

Industry Perspectives on Quarantine of CFSI

**NRC Public Meeting
February 13, 2013**



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SECY 11-0154: *Incorporate industry best practices for quarantining CFSI items and removing them from the supply chain without returning them to the supplier*

Problem: A graded approach is needed when addressing whether or not to return CFSI items to the OEM/OES. Once a candidate CFSI is identified, there are a number of factors that determine the proper disposition of the item(s).



Industry Objectives

- **Ensure that CFSIs are not introduced into nuclear plants.**
- **Quarantined items identified or suspected of being a CFSI.**
- **Report CFSI and perform other follow-up actions, as appropriate.**



Potential Follow-up Actions for Quarantined CFSI

- **Contacting the OEM/OES for details**
- **Making the proper notifications**
 - INPO Operating Experience
 - EPRI “scfi” database
 - NRC (e.g., Part 21), as appropriate
- **Determining if CFSI should be returned to the OEM/OES**
- **Determining if CFSI should be subject to further evaluation**
- **A graded approach to return of CFSI is essential. Factors to consider:**
 - Was the source an OEM or Authorized distributor?
 - Was the source a smaller or lesser know supplier?
 - Is the source an Appendix B/AVL supplier?
 - Is the item to be dedicated for safety related use?



Other Considerations

- **How many items were procured?**
 - One or more items?
 - Sufficient quantity to send a sample back to the OEM /OES for evaluation?
- **Appendix B or Commercial procurement?**
- **Potential NRC interest in access to CFSI for evaluation**
- **Financial considerations, including replacement item cost and schedule**

Summary

- **Key elements of expected industry guidance on quarantine of CFSI:**
 - Quarantine CFSI to prevent usage or comingling with other stock
 - Share/report CFSI information to INPO, EPRI, and NRC, as appropriate
 - Guidance on appropriate follow-up with OEM/OES
 - Factors to consider in a graded approach to disposition/return of CFSI