



NRC UPDATE

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EPRI Joint Utility Task Group (JUTG)

Procurement Virtual Forum



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Topics

- Vendor Inspection Findings
- NRC Tools to Use
 - New International Organization for Standardization (ISO) 17025:2017 SE
 - Use of Remote Assessment Techniques
 - COVID-19 Change to Callaway's Quality Assurance (QA) Program
- Blast from the Past
 - Appendix B Audit vs American Society of Mechanical Engineers (ASME) survey

Vendor Inspection Findings

- Significant Findings
 - ▣ Control of Special Processes
 - ▣ Corrective action



Control of Special Processes

Westinghouse Electric Company in Hopkins, SC, February 26, 2020

Criterion IX, “Control of Special Processes,” of Appendix B

Inspection conducted January 2020, to verify QA activities associated with the top nozzle pins for a 15x15 fuel assembly for Turkey Point Nuclear Generating Station Unit 3.

Inspection Results: Nonconformance 99900005/2019-201-01

- The NRC inspection team observed weld filler material with either no markings or illegible labels. The NRC inspection team also noted that the weld filler material was not marked with the heat or lot number and was not the same filler weld material.

Corrective Action

Ametek Solidstate Controls in Columbus, OH, October 2, 2020

Criterion XVI, “Corrective Action,” of Appendix B

- ❑ Inspection conducted in October 2020, to verify QA activities associated with the design, engineering, manufacturing, and supply of electrical equipment to the U.S. operating nuclear fleet
- ❑ Inspection Results: Nonconformance 99901427/2020-201-01
 - ❑ Failing to test the critical characteristic of capacitors’ dissipation factor
 - ❑ failure to develop a technical evaluation for the testing of transformer impregnation resin, even though they were aware of the issue
 - ❑ Generation and closure of a CAR without addressing external audit and commercial-grade survey extensions as a result of travel restrictions due to COVID-19.

Corrective Action

SOR Inc. in Lenexa, KS, June 30, 2021

Criterion XVI, “Corrective Action,” of Appendix B

- Inspection conducted in May 2021, to verify QA activities associated with the design, engineering, manufacturing, and supply of electrical equipment to the U.S. operating nuclear fleet
- Inspection Results: Nonconformance 99900824/2021-201-01
 - SOR failed to adequately implement the corrective actions identified in CARs to prevent future reoccurrence of the root cause identified in these CARs related to third-party qualification report reviews.
 - SOR addressed the lower qualification level for the O-ring configuration of the pressure switch. However, SOR failed to provide an engineering justification to support the 20-year qualified life of the pressure switch with the O-ring configuration as required in the CAR.
 - SOR failed to adequately implement the corrective actions identified in the CAR to prevent future recurrence of assigning disposition codes to MRRs not directly defined by their procedure.

NRC Tools to Use

- New ISO 17025:2017 SE
 - By letter dated February 20, 2020, the Nuclear Energy Institute (NEI) submitted for NRC's review and endorsement, Revision 1 to NEI 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services."
 - NEI 14-05A was updated to recognize the 2017 edition of the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) 17025 and to address other areas based on operating experience.
 - By letter dated November 23, 2020, the NRC issued its SER on Revision 1 to NEI 14-05A.

What's New?

- Limitations of Use:
- **ILAC accreditation process cannot be used as part of the commercial-grade dedication process of non-destructive examination (NDE) services.**
 - NRC's recognition of the ILAC accreditation process does not include the commercial-grade dedication of NDE services based on a laboratory's accreditation to the 2017 edition of ISO/IEC 17025.
 - Specific personnel qualification and certification requirements for NDE personnel performing safety-related activities not addressed by the ILAC accreditation process.

What's New?

New Conditions:

- Subcontracting of services is **prohibited**.
 - Procurement documents must prohibit the accredited calibration or testing laboratory from subcontracting the services being procured.
 - The procurement document for accredited services must be submitted directly to the entity performing the calibration or testing.

What's New?

□ New Conditions (cont.):

- Use of laboratories with accreditations based on two consecutive remote accreditation assessments cannot be used.
 - During the documented review of a laboratory's accreditation, the dedicating entity must verify that the laboratory has achieved accreditation based on an on-site accreditation assessment by the selected accrediting body (AB) within the past 48 months.

Applicability

- For licensees, the use of ISO/IEC 17025:2017 as part of the ILAC accreditation process represents a QA alternative to the previously accepted QA program
- On June 1, 2021, ISO/IEC 17025:2005 became invalid and only accreditation to ISO/IEC 17025:2017 is recognized under the ILAC accreditation process.

NRC Tools to Use

Use of Remote Assessment Techniques

- The NRC found EPRI's Technical Report 3002019436, "Remote Assessment Techniques: Planning and Conducting Audits and Surveys Using Remote Techniques During Exigent Conditions," acceptable for use during exigent conditions.

NRC Safety Evaluation Report

- ADAMS Accession No. ML21159A126

NRC Tools to Use

COVID-19: Callaway's QAP Change

- Callaway's existing 90-day grace period for completing triennial vendor audits and commercial-grade surveys were set to expire for some of its suppliers on August 2020. Without a further extension, the affected suppliers would have to be removed from Callaway's Qualified Suppliers List within 90 days of the triennial audit or commercial-grade survey expiration date, which would adversely impact their ability to procure safety-related items and services.
- As the duration of the current national emergency is unknown, the NRC staff agreed that an overall extension of 25 percent to the triennial audit frequency for supplier audits and commercial-grade surveys may be implemented for exigent circumstances. The NRC staff found that the proposed changes continue to meet the requirements of Criterion VII of Appendix B to 10 CFR Part 50.

NRC Safety Evaluation Report

- ADAMS Accession No. ML20216A681



Blast from the Past

Recognition of ASME accreditation for N Stamp holders

- N-Stamps addressed in Information Notice (IN) 86-21, “Recognition of American Society of Mechanical Engineers Accreditation Program for N Stamp Holders”
- IN 86-21, Supplement 1 and Supplement 2
- Summary



Summary

- The IN recognizes that holders of Certificate of Authorization as evidence of a documented QA program that meets the requirements of 10 CFR Part 50, Appendix B
- The IN recognizes only the programmatic aspects of the ASME Accreditation program. It does not recognize if the suppliers are effectively implementing the approved QA Program.

References

- Vendor Inspection Of Westinghouse Electric Company - Columbia Fuel Fabrication Facility's, ADAMS No. ML20035E477
- Vendor Inspection Report Of Ametek Solidstate Controls, ADAMS Accession No. ML20315A059
- Vendor Inspection Report Of SOR Inc., ADAMS Accession No. ML21176A112
- Safety Evaluation (SE) for NEI Technical Report 14-05A, Revision 1, ADAMS No. ML20322A019
- NRC SE for EPRI's Technical Report 3002020796 "Remote Assessment Techniques: Planning and Conducting Audits and Surveys Using Remote Techniques During Exigent Conditions," ADAMS Accession No. ML21159A126
- NRC SE for Callaway Plant, Unit No. 1 - Operating Quality Assurance Manual Change Revision 34B (EPID L-2020-LLQ-0004 [COVID-19], ADAMS Accession No. ML20216A681
- IN-86-21, "Recognition of American Society of Mechanical Engineers Accreditation Program for N Stamp Holders," <https://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1986/index.html>