

Proposal for ITAAC Findings at Vendor Facilities

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Overview

- How the NRC Vendor Inspection Branches will handle ITAAC Findings at Vendor Facilities
- Proposed Licensee actions

Construction Program Inspections (IMC 2507)

The vendor inspections are performed as part of the construction inspection program to inspect vendors supplying SR materials, equipment and services:

- Vendor Quality Assurance (QA) Programs (10CFR50, App B)
- Reporting of Defects (10 CFR 21, 10 CFR 50.55e)
- Commercial Grade Dedication (10 CFR 21)
- **Type testing for ITAAC related activities**
- Environmental Qualification Testing
- Counterfeit, Fraudulent, or Suspect Items

Nonconformance Example

- NON 9990XXXX/201X-201-01
 - Lacking justification for the performance of partial valve strokes during valve flow testing

ITAAC	Design Commitment	Inspections, Tests, and Analyses	Acceptance Criteria
2.2.02.11a.i	The motor-operated and check valves identified in Table 2.2.2-1 perform an active safety-related function to change position as indicated in the table.	Tests or type tests of motor-operated valves will be performed to demonstrate the capability of each valve to operate under design conditions.	A test report exists and concludes that each motor-operated valve changes position as indicated in Table 2.2.2-1 under design conditions.

Vendor Inspection Branch Actions

- Directly and clearly tie the finding to the applicable ITAAC in the inspection report and cover letter “material to the ITAAC acceptance criteria, specifically...”
- Enforcement actions to the vendor
- Letter to the affected Licensees
- NRC Vendor Inspection COE will re-inspect the vendor to ensure closure of the issue.

Letter to Licensees

- Describes the ITAAC finding at the vendor facility and how it directly affects the ITAAC acceptance criteria
- Provide a contact number if there are any questions
- Previous ITAAC Findings at vendor facilities will be addressed in a single letter to Licensees
- **NO ENFORCEMENT ACTIONS TO LICENSEES**

ITAAC Closure Verification by Licensee (proposed)

- ITAAC closure notification (ICN) on these ITAAC findings at the vendor facilities
- The ICN will address the ITAAC finding and corrective actions taken for final review and closure

Questions?