

Nuclear Regulatory Commission (NRC)

Conducting Vendor Inspections During a Pandemic – Lessons Learned

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United States Nuclear Regulatory Commission

Protecting People and the Environment

Agenda

- Background and Overview
- How the NRC Adapted and Made Decisions
- Weekly COVID Assessment
- Lessons Learned
- 2020 and 2021 Inspections Performed
- Questions or Comments

Background and Overview

- The Quality Assurance and Vendor Inspection Branch (IQVB) conducts approximately 20 vendor inspections/audits/observations per fiscal year.
 - Vendor inspections include both routine inspections (IP43002) and reactive inspections (IP43003).
 - Prior to 2020, all vendor inspections were performed at the vendors' facilities.
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- Inspection Procedure (IP) 43002 "Routine Inspections of Nuclear Vendors" 3
 - IP 43003 "Reactive Inspections of Nuclear Vendors"

Background and Overview

- In March 2020, the NRC went into full-time telework at the onset of the COVID-19 pandemic.
- Due to the stay-at-home mandates, the ability for NRC inspectors to travel was directly impacted.
- To adapt, IQVB developed strategies to perform both on-site and remote (or hybrid) vendor inspections to meet the agency's goal.

How the NRC Adapted and Made Decisions

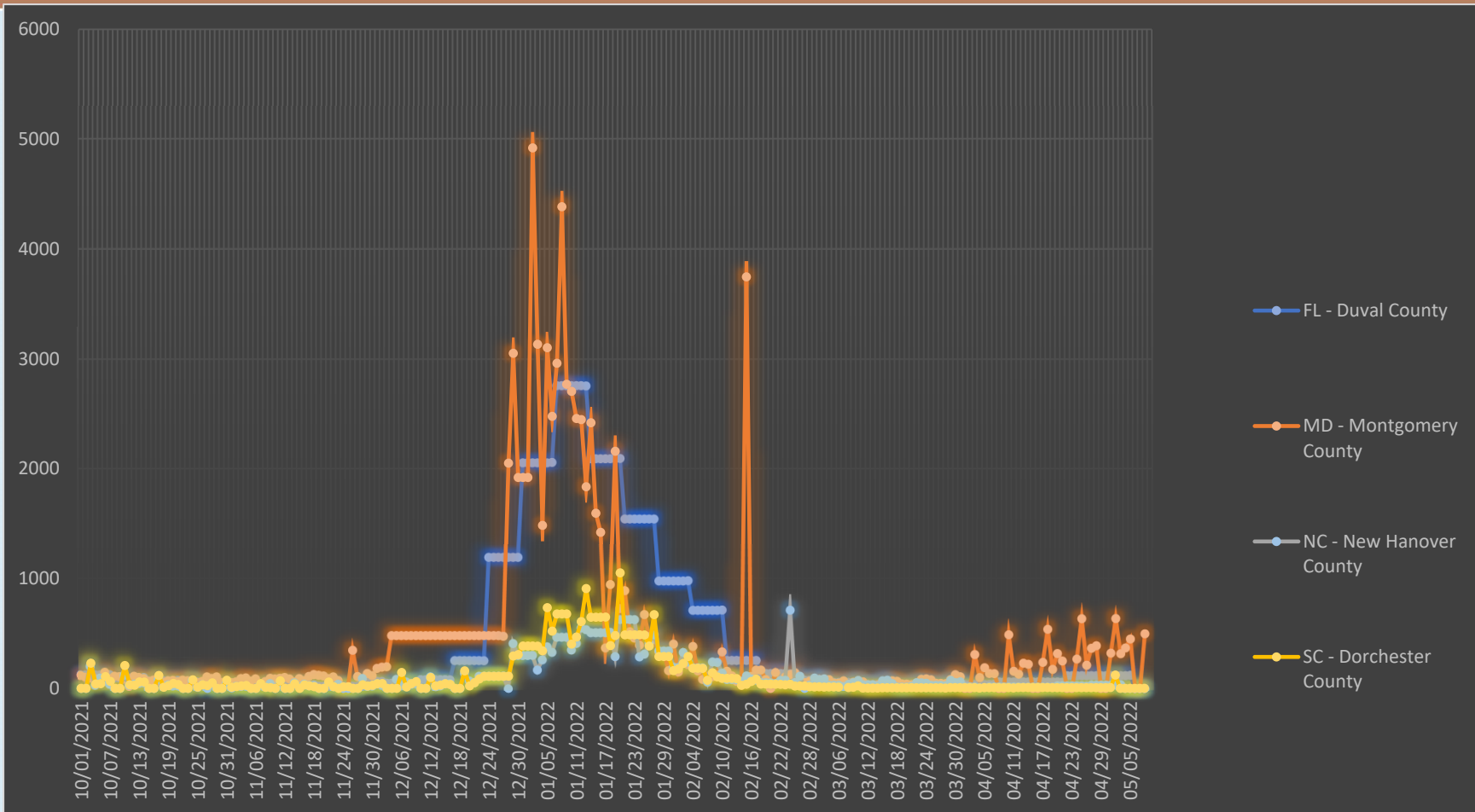
- Developed a strategy for determining how to conduct vendor inspections.
 - How severe is the COVID condition at a vendor's location?
 - Covid questionnaire to ask vendor
- Is remote or hybrid inspection an option? Is it a good option?
 - Some areas can be inspected remotely more effectively than others such as corrective actions, internal audits, 10 CFR Part 21, etc.
 - Areas like M&TE may not be a good option for remote inspection
- Management Discretion
 - M&TE – Measuring & Test Equipment

Weekly COVID Assessment

Summerville, SC (Dorchester County)	Update 4/4: 2.33%	Update 4/4: Low
	Update 4/11: 3.03%	Update 4/11: Low
	Update 4/18: 2.5%	Update 4/18: Low
	Update 5/2: 8%	Update 5/2: Low
	Update 5/9: 12.56%	Update 5/9: Low
Wilmington, NC (New Hanover County)	Update 4/4: 2.48%	Update 4/4: Low
	Update 4/11: 5.27%	Update 4/11: Low
	Update 4/18: 8.29%	Update 4/18: Low
	Update 5/2: 13.67%	Update 5/2: Low
	Update 5/9: 15.98%	Update 5/9: Low
Jacksonville, FL (Duval County)	Update 4/4: 2.24%	Update 4/4: Low
	Update 4/11: 3.19%	Update 4/11: Low
	Update 4/18: 3.43%	Update 4/18: Low
	Update 5/2: 7.07%	Update 5/2: Low
	Update 5/9: 8.59%	Update 5/9: Low
North Bethesda, MD (Montgomery County)	Update 4/4: 1.45%	Update 4/4: Low
	Update 4/11: 2.09%	Update 4/11: Low
	Update 4/18: 3.37%	Update 4/18: Low
	Update 5/2: 4.4%	Update 5/2: Low
	Update 5/9: 5.54%	Update 5/9: Low

<https://covid.cdc.gov/covid-data-tracker/#county-view>

Weekly COVID Assessment



<https://usafacts.org/visualizations/coronavirus-covid-19-spread-map/>

Lessons Learned

- Engage vendors early to coordinate inspection logistics. Chances are that some or most of a vendor's staff is still working at home in some capacity.
- Use of electronic file sharing systems such as Microsoft Box to gather high level documents such as QA manuals and implementing procedures.
- Establish virtual communication tools such as Microsoft Teams, WebEx or Zoom with vendors to ensure entrance, exit and daily debrief meetings are conducted effectively.

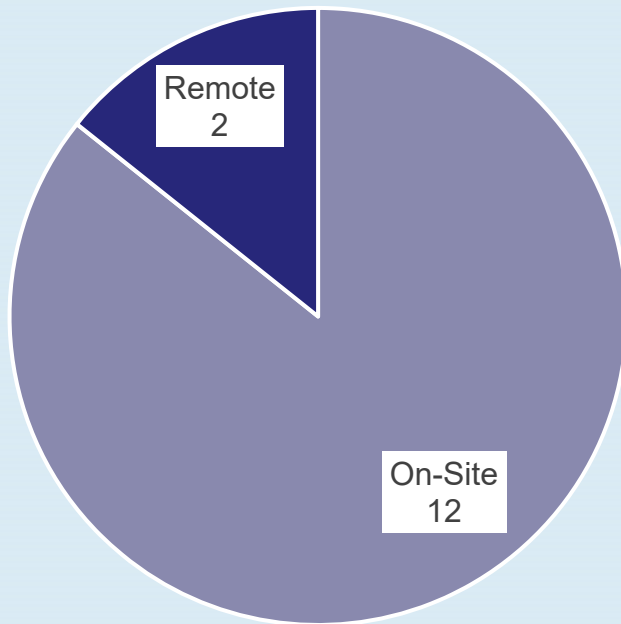
- QA – Quality Assurance

Lessons Learned

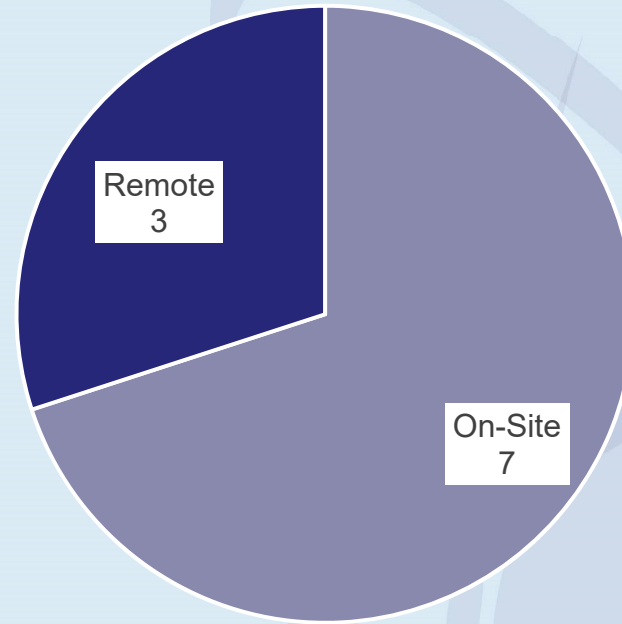
- NRC inspectors may or may not be able to sign forms related to COVID at a vendor's facility. Early engagement and communication is key.
- Be flexible. A vendor may not have all their staff available on site. The NRC inspector availability can change as well.
- Even at vendor locations with low COVID rates, the NRC inspectors still practice safety protocols such as social distancing, mask wearing etc.

2020 and 2021 Inspections Performed

FY 2020 Inspections



FY 2021 Inspections



- Not counting other activities such as observation of Nuclear Procurement Issues Corporation (NUPIC) audits
- Data from Vendor Newsletters (<https://www.nrc.gov/reactors/new-reactors/oversight/quality-assurance/vendor-insp/vendor-newsletters.html>)

Questions or Comments?

