



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 7, 2020

Mr. Bradley J. Sawatzke
Chief Executive Officer
Energy Northwest
76 North Power Plant Loop
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION – REDUCTION IN COMMITMENT TO
THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION
(EPID L-2020-LLQ-0003 [COVID-19])

Dear Mr. Sawatzke:

By letter dated May 18, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20139A225), as supplemented by letter dated June 1, 2020 (ADAMS Accession No. ML20153A471), Energy Northwest (the licensee) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for approval of a revision to the Columbia Generating Station's (Columbia) Operational Quality Assurance Program Description (OQAPD) that results in a reduction of commitment to the previously accepted quality assurance program in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.54(a)(4).

Specifically, Energy Northwest's submittal requested to implement guidance found in the Electric Power Research Institute's (EPRI's) Technical Report 3002019436, "Remote Source Verification During a Pandemic or Similar State of Emergency: Screening Criteria and Process Guidance," for performing remote source verification. The EPRI Technical Report 3002019436 was developed with industry stakeholders, which included NRC staff, to provide the option within a licensee's or vendor's quality assurance program for remote performance when a source verification is required. Energy Northwest's proposed change does not apply to vendor audits or surveys and specifically addresses the vendor surveillance portion of source verification activities identified in the OQAPD. The proposed change provides guidance for the application of video and other real-time communication technologies for the successful performance of remote vendor surveillance. Energy Northwest's proposed use of this method of source verification will only be applicable when a pandemic or a similar state of emergency has been declared restricting access or travel to and/or from those locations affected by the declaration.

The NRC staff has reviewed Energy Northwest's submittal. Based on the enclosed safety evaluation, the NRC staff concludes that there is reasonable assurance that Columbia's OQAPD will continue to meet the requirements of Criterion VII "Control of Purchased Material, Equipment, and Services," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50. Therefore, the NRC staff finds the proposed changes to Columbia's OQAPD for remote source verification during exigent conditions acceptable.

B. Sawatzke

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If you have any questions regarding this matter, please contact me at (301) 415-8371 or via e-mail at Mahesh.Chawla@nrc.gov.

Sincerely,

/RA/

Mahesh L. Chawla, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure:
As stated

cc: Listserv

SUBJECT: COLUMBIA GENERATING STATION – REDUCTION IN COMMITMENT TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (EPID L-2020-LLQ-0003 [COVID-19]) DATED JULY 7, 2020

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UNITED STATES
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR CHANGE TO THE COLUMBIA

OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated May 18, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20139A225), as supplemented by letter dated June 1, 2020 (ADAMS Accession No. ML20153A471), Energy Northwest (the licensee) submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for approval of a revision to the Columbia Generating Station's (Columbia) Operational Quality Assurance Program Description (OQAPD) that results in a reduction of commitment to the previously accepted quality assurance (QA) program in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," Section 50.54(a)(4).

Specifically, Energy Northwest's submittal requested to implement guidance found in Electric Power Research Institute's (EPRI's), Technical Report (TR) 3002019436, "Remote Source Verification During a Pandemic or Similar State of Emergency," for performing remote source verification. The EPRI TR 3002019436 was developed with industry stakeholders, which included NRC staff, to provide the option within a licensee's or vendor's QA program for remote performance of a source verification when required during exigent conditions. Energy Northwest's proposed change does not apply to vendor audits or surveys and specifically addresses the vendor surveillances portion of source verification activities identified in the OQAPD. The proposed change provides guidance for the application of video and other real-time communication technologies for the successful performance of remote vendor surveillance [EPRI's source verification]. Energy Northwest's proposed use of this method of source verification will only be applicable when a pandemic or similar state of emergency has been declared restricting access or travel to and/or from those locations affected by the declaration.

2.0 REGULATORY BASIS

The regulation in 10 CFR 50.54(a)(4) sets forth the NRC's regulatory requirements regarding changes to a QA program description. Changes to a QA program description that reduce the licensee's commitments must be submitted and receive NRC approval prior to implementation. This includes changes made to the QA program description as presented in the safety analysis

report or in a topical report that must be submitted as specified in 10 CFR 50.54(a)(4). The submittal of a change to the QA program description must include all pages affected by that change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of Appendix B to 10 CFR Part 50, and the QA program description commitments previously accepted by the NRC.

The regulatory requirement for QA program audits of suppliers is set forth in Criterion VII of Appendix B to 10 CFR Part 50. Criterion VII requires, in part, the establishing of measures for assuring that “purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery.”

3.0 TECHNICAL EVALUATION

Source verifications are typically performed to verify successful completion of certain fabrication and testing activities related to equipment that are complex, expensive, or designated for use in nuclear safety-related applications. Regulatory requirements and guidance related to the use of source verification to accept a basic component for use, either with or without commercial-grade dedication, are provided in Criterion VII of Appendix B to 10 CFR Part 50; NRC Inspection Procedure 43004, “Inspection of Commercial-Grade Dedication Programs” (ADAMS Accession No. ML16344A092); and EPRI TR 3002002982, Revision 1 to EPRI NP-5652 and TR-102260, “Plant Engineering: Guideline for the Acceptance of Commercial-Grade Items in Nuclear Safety-Related Applications,” dated September 2014, which was endorsed by NRC Regulatory Guide 1.164, “Dedication of Commercial-Grade Items for Use in Nuclear Power Plants,” Revision 0, dated June 2017 (ADAMS Accession No. ML17041A206), and defines source verification. In all cases, both the regulatory requirements and guidance refer to source verifications being performed “at the contractor or subcontractor source,” “by direct observation,” or “at the location of material procurement or manufacture,” respectively.

Given technological advances since the requirements of Appendix B were first promulgated, Energy Northwest requested to modify the Columbia OQAPD to utilize the guidance in EPRI TR 3002019436 in lieu of the regulatory requirements of Criterion VII for performing source verifications. The proposed change does not apply to vendor audits or surveys and specifically addresses being limited to remote source verification activities. The change will provide guidance for the application of video and other real-time communication technologies for the successful performance of remote source verification. The use of this method of verification will only be applicable when a pandemic or similar state of emergency has been declared restricting access or travel to and/or from those locations affected by the declaration.

The proposed change will provide an alternate method of performing source verification at the contractor or subcontractor source under certain conditions. During its review, the NRC staff noted that Columbia’s OQAPD definitions differed from those used in the EPRI TR 3002019436 in that “source verification” at Columbia includes vendor surveillance, inspections and audits. In the supplemental letter dated June 1, 2020, Energy Northwest clarified the use of the term “vendor surveillance” which is the existing OQAPD terminology, and its equivalent to the EPRI’s term “source verification.” The functional description of these two terms are the same for Columbia’s submittal. The use of this method of verification will only be applicable when a pandemic or similar state of

emergency has been declared restricting access or travel to and/or from those locations affected by State and national declarations. The proposed change would not apply to other quality assurance activities, such as vendor audits or surveys used to qualify a vendor's QA program.

To incorporate the use of remote source verification, Energy Northwest implemented the following changes to the Columbia OQAPD: (1) Section 7.2.5 was revised to reflect that remote source verification will be performed in accordance with the guidance in EPRI TR 3002019436; (2) the EPRI technical report was incorporated by reference in the Columbia OQAPD; (3) guidance will be used for dedication or as an acceptance method for safety-related purchase orders or contracts; and (4) the application of the guidance will be limited by the application of the EPRI TR's screening questions.

As previously stated, the EPRI TR 3002019436 was prepared to provide licensees and vendors with guidance for using remote communication and video capabilities to perform remote source verification in extreme circumstances where it is not possible to perform onsite source verification due to conditions that threaten the health and safety of individuals performing the verification. The NRC staff reviewed EPRI TR 3002019436 and the quality controls recommended to utilize the technical report guidance. By incorporating the EPRI TR 3002019436 into the Columbia OQAPD, Energy Northwest committed to implementing quality controls that will be in place prior to witnessing the vendor surveillance [source verification], such as:

- The ability to review the actual documents and procedures online, as well as preparations, equipment, personnel, and other things going on in the vicinity of the activity.
- The ability to ask questions during the process, request adjustments, and doublecheck measurements.
- The verifier's field of vision and ability to observe and verify can be adjusted by the frame of the camera or video screen.
- The ability to verify the capabilities of the video equipment and individuals operating the video equipment prior to performance of the remote source verification.

EPRI TR 3002019436 provides a screening of the specific source verification to be performed to determine if remote source verification is appropriate for the activities being verified prior to conducting the activity remotely. The EPRI TR 3002019436 required screening employs the following six attributes with associated guidance provided:

1. Is it possible to do onsite surveillance?
2. Is the activity an assessment?
3. Can the activity be surveilled remotely?
4. Can progress and results be captured and communicated in real-time?
5. Can a maintainable record be created for objective evidence? and
6. Does initiating entity concur with the use of remote surveillance?

Further, the screening questions included in Section 4 of EPRI TR 3002019436 were included in Columbia's implementing procedure SQI-7-4, "Source Surveillance Activities." The licensee stated that the application of the second screening question of the EPRI TR 3002019436 ("Is the activity an assessment?") will ensure that remote source verifications are not used for assessment of activities such as audits or surveys.

Based on the quality controls in place, the NRC staff concluded that remote source verification will be an effective alternative for source verification activities during exigent conditions at Columbia. Although remote source verification cannot fully replace the ability to observe and verify activities at the source, as discussed above, the use of modern communication technologies permits a remote source verification plan to be developed and implemented that will continue to satisfy the relevant criteria of Appendix B to 10 CFR Part 50, providing an equivalent, and therefore, an acceptable level of quality control. As stated above, the proposed change will only apply to source verification activities that can be justified by applying the controls described in the EPRI TR 3002019436.

4.0 CONCLUSION

The NRC staff has reviewed Energy Northwest's submittal for implementation of EPRI TR 3002019436 in Columbia's OQAPD provided in the letter dated May 18, 2020, as supplemented with clarifications in the letter dated June 1, 2020. Although remote source verification is not intended to replace the ability to observe and verify activities at the source, the NRC staff finds that available technologies can be effectively applied to sufficiently and successfully verify certain activities in extreme circumstances. The NRC staff has reviewed Columbia's submittals and the guidance in EPRI TR 3002019436. The NRC staff has determined that the implementation of EPRI TR 3002019436, as outlined in Energy Northwest's submittal, will continue to meet the requirements of Criterion VII of Appendix B to 10 CFR Part 50, and, therefore, is acceptable.

Principal Contributor: Aaron Armstrong

Date: July 7, 2020