

Activity On-Site Contractor Control

1.0 Purpose This guideline provides a method for evaluating the implementation of contractor controls at nuclear power plants.

2.0 Scope This guideline has been developed for the review and evaluation of the following areas:

- QA program.
- Personnel qualifications.
- Control of work activities.

References

1. NRC I&E Chapter 3500, "Quality Assurance."
2. Site QA Plan.
3. ANSI N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."
4. SNTTC-1A.

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, 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 Review the on-site acceptable suppliers' list and select a contractor or contractors who are presently performing or will be performing service contracts.

3.3 Verify the following by observation and/or inspection:

- A. The contractor has a QA program, applicable to the contract activities, which conforms to the applicable portions of ANSI N45.2 or 10CFR50, Appendix B, and it is being acceptably implemented.
- B. In lieu of having a documented and approved QA program, the activities are placed under the utility's own QA program.
- C. The contractor's quality personnel are knowledgeable of the QA program requirements.

- D. Contract personnel have been or are being trained (or qualified) to any applicable utility/industry requirements and records maintenance requirements.
 - E. If applicable, personnel have been or are being certified and possess evidence of certification when on-site in accordance with SNTFC-1A and ANSI N45.2.6.
 - F. If applicable, the contractor's NDE procedures have been approved by an authorized nuclear inspector and a utility NDE Level III individual for compliance to Sections III, V, and XI of the ASME code and the AWS structural welding code D1.1
 - G. Final radiographs and other NDE records generated by the contractor are reviewed by a utility NDE Level III individual.
- 3.4 Using applicable guidelines, observe and evaluate the work activity. Also, check for the following:
- A. Verify, by observation or other method, that contractors provide the utility right of access to the work, whether on- or off-site, to perform QA audits, inspections, or surveillances."
 - B. Verify, by observation or other method, that contractors are documenting, evaluating, and resolving conditions adverse to quality in accordance with the approved program and contract.
 - C. For work currently being performed in radiologically controlled areas, verify the following by field observation:
 - 1. The contractor complies with all radiological control (RADCON) signposting.
 - 2. The contractor complies with all radiological work permit requirements.
 - 3. The contractor complies with utility requirements on eating, smoking, drinking, or use of tobacco products within radiologically controlled areas.
 - 4. The contractor complies with dosimetry requirements.
 - D. Verify, by observation or other method, that contractors are being monitored by site management.
 - E. Verify, by observation or other method, that the work scope is governed by approved and controlled drawings, procedures, and instructions. If the activity is controlled by utility drawings, procedures, and instructions, verify that the contractor personnel have been appropriately trained in their application.
 - F. Verify, by observation or other method, that the activity is being reviewed, inspected, and/or tested to establish product acceptability.
 - G. Verify, by observation or other method, that contractor-supplied items were procured in accordance with an approved QA program, meet utility design requirements, and are traceable to the procurement document and point of installation.
 - H. Verify, by observation or other method, that the contractor-furnished tools and equipment requiring certifications and/or calibration are certified under the contractor's QA program prior to use, are being calibrated and controlled, and

there is objective evidence of certification/calibration on-site.

- I. Check equipment such as liners, high-integrity containers, tanks and vessels, piping and connections, valves, instrumentation and controls, control panels, and other important system components to the requirements of the contract.
- J. Verify, by observation or other method, that QA records are being generated in accordance with procurement document requirements.
- K. Verify, by observation or other method, that contractors comply with the requirements for contaminated tool and equipment control.
- L. Verify, by observation or other method, that all the necessary work permits have been obtained, such as:
 - 1. Clearances.
 - 2. Burning permits.
 - 3. Scaffold permits.
 - 4. Combustible permits.
- M. Verify that there is a method for acceptance of any work performed by the contractor.

4.0 Other Guidelines for Consideration

- 4.1 See Chapter 1, “General Quality Surveillance Guidance.”