

NRC Update NUPIC General Membership Meeting June 12-13, 2023 Denver, CO



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Quality Assurance & Vendor Inspection Branch

Office of Nuclear Reactor Regulation



Recent & Upcoming NRC Inspections

Recent:

- Valcor
- Prysmian Group (General Cable)
- TN Americas (NUPIC Observation)
- Japanese Steel Works (WGSUP)
- Nutherm International
- Ultra Energy
- Global Nuclear Fuels Americas
- MPR Associates
- Mistras Services
- Curtiss-Wright, QualTech NP
- Fluke Biomedical Company

Upcoming:

- ANSYS
- □ Fluor
- Velan

NRC Vendor Inspections & Findings

□ RESULTS:

- □ Criterion XVI, Corrective Action Target Rock
 - Prompt Identification and Correction
- Criterion VIII, Identification and Control of Material,
 Parts, & Components Reuter-Stokes
 - Use of incorrect material in safety related components



NRC Inspection Observations

Sampling Plan Documentation:

- Multiple vendors have been observed to not provide adequate justification for technical bases of sampling plans, specifically related to traceability and sample size.
- EPRI 3002002982, Section D.2.9 "Basis for selection of sampling plans. When sampling is used, document the sampling plan selected for each critical characteristic and the basis/factors considered when selecting the sampling plan."
- EPRI TR-017218-R1, Section 1.4.5 "The commercial grade item acceptance sampling process and the bases for sampling plan selection and application should be adequately documented. Documentation should address such factors as lot formation, complexity of the item, adequacy of supplier control as appropriate, safety function, test methodology, product performance, acceptance history of a supplier, item performance history, and other qualitative factors."



NRC Inspection Observations

Management of Corrective Actions:

- 10 CFR 50 Appendix B, Criterion 16 "Corrective Action"
 - "Measures shall be established to assure that conditions adverse to quality, ... are <u>promptly</u> identified and corrected."
- NQA-1-2015, Requirement 16:
 - "Conditions adverse to quality shall be identified <u>promptly</u> and corrected as soon as practicable."
 - SUBPART 3.1-16.1 does not recommend a timeframe
- NRC vendor inspectors have observed vendors selfimposing a due date of 30 days.
 - Some vendors allow for an extension.
 - There have been observations of vendors not achieving the 30 day self-imposed limit.





Regulatory Guide (RG) 1.28

- □ Draft Guide (DG) 1403 proposes specific changes for revision 6.
 - □ Published on April 24, 2023
 - Public comment period closed on June 2, 2023
 - IQVB will review and address public comment prior to releasing revision 6.



Commercial-Grade Dedication Inspections at Licensees

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- IQVB Staff worked with NRR Inspection program leads and regional inspection teams to develop an inspection of licensee Commercial Grade Dedication programs.
- Seven inspections have been performed against this inspection procedure.
 - Currently reviewing complete inspections for lessons learned.
 - No more than minor findings identified to date.
 - Common themes observed:
 - Control of material once it leaves the warehouse
 - Shelf life of parts in the warehouse
 - Adherence to established procedures



ASME Code Case N-883

- Case N-883 Construction of Items Prior to the Establishment of a Section III, Division 1 Owner
 - Approved in Jan. 2018
 - Allows for construction of items prior to the establishment of an owner by certificate holders, under specific conditions.
- RG 1.84 Design, Fabrication, and Materials Code Case Acceptability, ASME Section III
 - Allows for Code Case N-883 to be used only by holders of Construction Permits, Operating Licenses, or Combined Operating License.
- The NRC staff is continuing development of regulatory proposals to consider submissions similar to this in the future.



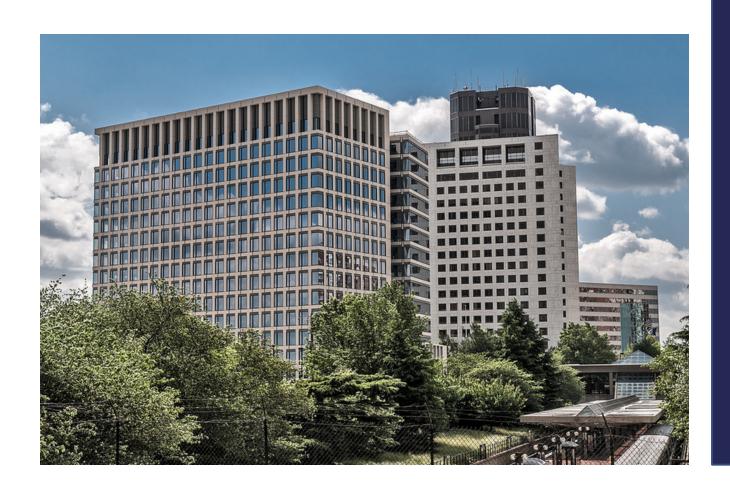
EPA Rulemaking on DecaBDE

- DecaBDE used as a fire retardant additive in various products, specifically in nuclear industry cabling.
- U.S. EPA Rulemaking bans Manufacture, Processing, & Distribution
 - EPA began initial rulemaking and communications in 2010
 - Manufacture was banned in Jan. 2021
 - Processing and distribution for cable industry was banned in Jan. 2023
- Impact to Nuclear Industry For items containing DecaBDE
 - Processing is prohibited, with the exception of processing for disposal.
 - Distribution may be allowed in some specific cases, based on EPA Rules.
 - Import or export has significant limitation, based on EPA Rules.
- Consent Agreement & Final Order (CAFO) and Enforcement Statement
 - On May 1, EPA signed a CAFO with RSCC to allow for their continued use of DecaBDE in cabling while qualifying a replacement.
 - On May 2, EPA released an Enforcement Statement addressing the use of cabling containing DecaBDE during qualification of replacements.



2nd Town Hall on Vendor Oversight

- Scheduled for June 21, 2022
- Will be held virtually from 1:00 to 4:00 (Eastern Time)
- Registration is Open
 - https://www.nrc.gov/reactors/new-reactors/how-weregulate/oversight/quality-assurance/town-hallmeetings.html
- □ Planned topics −
 - DecaBDE: Update and Follow-up Activities
 - Part 21 Reporting
 - Sample Sizes in Commercial Grade Dedication and Other Issues Identified during NRC Inspections
 - Two dedicated Question & Answer Sessions



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