#### Duke Energy

Remote Source Verification/Surveillance Remote & Hybrid Assessments

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Duke Energy Vendor Quality performs surveillance/source verification:

- Commercial Grade Dedication Method III
- Procurement/Technical/Engineering Specifications
- Restricted Suppliers
- Major Project Activities

COVID-19 – Coronavirus had a negative impact on our ability to conduct this oversight activity.

QAPD/Directives/Procedures did not provide options for performing remote source verification.

#### Looked for Solutions:

- EPRI Document 3002019436-A, "Remote Source Verification During a Pandemic or Similar State of Emergency" (Screen Criteria and Process Guidance)
- Energy-Northwest submitted a request to the NRC for a reduction in commitment of their QAPD to implement 3002019436-A.
- NRC granted the use of remote surveillance and stated, "that available technologies can be effectively applied to sufficiently and successfully verify certain activities in extreme circumstances."

Duke Energy revised our surveillance procedure, which includes the guidance from EPRI 002019436-A

Screening Criteria

**Processes Used** 

During the Pandemic we have performed approximately 14 source verification activities.

- Nuclear safety-related
- Commercial Grade Method III

Non-reversing Starters

**Overload Heaters** 

Commercial Grade Dedication by supplier of materials, including

dimensional inspections

Diesel Filters (Method III)

#### **Processes Used**

Skype

**MS TEAMS** 

Facetime

WebEx

Smartphones, tablets (iPhone, iPad)

Remote source inspections are performed in accordance with procedures and documented in the same manner as on-site verification:

Procedures are followed

Test parameters are properly established

Personnel are qualified

M&TE is properly calibrated

Documentation is properly completed

Duke Energy Remote Hybrid & Remote Assessments During the Pandemic we also performed several "hybrid & remote assessments"

- Audits (Duke Energy Only, NUPIC, NEI AA/FFD)
- Commercial Grade Surveys

In order to accomplish this Duke Energy updated the QAPD to include the Safety Evaluation of Southern Nuclear QATR change request (ML21161A201)

(EPRI's) Technical Report (TR) 3002020796, "Remote Assessment Techniques: Planning and Conducting Audits and Surveys Using Remote Techniques During Exigent Conditions" Duke Energy Remote Hybrid & Remote Assessments The audit/survey "Grace Period" was used in most cases.

Very few suppliers were actually "dropped" or allowed to expire

Some suppliers were allowed to maintain approval beyond the grace period by utilizing the "Vendor Audit Relief" options or VARS

Examples of Hybrid & Remote Assessments:

- Audit of distribution suppliers
- Commercial Grade Surveys
- Hybrid approach utilizing NUPIC guidelines

# Questions ?