

NOTICE OF VIOLATION

Texas Utilities Electric Company
400 North Olive Street, Lock Box 81
Dallas, Texas 75201

Docket Nos. 50-445; 50-446
Permit Nos. CPPR-126; CPPR-127
EA 87-122

During an NRC inspection conducted during the period from March 1 through April 30, 1987, the NRC staff reviewed the circumstances associated with a construction deficiency related to the floor mounting conditions for the 6.9 kv switchgear. The NRC was notified of this reportable deficiency on February 13, 1987. The failure to report this deficiency in September 1986 when the vendor identified the significance of the deficiency constitutes a violation of NRC requirements. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1987), the violation is set forth below:

10 CFR Part 50.55(e) requires, in part, that the Commission be notified within 24 hours of each deficiency in design and construction which, were it to remain uncorrected, could have affected adversely the safety of operations at any time throughout the expected life of the plant, and which represents a significant deficiency in construction which will require extensive evaluation, extensive redesign, or extensive repair to meet the criteria and bases stated in the safety analysis report or to establish the adequacy of the structure or component to perform its intended safety function.

Contrary to the above, TU Electric Company did not report a construction deficiency within twenty-four hours of notification of its significance. By letter dated September 5, 1986, Brown-Boveri notified TU Electric that deficiencies in the installation of Class 1E 6.9 kv switchgear could cause failure of the equipment in a seismic event. On February 13, 1987, approximately five months later, TU Electric notified the NRC of the deficiency. The deficiency required extensive repair to establish the adequacy of the components.

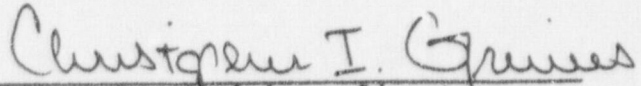
This is a Severity Level IV violation (Supplement II).

Pursuant to the provisions of 10 CFR 2.201, TU Electric Company is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission within 30 days of the date of this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each alleged violation: (1) admission or denial of the alleged violation, (2) the reasons for the violation if admitted, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why

the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken. Consideration may be given to extending the response time for good cause shown. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

The response to this Notice should be addressed to: U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Director, Office of Special Projects, and a copy to the NRC Resident Office at the facility which is the subject of this Notice.

FOR THE NUCLEAR REGULATORY COMMISSION


Christopher I. Grimes, Director
Comanche Peak Project Division
Office of Special Projects

Dated at Bethesda, Maryland,
this 4th day of August, 1987

ENCLOSURE 2

TU ELECTRIC PRESENTATION
ENFORCEMENT CONFERENCE

JUNE 6, 1987

**FAILURE TO REPORT IN A TIMELY MANNER A SIGNIFICANT DEFICIENCY IN CONSTRUCTION
OF THE 6.9 Kv SWITCHGEAR.**

- CHRONOLOGY

- ANALYSIS OF PROBLEM

- CORRECTIVE ACTION PLANNED OR TAKEN

- PAST PERFORMANCE

- SUMMARY AND CONCLUSIONS

CHRONOLOGY: SDAR-CP-87-03 (SN-220)

6.9 KV SWITCHGEAR INSTALLATION

NOVEMBER, 1985

NCR E85-201646S ISSUED DOCUMENTING MISALIGNMENT CONCERNS OF BREAKERS IN THE UNIT 2 INSTALLATION.

**NOVEMBER 1985 TO
AUGUST, 1986**

TU ELECTRIC AND THE VENDOR (BBC) PERFORMED A SITE INVESTIGATION OF BREAKER CONDITIONS.

SEPTEMBER 5, 1986

BBC ENGINEERING INSPECTION REPORT ISSUED.

**SEPTEMBER, 1986 TO
NOVEMBER 1986**

SITE ENGINEERING TRANSITION OCCURS (INVOLVING G&H TO SWEC)

JANUARY 14, 1987

BBC LETTER RECOMMENDED COMPLETE REWORK OF THE UNIT 1 SWITCHGEAR FOUNDATION.

**FEBRUARY, 1987 TO
MAY 1987**

UNIT 1 SWITCHGEAR REPAIRED

FEBRUARY 12, 1987

**REPORTABILITY EVALUATION FORM (SN-220)
ISSUED DOCUMENTING INSTALLATION
DEFICIENCIES.**

FEBRUARY 13, 1987

**LICENSING VERBALLY NOTIFIED THE NRC OF
A REPORTABLE DEFICIENCY PURSUANT TO
10CFR50.55(E) LOGGED SDAR CP-87-03.**

ANALYSIS OF PROBLEM

SYMPTOMS

- RESPONSIBLE MANAGER DID NOT DOCUMENT OBVIOUS PROBLEM
- SYSTEM HANDLED AS "CIVIL-STRUCTURAL" PROBLEM, DESIGN INTERFACE REGARDING EQUIPMENT QUALIFICATION NOT GIVEN SUFFICIENT VISIBILITY
- FOCUS WAS ENTIRELY ON "LAST STEP EVALUATION" FOR REPORTABILITY

PROBLEM

INSENSITIVITY ON THE PART OF TECHNICAL PERSONNEL TO TIMELY REPORT AN OBVIOUS PROBLEM

- PERIOD FROM SEPTEMBER 1986 UNTIL FEBRUARY 12, 1987

ANALYSIS OF PROBLEM

CONTRIBUTORY FACTORS

- TRANSITION OF ENGINEERING RESPONSIBILITY FROM G&H TO SWEC OCCURRED IN THIS TIME FRAME
- PROCEDURES FOR IDENTIFYING POTENTIALLY SIGNIFICANT DEFICIENCIES DID NOT PROVIDE SUFFICIENT GUIDANCE

CORRECTIVE ACTION PLANNED OR TAKEN

- EXTENSIVE REVIEW AND SIGNIFICANT CHANGES TO PROCEDURES TO PROVIDE MORE DETAILED GUIDANCE
- DRAFT OF NEO 9.01 (NEO-CS-1) "EVALUATION OF AND REPORTING OF ITEMS/EVENTS UNDER 10CFR21 AND 10CFR50.55(E)" IS IN THE REVIEW CYCLE SCHEDULED FOR ISSUE IN LATE JULY
- SUPPORTING PROCEDURES EC 9.01 "EVALUATION OF AND REPORTING OF ITEMS/ EVENTS UNDER 10CFR21 AND 10CFR50.55(E)" AND ECE 9.01 "EVALUATION OF AND REPORTING OF ITEMS/EVENTS UNDER 10CFR21 AND 10CFR50.55(E)" DRAFTS IN REVIEW WITH LATE JULY ISSUANCE SCHEDULED.
- CONTRACTOR EMPLOYEE RESPONSIBILITIES SPECIFICALLY IDENTIFIED IN PROCEDURE NEO-CS-1
- TRAINING ON PROCEDURE CHANGES AND SENSITIVITY TO REPORTING ISSUES TO BE CONDUCTED PRIOR TO PROCEDURE IMPLEMENTATION

CORRECTIVE ACTION PLANNED OR TAKEN
(CONTINUED)

- EXECUTIVE VICE PRESIDENT NEO VERBALLY ADDRESSED POLICY OF "IF IN DOUBT REPORT IT" TO ALL MANAGERS ATTENDING WEEKLY PROJECT STATUS MEETING
- VICE PRESIDENT E&C ISSUING WRITTEN INSTRUCTIONS CONCERNING TIMELY REPORTING OF OBVIOUS PROBLEMS (COMPLETED)
- IMPLEMENTING PROJECT REVIEW OF APPROXIMATELY 18,000 PROJECT DEFICIENCY DOCUMENTS (INCLUDING NCR'S, DR'S, AND CDR'S) FOR APPLICABILITY TO OTHER NUCLEAR FACILITIES. RESULTS INCLUDE 10 SN'S WITH FINAL DISPOSITION SCHEDULED FOR LATE JULY.

COMANCHE PEAK STEAM ELECTRIC STATION
6.9 KV SWITCHGEAR REWORK SCHEDULE

TRAIN 'A'

<u>MAJOR ACTIVITY</u>	<u>COMPL. DATE</u>
1. DETERMINATE/PULLBACK	COMPLETE (02/21/87)
2. REMOVE GEAR	COMPLETE (02/22/87)
3. CHIP FLOOR	COMPLETE (02/26/87)
4. INSTALL ATTACHMENTS	COMPLETE (03/03/87)
5. REPAIR (GROUT FLOOR)	COMPLETE (03/14/87)
6. EVALUATE AND REPAIR CUBICLES	COMPLETE (03/31/87)
7. RESET GEAR	COMPLETE (04/03/87)
8. REPULL/RETERMINATE	COMPLETE (05/30/87)
9. RETEST AND ENERGIZE	COMPLETE (05/30/87)

COMANCHE PEAK STEAM ELECTRIC STATION
6.9 KV SWITCHGEAR REWORK SCHEDULE

TRAIN 'B'

<u>MAJOR ACTIVITY</u>	<u>COMPL.. DATE</u>
1. CROSS CONNECT CCW, INSTALL TEMP. POWER, DEENERGIZE	COMPLETE (03/30/87)
2. DETERMINATE/PULL BACK	COMPLETE (04/07/87)
3. REMOVE SWITCHGEAR	COMPLETE (04/13/87)
4. CHIP FLOOR	COMPLETE (04/24/87)
5. INSTALL ATTACHMENTS	COMPLETE (04/29/87)
6. REPAIR FLOOR	COMPLETE (05/05/87)
7. EVALUATE AND REPAIR CUBICLES	COMPLETE (05/19/87)
8. RESET SWITCHGEAR	COMPLETE (06/05/87)
9. PULL AND RETERMINATE	07/06/87
10. RETEST/REENERGIZE	07/17/87

COMANCHE PEAK STEAM ELECTRIC STATION
6.9 KV SWITCHGEAR REWORK SCHEDULE - UNIT 2

TRAIN 'A'

SCHEDULED COMPLETION 11/21/87

TRAIN 'B'

PHYSICAL REWORK COMPLETED. SCHEDULED TESTING COMPLETION 8/15/87

PAST PERFORMANCE

CPSES HAS A LOW THRESHOLD FOR 50.55(E) REPORTING.

- HIGH NUMBER OF POTENTIAL ISSUES REPORTED TO NRC
- LOW PERCENTAGE OF POTENTIAL ISSUES REPORTED ULTIMATELY ASSESSSED AS REPORTABLE

HISTORICAL TRENDS

	NOTIFICATIONS ISSUED PURSUANT TO 10CFR50.55(E) AS "POTENTIALLY" REPORTABLE	FINAL ASSESSMENTS REPORTABLE	NOT REPORTABLE	PENDING
Pre-1985	146	54 (37%)	91 (63%)	1
1985	61	26	31	4
1986	77	29	28	20
1987	29	2	1	26
	313	111 (36%)	151 (48%)	51 (16%)

COMPARATIVE TRENDS

FACILITY	PERIOD	REPORTED AS "POTENTIALLY" REPORTABLE 10CFR50.55 (E)	FINAL ASSESSMENTS REPORTABLE 10CFR50.55 (E)
BYRON 2	84-86 (3 YRS)	---	17
BRAIDWOOD 1	84-86 (3 YRS)	---	30
WATERFORD	84-85 (2 YRS)	39	20
PERRY	85-86 (2 YRS)	57	26
PALO VERDE	84-86 (3 YRS)	136	70
COMANCHE PEAK	85-86 (2 YRS)	138	55*

* 24 NOTIFICATIONS STILL PENDING FINAL REPORTABILITY EVALUATION.

SUMMARY AND CONCLUSION

THE 50.55(E) REPORT FOR THE 6.9KV CONSTRUCTION DEFICIENCY WAS UNTIMELY; HOWEVER,

- 1) TU ELECTRIC'S CORRECTIVE ACTIONS WERE RESPONSIVE AND EXTENSIVE
- 2) TU ELECTRIC'S PREVIOUS REPORTING HISTORY HAS BEEN GOOD

CONCLUSION:

THE SIGNIFICANCE OF AN UNTIMELY REPORT IS AT A DIFFERENT THRESHOLD IN THE NRC'S ENFORCEMENT POLICY THAN A FAILURE TO REPORT. THIS FAILURE TO PROVIDE A TIMELY REPORT OF THE 6.9KV CONSTRUCTION DEFICIENCY SHOULD NOT BE THE BASIS FOR ESCALATED ENFORCEMENT ACTION. THIS CONCLUSION IS CONSISTENT WITH SECTION III OF THE NRC'S ENFORCEMENT POLICY WHICH STATES "... THE SEVERITY OF AN UNTIMELY REPORT, IN CONTRAST TO NO REPORT, MAY BE REDUCED DEPENDING ON THE CIRCUMSTANCES SURROUNDING THE MATTER".

NONCONFORMANCE CONTROL PROGRAM

I. Describe the nonconformance control program as it relates to discovery and initiation of corrective actions to resolve nonconforming conditions.

II. Address each of the NRC findings.

III. Describe how the nonconformance control program meets 10CFR50 Appendix B Criterion XV.

IV. Conclusion

DEFINITIONS

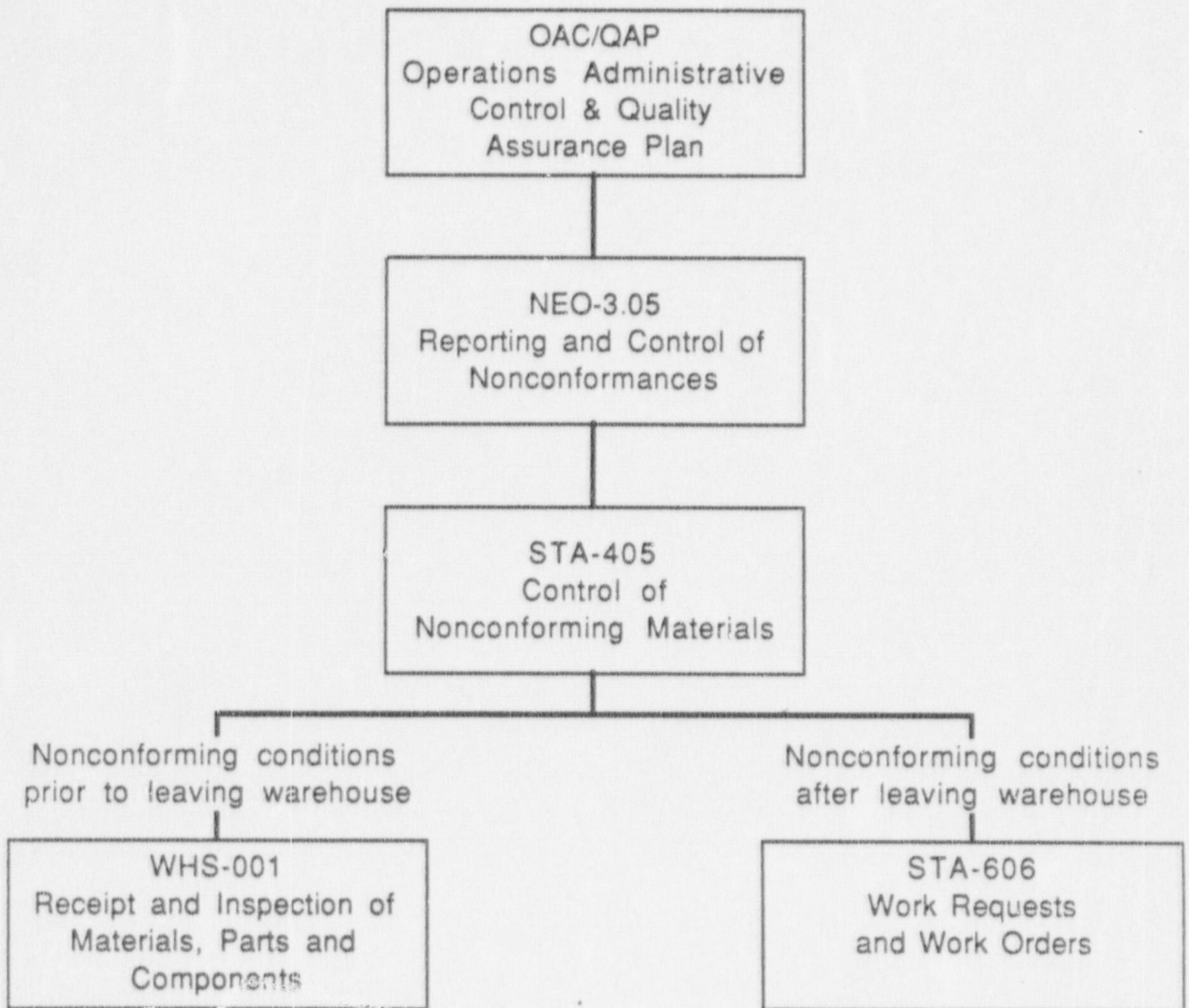
Rework - The process by which a nonconforming item is made to conform to prior specified requirements by corrective means.

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 does not conform to the original requirements.

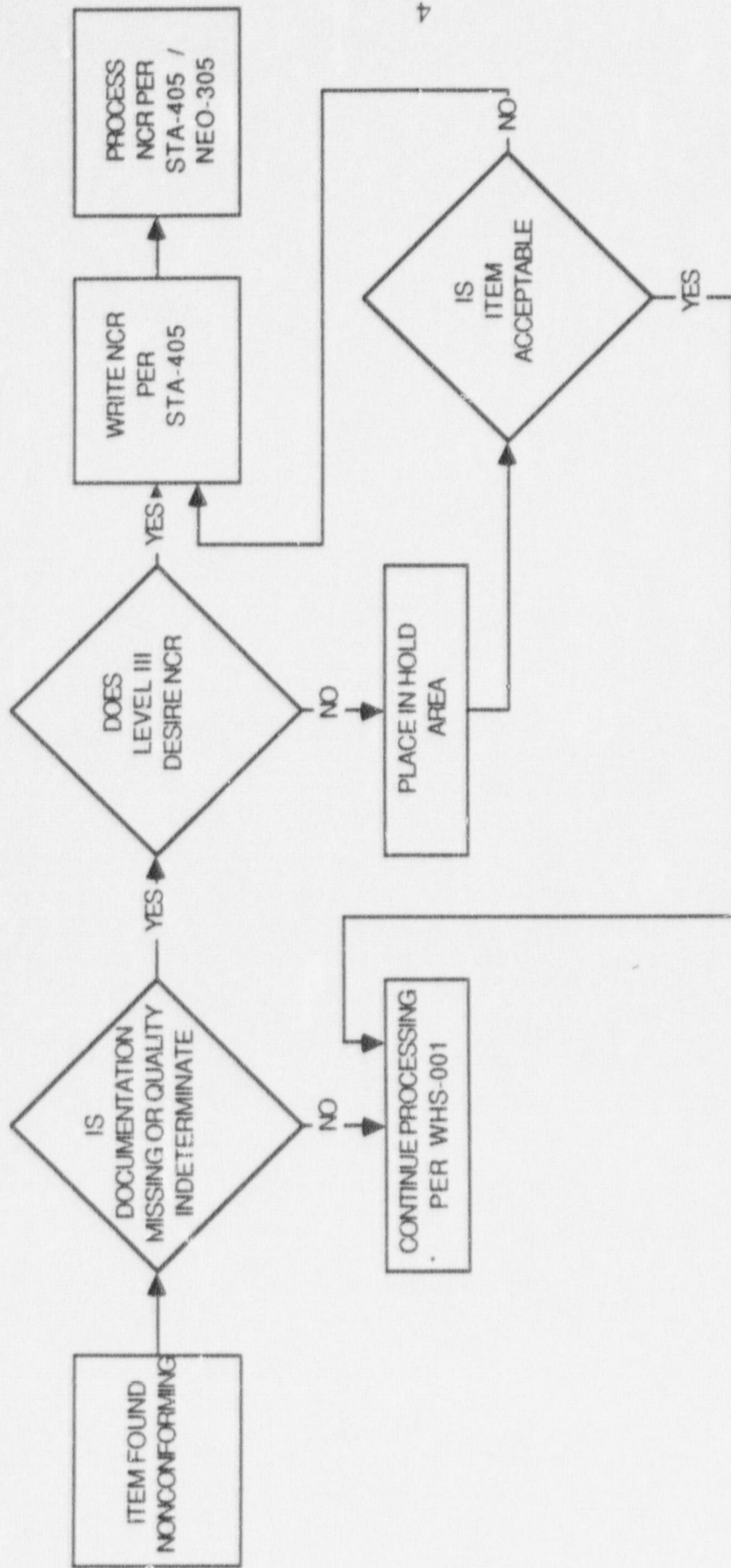
Scrap - The determination that an item is not acceptable for use in a safety related application and must be segregated or disposed of to preclude such use.

Use-As-Is - A disposition which may be assigned for a nonconformance when it can be established that the discrepancy shall result in no condition adverse to safety and that the item under consideration will continue to meet all engineering functional requirements.

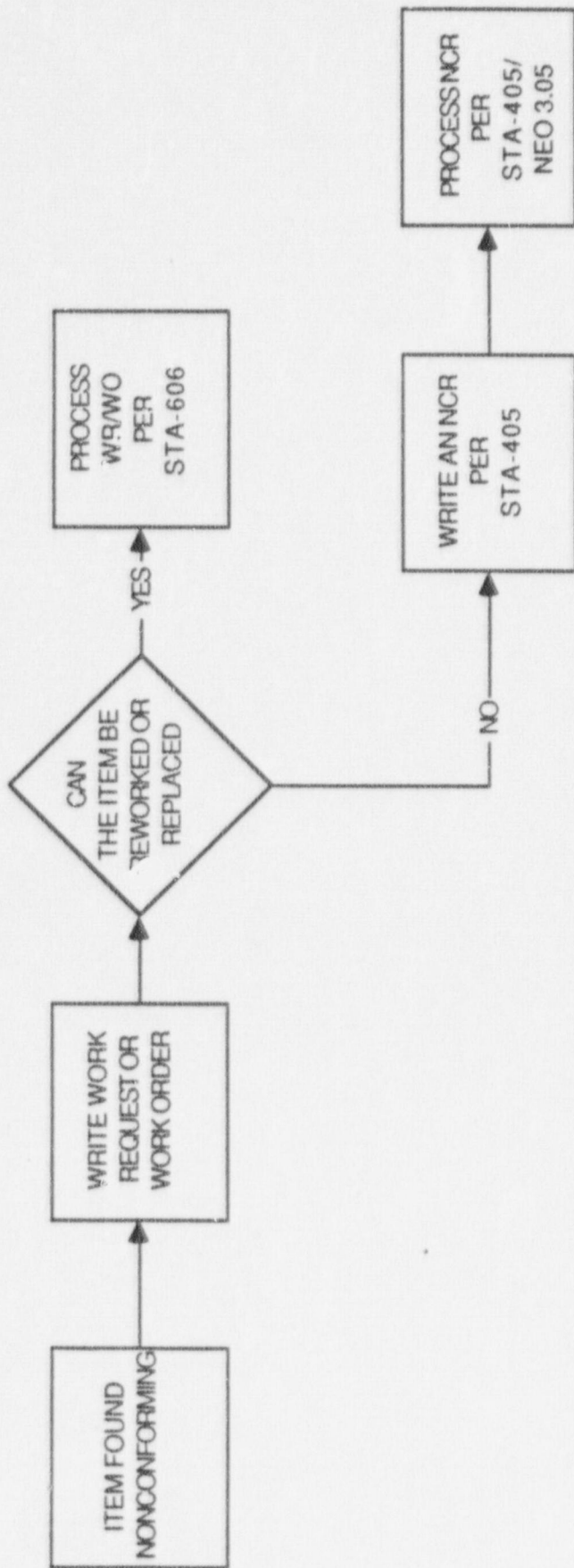
Heirarchy of Documents for Operations Nonconformance Control Program



ITEMS FOUND NONCONFORMING BEFORE LEAVING WAREHOUSE



ITEMS FOUND NONCONFORMING AFTER LEAVING WAREHOUSE



NRC FINDINGS

NRC FINDING

NEO 3.05 contains wording that appears in variance with Criterion XV by adding the phrase "...and cannot be corrected within the scope of such requirements or otherwise [sic] requires an Engineering disposition" to the applicability statement. This appears to mean if it can be fixed by some means, it is not nonconforming and does not need to be reported as nonconforming.

RESPONSE

NEO 3.05, "Reporting and Control of Nonconformances", paragraph 2.1 states "This procedure is applicable to quality related items or conditions which deviate from: drawings, specifications, or other engineering requirements and cannot be corrected within the scope of such requirements or otherwise requires an Engineering disposition."

The wording in paragraph 2.1 means that any nonconforming condition which is dispositioned "repair", or "use-as-is", which by definition requires Engineering approval, must be accomplished in accordance with NEO 3.05 by using a Nonconformance Report. Items which can be corrected within the scope of existing engineering requirements and require no Engineering input (i.e., "rework" or "scrap") may be corrected in accordance with that organization implementing procedures. In the case of Operations this means the Work Request/Work Order Program.

NRC FINDING

A note contained in Section 6.0 of NEO 3.05 states, "Nonconformance Reports shall be prepared on items when a 'repair' or 'use-as-is' disposition is required." The meaning here appears to be that the type of disposition is the judging factor for writing Nonconformance Reports (NCR's), not that a nonconforming condition exists.

RESPONSE

The fact that an item does not meet specified requirements is the criterion used to determine an item is nonconforming. An NCR is required for nonconforming conditions requiring a "repair" or "use-as-is" disposition. If the item can be reworked, a Work Request/Work Order is written to identify and correct the nonconforming condition.

NRC FINDING

Section 6.4 of NEO 3.05 starts with a sentence that reads, "Upon discovery of a nonconforming condition, it should be determined if an NCR is required." This again relates to the above note for determining NCR requirements by the type of disposition.

RESPONSE

NEO 3.05, "Reporting and Control of Nonconformances", paragraph 6.4 states, in part, "Upon discovery of a nonconforming condition it should be determined if an NCR is required. Work documents or NCR's shall be prepared to correct the nonconformance by rework or replacement. If the item cannot be reworked or replaced a Nonconformance Report shall always be originated."

This paragraph clearly establishes and acknowledges that a nonconforming condition exists. The question remaining is, can it be reworked, repaired, or used as is. If it can be reworked, then a work document such as the Work Request/Work Order can be used. If not, then an NCR must be written to get Engineering approval of the "repair" or use-as-is" and dispositioned.

NRC FINDING

Section 6.5 of NEO 3.05 tasks QA/QC to perform an evaluation of NCR's. The evaluation is to "determine if the NCR is valid, complete, and sufficiently detailed so the problem can be clearly understood and located." The steps following this section provide no guidance for determining validity. Discussion with a representative of the applicant's QA/QC department indicated that if an NCR could be written up on a Work Request, the QA/QC evaluator would invalidate the NCR. However, once the NCR has been invalidated and returned to the initiator, there is no explicit procedural instruction requiring the initiator to write up a Work Request.

RESPONSE

The validity review performed by Quality Assurance is for two reasons. First, to assure that a nonconforming conditions exists, and second to assure that items which can be reworked are reported using the Work Request/Work Order.

Clear guidance does exist in STA-405 for direction as to what must be done once an (NCR) is discovered. Paragraph 4.2.2.1 of STA-405 states:

— nonconforming condition
"The reporting of nonconformances that are on installed plant equipment shall normally begin with the initiation of a work request and work order, and notification of the Shift Supervisor."

NRC FINDING

Implementing Procedure STA-405, "Control of Nonconforming Materials", states that those identified nonconforming conditions that can be dispositioned by "rework" or "scrap" (i.e. replace) need not be reported on nonconformance reports. Again, as in NEO 3.05, it appears that the criteria for writing NCR's is the method of disposition, not the fact that an item is nonconforming. Additionally, the procedure is in variance with Section 3.9, paragraph 4 of the OAC/QAP above which requires an NCR to be prepared which identifies and describes the nonconformance.

RESPONSE

Section 3.9 paragraph 4 of the Operations Administrative Control and Quality Assurance Plant (OAC/QAP) states, in part:

"Materials, parts and components which are determined to be nonconforming, shall be identified and reported. Nonconformance reports shall be prepared which identify and describe the nonconformance, the disposition of the nonconformance and reinspection or testing performed to determine the acceptability of the item after the disposition has been completed.

The term "nonconformance reports" as used in this paragraph was intended to have a broader definition than Nonconformance Reports (NCR's). The practice of using Work Request/Work Order and previously Maintenance Action Requests as nonconformance reports has been in place since 1980. For nonconforming conditions dispositioned "rework" or "scrap", the WR/WO meet all the requirements for identifying and describing the nonconforming conditions, the dispositions, and the reinspection and/or testing.

NRC FINDING

The applicability statement of STA-405 requires nonconforming conditions discovered during receiving inspections to be identified as nonconformances. In addition, the definition of nonconformance defines deficient documentation as a nonconforming condition. Contrary to this, STA-405 also allows items which are nonconforming during receipt inspection to be placed in a "QC Hold" area without preparing an NCR.

Response

The practice described by this finding is accurate. However, procedure WHS-001, "Receiving and Inspection of Materials , Parts and Components", requires that the Receiving Inspection Report be checked UNSAT and the discrepancy be described in the "Remarks" section of the RIR. A Receiving Hold tag is then attached to the item and the item placed in a designated hold area. At this point an attempt is made to retrieve the missing documentation. If the missing documentation is retrieved then a reinspection is performed and, if acceptable, the RIR is checked SAT and the item accepted for placement into the warehouse. However, if the documentation is not received then an NCR is written.

COMPARISON OF NONCONFORMANCE CONTROL PROGRAM TO CRITERION XV

10CFR 50 Appendix B, Criterion XV, "Nonconforming Materials, Parts or Components" states:

"Measures shall be established to control materials, parts or components which do not conform to requirements in order to prevent their inadvertent use or installation."

This portion of Criteria XV is addressed in that STA-405 paragraph 4.1.1 requires that

"All station personnel are responsible for reporting nonconforming conditions discovered." There are two methods outlined in STA-405:

1) the Work Request/Work Order and 2) the Nonconformance Report (NCR).

10CFR 50 Appendix B, Criterion XV, "Nonconforming Materials, Parts or Components" states:

"These measures shall include, as appropriate, procedures for identification, documentation, segregation, disposition and notification to effected organizations."

These requirements of Criterion XV are met in the following manner:

- A. Identification - STA-405 requires that all personnel report nonconforming conditions. In addition, various inspection, engineering and maintenance procedures also require reporting of nonconforming conditions in accordance with STA-405.
- B. Documentation - After items are released from the warehouse STA-405 requires that a nonconforming condition be identified either by a Work Request /Work Order or an NCR. In the case of receiving, the item held pending receipt of documentation without writing an NCR are documented as and UNSAT on the Receiving Inspection Report. The RIR cannot be closed without the RIR item checked SAT or an NCR written.
- C. Segregation - Items received into the TU Warehouse are procedurally required to be segregated or otherwise identified as not being receipt inspected. Once inspection is performed and the item is determined to be nonconforming, it is further identified as nonconforming and placed in a Nonconforming Hold Area.

Items which are found nonconforming after release from the TU Warehouse generally cannot be segregated. However, items found nonconforming are identified by a Work Request Tag (when practical) which is placed on the nonconforming item. If an NCR is written, Hold Tags are used (when practical) to identify the nonconforming conditions.

Both the Hold Tag and the Work Request Tag are not attached under the following conditions:

- a. hanging the tag would be detrimental to the individual's safety;
 - b. the individual's exposure to radiation will be unnecessarily increased;
 - c. the item is on the main control board in the control room; and
 - d. the tag would interface with component operation.
- D. Disposition - All nonconforming items are dispositioned as rework, repair, scrap or use-as-is. Items which require engineering approval (repair and use as is) are documented on the NCR. Rework and scrap (replace) dispositions restore the item to an existing engineered condition.
- E. Notification - In the case of installed items found nonconforming while operating the plant, the shift supervisor is notified immediately so the plant can be placed in a safe operating condition should the condition warrant such an action. This requirement applies to the Work Request and the Nonconformance Report. In cases where and NCR or Work Request is generated on non installed items , the person responsible for correcting the condition is notified.

10CFR 50 Appendix B, Criterion XV, "Nonconforming Materials, Parts or Components" states:

"Nonconforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

These requirements of Criterion XV are met in the following manner:

The nonconformance control program requires that a nonconforming condition must be repaired, reworked, rejected (scrapped) or accepted (use as is). The nonconformance control program clearly defines these dispositions and provides measures to assure that engineering review is performed when necessary. All dispositions must be implemented in accordance with written procedures and/or instructions.

CONCLUSION

TU Electric finds that the nonconformance reporting program meets the provisions of 10 CFR 50 Appendix B Criterion XV. However, the TU Electric review of the program conducted as a result of the NRC finding revealed that improvements can be made in the program. A summary of these program enhancements which will be made follows:

- Revise the OAC/QAP to more clearly define the specific use of the Work Request/Work Order as a nonconformance report.
- Revise procedures to to clearly define the use of the term "invalidate."
- Revise WHS-001 to more clearly define placing items on hold without writing and NCR.
- Revise procedures to clearly describe the use of the Equipment History Program in identifying repetitive vendor deficiencies.
- Revise procedures to clearly describe Operations role and responsibility in timely review of Work Requests/Work Orders for 10CFR21 and 50.55(e) reportable conditions.

EXHIBIT 1

WORK REQUEST
Please Print

W/R# 38003

ORIGINATOR	TAG NO			DESCRIPTION		
	UNIT	SYSTEM	LEVEL	ROOM	OTHER	RADIATION CONTROLLED / REA <input type="checkbox"/> YES <input type="checkbox"/> NO
	PROBLEM / REQUEST					
SUPERVISOR	NAME			EXTENSION	DATE (MM/DD/YY)	DUE DATE (MM/DD/YY)
	EQUIPMENT			<input type="checkbox"/> Plant		<input type="checkbox"/> Non-Plant
	PRIORITY	<input type="checkbox"/> 11 - EMERGENCY <input type="checkbox"/> 12 - 24 HOUR <input type="checkbox"/> 21 - EXPEDITE <input type="checkbox"/> 32 - ROUTINE <input type="checkbox"/> 31 - EXPEDITE <input type="checkbox"/> 32 - ROUTINE				
	STATUS	UNIT - MODE <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6	SYSTEM <input type="checkbox"/> IN <input type="checkbox"/> OUT <input type="checkbox"/> EI	EQUIPMENT <input type="checkbox"/> IN <input type="checkbox"/> OUT <input type="checkbox"/> EI	CLEARANCE <input type="checkbox"/> YES <input type="checkbox"/> NO	OUTAGE <input type="checkbox"/> YES <input type="checkbox"/> NO
	TECH SPEC <input type="checkbox"/> YES <input type="checkbox"/> NO		START / /	TIME :	TIME LIMIT HRS	RESPONSIBLE ORGANIZATION <input type="checkbox"/> MM <input type="checkbox"/> EM <input type="checkbox"/> IC <input type="checkbox"/> MR <input type="checkbox"/> OTHER
REVIEW COMPLETE Signature					DATE	

STA 606 5

EXHIBIT 2

Print Date : XX/XX/XX

Page 1 of

WORK ORDER

WR # : XXXXXXXXXXXX

PRIORITY : XX

WORK ORDER # : CXXXXXXXXXX

Scheduled Date : XX/XX/XX

Rev. # : 0

Responsible Organization : XXXX XXXXXXXXXXXXXXXXXXXXXXXXXXXX

Quality Related : XX Safety Class : XX

TAG # : XXXXXXXXXXXXXXXXXXXX

ITEM/DESC: XXXXXXXXXXXXXXXXXXXXXXXXXXXX

Unit : XXX System : XXX Train : XX Bldg. / Elev. : XXXXXX Room : XXXXXXXX

PROBLEM OBSERVED/WORK REQUESTED

XX
 XX
 XX
 XX
 XX

ORIGINATOR : XXXXXXXXXXXXXXXXXXXX

Date Reported : XX/XX/XX

Conditional Release (Y/N) : _ # : _ - _

Tech Spec (Y/N) X Start (Time XX:XX Date XX/XX/XX) Req'd Compl. _ _ _ / _ _ _

***** CONDITIONS REQUIRED TO PERFORM WORK *****

Unit Mode : XX System : XX Equipment : XX

Special : _

***** SPECIAL INSTRUCTIONS *****

PERMITS: RWP : Y N # _ Confined Space Entry : Y N # _

FIRE : Y N

Combustible Loading : Y N

Clearance : Y N # _ - _ Cleaness Class : _ Housekeeping Zone : _

***** PREWORK REVIEWS *****

Y	N	FA	WELD	ISI	RR	RE	QC	ANII	Org.	AS
		FAILURE ANALYSIS								
		WELDING								
		INSERVICE INSPECTION								
		REPAIR/REPLACEMENT								
		RESULTS ENGINEERING								
		QUALITY CONTROL	IR	Y	N					
		AUTHORIZED NUCLEAR INSP.								
		PLANNING AND SCHEDULING								

Rev.	Date	FA	WELD	ISI	RR	RE	QC	ANII	Org.	AS

***** APPROVAL/AUTHORIZATION TO START WORK *****

Work Order Issued To : _____ Date : _/ _/ _

XXXXXXXXXXXXXXXXXXXXXXXXXXXX : _____ Date : _/ _/ _

Authorizing Supervisor (AS) : _____ Date : _/ _/ _

***** WORK COMPLETE *****

XXXXXXXXXXXXXXXXXXXXXXXXXXXX : _____ Date : _/ _/ _

QC Level II : _____ Date : _/ _/ _

Authorizing Supervisor : _____ Date : _/ _/ _

***** POST WORK REVIEWS *****

Failure Code : XX Activity Code : XX

Account # : XX

XXXX : _____ / _/ _ QC : _____ / _/ _

WELD : _____ / _/ _ ANII : _____ / _/ _

RR : _____ / _/ _ PS : _____ / _/ _

RE : _____ / _/ _

XXXXXXXXXXXXXXXXXXXXXXXXXXXX

