Foreign Material Control for Workers

Let's Talk Safety!!



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Why is FME Important



This problem was traced to a rag left in a brake line (used to stop tire rotation during gear retraction) during the plane's assembly. This caused the wheel to lock up upon landing. One rag caused a several million dollar accident and the near death of the two pilots.

Why is FME Important



 The Space Shuttle Columbia was the first space worthy shuttle in NASA's orbital fleet. It was destroyed during re-entry over Texas on February 1, 2003 after a hole was punctured in one of the wings during launch 16 days earlier when struck by insulation debris off of the Solid Rocket Booster.

Terminal Objective

Upon successful completion of this course, participants will be able to implement the **Nuclear Power Group (NPG) Foreign** Material Exclusion [FME] program as detailed in Standard Programs and Process SPP-6.5. In order to demonstrate their knowledge, students must score > 80% on a written examination.

Enabling Objectives

- 1. State the purpose of the FME Program as described in SPP-6.5.
- 2. Define the term Foreign Material and give examples and affects.
- 3. Identify the two levels of FME coverage.

Enabling Objectives

- 4. Describe the responsibilities of the following, emphasizing their roles in preventing entry of Foreign Material [FM] into a system or component.
 - Planner
 - Work Supervisor or Designee
 - Worker
 - Foreign Material Exclusion Monitor
- 5. Define the steps to be taken upon suspension of a job within a FME Zone.

Enabling Objectives

- 6. Identify steps required for recovery from loss of FME control as stated in SPP-6.5.
- 7. Describe the proper documentation to include purpose and use of the following procedure attachments.
 - FME Accountability Log
 - Foreign Material Control Requirements Sheet
 - Overhead Crane FME Pre-Operational Inspection
 - Foreign Material Control Exemption
 - FME Plan

Introduction

Nuclear power is but one of many industries that have been plagued by problems caused by foreign material. We have made great strides forward in its prevention, but still requires further diligence from everyone.

NPG's FME program has been successful in addressing most of these issues, but we are still seeing problems with breaches in fuel cladding.

FME can be summarized as <u>"Attention to Detail"</u> in the work that you perform.

Purpose of FME Control

To establish the requirements for maintaining cleanliness by preventing the uncontrolled introduction of foreign material into open systems or components and the recovery from intrusion of foreign material.

Emphasis is Always "FOCUS ON PREVENTION"

What is Foreign Material?

Materials that are not part of the systems/component design.

















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Types of Foreign Material

Welding slag



Shavings/Grinding dust



Bristles from Wire Brushes





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Types of Foreign Material

Foreign material from protective coverings:

Stripped paint & paint chips

Wire insulation





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Types of Foreign Material

Building material & Tools

Dirt & debris

Equipment parts

Does your job affect others?



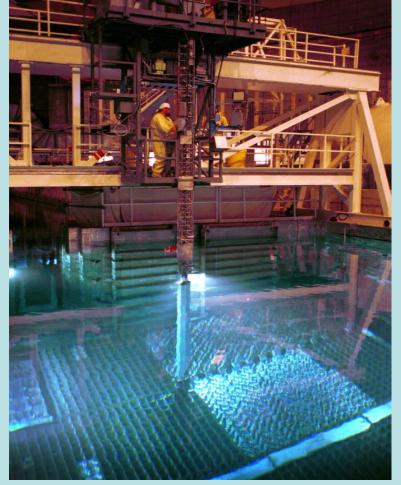
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Effects on Plant Performance

Damage to Fuel





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Effects on Plant Performance

- Corrosion
- Wear of equipment



Effects on Plant Performance

Impact damage caused by roll of paper towels. This resulted in 8 million dollars of damage.



Effects Plant Performance

Radiation Hot Spots



Radioactive Waste



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Cobalt Information

ALARA CONCERN!



Stellite contains a high percentage of cobalt which is highly radioactive via neutron bombardment

1 gram of Cobalt simulated for demonstration purposes

1 gram of Co-60 = 17,000 R/hr at contact!

(1 gram is equal to ~1/28 of an ounce)

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Foreign Material Here Can Kill

A dropped part in electrical equipment can cause an arc

- ✓ Do not leave Electrical Components open or uncovered.
- ✓ Do not allow a part or a tool to drop into electrical equipment.
- ✓ If you leave the equipment for a break, lunch or the night

CLOSE IT OR COVER IT!





Foreign Material Effects Everyone

- Loss of generation
- Increases maintenance costs
- Increases radiation exposure
- Shortens life of parts/equipment



FME Level 1 Zone (High Risk)

Established when the most restrictive controls are necessary to prevent the introduction of foreign material into a system or component.

FME Level 1 Zone (High Risk) Criteria

- Loss of FME Integrity could result in:
 - Personnel injury
 - Nuclear fuel failure
 - Reduced safety system or station availability
 - Outage extension
 - Significant cost for recovery



FME Level 1 Zone (High Risk) Criteria

- Final visual inspection of internal cleanliness before system closure is not possible.
- Increased risk to systems, components, or structures.
- Work on systems listed in Appendix B with process stream open.

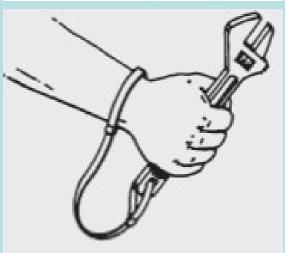




FME Level 1(High Risk) Zone Requirements

- Assign a Monitor
- Establish tool and material accountability
- Lanyard use
- Establish Zone Boundary
- Establish Buffer Zone

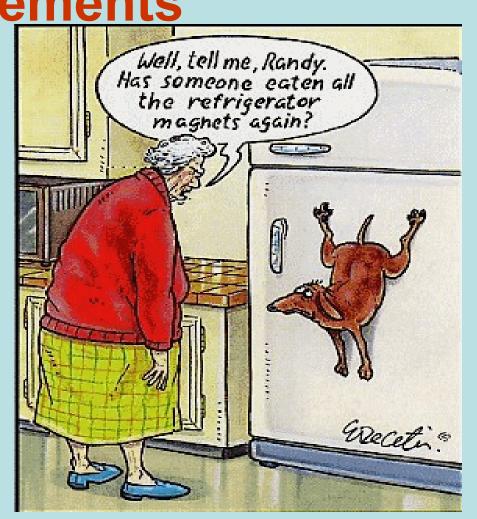




FME Level 1(High Risk) Zone Requirements

 Record items entering and exiting the FME Zone.

 Personnel entering the zone are accountability for securing their personal objects.



FME Level 1(High Risk) Zone Requirements

- Any time a crane passes over a FME Zone 1:
 - Preoperational walkdown
 - Remove or secure personal items
 - Secure items inside the cab
 - Post/Control crane as a FME Zone 1



FME Level 2 Zone (Moderate Risk)

Established for work that doesn't meet FME Level 1 criteria

FME Level 2 (Moderate Risk) Criteria

Work in areas with electrical contacts such as cabinets, panels, racks, boards, breakers, and other components.



FME Level 2 Zone (Moderate Risk) Criteria

- Final visual inspection of internal cleanliness before closure.
- Open SSC not meeting Level 1 criteria.





FME Level 2 Zone

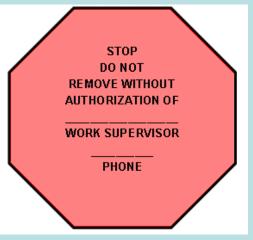
(Moderate Risk) Requirements

Lanyards used on items smaller than opening (Failsafe)

Maintain zone cleanliness per SPP-10.7

Use temporary Stop signs & covers when unattended







SELF-MONITORING

- Certain "NON-INTRUSIVE"
 work applications may be
 self-monitored, even on
 SSC work classified as
 High Risk on Appendix B.
- FME Monitor or Accountability Log is not required.
- Use of lanyards is required if introduction into SSC exists.



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SELF-MONITORING

- List of activities:
 - Instrument calibrations
 - Operation's rounds
 - Chemistry activities
 - Opening Elec. Cabinets
 - Adding oil to components
 - Non-intrusive PDM activities
 - Crane operation over a FMEZ 2 or with no load over a FMEZ 1
 - Other activities authorized by the FME coordinator



Work Planner Responsibilities

- Determines if system is to be opened
- Recommends what FME controls to be used
- Request evaluation for a reliable replacement gasket for components with a metallic crush style gaskets



Work Supervisor

- Verifies recommended FME control requirements.
- May increase controls as necessary.
- Verifies that the work to be performed will not affect or be affected by other activities in the area.



Work Supervisor

- Verifies ventilation systems won't inadvertently cause FME issues.
- Installation/Removal of protective cover is used (if needed) and documented in WID.
- Create FME Plan for all Level 1 Zones.



FME Plan Guidelines

- Discuss FME in Prejob briefs.
- Use FME covers
- Periodic
 Housekeeping
 Inspections
- As-Found and As-Left Zone Inspections
- Tooling and/or Material Control



FME Plan Guidelines

- Tooling pre-use inspections
- Accountability Logs
- Access to Confine Space zones
- Personnel badges and coverall requirements
- Removal of all personal articles



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FME Plan Guidelines

- Cutting, burning, grinding operations
- Control of filler material used in welding
- Instructions on how to recover from a loss of FM control
- Flushing requirements

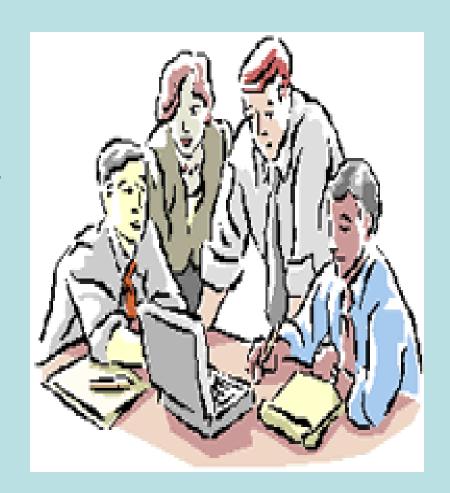


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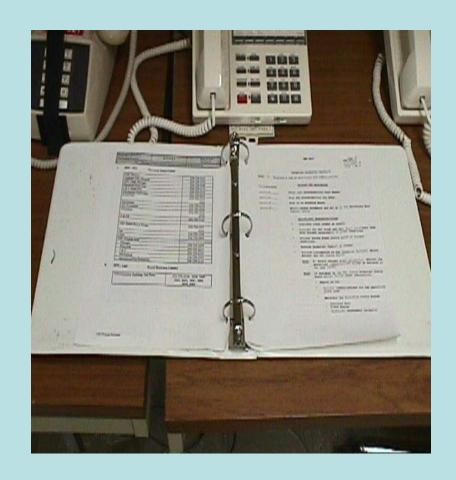
Work Supervisor/Designee

- Provide pre-job briefings
- Obtain qualified monitor
- Defines FME Zone boundaries
- Ensures Attach. 2 is in WID
- Ensures all prereq's have been met prior to opening a SSC
- Initial inventory and accountability log is maintained



Work Supervisor/Designee

- Ensures workers meet training requirements
- Ensures FME and cleanliness criteria have been met
- Witness closure
- Daily field observations



Worker Responsibilities

- Establishes FMEZ 1 boundaries using FME tape
- Cleans zone and surrounding area including overhead
- Removes nonessential material from FMEZ



Worker Responsibilities

- Erect a clean enclosure around the zone (if req'd)
- Verify ventilation system won't introduce debris into zone
- Examines all items for loose or missing parts
- Ensures all items are made fail-safe
- Clean all old/new components
 & parts of protective coatings.



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- Notify Monitor upon entering & exiting the zone
- Ensure external surfaces are clean
- Removes all personal items
 - Watches
 - Rings
 - Necklaces / Bracelets



What's wrong with this picture?

- Ensure areas around and below the zone are protected from items being dropped
- Examine all items going in for loose or missing parts
- Caution should be taken when opening systems with metallic crush style gaskets
- Use only approved chemicals



- Visually inspect system internals for FM immediately after breaching
- Inspect internals that will not be accessible as work progresses.
- Ensure system
 cleanliness before final
 closure



- In FME Zone 1
 - Log work gloves and paper
- For FME Zone 1 & 2
 - Log installation/removal of placing any temporary material in the SSC
 - Pipe plugs
 - Dams
 - barriers



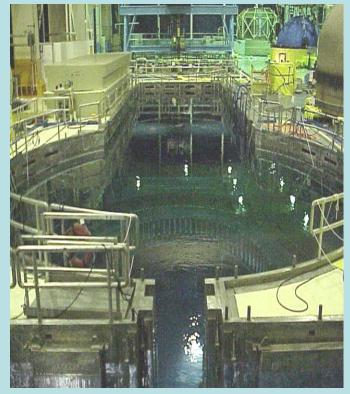


- Cleans immediately following system breaches and as work progresses
- Stop all work if FME control is lost
- Uses fail safe containers for small parts & items that can not be made fail safe

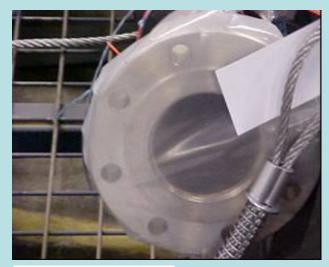


- Tie wraps should be bright in color, nonmetallic, and float if possible.
- Prohibit the use of metal tie wraps (plastic tie wraps containing metal tabs) in and adjacent to FMEZ around the Fuel pool, Reactor cavity, and other designated areas





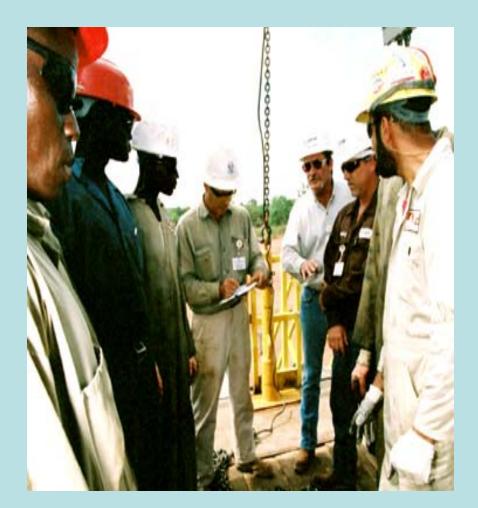
- Prohibit the use of clear plastic material in FMEZs or adjacent areas.
- Prohibit the use of wire brushes on systems that come in contact with the RCS, without proper consent and approval from the FME Coordinator.
- Plastic bags or duct tape should not be used for FME covers.
- Red duct tape may be used for other purposes PPT005.000 Rev. 7





FME Monitor (FMEM)

- Perform and document initial inventory and obtains concurrence from supervisor
- Maintains a copy of SPP-6.5 at the control point
- Maintains access control and accountability log for the FMEZ 1



FME Monitor

- Ensures only authorized workers enter zone
- Checks items entering FMEZ for loose or missing parts
- Inspect boxes and containers for loose debris
- Logs all tools, material, and equipment entering zone



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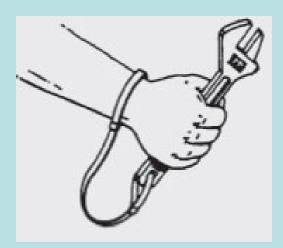
FME Monitor

- Ensures log entries are accurate and legible
- Ensures items are secured (failsafe)
- Stops all work in zone 1 if control is lost and notifies the supervisor
- Reconcile the accountability log each shift for active FME Zones. and quarterly for long duration FME Zones
 - such as the spent fuel pool, where no entries into the FME Zone have occurred since the last reconciliation.



FME Zone 1 Controls

- Tape placed over all pocket openings
- Loose objects & dosimetry made fail-safe
- Jewelry removed
- Paper, pens, and pencils shall be secured and logged
- PPE made fail-safe
- No clear plastic permitted





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Suspension of Work

- Work location is secured with covers, plugs
- All debris, tools, etc.. removed
- FME Level 1 (High Risk) sign posted
 - Boundary may be removed if sign is placed on the component
 - Stop signs with supv/contact info may be used as postings



Loss of FME Control

- Foreign Material introduced into components/systems.
- Material logged in that can't be accounted for.
- Material found in the zone that wasn't logged.
- Internal barriers fail or covers become damaged or missing.
- Missing parts.
- FME found in an open-air system.



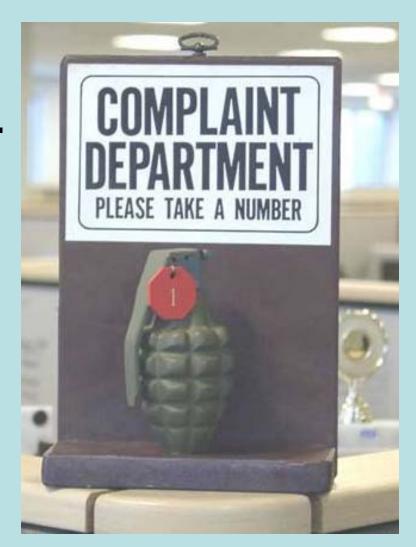
Notifications

- Notify Monitor and Supervisor and possibly RFF SRO.
- Notify FME Coordinator
- Notify the group's Dept.
 Manager
- During outages notify the OCC.



Retrieval

- If easily retrieved, with approval, remove object.
- If not easily retrieved, after notifications, develop retrieval plan.
- Always/Always Write a PER



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If Items Can't Be Accounted For

- Supervisor to determine when to do search and retrieval
- SE to evaluate the effects if not retrieved
- Technical Evaluation for items that fall into Rx vessel, Rx internals, Spent Fuel pool/transfer canal or systems with a direct path to Rx vessel



Completing the Job Closeout

- All FME PER's must be evaluated and system acceptable for closure
- Supervisor/Designee shall perform final inspection prior to closure and witness the closure of the system/component and sign-off Attachment 1
- Prior to closure, reconcile the FME Log



Completing the Job Closeout

- All FME concerns that could affect plant operation must be resolved prior to return to service
- Housekeeping shall be completed
- Supervisor shall initiate corrective actions if FME controls inadequate



Completing the Job Closeout

- Workers remove all materials, debris, tools, and equipment
- If determined FME controls were inadequate, initiate a PER as necessary
- Participants review for Lessons Learned and provide feedback to Planner on problems or good practices



Attachment 1 (Page 1 of 1) SPP-6.5-1 - FME Accountability Log

| Work Initiating Document: | | | FMEZ Location: | Sheet of | | | |
|---------------------------|--|---|--|--------------------------------------|--|---|--------------------------|
| Date/Time In | Person Entering (Print name) | Organization MSA, MSB, etc. | Item Description | Checked In By (FMEM Initials) | | Checked Out By (FMEM Initials) | Transferred to sheet# |
| Section 1 | and the second s | β · · · · · · · · · · · · · · · · · · · | | | inger Mill State (1.1. 20 | P3 | |
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| | | | | | | | |
| | | | | | *Sign, are indicates applicable to this FM Quarterly Accountal FMEM Initials FMEM Initials FMEM Initials | bility Log Reconci Date_ Date_ Date_ | iliation |
| FME Monitor: | Name Log Sheet | Reconciled: | ME Monitor: Signature | FME Monitor: Initials | Required for FMEZs which have Refer to section 3.3.3.0.9 of this Work Supervisor/Designee | orocedure | |
| NOTE: | State if item is consumed or installed. If | items are partially | y installed or consumed, record in Date/Time Out column. | installed, C - Consumed, R - Removed | <u>.</u> | | |

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ATTACHMENT 2 (Page 1 of 1)

FOREIGN MATERIAL CONTROL REQUIREMENTS

| Work Initiating Document: | | | | | | | | | | | | |
|---|-------------------------------|-----------------------|---|--|--|--|--|--|--|--|--|--|
| Foreign Material Exclusion Requirements | | | | | | | | | | | | |
| FME Classification: | | | | | | | | | | | | |
| Identify Appropriate FME Level Actions to be completed prior to initial component/system breach. SPP-6.5 Sections 3.1 BLOCKS DESIGNATED WITH X ARE REQUIRED | □Level 1 HIGHEST RISK | Level 2 Moderate RISK | Actio Comp Super | Requirements/ ns Performed/ bleted by Work visor/Designee | | | | | | | | |
| FME Work Practices Discussed in Pre-Job Brief FMEZ Monitor FMEZ Boundary FMEZ Devices addressed (Lanyards, Covers, etc.) If an equipment opening will act as a vent path, provide details of the temporary cover in the | X X X | *** | Init Date Init Date Init Date Init Date | | | | | | | | | |
| remarks section of this form. FMEZ Signs Posted FME Pre-job Inspections performed FMEZ Pre-cleaning completed FME Controls During Fabrication | | *** | Init. Date Init. Date Init. Date Init. Date Init. Date Init. Date | | | | | | | | | |
| FME Internal Device Configuration Control Record (plugs, dams, caps etc.) | See B | See B low | | See Below | | | | | | | | |
| FME Accountability Log Required | ⊠ | *** | Init Date | | | | | | | | | |
| *** In accordance with energific requirements in SPE is a near at the discretion of the tweet Supervisor, this item may be in the marks: DO NOT OPEN SYSTEM unless signed !!! Initial Inventory and appropriate levels of FME Initial internal Foreign Material inspection at the time of | | | | | | | | | | | | |
| controls exist. | | | | | | | | | | | | |
| Work Supervisor/Designee Date | Work Supervisor/Designee Date | | | | | | | | | | | |
| FME Internal Device Configuration Control Record | | | | | | | | | | | | |
| Internal Device Description Location Enst | alled Designee | | noved | Work Supervisor/ Designee Initials | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

Perform this prior to proceeding with your task

FME System / Component Closure Verify system / component is free of foreign material prior to final system / component closure and verify all

associated SPP-6.5-1 log entries have been reconciled Work Supervisor/Designee Date TVA 40928 [01-2006] Page 1 of 1 SPP-6.5-3 [01-31-2006]

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Summary

This course has equipped you with knowledge of our FME Program as it pertains to you're responsibilities. We have discussed the following in detail:

- FME levels,
- Documentation of FME forms
- PER's, Industry events, OE's, and Good FME Work Practices.

If everyone will actively practice FME control by these 3 simple words- FOCUS ON PREVENTION, we WILL minimize and/or eliminate the possibility of foreign material problems and in turn have a Safer Work Environment and more reliable equipment and operating systems.