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NONCONFORMANCES	PREPARED BY: <u>[Signature]</u> DATE <u>1/25/84</u>			
	APPROVED BY: <u>[Signature]</u> DATE <u>1/25/84</u>			

- 1.0 REFERENCES
- 1-A CP-QP-15.0, "Tagging System"
- 2.0 GENERAL
- 2.1 PURPOSE AND SCOPE

FOR INFORMATION ONLY

HISTORICAL FILE

The purpose of this procedure is to establish a method of documenting the identification, resolution, and closeout of nonconformances as defined in Paragraph 2.2. It is the responsibility of all site employees to report items of nonconformance to their supervisor or to the TUGCO Site QA Supervisor. The requirements contained herein are applicable to nonconformances identified for materials, services or items associated with safety-related structures, systems and components not under the jurisdiction of the ASME Code, Section III, Division 1.

NOTE: When nonconformances are detected by inspection and testing, they shall be reported in accordance with quality procedures/instructions describing the inspection or testing functions. Where specific guidelines are not given in quality procedure/instructions, the provisions of this procedure shall govern.

In Oct. 1983, a Building/Matrix Management Organization was established for the completion of Unit 1 and Common. Section 3.1 and 3.3 of this procedure describe the processing of nonconformances under this system. Section 3.1 and 3.2 describe the processing of nonconformances for Unit 2 and areas not under the Matrix organization.

- 2.2 DEFINITION
- 2.2.1 Nonconformance

A deficiency in characteristic, documentation, or procedure which renders the quality of an item unacceptable or indeterminate.

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3.0 PROCEDURE

3.1 NONCONFORMANCE IDENTIFICATION

3.1.1 Field Identification

When a nonconforming condition as defined in Paragraph 2.2.i is identified, the individual shall immediately apply a Hold Tag, when practical, (Reference 1-A) and note his name and telephone extension on the tag. He shall return and note on the Hold Tag the appropriate NCR number when obtained from the TUGCO NCR Coordinator.

NOTE: For electrical activities, the inspector may use his judgement to apply a Hold Tag to a nonconforming internal component. For example, the inspector may apply a Hold Tag to a broken/damaged terminal strip and note on the Hold Tag wording such as "Applied to Terminal Strip Only." On the NCR the statement would be "Applied to Terminal Strip Only - other unrelated activities may proceed."

3.1.2 Reporting

Nonconforming conditions shall be reported on the NCR form (Attachment 2). Supporting documentation, e.g., Inspection Reports, NDE reports, drawings shall also be attached to the NCR where appropriate. The location of the nonconforming condition (structure, room number, elevation and area code) and the system/subsystem number shall be recorded on the NCR form.

NOTE: The system/subsystem number is not required for discrepancies relating to conduit, cable trays, protective coatings, cable tray hangers or anchor bolt locations provided that the structure is identified.

3.1.3 Numbering the NCR

Before sending the NCR to the Quality Control Supervisor, or his designee, the individual reporting the nonconformance shall obtain a number from the TUGCO NCR Coordinator. This number shall be noted on the NCR and on the Hold Tag per Reference 1-A that is applied to the nonconforming item/equipment.

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The TUGCO NCR Coordinator shall assign numbers as follows:

e.g. NCR M - 80 - 00214

sequential NCR number
for that year

year

Discipline (Mechanical, Electrical
Instrumentation, Civil)

For NCR's on items/components turned over to TUGCO, the TUGCO NCR Coordinator shall add the letter "S" after the NCR number and forward a copy to TUGCO Startup for information.

The TUGCO NCR Coordinator enters the NCR number and brief description of the nonconforming condition in the Master NCR Log (Attachment 3).

NOTE: The TUGCO NCR Coordinator shall periodically review the Master NCR Log (at least annually) to ensure accuracy.

3.2 PROCESSING NONCONFORMANCE REPORTS FOR UNIT 2 AND AREAS NOT UNDER THE MATRIX ORGANIZATION

3.2.1 Draft NCR

The inspector will sign and forward the draft NCR to the Discipline QC Supervisor or designee. When individuals assigned to departments other than QA/QC are reporting a nonconforming condition, they shall forward the draft Nonconformance Report to the TUGCO NCR Coordinator for processing in accordance with this procedure.

3.2.2 Pre-Issuance Review and Preparation

The reported nonconformance shall be evaluated by the Discipline Quality Control Supervisor or his designee for clarity, accuracy, validity, specificity and legibility.

3.2.2.1 NCR's may be voided at any time if it is determined that nonconforming conditions do not exist, the nonconformance was previously reported on another NCR or other similar conditions exist. In the event that an NCR is determined to be invalid, "Void" shall be entered in bold letters in the disposition block with the reason and justification

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for voiding the NCR. Any pertinent supporting documentation shall be attached to the NCR and referenced in the reason/justification statements. Voiding of NCR's shall be approved by the QA/QC Supervisor or his designee by placing his signature and the date under the reason/justification statement. The original voided NCR will be forwarded to the TUGCO NCR Coordinator.

- 3.2.2.2 If the NCR is determined to be valid, the Discipline QC Supervisor signs and forwards the draft NCR to the TUGCO NCR Coordinator.

3.2.3 NCR Issue

The TUGCO NCR Coordinator enters the date issued in the NCR Log, maintains the original and forwards a copy of the NCR to an "Action Addressee".

(The "Action Addressee" normally is the responsible Engineering Supervisor who evaluates and dispositions the reported nonconformances.)

3.2.4 Disposition

3.2.4.1 Final Disposition (Rework, Repair, Scrap, Use-as-is)

The "Action Addressee" shall evaluate each reported nonconforming condition and determine an appropriate disposition to correct and/or resolve the nonconformance. The disposition shall be clearly and concisely recorded in the "Disposition" space on each NCR according to the following:

- a. The respective disposition block(s) shall be checked (i.e., Rework, Repair, Use-As-Is and/or Scrap).
- b. Rework Dispositions shall specify the rework actions required to correct the nonconforming conditions and bring the affected items into compliance with the specified requirements.
- c. Repair Dispositions shall specify the repair actions required to bring the nonconforming characteristic(s) to a condition such that the capability of the affected item to function reliably and safely is unimpaired, even though the item still may not conform to specified requirements. Repair dispositions shall also include appropriate Engineering technical justification for acceptance of the item with characteristics that do not comply with specified design requirements.

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- d. Use-As-Is Dispositions shall include sufficient Engineering technical justification to establish that the nonconforming characteristic will result in no adverse conditions and that the affected item will continue to meet all Engineering functional requirements, including performance, maintainability, fit and safety.
- e. Scrap Dispositions shall be made when it is determined that an item is unsuitable for its intended purpose and cannot be feasibly or economically reworked or repaired.

3.2.4.2 Temporary Waiver

For those nonconforming items which Construction/Engineering desires to continue to process on a "risk removal" basis, authorization shall be requested in the NCR disposition. In order to receive this authorization to continue the process, the following conditions must be satisfied:

- a. The NCR disposition shall include sufficient information and direction for accomplishing the work. Detail shall be provided to permit adequate evaluation of potential impact to affected parties (i.e., construction, engineering, QA/QC, records, start-up and operations);
- b. Engineer Review/Approval shall be by the Engineering Group Supervisor or above;
- c. Quality Assurance Review/Approval shall be by the Discipline QA/QC Supervisors or above.

After approval of the disposition a Blue Temporary Waiver Tag, per Reference 1-A, shall be affixed to the item. The NCR number shall be noted on the Temporary Waiver Tag.

3.2.5 Quality Assurance Review

The NCR disposition shall be reviewed by the Discipline Quality Engineer for adequacy and conformance to applicable specifications, code requirements and current drawing/design change.

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If the review is satisfactory the TUGCO NCR Coordinator will have the disposition entered on the original, obtain the required signatures, and enter the date on the NCR log. If the disposition is not satisfactory, the Quality Engineer shall resolve all comments with the Engineer who dispositioned the NCR.

Based on his review, the QE may recommend voiding in accordance with Section 3.2.2.1.

Upon Quality Engineering approval of the disposition, and prior to beginning any rework/repair, QC shall remove the red hold tag and blue waiver tag (if applicable).

3.2.6 Revision of Nonconformance Reports

When changes are required to the nonconforming condition or disposition, the NCR shall be revised. This revision shall be denoted on the NCR number and the reason(s) for revision included in the comments section. The necessary approvals shall be obtained in accordance with this procedure for the portion affected by revision.

3.2.7 Implementation of the Disposition

NCR's dispositioned "Rework", "Repair" or "Scrap" shall be sent by the TUGCO NCR Coordinator to the appropriate department responsible for scheduling/coordinating work activities for implementation of the disposition.

NCR disposition "Use As Is" shall be sent to the Non-ASME QA/QC Supervisor for approval.

For NCR's dispositioned as "Rework", "Repair", or "Scrap" and identified with an "S" after the NCR number, an information copy will also be sent to TUGCO Startup.

3.2.8 Verification/Closure

The Discipline QC Supervisor shall ensure that the NCR disposition work items are verified and/or witnessed by QC. QC shall document their inspections (via, inspection reports, checklists, travelers, etc. as required). These documents shall be either attached to or referenced on the NCR as appropriate.

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The QA/QC Supervisors, or their designee, shall close the NCR by signing the "Verification" block of the original.

The closed NCR will then be transmitted by the NCR Coordinator to the Permanent Plant Records Vault and the date entered in the NCR log.

3.3 PROCESSING NONCONFORMANCE REPORTS FOR UNIT 1 AND COMMON (SEE ATTACHMENT 1 FOR NCR FLOW)

3.3.1 Draft NCR

Following completion of activities specified in Section 3.1, the inspector will sign and forward the draft NCR to the Building QC Supervisor or designee. When individuals assigned to departments other than QA/QC are reporting a nonconforming condition, they shall forward the draft Nonconformance Report to the Building NCR Coordinator for processing in accordance with this procedure.

3.3.2 Pre-Issuance Review and Preparation

The reported nonconformance shall be evaluated by the Building Quality Control Supervisor or his designee for clarity, accuracy, validity, specificity and legibility.

3.3.2.1 NCR's may be voided by the Building QC Supervisor if it is determined that nonconforming conditions do not exist, the nonconformance was previously reported on another NCR or other similar conditions exists. In the event that an NCR is determined to be invalid, "Void" shall be entered in bold letters in the disposition block with the reason and justification for voiding the NCR. Any pertinent supporting documentation shall be attached to the NCR and referenced in the reason/justification statements. The original voided NCR with supporting documentation shall be filed in the PPRV and a copy forwarded to the TUGCO NCR Coordinator.

3.3.2.2 If the NCR is determined to be valid, the Building QC Supervisor signs and forwards the draft NCR to the Building NCR Coordinator. The Building NCR Coordinator sends a duplicate copy to the TUGCO NCR Coordinator for redundant filing.

3.3.3 NCR Issue

The Building NCR Coordinator enters the date issued in the Building NCR Log and forwards the original NCR to an "Action

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Addressee". (The Building NCR Log will be similar to the Master Log maintained by the TUGCO NCR Coordinator.)

(The "Action Adressee" normally is the responsible Construction/Engineering Building Supervisor who evaluates and dispositions the reported nonconformances.)

3.3.4 Disposition

3.3.4.1 Final Disposition (Rework, Repair, Scrap, Use-as-is)

The "Action Addressee" shall evaluate each reported nonconforming condition and determine an appropriate disposition to correct and/or resolve the nonconformance. The disposition shall be clearly and concisely recorded in the "Disposition" space on each NCR according to the following:

- a. The respective disposition block(s) shall be checked (i.e., Rework, Repair, Use-As-Is and/or Scrap).
- b. Rework Dispositions shall specify the rework actions required to correct the nonconforming conditions and bring the affected items into compliance with the specified requirements.
- c. Repair Dispositions shall specify the repair actions required to bring the nonconforming characteristic(s) to a condition such that the capability of the affected item to function reliably and safely is unimpaired, even though the item still may not conform to specified requirements. Repair dispositions shall also include appropriate Engineering technical justification for acceptance of the item with characteristics that do not comply with specified design requirements.
- d. Use-As-Is Dispositions shall include sufficient Engineering technical justification to establish that the nonconforming characteristic will result in no adverse conditions and that the affected item will continue to meet all Engineering functional requirements, including performance, maintainability, fit and safety.

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- e. Scrap Dispositions shall be made when it is determined that an item is unsuitable for its intended purpose and cannot be feasibly or economically reworked or repaired.

3.3.4.2 Temporary Waiver

For those nonconforming items which Construction/Engineering desires to continue to process on a "risk removal" basis, authorization shall be requested in the NCR disposition. In order to receive this authorization to continue the process, the following conditions must be satisfied:

- a. The NCR disposition shall include sufficient information and direction for accomplishing the work. Detail shall be provided to permit adequate evaluation of potential impact to affected parties (i.e., construction, engineering, QA/QC, records, start-up and operations);
- b. Engineer Review/Approval shall be by the Building Group Supervisor or above;
- c. Quality Assurance Review/Approval shall be by the Building QA/QC Supervisors or above.

After approval of the disposition a Blue Temporary Waiver Tag, per Reference 1-A, shall be affixed to the item. The NCR number shall be noted on the Temporary Waiver Tag.

3.3.5 Quality Assurance Review

The NCR disposition shall be reviewed by Quality Assurance for adequacy and conformance to applicable specifications, code requirements and current drawing/design change. Disposition for scrap, rework, and standard repairs are approved by the Building QC Supervisor. Dispositions for use-as-is and non-standard repairs shall be approved by the Non-ASME QE Supervisor.

If review is satisfactory the Building NCR Coordinator shall enter the date on the NCR log. If the disposition is not satisfactory, the Building QC Supervisor or Non-ASME QE Supervisor, as appropriate, shall resolve all comments with the Engineer who dispositioned the NCR. The Building NCR Coordinator sends a duplicate dispositioned copy to the TUGCO NCR Coordinator.

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Upon Quality Assurance approval of the disposition, and prior to beginning any rework/repair, QC shall remove the red hold tag and blue waiver tag (if applicable).

3.3.6 Revision of Nonconformance Reports

When changes are required to the nonconforming condition or disposition, the NCR shall be revised. This revision shall be denoted on the NCR number and the reason(s) for revision included in the comments section. The necessary approvals shall be obtained in accordance with this procedure for the portion affected by revision.

3.3.7 Implementation of the Disposition

NCR's dispositioned "Rework", "Repair" or "Scrap" shall be sent by the Building NCR Coordinator to the appropriate building department responsible for scheduling/coordinating work activities for implementation of the disposition.

For NCR's dispositioned as "Rework", "Repair", or "Scrap" and identified with an "S" after the NCR number, an information copy will also be sent to TUGCO Startup.

3.3.8 Verification/Closure

The QC Building Supervisor shall ensure that the NCR disposition work items are verified and/or witnessed by QC. QC shall document their inspections (via, inspection reports, checklists, travelers, etc. as required). These documents shall be either attached to or referenced on the NCR as appropriate.

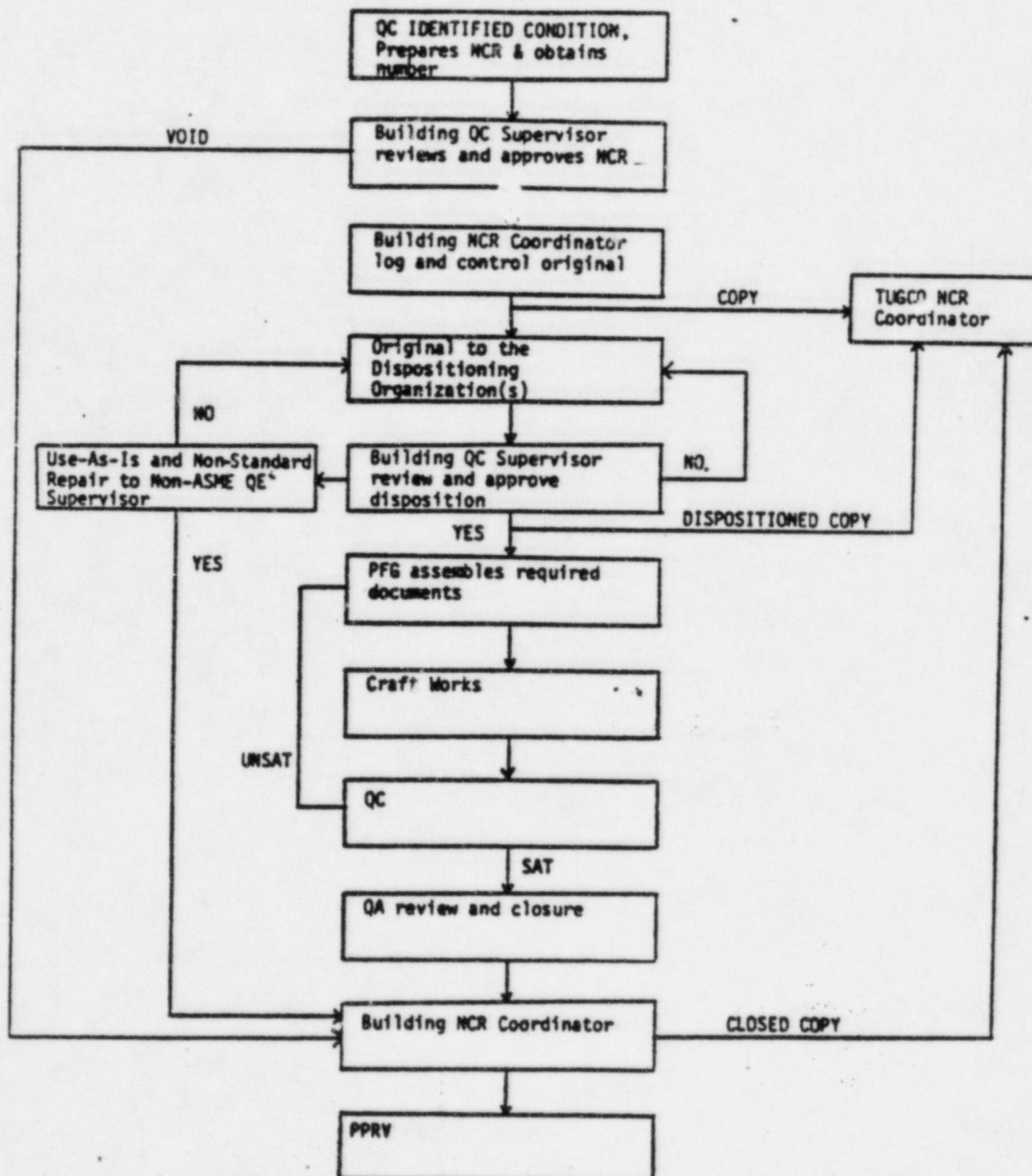
The QE or QC Supervisors, as appropriate, or their designees, shall close the NCR by signing the "Verification" block of the original.

Copies of closed NCR's will be distributed by the cognizant Building NCR Coordinator as follows:

- a. The original will be sent to the appropriate building Paper Flow Group who will transmit to the Permanent Plant Records Vault (PPRV).
- b. A copy of the closed NCR will be sent to the TUGCO NCR Coordinator for Master Log updating and duplicate filing.

ATTACHMENT 1

UNIT 1 AND COMMON
NCR FLOW CHART



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ATTACHMENT 2

TEXAS UTILITIES
GENERATING CO.

COMANCHE PEAK STEAM ELECTRIC STATION
NONCONFORMANCE REPORT (NCR)

NCR No.

REPORTING PERSONNEL

UNIT	STRUCTURE/SYSTEM	ITEM/COMPONENT	TAG/ID NUMBER	LOCATION OR ELEVATION	R/R NO.
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NONCONFORMING CONDITION

REFERENCE DOCUMENT: _____ REV _____ PARA _____

REPORTED BY: _____ DATE: ____/____/____

OE

OE REVIEW/APPROVAL:	DATE: ____/____/____
ACTION ADDRESSEE	DEPARTMENT

ACTION ADDRESSEE

DISPOSITION: REWORK _____ REPAIR _____ USE AS IS _____ SCRAP _____

OE

ENCL. REVIEW/APPROVAL	DATE: ____/____/____
OE REVIEW APPROVAL:	DATE: ____/____/____
DISPOSITION VERIFICATION & CLOSURE:	DATE: ____/____/____

COMMENTS:

