

NUPIC and Supplier Oversight Issues

NUPIC
Nuclear Procurement
Issues Committee



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Presentation Topics

- ❑ **Background**
- ❑ **NUPIC Objectives**
- ❑ **NUPIC Process**
- ❑ **NUPIC Audit Finding Trends**
- ❑ **NRC Inspection Issues**
- ❑ **NUPIC Audits vs. NRC Inspections**
- ❑ **Improvement Activities**

NUPIC Background

- ❑ Formed in 1989**

- ❑ 32 US members**

- ❑ 13 International members (Brazil, Canada(4), Korea, Mexico, Taiwan, Slovenia, South Africa, Spain, Sweden and Romania)**

NUPIC Objectives

- ❑ Cooperative program for performing and sharing joint supplier audits**
- ❑ Audits are evaluated by each member and serve as basis for maintaining suppliers on Approved Suppliers List**
- ❑ NUPIC also provides a forum for sharing procurement and supplier quality issues**

NUPIC Process

- ❑ NUPIC audits are performed for suppliers with five (5) or more member users**
- ❑ Each audit is led by a member under their QA program with participants from 3 or more other members**

NUPIC Audit Finding Trends

YEAR	No. of Audits	No. of Audit Findings
2006	131	458
2007	106	366
2008*	85	281
*through 10/08		
TOTALS	322	1105

NUPIC Audit Finding Trends

Code	Description	# Findings	% Findings
A	Commercial Grade Dedication	115	10 %
B	Measure and Test Equipment	60	6 %
C	Software	54	5 %
D	Design Control/Change	62	6 %
E	Special Processes	23	2 %
F	Procurement	130	12 %
G	Fabrication/Assembly/Shop Floor Operation	36	4 %
H	Testing/Inspection	33	3 %
I	Non-conformance/Corrective Action Program	159	14 %
J	Programmatic/Other	418	38 %

NUPIC Audit Finding Trends

DESCRIPTION – (Programmatic 38%)	2006	2007	2008
Programmatic/Other Problems	6	8	12
Does not fit in any other category	12	9	6
Training	13	14	10
Audits	46	38	20
Order Entry	30	12	14
QA Organization ineffective	1	0	1
Records/Document Control	34	35	22
Failure to follow procedure	28	24	23

NUPIC Audit Finding Trends

DESCRIPTION – (Non-conformance 14%)	2006	2007	2008
Non-conformance/Corrective Action Program	3	6	4
Inadequate Procedure	10	14	14
Inadequate customer notification for NCRs	0	0	1
Inadequate justification for NCR dispositions	2	1	2
Inadequate follow-up	7	5	1
Deficient 10CFR21 Reporting	4	3	19
Inadequate preventative action	7	2	4
Failure to follow procedure	20	23	7

NUPIC Audit Finding Trends

DESCRIPTION – (Procurement 12%)	2006	2007	2008
Procurement Problems	3	1	1
Inadequate Procedure	14	12	7
Purchase Order Error	6	1	3
Procurement documents – insufficient information	13	9	3
Poor supplier control	12	7	9
PO requirements not passed on to sub-tiers	2	1	0
Failure to follow procedure	11	3	3

NUPIC Audit Finding Trends

DESCRIPTION – (Dedication Problems 10%)	2006	2007	2008
Commercial Grade Dedication Problems	8	6	2
Inadequate Procedure	12	13	10
No dedication plans	1	7	6
Inadequate dedication	7	7	7
Inadequate sampling plans	0	2	0
Inadequate piece/parts classification	1	0	0
Failure to follow procedure	11	11	4

NRC Inspection Issues

- Evaluated NRC Inspection Reports posted since 2006**
 - 34 Inspections evaluated**
 - 114 violations or non-conformances identified**
 - Assigned each a cause code using the NUPIC definitions**

NRC Inspection Issues

Code	Description	# Findings
A	Commercial Dedication	13
B	Measure and Test Equipment	1
C	Software	0
D	Design Control/Change	2
E	Special Processes	3
F	Procurement	3
G	Fabrication/Assembly/Shop Floor Operation	3
H	Testing/Inspection	3
I	Non-conformance/Corrective Action Program	48
J	Programmatic/Other	13

NRC Inspection Issues

Non-Conformance/Corrective Action Programs

- Inadequate procedure (26)**
- Failure to follow procedure (13)**
- Deficient Part 21 reporting (5)**
- Inadequate justification for NCR dispositions (2)**
- Inadequate customer notification for NCRs (1)**
- Inadequate follow-up (1)**

NRC Inspection Issues

Commercial Grade Dedication

- Inadequate dedication (7)**
- Inadequate procedure (4)**
- Inadequate sampling plans (1)**
- Failure to follow procedure (1)**

NRC Inspection Issues

Programmatic/Other

- Records/Document Control (5)**
- Audits (3)**
- Training (2)**
- Order Entry (2)**
- Does not fit any other category (1)**

NUPIC Audits vs. NRC Inspections

Lessons Learned

- Provide more narrative dialogue in the Assessment/Summary section of the Audit checklist. Ensure each question is thoroughly and properly answered.**
- Provide auditor training in 10 CFR 21, especially definitions and expectations.**
- Provide auditor training in dedication, the establishment of lot/batch formations, and the establishment of sampling plans and the technical basis**

NUPIC Audits vs. NRC Inspections

Lessons learned cont'd.

- Increase attention to detail in observing field activities. Observe with procedure in hand to verify procedure compliance. Question procedure requirements to ensure procedures are adequate.**
- Specific checklist and guideline enhancements.**
- Improve identification of technical issues to be evaluated.**

Improvement Activities

- Provide training at NUPIC Vendor Meetings**
- Worked with EPRI in the development of training for suppliers**
- Working with NIAC to communicate checklist changes**
- Developing supplier auditor training and incorporating NUPIC checklist and information**