



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

Assessment and Enforcement Program Development Workshop

December 18, 2007



Minor Violations and Findings

- Introduction to Minor Violations/Findings
- Minor Violations/Findings Screening Questions
- Examples of Minor Violations/Findings



Minor Categorization

- Minor categorization not significantly different than current definition in MC 0612E
- Failures to implement requirements that have insignificant safety or regulatory impact should normally be categorized as minor.
- While licensees must correct minor violations, minor violations or other minor findings **do not normally warrant documentation** in inspection reports or inspection records and **do not warrant enforcement action.**



Minor Violation General Categories

- Work in Progress – Special Category
- Record keeping issues - issues that can be corrected and do not preclude the licensee from demonstrating that plant equipment was adequately constructed.
- Insignificant dimensional, time, calculation, or drawing discrepancies characterized by minor discrepant values referred to in either the licensee's Final Safety Analysis Report (FSAR) or design documents.
- Insignificant procedural errors - procedural errors or inadequate procedures that have no actual impact on safety equipment or personnel safety.
- Insignificant engineering or construction errors where plant equipment was not installed exactly as designed but still can perform its intended safety function in all respects.



Special Category Work in Progress

- Definition: Issues that are still being handled at the craft/working level which have not been accepted by appropriate independent review and/or quality assurance.
- Work in progress category acknowledges that licensee quality program would likely have found and corrected the problem, but
- NRC does not expect inspectors to stand by and allow licensees to proceed into noncompliance.



Minor Violations Initial Screening Review

- Determine if activity is still “work in progress” – if yes finding is minor.
- If no, compare finding with the appropriate category and condition examples for assist in determination if finding is minor.
- If match is not found, use screening questions for assist in determination.



Minor Violation Screening Questions

An answer of “yes” to any of the following questions determines that the finding should be considered more than minor.

- (1) Does the finding represent an improper or uncontrolled work practice that impacted the quality of SSCs that have ITAAC?
- (2) Does the finding represent non-compliance with the requirements of a design or fabrication code required by 10 CFR 50.55a?
- (3) Does the finding represent an inadequate process, procedure, or quality oversight function, that if left uncorrected, could adversely affect the quality of the fabrication, construction, testing, analysis, or records of an SSC that has ITAAC requirements?
- (4) Does the finding represent a deviation, that if left uncorrected, could adversely affect the environmental or seismic qualification of an SSC?



Examples of Minor Violations/Findings

Record Keeping Issue.

The Welding Engineering Unit (the organization responsible for generation and issuing of weld maps (WMs) and weld map change requests (WMCRs)) were not controlling the WMs and WMCRs through the normal Document Control and Records Management system.

Violation. Failure to follow licensee procedure for the control of documents and records.



Enforcement Examples

Record Keeping Issue (continued).

Minor if... The control system used by the Welding Engineering was similar to the control system used in the normal Document Control and Records Management system, and personnel using WMs and WMCRs were familiar with the system.

Greater than minor if... Weld map change requests were being processed against superseded weld maps, or superseded weld maps were being used in the field for inspection and documentation of ITAAC-related welding activities.



Enforcement Examples

Certain Fabrication Discrepancies.

A Seismic Class I support in the reactor turbine building was fabricated using 4-inch tube steel, the inspector noted that the plan required the use of 3-inch tube steel for this particular support.

The violation. Failure to follow procedure for installation of Seismic Class I supports.



Enforcement Examples

Non-significant Drawing Discrepancies (continued).

Minor if... The support design is such that the use of the larger structural shape does not degrade the final support, or affect the seismic qualification, (e.g., the support is a tripod or box design with all the weight of the support directly transferred to the foundation,) and the use of over-size material is documented in the corrective action program.

Greater than minor if... The support design is such (e.g., cantilever structure attached to a building support,) that the additional weight from the over-size material causes increased stress on the attached structure and a negative affect on seismic calculations.



Enforcement Examples

Procedural Errors.

A contractor crew was found to be using a fabrication drawing which did not have a recently issued change notice attached.

The violation. Failure to follow procedure for control of procedures, drawings, and plans.

Minor if... The recently issued change notice did not have any impact on the section of the drawing in use by the contractor crew, and the incident was noted in the licensee's corrective action program.

Greater than minor if... The change notice contained information that had an affect on the work activities in progress, or the acceptance criteria for the finished product.



Enforcement Examples

Work in Progress.

Bends in stainless steel piping were made using an unapproved and unqualified pipe bender in accordance with an unapproved and unqualified pipe bending procedure.

The violation. Failure to follow ASME requirements for qualification of pipe bending equipment.

Minor if... Qualification status of the pipe bender and the approval and qualification of the pipe bending procedure were discovered prior to the pipe bends being approved for welding into the system.

Greater than minor if... Pipe bends were approved for welding into the system and subsequent inspection found that areas of the wall thickness on one or more of the pipe bends were below minimum wall thickness requirements.



Enforcement Examples

Work in Progress

Discovery of the failure to install lock nuts on three anchor bolts of a safety related vertical steel structure. Installation of the lock nuts was specified by the applicable construction drawing. The installation of the columns had been considered to be complete by the project contractor installing the column and its bolting.

The violation. App B, Criterion V, Failure to follow requirements of drawing for a safety related structure.

Minor if... Structure had not yet received required QC review or been accepted by the licensee, and the lock nuts were to provide protection against loosening of anchor bolts due to service induced vibration.

Greater than minor if... QC review failed to identify, or structure accepted by the licensee, or if acceptance by project installation contractor constituted final acceptance for the project.



Conclusions and Recommendations

- Workshop Summary
- Next steps
- Public Meeting Schedule:
January 31, 2008
Early March 2008