

## NEI Feedback on Power Operated Valve Inspections

### Key Points

- **Remote Inspections:** Much of our feedback on POV experience overlaps with our feedback on experience with remote inspections conducted during COVID restrictions this year.
  - **Daily Communications Routine:** For team inspections like POV, especially when done remotely, it is highly beneficial to establish a schedule of daily contacts between the inspection team and the licensee's point of contact.
    - A common practice that seemed to work well was holding conference calls or video conferences in the morning and afternoon to ensure mutual understanding of the status of document requests, questions and answers, and schedules.
    - Additionally, the inspection process should encourage the use of all appropriate methods, including email, phone calls, etc., for communicating NRC questions and clarifications and licensee responses.
  - **Data Exchange:** It is vital to establish agreement on the method for electronic exchange of files. The platform for sharing information must support the large amount of material NRC requires and allow remote workers to participate seamlessly.
  - **Coordination of Onsite Support:** With administrative plant support personnel working remotely much of this year, it was especially important to schedule NRC onsite work and NRC records requests with consideration of the licensees' desire to minimize the added health risk to company personnel who would be needed to come onsite to support NRC efforts.
  - **Breadth of Support Needed:** The POV inspection ultimately required support from across the plant organization, not just engineering. Inspection support entailed plant operations and maintenance especially, further complicating the challenge of coordinating onsite personnel availability during the COVID restrictions.
- **Onsite Inspection:** We understand the limitations of remote inspections and we, like the NRC, have done our best to compensate for those limitations during the COVID restrictions.
  - In some cases, licensees have been able to utilize technology (e.g., recent photographs, video recordings, or video feed) to supplement or streamline walkdowns and visual inspections.
  - In some cases, the resident inspectors were able to cover for remote inspectors. From the licensees' perspective, this is helpful because the residents generally know the plant better than do other inspectors.
  - We see the challenges of conducting meetings remotely and communicating mostly or entirely remotely during inspections. However preferable face-to-face meetings might be to most of us, under COVID restrictions those meetings are not as easy or convenient to hold as we were accustomed to prior to the pandemic.
  - With the uncertainty of COVID hanging over us for the indefinite future and many plants continuing to operate with support staff working remotely, we must strive to make the inspection process work with as much being done remotely as possible for the safety of both NRC and plant personnel.

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- When the onsite portion of the inspection cannot be completed during the designated inspection weeks, the NRC should nonetheless strive to complete the missing portion of the inspection as timely as practicable.
- **Initial Data Request:** The request for information on the initial set of 30 valves of potential interest to the NRC requires the licensee to gather a great amount of documentation to provide the level of detail specified. This is a great burden on the licensees.
  - Is every piece of this detailed information essential to the NRC's down-selection process to choose the 6-12 valves to be scrutinized more closely once the inspection begins?
  - Could the NRC's initial screening of the 30 valves be performed just as effectively using a smaller, simpler, and less burdensome data request to the licensees?
- **Subsequent Data Requests:** Licensees reported receiving duplicate requests for files that were already provided to the NRC.

### For more information, contact:

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