed . based on the Welder Qualification Program, Welder Training Program, and Bechtel SQN Implementation Audit, Key Elements 3.0, 4.0, and 5.0. <u>CLOSED</u>

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SEQUOYAH WELD PROJECT REPORT NUMBER	(GENERIC) EMPLOYEE CONCERN NUMBER	ISSUE	ECTG ACTION
WP-O9-SQN	IN-85-406-002	Weld Inspection Criteria Used For SQN Construction	Not substantiated. Closed based on the existing program and Bechtel SQN Implementation Audit, Key Element 10.0. <u>CLOSED</u>
WP-10-SQN	WI-85-030-010	SQN Implementation of Weld Program Study QAE-80-2	Substantiated. This study was not applicable to SQN. <u>CLOSED</u>
WP-11-SQN	IN-85-282-002 IN-85-271-001	Surface Grinding of Welds	Not substantiated. Grinding is an acceptable practice. <u>CLOSED</u>
WP-13-SQN	IN-85-247-002 IN-85-303-001	Suitability of Welding Equip- ment For Construction and Modification Welding Activities	Not substantiated. Review indicates equip- ment is suitable. The Reinspection did not identify problems due to welding equipment. <u>CLOSED</u>
WP-16-SQN	SQM-5-001-001 SQM-5-001-002 WBM-5-001-001 BEM-5-001-001 BEM-5-001-002 BFM-5-001-002 WI-85-080-007 IN-85-212-001	Performance of Preweld Inspections Note that concern SQM-5-001-002 is a SQN specific concern.	Substantiated non- compliance by Nuclear Operations with ANSI N45.2.5 Surveillance Program for Structural Welding. Interim cor- rective actions have been formulated. To be closed upon completion of correction actions. <u>CLOSED</u> upon completion of corrective actions.

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SEQUOYAH WELD PROJECT REPORT NUMBER	(GENERIC) EMPLOYEE CONCERN NUMBER	ISSUE	ECTG ACTION
WP-17-SÇN	IN-85-127-001 IN-85-007-003 IN-85-657-001	Vendor Weld Quality	The issue vendor welds not the same quality as TVA field welds was substantiated by NSRS I-85-753-WBN. The issue that vendor welds are not inspected in field was not substantiated. Report close concerns. No corrective action identified. <u>CLOSED</u>

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