

PAGE FROM PROOFS FILE "APPROVED RECORDS"

BPVC Section XI

WGGR Record Number 16-2520

Page 1 of 3

Wording of Previously Approved Record 14-1483

Revised Wording to Provide Needed Clarity
for Evaluation Recording and Reporting
(Changes shown in gray highlights)

IWA-1400 OWNER'S RESPONSIBILITY

...

NOT PART OF PREVIOUSLY APPROVED RECORD 14-1483

NOT PART OF PREVIOUSLY APPROVED RECORD 14-1483

...

(q) recording of regions in components where flaws or relevant conditions exceeding the acceptance standards have had an analytical or engineering evaluation performed to allow continued operation as permitted by IWB-3132.3, IWC-3122.3, IWE-3122.3, IWL-3112, IWL-3212, and IWL-3222. Any continued operation time or cycle limits inherent in the evaluation shall also be recorded.

IWA-6230 OWNER'S ACTIVITY REPORT

...

(b) For preservice and inservice examinations ...

(1) A listing of the items with flaws or relevant conditions that exceeded the acceptance criteria of Division 1 and that required analytical or engineering evaluation to continue service, as permitted by IWB-3132.3, IWC-3122.3, IWE-3122.3, IWL-3112, IWL-3212, and IWL-3222, shall be provided with the information and format of Form OAR-1, Table 1. This information is required whether or not the flaw or relevant condition was discovered during a scheduled examination or test.

IWA-6340 INSERVICE INSPECTION RECORDS

...

NOT PART OF PREVIOUSLY APPROVED RECORD 14-1483

IWA-1400 OWNER'S RESPONSIBILITY

...

(l) maintenance of adequate inspection, examination, test, evaluation, and repair/replacement activity records such as radiographs, diagrams, drawings, calculations, examination and test data, description of procedures used, and evidence of personnel qualifications.

(m) retention of all inspection, examination, test, and repair/replacement activity records and evaluation calculations for the service lifetime of the component or system.

...

(q) recording of regions in components where flaws or relevant conditions exceeding the acceptance standards have had an evaluation performed to allow continued service, in accordance with IWB-3132.3, IWB-3142.4, IWC-3122.3, IWC-3132.3, IWD-3132.3, IWE-3122.3, IWF-3112.3, IWF-3122.3, IWL-3112, IWL-3212, and IWL-3222. Any continued service, time or cycle limits inherent in the evaluation shall also be recorded.

IWA-6230 OWNER'S ACTIVITY REPORT

...

(b) For preservice and inservice examinations ...

(1) A listing of the items with flaws or relevant conditions that exceeded the acceptance criteria of Division 1 and that required evaluation determine acceptability for continued service, in accordance with IWB-3132.3, IWC-3122.3, IWE-3122.3, IWL-3112, IWL-3212, or IWL-3222, shall be documented on Form OAR-1, Table 1. This information is required whether or not the flaw or relevant condition was discovered during a scheduled examination or test.

IWA-6340 INSERVICE INSPECTION RECORDS

...

(d), records of evaluations performed to accept flaws or relevant conditions that exceeded acceptance standards

Commented [RKR1]: Use this generic "evaluation" term to cover all evaluation types used by approved SGWCS record 15-208
Deleted: analytical
Deleted: analytical
Commented [RKR2]: Use this generic "evaluation" term to cover all evaluation types used by approved SGWCS record 15-208
Commented [RKR3]: Revert back to this generic "evaluation" term to cover all potential evaluation types used by approved SGWCS record 15-208
Deleted: analytical or engineering
Commented [RKR4]: Service is the term used in most "acceptance by evaluation" paragraphs
Deleted: operation
Deleted: as permitted
Commented [RKR5]: Revised as an editorial comment to address Mr. Bellamy's ballot comment to make "in accordance with" wording of this paragraph consistent with the wording of IWA-6230(b)(1) below Change accepted by Mr. Bellamy
Commented [RKR6]: Add back five previously deleted "acceptance by evaluation" paragraph references for this record keeping requirement
Deleted: IWB-3142.4,
Deleted: IWC-3132.3, IWD-3132.3,
Deleted: by
Deleted: IWF-3112.3, IWF-3122.3, and
Commented [RKR7]: Service is the term used in most "acceptance by evaluation" paragraphs
Deleted: operation
Commented [RKR8]: Revert back to this generic "evaluation" term to cover all potential evaluation types used by approved SGWCS record 15-208
Deleted: analytical or engineering
Deleted: to
Deleted: determine acceptability
Deleted: as permitted
Deleted: by
Commented [RKR9]: Included all "acceptance by evaluation" paragraph references that require reporting in Form OAR-1, Table 1 by approved SGWCS record 15-208. The list is a subset of the evaluations recorded in IWA-1400(q) above.
Deleted: and
Deleted: provided
Commented [RKR10]: Other wording changes were made to support reporting clarity
Deleted: with the
Deleted: information and format of
Deleted: records of flaw acceptance by analytical evaluation
Commented [RKR11]: Used this generic "evaluation" term to cover all potential evaluation types used by approved SGWCS record 15-208 Also included existing "flaws or relevant conditions" wording found in IWA-1400(q) and IWA-6230(b)(1)

PAGE FROM FILE "2017 PROOFS"

ARTICLE IWA-6000 RECORDS AND REPORTS

IWA-6100 SCOPE

This Article provides the requirements for the preparation, submittal, and retention of records and reports.

IWA-6200 REQUIREMENTS

IWA-6210 RESPONSIBILITIES

(17) IWA-6211 Owner's Responsibilities

(a) The Owner shall prepare plans and schedules for preservice and inservice examinations and tests to meet the requirements of this Division.

(b) The Owner shall prepare records of examinations, tests, and repair/replacement activities.

(c) The Owner shall complete the Owner's Activity Report, [Form OAR-1](#), for preservice and inservice examination of pressure-retaining components and their supports, and core support structures. For preservice examinations performed prior to placement of the unit into commercial service, [Form OAR-1](#) shall be completed. For preservice and inservice examinations performed following placement of the unit into commercial service, [Form OAR-1](#) shall include records of examinations, tests, and repair/replacement activities completed since certification of the preceding [Form OAR-1](#). [Form OAR-1](#) shall be completed as required by [IWA-6230](#).

(d) The Owner shall prepare the Owner's Repair/Replacement Certification Record, [Form NIS-2](#), upon completion of all required activities associated with the Repair/Replacement Plan necessary to place the item in service.

(e) All [Form NIS-2s](#) associated with repair/replacement activities performed since certification of the preceding [Form OAR-1](#) shall be completed prior to the completion of [Form OAR-1](#).

(f) When the Owner contracts a Repair/Replacement Organization to perform repair/replacement activities, the Owner shall require the Repair/Replacement Organization to provide a document certifying its repair/replacement activities. [Nonmandatory Appendix T²⁰](#) provides a report form that may be used for contracted repair/replacement activities and that will assist the Owner in completing and filing [Form NIS-2](#).

IWA-6212 Contracted Repair/Replacement Organization's Responsibilities

A contracted Repair/Replacement Organization shall prepare a document, acceptable to the Owner, certifying its repair/replacement activities. [Nonmandatory Appendix T²⁰](#) provides a report form that may be used for contracted repair/replacement activities and that will assist the Owner in completing and filing [Form NIS-2](#).

IWA-6220 OWNER'S REPAIR/REPLACEMENT CERTIFICATION RECORD

(a) A Repair/Replacement Plan shall be prepared in accordance with [IWA-4150](#) for all repair/replacement activities, including rerating, and shall be given a unique identification number.

(b) Upon completion of all required activities associated with the Repair/Replacement Plan, the Owner shall complete [Form NIS-2](#), as shown in [Mandatory Appendix II](#).

(c) [Form NIS-2](#) shall be completed after satisfying all Section XI requirements necessary to place the item in service and prior to completion of [Form OAR-1](#).

(d) [Form NIS-2](#) shall be certified by the Owner and presented to the Inspector for the required signature.

(e) The certified [Form NIS-2](#) shall be retained by the Owner in accordance with [IWA-6350](#).

(f) The Owner shall maintain an index of Repair/Replacement Plans.

IWA-6230 OWNER'S ACTIVITY REPORT

(17)

(a) [Form OAR-1](#) for the preservice examinations shall be completed prior to the date of placement of the unit into commercial service.

(b) For preservice and inservice examinations performed following placement of the unit into commercial service, [Form OAR-1](#), as shown in [Mandatory Appendix II](#), shall be processed as specified below within 90 calendar days of the completion of each refueling outage.

(1) A listing of the items with flaws or relevant conditions that exceeded the acceptance criteria of Division 1 and that required analytical or engineering evaluation to determine acceptability for continued service in accordance with [IWB-3132.3](#), [IWC-3122.3](#), [IWE-3122.3](#), [IWL-3112](#), [IWL-3212](#), or [IWL-3222](#), shall be documented on [Form OAR-1](#), [Table 1](#). This information is required whether or not the flaw or relevant condition was discovered during a scheduled examination or test.

PAGE FROM MY 3/2017 ERROR NOTIFICATION TO LAUREN

Problem No. 2:

A mistake was made incorporating Record 16-2520 revisions into paragraph IWA-6230(b)(1). The following two phrases were not deleted: "analytical or engineering" and "to determine acceptability".

Background:

Record 14-1483 revisions associated with IWA-6230(b)(1) included the addition of the first phrase. Subsequently, Record 16-2520 modified IWA-6230(b)(1) again by deleting the added phrase. Record 16-2520 also deleted the second phrase from original 2015 Edition wording.

2017 IWA-6230(b)(1):

Following the incorporation of all revisions from the two records, the final paragraph should read as shown below.

IWA-6230 OWNER'S ACTIVITY REPORT

...

(b) For preservice and inservice examinations ...

(1) A listing of the items with flaws or relevant conditions that exceeded the acceptance criteria of Division 1 and that required evaluation for continued service in accordance with IWB-3132.3, IWC-3122.3, IWE-3122.3, IWL-3112, IWL-3217, or IWL-3222, shall be documented on Form OAR-1, Table 1. This information is required whether or not the flaw or relevant condition was discovered during a scheduled examination or test.