



U.S.NRC

UNITED STATES NUCLEAR REGULATORY COMMISSION

Protecting People and the Environment

**Inspection Procedure 71111.21N.03
Commercial Grade Dedication Inspection
Public Workshop**

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October 13, 2022



CGD Public Meeting Agenda

- Why we are Inspecting Commercial Grade Dedication (CGD)
- CGD Inspection Procedure Requirements and Guidance
- Lessons Learned from Previous Inspections
- Run through inspection scenarios
- Industry comments/Public Comments
- Question and Answer Period

Why Are We Inspecting CGD?

- Relatively few efforts in current baseline inspection, on verifying implementation of verifying Commercial Grade Items (CGI)s meet their design requirements
- Operating experience indicates issues exist regarding CGD performance

Why Are We Inspecting CGD? (continued)

- CGD is important ensure new components not manufactured at App B facilities can meet their safety function.
- Less App B vendor facilities, more CGD occurring over the years.

CGD Procedure and Guidance



IP 71111.21N.03

Objective

- IP 71111.21.03 (June 28, 2022), “Commercial Grade Dedication,” specifies that the objectives are:
 - To review the implementation of the licensee’s process for dedicating commercial-grade items (CGIs), as required in applicable portions of Appendix B to Title 10 of the Code of Federal Regulations (10 CFR) Part 50 (Appendix B) to ensure reasonable assurance is provided that CGIs will perform their intended safety function.
 - To review implementation of the licensee’s procurement process for safety-related components as required in Appendix B or 10 CFR 50.69.

General Guidance

Section 02.01 Sample Selection

- The Inspectors will request the licensee to make available:
 - Design-basis capability information including function, safety significance, procurement documentation for Commercial Grade Items(CGI)
 - See Appendix B to the CGD inspection procedure
- With the information provided, the inspection team lead will select 9 to 15 CGIs to sample.

General Guidance

Section 02.01 Sample Selection

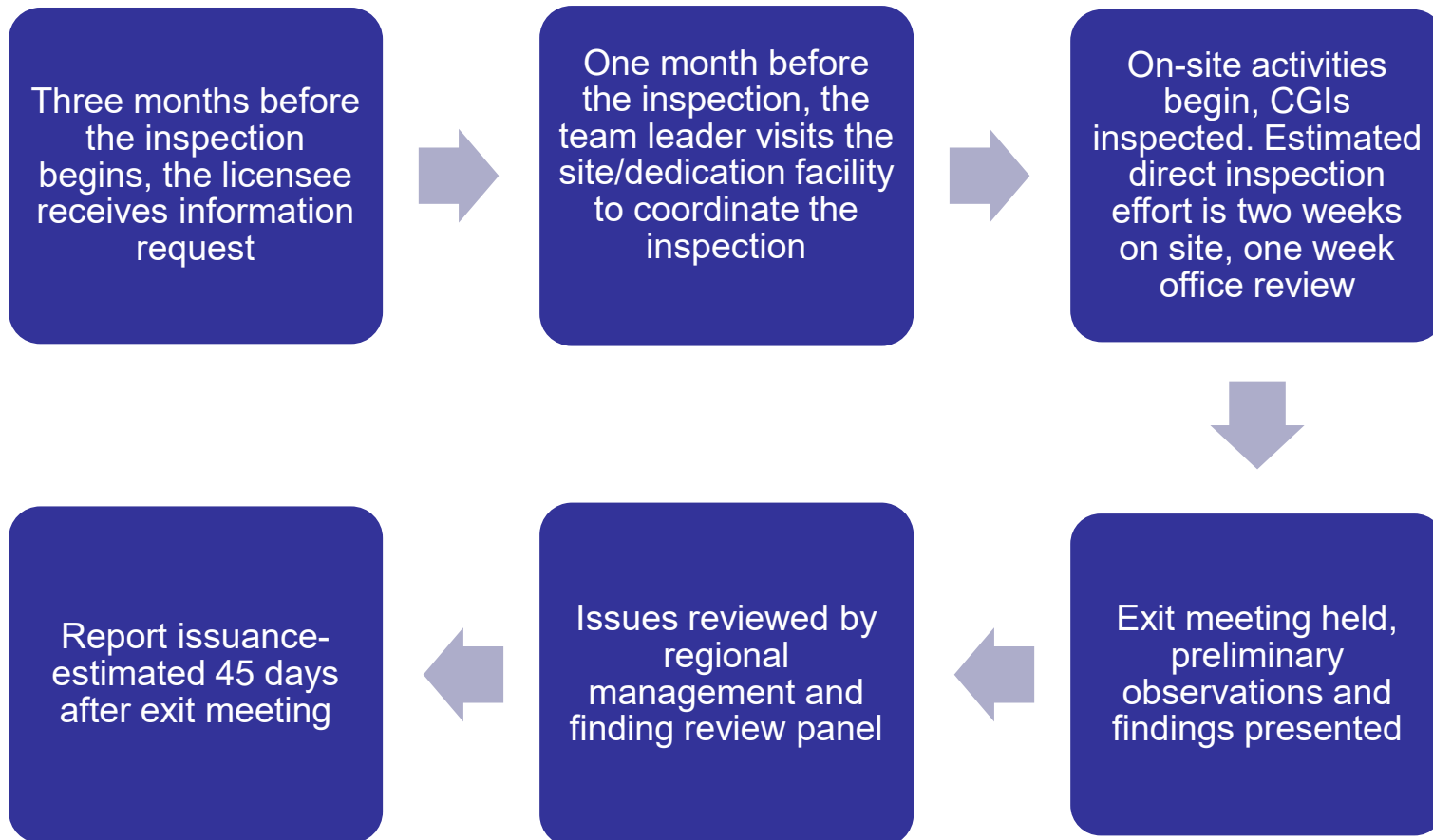
The inspectors will consider the following for selection of a CGD sample for detailed inspection review:

- System Risk
- CGIs with high incidence of corrective maintenance and/or poor performance
- CGIs with questionable assumptions in critical characteristics
- Operational Experience (industry, NRC, site specific)

Pre-Inspection Activities

- Discuss inspection with licensee staff and obtain information needed to perform inspection.
- Bagman trip to site, and/or offsite dedication facility.
- Coordinate inspection logistics (site access, badging, inspection team space) with licensee

Inspection Process Flow



EQ/POV Inspection Lessons Learned



EQ Inspection Takeaways

- Included background guidance and regulatory basis and regulatory guidance in the inspection procedure
- Ensured inspectors were properly interpreting each nuclear power unit's unique licensing basis
- Ensured consistent communication between inspectors and NRR technical/program office
- Modified the minor/more-than-minor screening examples contained in NRC guidance

POV Inspection Enhancements

- Identified technical and programmatic points-of-contact within the NRC
- Enhanced training for inspectors was developed (technical/process and inspection implementation focused)
- Tabletop dry runs performed using minor/more-than-minor examples
- Findings review panel established proactively

FAQs

- Q: What has been communicated to stakeholders?
- A: ROP monthly public meetings since September 2021
 - CGD inspections replacing POV inspections beginning in January 2023
 - NRC incorporated lessons learned from EQ and POV inspection implementation

FAQs

- Q: What is publicly available in regards to CGD material?
- A: Publicly available now:
 - Inspection Procedure IP71111.21N.03 (ML22075A251)
 - CGD implementation training (ML22249A359)

FAQs

- Q: What are the NRC resources uses per CGD inspection?
- A: 3 NRC inspectors, 2 weeks onsite
– 210 hrs

FAQs

- Q: Will each operating reactor site receive a CGD Inspection?
- A: Yes. Even if sites share a corporate dedication facilities.

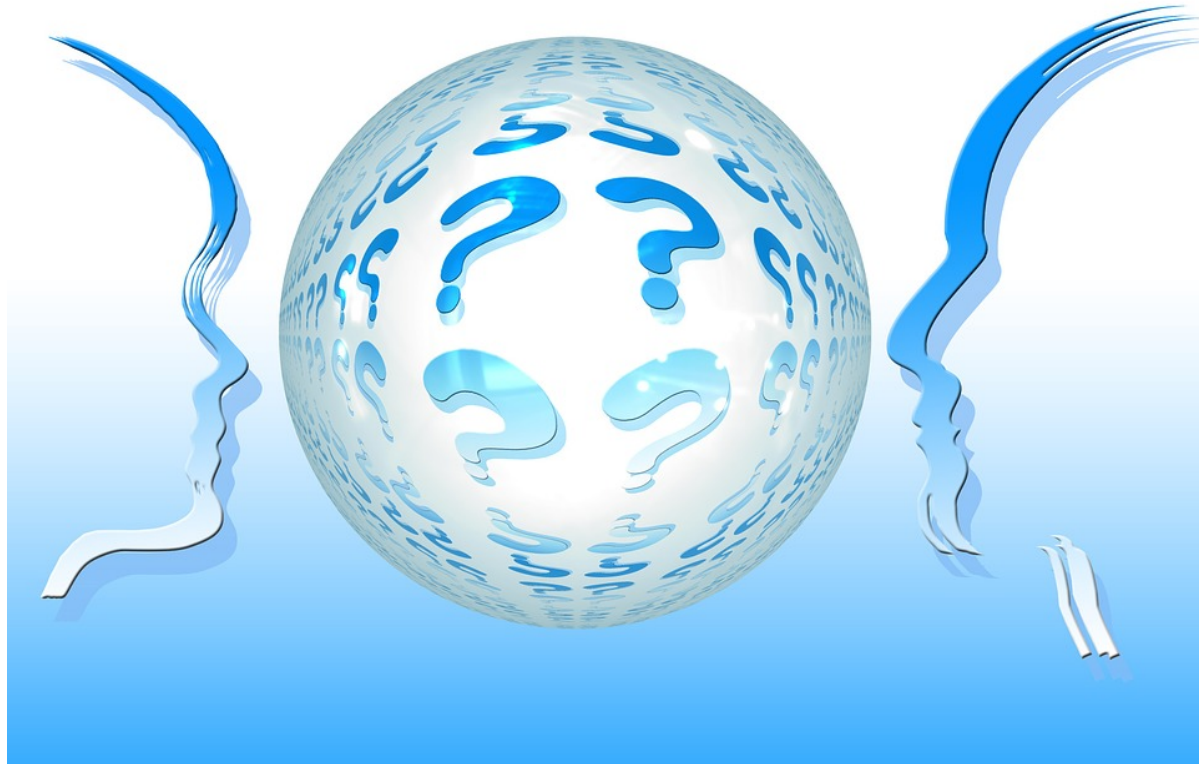
FAQs

- Q: Will there be other public workshops?
- A: Staff is open to date and location and will consider any input received.
 - This is the second planned public workshops for fall 2022.

Scenario Discussion

- Discuss 2 scenarios of CGD issues and how the NRC staff would assess them.

Q & A Session





**For additional information,
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