



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 20, 1990

TO: ALL POWER REACTOR LICENSEES AND APPLICANTS

SUBJECT: RELAXATION OF STAFF POSITION IN GENERIC LETTER 83-28, ITEM 2.2
PART 2 "VENDOR INTERFACE FOR SAFETY-RELATED COMPONENTS"
(GENERIC LETTER NO. 90-03)

This letter is to clarify the staff position in Part 2 of Item 2.2 of Generic Letter 83-28 (Vendor Interface for Safety-Related Components).

The original position reads as follows:

"For vendor interface, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and is appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with action 2.2.1 (equipment classification). The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgement for receipt of technical mailings. It shall also define the interface and division of responsibilities among the licensee and the nuclear and non-nuclear divisions of their vendors that provide service on safety-related equipment to assure that requisite control of and applicable instructions for maintenance work on safety-related equipment are provided."

Since this position was established, the industry has generally taken the position that the Vendor Equipment Technical Information Program (VETIP) described in the Nuclear Utility Task Action Committee (NUTAC) Report, INPO 84-010 issued in March 1984, meets the intent of Generic Letter 83-28, Item 2.2 Part 2. The VETIP program includes the Nuclear Plant Reliability Data System (NPRDS) and the Significant Event Evaluation and Information Network (SEE-IN), both managed by INPO. It also includes existing programs the utilities now conduct with vendors. In particular, it includes interaction with the NSSS vendor.

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The staff has reviewed the VETIP program and has had the benefit of considerable discussions with licensees regarding vendor interface. It is now recognized that implementing a formal vendor interface program for every safety-related component is not practical. It is also recognized that vendors may not always be in the best position to analyze a failure because they may not be aware of the components' application, environment or maintenance history. Therefore, we conclude that the elements of VETIP provide a framework to improve the quality and availability of equipment technical information for use by utility licensees.

Experience has shown that many vendors, in addition to NSSF vendors, do produce valuable information relating to their equipment. For this reason, the staff concludes that an adequate vendor interface program should include:

- (a) A program with the NSSF vendor as described in the VETIP, which covers all the safety-related components within the NSSF scope of supply. This program should include provisions for assuring receipt by the licensee/applicant of all technical information provided by the NSSF vendor; and
- (b) A program of periodic contact with the vendors of other key safety-related components not included in (a) above.

The vendor interface program should also take into account the requirements of 10 CFR Part 50, Appendix B which requires the licensee or applicant to be responsible for establishing and executing the quality assurance program. It states that the licensee or applicant may delegate to others the work of establishing and executing the quality assurance program or any part of it, but the licensee or applicant shall retain responsibility for the program. Therefore, the licensee or applicant should have a program which assures that procedures and instructions are properly prepared and implemented and that quality assurance programs for design, maintenance or modification work performed on safety-related equipment by outside vendors or contractors are properly implemented. These programs should clearly establish and delineate in writing the authority and duties of persons and organizations performing activities affecting this safety-related equipment.

The programs in (a) above should provide for the licensee or applicant to receive all updates to instruction and maintenance manuals, technical information bulletins, revised test procedures, and updated replacement parts information. The programs should include provisions which ensure the licensee receives all such vendor issued information pertinent to its safety-related equipment.

The program described in (b) above is not intended to be as extensive as the program in (a), but is intended to be a good faith, documented effort to periodically contact the vendors of key, safety-related components (such as auxiliary feedwater pumps, batteries, inverters, battery chargers, cooling water pumps, and valve operators), not already included in the interface program of (a) above, to obtain any technical information applicable to this

equipment. Documented periodic contact via telephone is sufficient. It is expected that a reasonable and prudent review of operating experience, availability of vendor information, and component safety significance using insights obtained from generic or plant specific probabilistic risk analyses will yield a set of component vendors that will make up each licensee's program. In the event that vendors have gone out of business, cannot be identified, or will not supply information, the licensee or applicant should implement or continue to maintain a program that will assure that sufficient attention is paid to equipment maintenance, replacement, and repair to compensate for the lack of vendor backup such that equipment reliability commensurate with its safety function is assured.

Licensees and applicants are requested to review their present vendor interface programs and modify their programs as necessary to assure that both of the elements set out above are met. Pursuant to Section 182 of the Atomic Energy Act and 10 CFR 50.54(f), the NRC requires that licensees report to the NRC within 180 days of receipt of this generic letter whether or not they have taken the actions requested.

Licensees undertaking the actions requested should confirm that they have examined their vendor interface programs, that their programs either already include both of the elements set out in this letter or that the elements have been scheduled for implementation. If licensee actions are not complete at the time of their submittal, the licensee should submit a completion date for the remaining actions to be taken. If the licensee declines to undertake the actions requested by this letter, the licensee is required to provide justification for the position.

The response to this letter is to be provided under oath or affirmation and is necessary to enable the Commission to determine whether or not your license should be modified, suspended, or revoked. The response shall be addressed to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D. C. 20555. The NRC will continue to monitor the effectiveness of licensee or applicant vendor interface program implementation through the inspection process and will use the responses to this letter to plan and locate resources for inspections. Where a licensee's failure to (1) obtain information from vendors, (2) evaluate information obtained from vendors, or (3) implement necessary actions based on information obtained from a vendor results in conditions adverse to quality, the NRC will make findings and take action in accordance with its regulations.

This request is covered by the Office of Management and Budget Clearance Number 3150-0011, which expires January 31, 1991. The estimated average burden hours is 320 person hours per licensee response (144 person hours per year per licensee thereafter), including assessment of the new recommendations, searching data sources, gathering and analyzing the data, and preparing the required letters. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Records and Reports Management Branch, (MNBB-7714) Division of Information Support Services, Office of Information Resources Management, U.S. Nuclear Regulatory Commission, Washington, D. C. 20555; and to the Paperwork Reduction Project (3150-0011), Office of Management and Budget, Washington, D. C. 20503.

Backfit Discussion

The actions described in this generic letter are relaxations of the original position taken in Generic Letter 83-28 and are not considered a backfit in accordance with NRC procedures. An evaluation of this letter was performed in accordance with the charter of the Committee to Review Generic Requirements (CRGR) and will be made available in the public document room with the minutes of the 178th meeting of the CRGR.

If you have any questions about this matter, please contact the NRC project manager or the technical contact listed below.

Sincerely,



James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

Enclosure:
Listing of Recently Issued
Generic Letters

Technical Contacts:
S. Newberry, NRR
(301) 492-0782

D. LaBarge, NRR
(301) 492-1421

LIST OF RECENTLY ISSUED GENERIC LETTERS

Generic Letter No.	Subject	Date of Issuance	Issued To
90-02	ALTERNATIVE REQUIREMENTS FOR FUEL ASSEMBLIES IN THE DESIGN FEATURES SECTION OF TECHNICAL SPECIFICATIONS	02/01/90	ALL LWR LICENSEES AND APPLICANTS
90-01	REQUEST FOR VOLUNTARY PARTICIPATION IN NRC REGULATORY IMPAC SURVEY	01/18/90	ALL LICENSEES OF OPERATING REACTORS & CONSTRUCTION PERMITS FOR LWR NUCLEAR POWER PLANTS
89-23	NRC STAFF RESPONSES TO QUESTIONS PERTAINING TO IMPLEMENTATION OF 10 CFR PART 26 - GENERIC LETTER 89-23	10/23/89	ALL HOLDERS OF OPERATING LICENSEES AND CONSTRUCTION PERMITS FOR NUCLEAR POWER PLANTS
89-22	POTENTIAL FOR INCREASED ROOF LOADS AND PLANT AREA FLOOD RUNOFF DEPTH AT LICENSED NUCLEAR POWER PLANTS DUE TO RECENT CHANGE IN PROBABLE MAXIMUM PRECIPITATION CRITERIA DEVELOPED BY THE NATIONAL WEATHER SERVICE (GENERIC LETTER 89-22)	10/19/89	ALL LICENSEES OF OPERATING REACTORS AND HOLDERS OF CONSTRUCTION PERMITS (EXCEPT BYRON BRAIDWOOD, VOGTLE, SOUTH TEXAS, AND RIVER BEND)
89-21	REQUEST FOR INFORMATION CONCERNING STATUS OF IMPLEMENTATION OF UNRESOLVED SAFETY ISSUE (USI) REQUIREMENTS	10/19/89	ALL HOLDERS OF OPERATING LICENSES AND CONSTRUCTION PERMITS FOR NUCLEAR POWER REACTORS
89-20	PROTECTED AREA LONG-TERM HOUSEKEEPING	09/26/89	ALL FUEL CYCLE FACILITY LICENSEES WHO POSSESS, USE, OR PROCESS FORMULA QUANTITIES OF STRATEGIC SPECIAL NUCLEAR MATERIAL
89-19	REQUEST FOR ACTION RELATED TO RESOLUTION OF UNRESOLVED SAFETY ISSUE A-47 "SAFETY IMPLICATION OF CONTROL SYSTEMS IN LWR NUCLEAR POWER PLANTS" PURSUANT TO 10 CFR 50.54(f)	09/20/89	ALL LICENSEES OF OPERATING REACTORS, APPLICANTS FOR OPERATING LICENSES AND HOLDERS OF CONSTRUCTION PERMITS FOR LIGHT WATER REACTOR NUCLEAR POWER PLANTS

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Sincerely,

original signed by:
Gary M. Holahan

James G. Partlow
Associate Director for Projects
Office of Nuclear Reactor Regulation

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