

TVA EMPLOYEE CONCERNS
SPECIAL PROGRAM

REPORT NUMBER:
80205-SQN
REVISION NUMBER:
4
PAGE 1 OF 4

REPORT TYPE
Element Report
TITLE:
Inspection Program Scope

REASON FOR REVISION: Rewritten to comply with Writer's Guide and
Incorporation of any SRP and TAS comments and
elimination of a concern.

Revision indicators are not shown on each page as the
reformatting entailed a complete rewrite.

Note: Sequoyah Applicability Only

PREPARATION

PREPARED BY: DONALD G. BARLOW

SIGNATURE

DATE

1-6-87

REVIEWS

PEER:

SIGNATURE

DATE

1/6/87

TAS:

SIGNATURE

DATE

1/8/87

CONCURRENCES

SIGNATURE

DATE

CEG-H :

SRP :

SIGNATURE*

DATE

1-6-87

1-8-87

APPROVED BY:

ECSP MANAGER

DATE

1-9-87

N/A

MANAGER OF NUCLEAR
POWER

DATE

CONCURRENCE (FINAL
REPORT ONLY)

8701200408 870113
PDR ADOCK 05000327
P PDR

*SRP Secretary's signature denotes SRP concurrences are in files.

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1.0 CHARACTERIZATION OF ISSUE

1.1 Introduction

The issue described below was derived from an Employee Concern generated as a result of the Watts Bar Employee Concern Special Program. This issue was determined to be site specific to the Sequoyah Nuclear Plant (SQN).

1.2 Description of Issue

The basic issue raised by the concern is that Turbine Building non-code piping did not receive quality inspections. Inspection was performed by the foreman. (XX-85-007-003)

2.0 SUMMARY

2.1 Summary of Characterization of Issue

The issue raised by the concerned employee suggests that non-code piping for the Condensation, Heater Drain, Feedwater and Auxiliary Feedwater Systems was not inspected by QC and the only inspection that was performed was done by a foreman.

2.2 Summary of Evaluation Process

The upper tier TVA Topical Report and Nuclear Quality Assurance Manual (NQAM) and lower tier procedures and instructions were reviewed to determine that appropriate requirements and responsibilities, along with procedural direction were provided to control the activities associated with the issues. Other quality documents such as drawings, inspection reports, correspondence, and Nonconformance Reports (NCRs) were also reviewed and discussions were conducted with TVA personnel to determine the extent of the concern and its significance.

After the criteria were established an evaluation was made to determine if the issue could be substantiated.

2.3 Summary of Findings

In the issue of Turbine Building non-code piping it was determined that the concerned employee meant non-CSSC piping as opposed to non-code piping, since all piping is fabricated/installed to established codes. Some codes pertain to CSSC systems and others to non-CSSC or non-critical piping systems.

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It was found that the piping in question did receive inspection coverage and these inspections were adequate as evidenced by review of selected inspection reports. Thus, the concern is unsubstantiated.

3.0 EVALUATORS

W. M. Akeley
D. G. Barlow

4.0 EVALUATION PROCESS

4.1 General Methods of Evaluation

The evaluation process consisted of a research of the Employee Concerns files, the Quality Technology Corporation Employee Response Team (ERT) files, and Nuclear Safety Review Staff (NSRS) files, and reviews of the TVA Topical Report and NQAM to determine inspection requirements and commitments. Engineering documents were reviewed to determine system classification along with other quality documents to determine the extent of the issues raised. No investigative reports by ERT or NSRS were located.

Interviews were conducted and reviews of lower tier procedures and instructions were also performed together with the codes applicable to the fabrication of piping systems.

A listing of all documents reviewed during the investigations and evaluations of the issues making up this Element Report is included as Attachment B.

4.2 Specifics of Evaluation

Issue -- Turbine building non-code piping did not receive quality inspections.

A review of the Sequoyah Non-Critical/Critical Systems Listing was performed to determine if TVA classifies those piping systems referenced in the concern as non-safety related, to determine the applicability of the QA Inspection Program requirements. Selected flow diagrams were researched as they relate to the feedwater system since portions of the system were considered CSSC piping which require a complete piping/welding inspection. This also encompassed a review of the applicable code (American National Standards Institute ANSI B31.7, 1969 Edition, Winter 1970 addenda). The code of record was substantiated by reviewing the Construction Specification N2M-863 which also determined the responsibility and requirements for inspection of the piping systems in question.

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5.0 FINDINGS

Findings on Issue -- Turbine building non-code piping did not receive quality inspections.

Discussion

A review of the Non-Critical/Critical Systems Listing, Appendix A, of SQA-134, indicated that the Condensate System, Heater Drains and Vents System, and portions of the Feedwater and Auxiliary Feedwater Systems, given as examples in the concern, were determined to be non-safety related and were not subject to the provisions of the TVA Quality Assurance Inspection Program. However, these systems receive on a random basis, inspection by the foreman or construction craft personnel or both which is specified in the NQAM. For those portions of the Feedwater and Auxiliary Feedwater System which are considered critical, a review of the series 47W803 flow diagrams further revealed that complete piping/welding inspections are required and had been completed. Inspection reports of non-CSSC systems were also reviewed indicating that informal inspections were performed by construction on randomly selected welds, further substantiating the fact that even though the systems do not require formal inspections, they were inspected by the foreman or construction craft personnel or both on a random basis.

Conclusion

The issue of non-code (non-CSSC) piping not receiving quality control inspections is true. As stated above, noncritical systems do not require formal QC inspections to be performed in accordance with Code requirements. They do, however, receive randomly selected inspections by the foreman or craft personnel or both. Based on the fact that procedures have been developed for non-CSSC piping and specific requirements are well defined regarding non-CSSC piping regarding the inspection requirements, the issue is unsubstantiated and no corrective action is necessary.

6.0 ATTACHMENTS

- A. List of Employee Concern Information Subcategory 80205.
- B. List of Documents Reviewed

REFERENCE - ECPS120J-ECPS121C
FREQUENCY - REQUEST
ONP - ISSS - RHM

TENNESSEE VALLEY AUTHORITY
OFFICE OF NUCLEAR POWER
EMPLOYEE CONCERN PROGRAM SYSTEM (ECPS)
LIST OF EMPLOYEE CONCERN INFORMATION
SUBCATEGORY: 80205 INSPECTION PROGRAM SCOPE

PAGE -
RUN TIME - 13.4
RUN DATE - 10/1

CATEGORY: QA QA/QC PROGRAMS

CONCERN NUMBER	CAT	SUB CAT	S H R D	PLT LOC	GENERIC APPL B B S W F L Q B	QTC/HSRS INVESTIGATION REPORT	P S R	CONCERN DESCRIPTION	KEYWORD A KEYWORD B KEYWORD C KEYWORD D
XX -85-007-003 T50082	QA	80205	N	SQN	N N N N K-FORM	XX-85-007-003 RK 1/6/87	SS	SEQUOYAH - TURBINE BUILDING NON-CODE PIPING HAD NO QUALITY INSPECTION. INSPECTED BY FOREMAN ONLY. EXAMPLE: CONDENSATION, HEATER DRAIN, FEEDWAT ER AND AUX.-FEED WATER SYSTEM, UNIT 1 & 2. C/I HAS NO FURTHER INFORMATI ON.	INSPECTION PROCEDURES QUALITY PIPE

ATTACHMENT B

List of Documents Reviewed

- o Nuclear Quality Assurance Manual (NQAM) Part 1, Section 1-2, "Quality Assurance Manual Scope", Part I, Section 2.10, "Inspection".
- o TVA Topical Report TR 75-1A, Rev. 7
- o Standard Practices, SQA 134, Part V, Appendix A - "Non Critical System List", Part II - "Critical Structures, Systems, and Components (CSSC List)".
- o Site Quality Nuclear Procedure, SQNP A1-20, "Inspection Program".
- o Modifications and Additions Instruction, M&AI-1.
- o Flow Diagram 47W-803, Series 1, 2, and 3, "Feedwater/Auxiliary Feedwater Systems".
- o American National Standard Institute, ANSI B31.7 1969 Edition, Winter 1970 addenda