

From: [Geoffrey Ottenberg](#)
To: [Andrews, Sherry E](#)
Cc: [Geoffrey Ottenberg](#)
Subject: Catawba Nuclear Station NRC Commercial Grade Dedication Inspection- notification and information request
Date: Monday, November 28, 2022 4:54:19 PM
Attachments: [2023 CNS - CGD Inspection Information Request.docx](#)

Good afternoon, Sherry,

Thank you for working with me to get the Commercial Grade Dedication inspection started. As mentioned previously, attached you will find a Word document containing a notification letter with some general details regarding the inspection, including the inspection procedure we will be using, the planned dates of the inspection, and the inspection staffing. The notification letter also contains an information request for general information the inspectors will need to prepare for the inspection, and it also lists specific information that will be requested during the initial site visit week.

Feel free to reach out to me with any questions you may have regarding anything related to the inspection (inspection procedure, information request, etc.) and I'll do my best to address your questions/concerns. This is a new inspection for the NRC, and of course also for Catawba, but I'm looking forward to working with you on it. I think if we communicate openly and often, we'll get through it successfully.

Sincerely,

Geoff Ottenberg

Senior Reactor Inspector - Engineering Branch I
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
404-997-4658
Geoffrey.Ottenberg@nrc.gov

**Catawba Nuclear Station - Design Bases Assurance Inspection (Programs)
Initial Information Request**

Inspection Procedure: 71111.21N, "Design Bases Assurance Inspection (Programs)," Attachment 21N.03, "Commercial Grade Dedication," dated June 28, 2022 (ADAMS ML22075A251)

Inspection Dates: Information Gathering Visit: January 17- 20, 2023
Preparation Week: March 6-10, 2023
Onsite Week 1: March 13-17, 2023
Onsite Week 2: March 27-31, 2023

Inspection Report: 05000413/2023011, 05000414/2023011
(Standalone Inspection Report)

Inspectors: G. Ottenberg (Lead, Mechanical)
R. Fanner (Electrical)
T. Su (Electrical)

The purpose of this letter is to notify you that three inspectors from Region II will conduct an inspection at your site in accordance with Inspection Procedure 71111.21N, "Design Bases Assurance Inspection (Programs)," Attachment 21N.03, "Commercial Grade Dedication." This is not considered a team inspection. The inspection will evaluate Catawba's process for dedicating commercial-grade items, 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 these items will perform their intended safety function. Additionally, this inspection will evaluate implementation of Catawba's procurement process for safety-related components, as required in Appendix B. The inspectors will select samples of components that are risk significant and within the scope of the program.

On January 17, 2023, Mr. Geoff Ottenberg, a Senior Reactor Inspector from the NRC's Region II office, will begin the inspection with an information gathering visit to the site. The purpose of the visit is to become familiar with the process for dedicating commercial-grade items and the process for procuring safety-related components at Catawba. This visit may include a tour of onsite commercial-grade item dedication facilities, receipt inspection facilities, storage facilities, and installed plant components associated with potential inspection samples. During the visit, the team lead will also review the information provided in the initial information request to select a list of potential inspection samples. The team lead may also identify other information needed to support the inspection during this visit.

To minimize the impact on your staff and to ensure a productive inspection, we have enclosed two separate requests for information needed prior to the onsite information gathering visit and offsite inspection preparation week. The first request (Enclosure 1) is generally for information that will be used to choose the inspection samples or information that will be applicable to all inspection samples throughout the inspection. This information should be made available to the team lead prior to the information gathering visit. The second request (Enclosure 2) is for information specific to individual samples and should be made available prior to the offsite preparation week.

Please provide the information requested in Enclosure 1 to the Region II Office or a file sharing site by January 6, 2023. Additional documents may be requested during the information gathering visit. The inspectors will try to minimize your administrative burden by specifically identifying only those documents required for inspection preparation. The additional information should be provided to the Inspectors in the Region II office or a file sharing site by March 3, 2023.

During the information gathering visit, Mr. Ottenberg will also discuss the following inspection support administrative details: (1) availability of knowledgeable plant engineering and licensing personnel to serve as points of contact during the inspection, (2) method of tracking inspector requests during the inspection, (3) computer access, (4) working space, (5) arrangements for site access, and (6) other applicable information.

**INFORMATION REQUEST FOR CATAWBA NUCLEAR STATION DESIGN BASES
ASSURANCE INSPECTION (PROGRAMS)
(COMMERCIAL GRADE DEDICATION)**

Prior to the information gathering visit, please provide the information electronically in “.pdf” files, Excel, or other searchable format on CDROM (or FTP site, SharePoint, etc.). The CDROM (or website) should be indexed and hyperlinked to facilitate ease of use.

Contact Information: Geoff Ottenberg
(404) 997-4658
Geoffrey.Ottenberg@nrc.gov

Information Gathering Visit: An information gathering visit is currently scheduled the week of January 17, 2023. During this visit, we would like to identify the component samples for this inspection. We’d like to meet with procurement and dedication specialists to discuss the upcoming inspection and our sample selection process. Purposes of the site visit are to: (a) discuss the scope of the planned inspection; (b) obtain advance information to review in preparation for the inspection; (c) ensure that the information to be reviewed is available at the beginning of the inspection; and (d) verify that logistical issues (such as obtaining both site and computer system access and arranging the location of the inspection team working area) will be resolved prior to inspector arrival. Please reserve a room during the scheduled inspection dates. We request the room have a telephone, wireless internet access, and a licensee computer with access to procedures, corrective action program documents, and a printer.

Logistics:

Information gathering visit: January 17-20, 2023
Onsite inspection weeks: March 13-17, and March 27- 31, 2023

Please schedule an entrance meeting for around 2:00 p.m. on Monday, March 13, 2023 (approximately 15 minutes). The date and time of the exit meeting will be discussed at a later date. In addition, I’d like to have a daily debrief with your inspection support staff at a convenient time in the afternoons for both onsite inspection weeks (Time TBD, approximately 30 minutes).

We will need a conference room as workspace for the inspectors. We will also need an area available for conducting interviews.

Please provide access to your document system (preferably at least one computer in our conference room), nearby printers, and Wi-Fi access.

During the information gathering visit, please provide info on (1) conference room location & phone number, (2) cafeteria location/hours, and (3) procurement and engineering staff normal working hours. Also, please let me know if there are any potential resource conflicts during our scheduled inspection weeks (Fridays off, EP drills, management retreats) and we’ll do our best to accommodate.

Team Members: Geoffrey Ottenberg (Inspection Lead, Mechanical)
Rodney Fanner (Electrical)
Teh-Chiun (TC) Suh (Electrical)

Please verify the status of access authorization and requirements for unescorted access for each inspector. Please provide me with a list of exceptions, and I will address them.

PAPERWORK REDUCTION ACT STATEMENT

This letter contains voluntary information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). The burden to the public for these information collections is estimated to average 60 hours per response. Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: T6A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct nor sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the Code of Federal Regulations 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Enclosure 1

Documents Requested Prior to Information Gathering Visit

The documents and information requested below should generally be made available to the inspection team for the team's use both on-site and off-site during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet-based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, it is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below.

Documents requested by January 6, 2023:

1. Licensing basis documents such as the updated final safety analysis report and technical specifications.
2. Procedures for dedicating commercial-grade items and for procurement of safety-related components. Procedure controlling counterfeit, fraudulent, and suspect items.
3. List of commercial-grade items, with a brief description of application, that have been dedicated for safety-related applications. These items may be dedicated by Catawba Nuclear Station or dedicated by a vendor (or other licensee) and procured by Catawba Nuclear Station. Please note whether the item has been installed in the plant. The list should encompass the past six years of dedication activities.
4. List of any commercial grade-items that failed after completing the dedication process. The list should encompass the past six years of dedication activities.
5. List of components procured as safety-related, with descriptions, if not included above. Please note whether the item has been installed in the plant. The list should encompass the past six years of procurement activities.
6. List of corrective action program documents, with descriptions, related to commercial-grade items, procurement, or storage, including any items that failed after completing the dedication process. The list should encompass the past six years of these activities.
7. List of systems, system numbers/designators, and corresponding names.

Enclosure 2

Documents Requested Prior to Inspection Preparation Week

For the samples identified by the team lead, the documents and information requested below should generally be made available to the inspection team for the team's use both on-site and off-site during the inspection. Electronic format is the preferred media. If electronic media is made available via an internet-based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, it is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

Documents requested by March 3, 2023:

1. Purchase requisition and purchase orders.
2. Other pertinent vendor/licensee correspondence.
3. Original and updated design specifications.
4. Catalog specifications.
5. Procurement basis evaluation such as like-for-like, equivalency, plant design change packages, drawing and specification updates.
6. 10 CFR 50.59 documentation, if required.
7. Material receiving reports, packing lists/invoices, and other shipping documents.
8. Receipt inspection reports and any related test reports.
9. Other documents to trace the item from the time it was dedicated to the time it was installed, tested, and accepted.
10. Certificates of conformance/compliance/quality.
11. Vendor test and inspection reports.
12. Third-party or sub-vendor test and inspection reports.
13. Shelf-life information.
14. Vendor dedication/partial dedication information.
15. Design/material/process change history information.

16. Completed commercial-grade dedication document, including: safety classification; identification of safety function/application requirements; identification of critical characteristics; identification of verification methods and acceptance criteria for the critical characteristics, evaluation of credible failure modes (if applicable); and identification of the supplier's quality assurance program that meets 10 CFR Part 50, Appendix B.
17. Any deviation from design, material, and performance characteristics relevant to the safety function (nonconformance dispositions).
18. Documents showing objective evidence such as: special test and inspection procedures and results; commercial-grade survey reports, showing: item, design, material, and specific performance characteristics (relevant to safety function); and source inspection reports.
19. Completed post-installation test procedure and results.
20. Completed stock or material issue forms and installation work orders or reports.
21. Historical performance information.