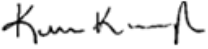




UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 5, 2023

MEMORANDUM TO: Russ Felts, Director
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

FROM: Kerri A. Kavanagh, Chief  Signed by Kavanagh, Kerri
Quality Assurance Vendor Inspection Branch on 02/05/23
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

SUBJECT: TRIP REPORT BY THE NUCLEAR REGULATORY
COMMISSION STAFF OF THE NUPIC JOINT UTILITY TEAM
AUDIT AT RSCC WIRE AND CABLE

On December 5-9, 2022, Greg Galletti and Vincent Voltaggio of the Office of Nuclear Reactor Regulation, Division of Reactor Oversight, observed the performance of a Nuclear Procurement Issues Corporation (NUPIC) joint utility audit of RSCC Wire and Cable Corporation (RSCC), in East Granby, Connecticut. Xcel Energy (Xcel) led the audit, with participation from Pacific Gas & Electric, Energy Northwest, American Electric Power, Eletrobras Eletronuclear (Brazil), and Electric Power Research Institute, using the NUPIC checklist and performance-based supplier audit (PBSA) worksheet. The RSCC audit number is 25254. The purpose of the staff's observation was to assess the NUPIC quality assurance audit process used for suppliers of components to the nuclear industry. The trip report of the staff's observations includes a list of NUPIC audit team members observed.

Enclosure:
As Stated

CONTACT: Vincent Voltaggio, NRR/DRO
(301) 415-1831

Greg Galletti, NRR/DRO
(301) 415-1831

SUBJECT: TRIP REPORT BY THE NUCLEAR REGULATORY COMMISSION STAFF OF
THE NUPIC JOINT UTILITY TEAM AUDIT AT RSCC WIRE AND CABLE
CORPORATION Dated: February 5, 2023

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OFFICE	NRR/DRO/IQVB	NRR/DRO/IQVB	NRR/DIRS/IQVB
NAME	GGalletti	VVoltagio	KKavanagh
DATE	1/26/2023	2/3/2023	2/5/2023

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NUCLEAR PROCUREMENT ISSUES CORPORATION AUDIT
OBSERVATION TRIP REPORT

Vendor Audited: RSCC Wire & Cable LLC.
20 Bradley Park Road, East Granby, CT 06026

Lead Licensee: Xcel Energy

Lead Contact: Kevin McFadden
NUPIC Lead Auditor
Xcel Energy
kevin.t.mcfadden@xcelenergy.com

Nuclear Industry Activity: RSCC Wire & Cable, located in East Granby, CT., produces Class 1E cables and commercial grade dedication services to the commercial nuclear industry.

Observation Dates: December 5 through December 9, 2022

Observer: Greg Galletti, NRR/DRO/IQVB
Vincent Voltaggio, NRR/DRO/IQVB

Approved by: Kerri A. Kavanagh, Chief
Quality Assurance Vendor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

Subject

This trip report documents observations made by a member of the U.S. Nuclear Regulatory Commission (NRC), Office Nuclear Reactor Regulation (NRR), Division of Reactor Oversight (DRO), during a NUPIC joint utility audit conducted on December 5-9, 2022, at RSCC Wire & Cable (RSCC), East Granby, Connecticut.

Background/Purpose

The Nuclear Procurement Issues Corporation (NUPIC) was formed in 1989, by a partnership involving all domestic and several international nuclear utilities. The NUPIC program evaluates suppliers furnishing safety-related components, services, and commercial-grade items to nuclear utilities. The NUPIC audit was performed using Revision 22 of the NUPIC audit checklist and the results will be provided to NUPIC members that procure parts and services from RSCC.

The purpose of the NUPIC audit was to evaluate the implementation and effectiveness of RSCC Quality Assurance (QA) Program at the East Granby, CT facility. The audit team was comprised of individuals from the following NUPIC member utilities (Xcel Energy, Pacific Gas & Electric, Energy Northwest, American Electric Power, Eletrobras Eletronuclear) and was led by Xcel Energy. The technical specialists were from the Electric Power Research Institute, and it was their responsibility to verify RSCC ability to control critical characteristics identified on the Performance Based Supplier Audit Worksheet (PBSA).

The purpose of the NRC staff's observation of this audit was to ensure that the NUPIC audit process continues to meet the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities." The NRC staff implemented Inspection Procedure 43005, "NRC Oversight of Third-Party Organizations Implementing Quality Assurance Requirements," during the observation.

Observation Activities

The NRC observers independently assessed and reviewed RSCC implementation of selected portions of their QA program to evaluate whether NUPIC effectively identified and responded to issues. RSCC provided the QA manual, implementing procedures, and samples of completed work products including, but not limited to, design packages, commercial grade item dedication plans, training and qualification records, and corrective action reports to the NUPIC audit team. The RSCC QA manual is based on the American Society of Mechanical Engineers Nuclear Quality Assurance standard NQA-1-2008/2009 Addendum. The NRC observed that NUPIC appropriately focused their audit efforts on Appendix B criteria most relevant to RSCC activities such as design control, commercial grade dedication, corrective action, control of special processes, inspection, control of measurement and test equipment, nonconforming materials, parts, and components, document control, and procurement document control. In addition, the NRC staff observed the NUPIC technical specialist focused on the critical areas described in the PBSA and the technical specialist's conclusions were drawn from a review of objective evidence reflective of RSCC performance. The NRC observers reviewed samples of the documentation provided by RSCC for the audit team to draw independent conclusions. The NRC observers participated in discussions between the NUPIC audit team members and the vendors staff, while refrained from directing or leading NUPIC, as to not interfere with the conduct of NUPIC's audit.

The QA areas reviewed during the audit included the following: contract review, design, commercial grade dedication, procurement, fabrication/assembly activities, material control and handling, storage and shipping, special processes, tests, inspections and calibration, document control/adequacy, organization/program, nonconforming items/Part 21, internal audits, corrective action, and training/certification. Specifically, NRC staff observed RSCC design packages engineering change and procurement change notices, procurement, identification of material tagging and nonconformance control, calibration services and certifications, and training and qualification records. Additionally, the NRC staff accompanied the NUPIC team members while they performed walkdowns of portions of the facility, observations of in-process production activities included: special processes (nondestructive testing, and irradiation), MT&E, inspection (Receipt, Dimensional Inspection), and material handling and control, as well as attending discussions between the NUPIC audit team members and RSCC personnel.

Discussion

The NRC observers verified NUPIC adequately considered RSCC scope of supply and observed in-process work practices and completed work products to verify activities were performed in accordance with the vendor's applicable procedures. The NRC observers confirmed the NUPIC audit team was implementing the latest revision of the NUPIC audit checklist, Revision 22, and NUPIC Document No. 11, "Joint Audit & Checklist Implementation Guideline," Revision 24, to conduct their assessment activities. The NRC staff observed the NUPIC audit team members completing sections of the NUPIC checklist and documenting objective evidence to support the conclusions discussed during the daily team meetings. The NRC staff also observed NUPIC's process for evaluating potential findings and deficiencies, including discussions during internal NUPIC daily team discussions meetings, and during debriefing activities with RSCC personnel. The NRC staff also discussed their observations with NUPIC's lead auditor and team members.

The NUPIC audit team concluded that the vendor is effectively implemented their QA program in accordance with the applicable requirements of 10CFR50 Appendix B, and 10CFR21. There were three findings identified from the audit in the following areas: document control/adequacy, test, inspections, and calibration, and corrective action. Additionally, nine deficiencies were identified in the following areas: contract review (3), commercial grade dedication, procurement, tests, inspection, and calibration, internal audits, corrective action, and procurement document control. The NRC staff observed that the vendor was generally receptive to the deficiencies identified by the NUPIC audit team, and initiated actions to address those concerns.

Conclusion

The NRC staff observed the NUPIC audit team conduct a review of the RSCC QA program. The NRC staff confirmed that the NUPIC audit team focused on the most relevant portions of the QA program consistent with the vendor's scope of supply and performed their assessment activities through a combination of direct observation of in-process work activities and a review of completed work products. The NRC staff confirmed that the NUPIC audit team adequately implemented the guidance in the NUPIC audit checklist, documented objective evidence to support their conclusions, and conducted the audit in a courteous and professional manner. The NRC staff concluded that the NUPIC auditors/technical specialist adequately completed their assigned programmatic elements in accordance with the NUPIC policies and procedures for conducting joint audit activities and resulted in a thorough and comprehensive evaluation of the vendors program.

List of Participants

Name	Title	Affiliation	Entrance	Exit
Jack Phelps	Audit Team Leader	XEL	X	X
Kevin McFadden	Audit Team Lead-in training	XEL	X	X
Drew Mantley	Technical Specialist	EPRI	X	X
Ilya Goldberg	Technical Specialist-in training	EPRI	X	X
Cynthia Larson	Audit Team Member	AEP	X	X
Matt Harrington	Audit Team Member	ENW	X	X
Bob Carvel	Audit Team Member	PGE	X	X
Claudia Regina da Silva Ferreira Lime	Audit Team Member	ETN	X	X
Greg Galletti	NRC Observer	NRC	X	X
Vincent Voltaggio	NRC Observer	NRC	X	X
Phillip Sargenski	Quality Assurance Manager	RSCC	X	X
Eric Rasmussen	Director of Engineering & Sales	RSCC	X	X
Rick Newhall	Executive Director of Quality Operations	RSCC	X	X

Documents Reviewed

RSCC

Nuclear Quality Manual, Revision 12, 6/11/19
 Standard Procedure (SP) #091SP002, "Control of Purchase Orders," Revision 16, 10/19/22
 SP #091SP001, "Approved Supplier Listing," Revision 15, 4/27/16
 Corrective Action Report (CAR) No. 1532, issued 3/4/21
 CAR No. 1504, issued 11/15/21
 CAR No. 1505, issued 11/15/21
 10 CFR Part 21 Evaluation, issued 11/8/19
 10 CFR Part 21 Evaluation, issued 8/25/20
 Off-Standard Report (OSR) 10767, issued 7/15/22
 OSR 11640, issued 12/2/22
 OSR 11338, issued 8/17/22

NUPIC

NUPIC audit checklist, Revision 21
 NUPIC Document No. 11, "Joint Audit & Checklist Implementation Guideline," Revision 24