

NRC INSPECTION MANUAL

DQASIP

INSPECTION PROCEDURE 53055

CONTAINMENT PENETRATIONS (MECHANICAL) RECORD REVIEW

PROGRAM APPLICABILITY: 2512

53055-01 INSPECTION OBJECTIVES

To review a sample of containment penetration records to determine whether:

01.01 The licensee system for preparing, reviewing, and maintaining records is functioning properly.

01.02 The selected records reflect work was accomplished consistent with the specification and code requirements.

01.03 The records indicate any potentially generic problems, management control inadequacies, or other weaknesses that could have safety significance.

Inspection Schedule

May Be Started

After work is
30% complete.

Must Be Started

Before work is
50% complete.

Must Be Completed

Before work is
80% complete.

53055-02 INSPECTION REQUIREMENTS

Review licensee/contractor requirements covering the span of records for containment penetrations in safety-related areas. Determine who prepares each record and, importantly, who is required to review the records for accuracy and for assuring that the recorded information meets requirements. To determine whether the licensee/contractor system for documenting work is functioning properly, review two records in each of the following areas:

02.01 Receipt Inspection and Material Certification

- a. Records confirm that required material certifications, non-destructive tests (NDE), and other specification requirements were met.
- b. The penetration components were inspected for damage.

02.02 Installation and Testing Inspections

- a. Records confirm that specified components were installed as specified.

- b. Records confirm that the required inspections were performed in the right sequence to verify correct positioning, alignment, fitup, and NDE.
- c. Records indicate that required protection was provided after installation.
- d. Records indicate that the required leak testing has been satisfactorily completed.

02.03 Nonconformance/Deviation Records

- a. Records include current status of nonconformances/deviations.
- b. Records are legible, complete, have been reviewed by QC personnel and are readily retrievable.

02.04 Qualification Records of Craft, QA, and Inspection (QC) Personnel

- a. Records are complete and current.
- b. Records establish that personnel are adequately qualified for their assigned duties and responsibilities.

02.05 QA Audits

- a. Records indicate that the required audits were performed.
- b. Deficiencies identified during audits were corrected. Corrective action was such that repetition of the deficiency or similar deficiencies would be precluded.

53055-03 INSPECTION GUIDANCE

General Guidance

- a. Test reports and certifications should be compared with the purchase specifications and should be at the site. The records should be complete, legible, properly reviewed/approved, and retrievable for the inspector's review.
- b. The inspection records should confirm that installation inspections and testing activities were completed and that installation was performed as required.
- c. The inspector should bear in mind that the NRC's sample covers only a very small portion of the records involved. Thus, substantive errors or departures from requirements identified in NRC's sample raise the issue of whether the licensee is adequately controlling the process.
- d. Findings from this inspection activity should address each element as being satisfactory, being unresolved and requiring resolution, or being in violation and requiring correction. When significant inadequacies are identified in quality records, the inspector should inform cognizant regional supervision. The issue should be addressed at the appropriate level of licensee management. The licensee should be asked to verify that his record system is adequate when substantial errors are found.

03.01 Specific Guidance

Inspection Requirement 02.01. The receiving inspection records should indicate that the material characteristics specified by the purchase specifications have been verified. When

this is done by material certifications certifying compliance to purchase specifications, the certifications should be included in the site QA records.

53055-04 REFERENCES

Applicable portions of the SAR, including pertinent codes and standards referenced in these chapters

Regulatory Guide 1.88, Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records

Section 03 of Inspection Procedure 55050

Section 03 of Inspection Procedure 55100

END