

Activity Work Package Control

- 1.0 Purpose* This guideline provides a method to evaluate the preparation, use, and control of modification work packages that provide modification instructions for systems, components, instruments, or controls.
- 2.0 Scope* This guideline has been developed for use in the review and evaluation of work packages relating to modifying, maintaining, repairing, reworking, replacing, or adjusting plant critical structures, systems, and components (CSSC) items.

References

1. USNRC I&E Manual Chapter 37828B, "Modifications and Changes to Facility and Systems" 10/76.
2. INPO Good Practice 85-013, "Plant Modification Control Program."

3.0 Guidelines

3.1 In preparation for and during the conduct of this surveillance

- Obtain and review implementing procedures, instructions, and drawings governing this activity.
- Prepare a guide or checklist using the selected items from this guideline.
- Review past surveys, audits, surveillances, and other evaluations/assessments.
- Ensure that checklists include, where applicable, actual observations of performance, i.e., general plant conditions, radiological work practices, housekeeping, work document controls and use, and safety practices.

Note: Refer to Chapter 1 for specific details on the attributes listed above.

3.2 For this evaluation, select work packages involving work being planned, already underway, or previously conducted on structural, mechanical, electrical, and instrument and control CSSC items. Work package development activities should be evaluated in each technical discipline. The sample selected can include those routine or periodic lubrications, inspections, adjustments, or part replacements that do not require step-by-step details, but should also consider those other cases where special skills and more detailed instruction is necessary, e.g., pump/motor alignments, safety valve adjustments, tube plugging, and modifications.

3.3 Select work packages from each of the technical areas for verification of the following:

- A. Work packages are being legibly prepared. Sections of the form that are not applicable should be appropriately marked or deleted. Confirm that a controlled system exists for the initiation of work packages by designated personnel and that status of open, closed, late, and incomplete work packages is maintained and correct.
- B. Changes to the work description, referenced work instructions, detailed step-by-step work guidance, or other pertinent information are properly identified and approved.

- C. The work description should be clearly worded and provide an accurate description of the reason for initiating the work activity. Confirm that CSSC equipment is correctly identified. The initiating organization should have access to the Q List for determining this equipment category.
 - D. The work instructions to conduct the activity can be detailed or reference can be made to approved plant instructions. Confirm that current revisions are identified.
 - E. Quality control (QC) hold/witness points should be established. QA review of the work package should be indicated according to site-specific instructions.
 - F. Housekeeping and cleanliness acceptance criteria and foreign material exclusion considerations should be provided. Attention should be given to the use of approved lubricants, sealant compounds, tapes, etc.
 - G. Instructions are provided or procedures referenced for control of special processes such as welding, NDE, cleaning, hydrostatic/pneumatic testing, application of protective coatings, etc. Acceptance criteria should be identified for specific modification work instructions.
 - H. Requirements are noted, when applicable, for the identification of measuring and test equipment (M&TE).
 - I. Warnings, safety precautions, and fire protection actions to be observed to ensure personnel safety and avoid equipment or system damage are provided.
 - J. When ASME Section XI work is indicated, the work package should provide for authorized inspection agency (AIA) representative notification and approval of the work plan, performance of new baseline inspections, and documentation preparation and approval.
 - K. Confirm that entries are being made on the work package identifying requisition numbers for spare parts and components.
 - L. Consider the potential for maintenance-initiated common mode failures for activities such as calibrating or adjusting setpoints for reactor protection devices. Confirm for work packages that check or adjust setpoints for reactor protection and engineered safety features instrumentation that the work package provides for independent verification of the as-left calibration. Alternatively, the work package could provide for control of redundant conditions by defining personnel and measuring the test equipment (M&TE) limits for the number of channels that can be adjusted.
 - M. Confirm that the modification work package has been authorized by a responsible person.
 - N. Confirm that the results of modification activities are being documented in the work package.
 - O. Determine if post-activity tests are noted in the work package.
- 3.4 Confirm that the work package or adjunct procedure provides for permission from the shift engineer or his equivalent representative before plant equipment is removed from service. Equipment control considerations for operations personnel who establish plant conditions for the work, provide electrical or mechanical

isolation, depressurize or drain systems, etc., and return systems to service should be provided in established site clearance procedures.

3.5 By review of completed work packages confirm that modification records for plant equipment are being prepared and retained that detail, among other things, repairs affected, tests conducted, parts replaced, and work package number.

3.6 Work packages should be maintained in accordance with document control procedures.

3.7 Ensure that deficiencies are noted on appropriate nonconformance documents.

4.0 Other Guidelines for Consideration

4.1 See Chapter 1, "General Quality Surveillance Guidance."