NUCLEAR DIVISION PROCEDURE

TITLE

CONTROL OF NONCONFORMING MATERIALS, PARTS, AND COMPONENTS

NDP NO. 600-1

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Originator	Date	Manager, QA	Date	VP, Nuclear Division	Date
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	Attachment A/2		

1.0 PURPOSE

This procedure establishes measures to assure that nonconforming materials, parts, and components will be adequately documented and controlled; that affected organizations will be notified; that corrective action responsibilities will be appropriately assigned; that recommended corrective actions will be approved by responsible management; and that corrective action implementation will be independently verified.

2.0 APPLICABILITY

2.1 This procedure applies to all PGE organizations and employees engaged in activities that affect quality-related materials, parts, and components.

2.2 Nonconforming activities are controlled in accordance with NDP 600-2.

3.0 DEFINITIONS

3.1 Rework - The process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling, or other corrective means.

3.2 Repair - The process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safely is unimpaired even though that item still may not conform to the original requirement.

3.3 Use-as-is - The disposition which may be imposed for a nonconformance when it can be established that the discrepancy will result in no adverse conditions and that the item under consideration will continue to meet all engineering functional requirements including performance, maintainability, fit, and safety.

3.4 Reject - The disposition applied to nonconforming materials, parts, or components which are unsuitable for their intended purpose but which may be feasible to return to the supplier as salvage for replacement or credit, or feasible to scrap.

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

4.0 REFERENCES

4.1 PGE-8010, "Nuclear Quality Assurance Program".

4.2 NDP 100-4, "Reporting Requirements".

4.3 NDP 100-5, "Preparation of Safety Evaluations Required by 10 CFR 50 and Trojan Technical Specifications".

4.4 NDP 100-11, "Protection of Safeguards Information".

4.5 NDP 200-1, "Design Change Control".

4.6 NDP 200-2, "Plant Configuration Changes".

4.7 NDP 600-2, "Control of Nonconforming Activities".

4.8 NDP 600-3, "Event Reports".

4.9 NDP 700-4, "10 CFR 21 Reporting of Nuclear Plant Defects or Noncompliances".

4.10 Trojan Operating License, NPF-1.

5.0 PROCEDURES

5.1 General.

A. A manager or supervisor who identifies or is informed of nonconforming materials, parts, and components is responsible for assuring that the nonconformance is, or has been, documented on a nonconformance report (NCR) (Attachment A). Deficiencies which do not affect safety-related equipment, are not reportable, and can be reworked at PGE, may be corrected using a maintenance request (MR) in lieu of an NCR.

Documentation deficiencies, identified during material receipt inspections, may be corrected without use of an NCR provided they are resolved within 30 days.

B. The QA Operations Branch is responsible for logging, tracking, and reviewing NCRs throughout their processing to verify that actions comply with this procedure and the QA Program. The QA Operations Branch is also responsible for assigning NCR numbers, for assuring placement and removal of QC hold tags, and for entering NCR data on the Commitment Tracking List.

C. The Quality Control Group is responsible for placement and removal of QC hold tags.

D. NCRs identifying nonconforming security-related items shall be evaluated for control as "Safeguards Information" in accordance with NDP 100-11.

E. Any design changes resulting from corrective action dispositions shall be controlled in accordance with NDP 200-1 or NDP 200-2.

5.2 NCR Initiation.

An NCR may be initiated by any PGE employee by obtaining an NCR form and completing Items [1], [2], [3], and [4]*. (Assistance on completion of the NCR may be obtained from the QA Operations Branch.)

[1] A. Identify the nonconforming item. Include, if possible, serial number, part number, model number, and purchase order number (if related to receipt inspection).

[2] B. Identify if the nonconforming item is installed in the Plant. Give the location and/or Plant equipment number, if installed.

[3] C. Identify the basic reference document which contains the requirement (eg, drawing number, specification number) which is not met.

[4] D. Describe the nonconforming condition. Be as specific as possible. Sign and date the NCR as the initiator.

E. Send the NCR to the initiator's department supervisor.

5.3 NCR Initiator's Supervisor Actions.

A. For corrective action timeliness, Steps B through E of this section should be completed within 5 calendar days of the date the NCR was initiated.

[5] B. If the nonconforming item is an in-use security-system-related item, inform the Trojan Plant Security Watch Supervisor IMMEDIATELY so an assessment can be made for reportability and compensatory measures can be taken, if needed.

C. If the nonconforming item is installed in an operating system or equipment, contact the shift supervisor and an offsite or onsite engineering supervisor to determine if the system or equipment must be removed from service (declared inoperable) based upon the effect the nonconformance has upon system/equipment operation and/or function (including Technical Specification requirements).

If continued use is acceptable, document the determination on the NCR and any precautions and/or limitations that apply including the effect on mode changes. The names of those involved in the determination shall be listed.

D. Sign and date the NCR.

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* The NCR item to be completed is identified in brackets (eg, [1]) next to the applicable procedure step.

E. Send the original NCR and any attachments to the QA Operations Branch.

NOTE: If the initiating supervisor knows the corrective action recommendation, he may include the information on the NCR at this time, providing this does not delay transmitting the NCR.

5.4 QA Operations Branch Actions.

A. For corrective action timeliness, Steps B through G of this section should be completed within two calendar days of receipt of the NCR.

[6] B. Screen the NCR for completeness and obvious errors. If invalid, return to the initiator with an explanation. If valid, assign and enter the NCR number in the Commitment Tracking List and on the NCR.

C. Ensure the nonconforming items are identified and controlled to prevent their inadvertent use by use of QC hold tags and/or the necessary danger and caution tags as determined appropriate by the QA Operations Branch Manager. If the items are installed in Plant systems and/or equipment, the precautions or limitations identified in Paragraph 5.3.C shall be considered.

[7] D. If a QC hold tag is to be used, contact the QC Group for a tag number and their assistance in installing the tag. Enter the QC hold tag number on the NCR.

E. Enter the name and organization of the supervisor responsible for recommending corrective action and determining the root cause. If possible, the supervisor should be contacted prior to assigning action.

F. Identify a tracker, sign and date the NCR.

G. Send the original NCR and any attachments to the responsible supervisor and information copies to the following:

1. Shift supervisor, if the item is or will be installed in the Plant.

2. NCR initiator.

3. Plant Review Board Chairman.

4. Trojan Plant General Manager.

5. General Manager, Technical Functions.

6. Manager, NQAD.

7. QC Supervisor (for NCRs with QC hold tags).

5.5 Plant Review Board Subcommittee Actions.

A. Evaluate the nonconformance for reportability in accordance with NDP 100-4, NDP 600-3, NDP 700-4, and the Trojan Operating License, and initiate the required reports.

B. Document the nonconformance reportability determinations in the next PRB meeting minutes.

5.6 Responsible Supervisor Actions.

A. For corrective action timeliness, Steps B through F of this section should be completed within 15 calendar days of receipt of the NCR.

[9] B. Document the probable root cause of the nonconformance and document whether or not a follow-up investigation has been initiated by an Event Report per NDP 600-3.

[10] C. Recommend corrective action that resolves the specific nonconformance. If the root cause has been clearly identified, the corrective action should address it in order to preclude repetition.

D. Identify what documents need to be revised to reflect the completed corrective action.

E. Sign and date the NCR.

F. Send the original NCR to Manager, NPE, with a copy to the QA Operations Branch.

5.7 NPE Actions.

A. For corrective action timeliness, Steps B through H of this section should be completed within 15 calendar days of receiving the responsible supervisor's recommendations. If NPE made the corrective action recommendations, the same action engineer shall not be assigned the actions of Steps B through F of this section.

[11] B. Determine if the nonconforming item is safety-related, if the recommended corrective action represents an unreviewed safety question, and if the recommended corrective action involves a design change.

C. Classify the recommended corrective action into one of the four classification categories as defined in Sections 3.1 through 3.4.

D. Conduct an evaluation of the recommended corrective action in accordance with NDP 100-5 for repair or use-as-is dispositions, and attach the evaluation to the NCR. For repair or use-as-is corrective action for which a design change document is not referenced, attach a Design Review Report (DRR). This DRR should state why a design change document is not needed and should verify the acceptability of the corrective action.

E. Recommend approval or disapproval of the corrective action proposed by the responsible supervisor. If disapproval is recommended, attach an alternate recommendation.

F. If applicable, identify additional documents that must be revised, and the design change that must be completed prior to closeout of the NCR.

G. Sign and date by NPE Manager or his designee.

H. Send the original NCR to the Trojan Plant General Manager, with a copy to the QA Operations Branch.

5.8 Plant General Manager Actions.

[12] A. If acceptable, the Trojan Plant General Manager shall document his approval of the nonconformance corrective action and assign a supervisor action to implement the corrective action. Corrective action to be implemented under an MR or RDC/PCC should be assigned to the responsible construction work group supervisor.

B. Send the original NCR to the supervisor assigned the corrective action, with a copy to the QA Operations Branch.

5.9 Corrective Action Implementation.

The supervisor assigned the corrective action shall:

[13] A. In the case of a reject disposition, notify the Quality Control Group for removal of the QC hold tag, if installed, prior to disposing of the nonconforming item.

B. Document completion of the corrective action on the original NCR.

C. Send the original NCR to the QA Operations Branch for closeout of the NCR.

5.10 Corrective Action Verification by QA Operations Branch.

A. Verify that the stated corrective action was completed; verify adequate documentation of the nonconformance; and verify that any hold tags, clearances, or other means used to control the items have been removed, and notify the Shift Supervisor if the item is installed in the Plant.

[14] B. Document the PRB's reportability determination on the NCR form.

C. Document QA verification by signing and dating the NCR.

[15] D. Distribute copies of the closed NCR to the following:

1. QA records (original).

2. Performance Monitoring/Event Analysis (PM/EA) Group.

3. NCR initiator.

4. Trojan Plant General Manager.

5. General Manager, Technical Functions.

6. Manager, NPE.

7. Manager, NQAD.

7. Supervisor assigned corrective action(s).

8. QA Operations Branch.

9. QA Engineering and Support Branch.

10. Plant Review Board Chairman.

11. TNOB QA Subcommittee.

12. Others, as appropriate.

E. Close out the NCR on the Commitment Tracking List.

5.11 Voiding NCRs.

Once an NCR number has been assigned, the following shall be done if it is determined that the NCR is invalid.

A. The QA Operations Branch Manager shall document the reason in the corrective action section of the original NCR, then sign and date under the statement, stamp "VOID" on the NCR, and obtain an NPE management signature concurring with the voiding action.

B. Upon receipt of NPE's concurrence, the QA Operations Branch Manager shall ensure the Commitment Tracking List is updated and any hold tags, clearances, or other means used to control the item are removed or cleared as appropriate.

C. Distribute the "voided" NCRs according to Paragraph 5.10.

5.12 Trending NCRs.

A. The PM/EA Group shall review NCRs semiannually for quality trends.

B. Results of the reviews shall be forwarded to:

1. Trojan Plant General Manager.

2. Trojan Nuclear Operations Board.

3. Vice President Nuclear.

6.0 ATTACHMENTS

6.1 Attachment A, Nonconformance Report. (Sample)

JGS/sf
5165Q

******SAMPLE******

NDP 600-1, Rev. 2
Attachment A
Page 1 of 2

6 NONCONFORMANCE REPORT NUMBER _____ - _____

INITIATOR

1 Item

2 Installed? ☐ Yes ☐ No | Location:

3 Requirement

4 Nonconforming Condition

5 FOR INSTALLED ITEMS ONLY
Continued Use Acceptable ☐ Yes ☐ No | FOR SECURITY SYSTEMS ONLY
Security Watch Supervisor:

Engineering Supervisor: | Shift Supervisor:

Precautions/Limitations:

Initiator | Date / / | Supervisor | Date / /

QA

7 QC Hold Tag Number ☐ N/A | Responsible Supervisor: | Organization:

8 Tracker: | QA Supervision Approval: | Date / /

RESPONSIBLE SUPERVISOR

9 Root Cause

Event Report Initiated ☐ Yes ☐ No

10 Corrective Action: (Remedial/Investigative/Preclude Repetition)

Recommended by (Responsible Supervisor): Date / / | Distribute Information Copy to QA Operations

NPE

11 Safety-Related? ☐ Yes ☐ No | Unreviewed Safety Question? ☐ Yes ☐ No | Design change? ☐ Yes ☐ No

Corrective Action Classification: ☐ Rework ☐ Repair ☐ Use-As-Is ☐ Reject

For repair or use-as-is: (attach NDP 100-5 Evaluation) | Design change reference

Recommend: ☐ Approval ☐ Disapproval (attach alternate recommendation)

NPE Management Date / / | Distribute Information Copy to QA Operations

TNP GM

12 Corrective Action Approved: Date / /

TROJAN PLANT GENERAL MANAGER

Supervisor(s) responsible for corrective action: | Distribute Information Copy to QA Operations

A.S.

13 Corrective Action Completed | Action Supervisor | Date / /

QA

14 Reportable? ☐ Yes ☐ No | Reporting Completed? ☐ Yes ☐ N/A | Commitments Completed? ☐ Yes ☐ No

REPORTABILITY INITIATED UNDER: ☐ 10CFR20.403 ☐ 10CFR21 ☐ 10CFR50.36 ☐ 10CFR50.72 ☐ 10 CFR 50.73 ☐ 10 CFR 70.52 ☐ 10CFR73.71 ☐ TS 6.9.2 ☐ OTHER

VERIFICATION BY QUALITY ASSURANCE

All resolution, corrective action, notification and reporting are complete

By Date / /

FINAL DISTRIBUTION (For other Departments to receive information copy when NCR is closed check below)

- ☒ NCR Initiator
- ☒ Action Supervisor
- ☒ NPE Manager
- ☒ Trojan Plant General Manager
- ☒ NQAD Manager
- ☒ TNOB QA Subcommittee
- ☒ QA Operations Branch
- ☒ QA Eng & Support Branch
- ☒ PM/EA Group
- ☒ PRB Chairman
- ☐ Authorized Inspector (for ASME Items)
- ☐ Technical Functions General Manager
- ☐ Purchasing
- ☐ Security
- ☐ QC Group
- ☐ Shift Supervisor

PGE 2237 (Oct 86)

Instructions for Completing a Nonconformance Report (NCR)

Item	Instruction
1	Initiator shall identify the nonconforming item, including, if possible, the serial number, part number, model number, and purchase order number.
2	Identify if the nonconforming item is installed in the Plant, giving the location and/or plant equipment number, if installed.
3	Identify the basic reference document which contains the requirement (eg, drawing number, specification number) which is not met.
4	Describe the nonconforming condition, and sign and date as the initiator.
5	The initiator's supervisor shall identify 1) the security watch supervisor contacted if the security system is involved and 2) the shift supervisor and engineering supervisor contacted if the nonconforming item is installed in an operating system and they have determined that continued use is acceptable; and any associated precautions and/or limitations, including the effect on mode change.
6	Quality Assurance Operations shall assign an identification number to the NCR in accordance with this procedure.
7	Designated QA personnel shall complete Item 1, enter the QC hold tag number, and enter the name of and organization of the supervisor responsible for recommending corrective action.
8	QA supervision shall select an NCR tracker, sign and date the NCR.
9	The responsible supervisor shall enter the probable root cause of the nonconformance, and document whether or not a follow-up review investigation has been initiated by an Event Report per NDP 600-3.
10	The responsible supervisor shall enter what corrective action has been or will be taken to resolve the nonconformance, what action will be taken to preclude repetition, what documents need to be revised to reflect the corrective action, sign and date, and forward to NPE, with a copy to Quality Assurance Operations.
11	NPE shall identify if the nonconforming item is safety-related, if the recommended corrective action represents an unreviewed safety question, if a design change is involved, classify the corrective action, conduct and attach an NDP 100-5 evaluation for repair or use-as-is dispositions, identify the applicable design change reference, recommend approval or disapproval of the proposed corrective action, sign and date, and forward to the TNP General Manager, with a copy to Quality Assurance Operations.
12	If acceptable, the TNP General Manager shall document his approval of the NCR recommended corrective action and assign an action supervisor.
13	The action supervisor shall document completion of the approved correction actions, and forward to Quality Assurance Operations.
14	Quality Assurance Operations shall verify completion of reporting, commitments and corrective action, close the NCR, and make distribution.