

Activity: Corrective Action

- 1.0 Purpose: This guideline provides a method for evaluating the implementation of corrective action systems.
- 2.0 Scope: This guideline encompasses those elements that control corrective action identification, evaluation, trending, tracking, verification and document control.
- 3.0 References:
- 3.1 ANSI 18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"
- 3.2 10CFR50 Appendix B Criterion XVI, "Corrective Action"
- 3.3 NRC I&E Procedure 42941B, "Control of Nonconformances and Corrective Action"
- 4.0 Guidelines:
- 4.1 In preparation for and during the conduct of this surveillance:
- E Obtain and review implementing procedures, instructions and drawings governing this activity.
- E Prepare a guide or checklist using the selected items from this guideline.
- E Review past surveys, audits, surveillances and other evaluations/ assessments.
- E 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 Guideline A.1, "General Quality Surveillance Guidance," for specific details on the attributes listed above.

4.2 Corrective actions may be generated whenever conditions such as those described below are identified, but not limited to:

- A. Evidence of repetitive failures.
- B. Evidence of abnormal or unexpected wear.
- C. Evidence of design deficiencies.
- D. Any nonconformance of items contrary to specified requirements.
- E. Receipt inspection rejections.
- F. Test deficiency involving failure of an item to meet acceptance criteria.
- G. Deficiencies identified by internal audits, surveillances, inspections.
- H. Deficiencies identified by external audits and inspections.
- I. Adverse trends.

4.3 Within a "reasonable period" of the date the problem was identified to the responsible organization assure that:

- A. The document was reviewed for its impact on station operation and reportability.
- B. If hardware is involved, the item is tagged, controlled and segregated to prevent inadvertent use.
- C. An evaluation for significance is performed.
- D. Generic implications are identified.
- E. If the item is significant, a root cause analysis is conducted.

F. A corrective action plan is developed to correct the specific problem.

G. A corrective action plan is developed to prevent recurrence of significant problems.

4.4 Effective corrective action systems should assure that:

A. Corrective action plans are tracked.

B. Extensions beyond committed "due dates" are granted only with approval of appropriate levels of management.

C. Corrective action commitments are verified complete prior to closure.

D. Corrective action commitments are incorporated, as appropriate, into controlled documents, systems, etc. to prevent recurrence.

5.0 Other Guidelines for Consideration:

5.1 A.1, "General Quality Surveillance Guidance"

5.2 M.6, "Nonconformances"

5.3 M.10, "Program Review/Audit"

5.4 M.17, "Inspection"