



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


March 23, 2023

MEMORANDUM TO: Samuel Lee, Director
Division of Operating Reactor Safety, Region I

Mark Franke, Director
Division of Reactor Safety, Region II

Julio F. Lara, Director
Division of Operating Reactor Safety, Region III

Ryan E. Lantz, Director
Division of Operating Reactor Safety, Region IV

FROM: Russell Felts, Director  Signed by Felts, Russell
Division of Reactor Oversight on 03/23/23
Office of Nuclear Reactor Regulation

SUBJECT: ESTABLISHMENT OF COMMERCIAL GRADE DEDICATION
INSPECTION AND AGE-RELATED DEGRADATION INSPECTION
CROSS REGIONAL PANELS

PURPOSE:

The purpose of this memorandum is to document the establishment of a Cross Regional Panel to promote consistent application and resolution of inspection findings and proposed enforcement action identified during inspections of licensee Commercial Grade Dedication (CGD) programs per U.S. Nuclear Regulatory Commission (NRC) inspection procedure 711111.21N.03, "Commercial Grade Dedication" and Age-Related Degradation (ARD) inspections under NRC inspection procedure 71111.21N.04, Age-Related Degradation."

BACKGROUND:

Beginning in calendar year 2023, the NRC will commence inspection of licensee CGD programs using NRC inspection procedure 711111.21N.03, which is an area that the NRC has not conducted focused inspection activities in several years. Then, beginning in July 2023, the NRC will commence inspection of licensee ARD programs using NRC inspection procedure 711111.21N.04. Because of the limited inspection experience in these areas and the lessons learned when implementing the Environmental Qualification and Power Operated Valve

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inspections, a Commercial Grade Dedication inspection Cross Regional Panel and an Age-Related Degradation inspection Cross Regional Panel, that consists of technical experts from the Office of Nuclear Reactor Regulation and Branch Chiefs from each regional office in the Division of Reactor Safety/Division of Reactor Operating Reactor Safety has been established to assist inspectors in the evaluation and assessment of potential inspection findings and enforcement actions from each inspection. Establishment of such panels has proven to be an effective approach to ensure inspection issues are evaluated in a consistent and timely manner across the four regional offices. This panel will follow the guidance outlined in a December 11, 2018, memorandum from Christopher Miller, Director, Division of Reactor Inspection and Regional Support to the Directors of the Division of Reactor Projects and Safety in the Regional Offices. (ML18232A192). Members of the panel are listed in Attachment (1) of this memo.

METHODOLOGY:

The CGD and ARD Cross Regional Panels will meet following the completion of each CGD or ARD inspection and review all inspection findings, including minor violations, and proposed enforcement actions identified during the conduct of inspection activities prior to the issuance of the subject inspection report. Although the frequency and length of the meetings will be determined by the Board Chairperson or their designee, it is recommended to expedite the meeting decision process and minimize discussion time that all proposed findings should be provided to board members several working days in advance of the meeting date.

Proposed findings can be viewed by board members using Reactor Program System (RPS) for the applicable inspection report under the "Sites Directory" or distributed to the board members following the guidance in the template included in Attachment 2. All performance issues, e.g. those that have been identified at the inspection exit meeting as minor or more than minor must be documented in the template or RPS and discussed at the panel meeting. The template or RPS entry should be completed by a knowledgeable inspector or the inspection team leader.

The panel chair will facilitate the discussion and help the panel reach consensus on the final disposition of the issue of concern, performance deficiency, and inspection finding. Similar to Significance Determination Process/Enforcement Review Panels (SERPs) consensus decision-making, unanimous agreement of the cross-regional panel voting members is not needed to establish consensus; rather, a consensus decision is one in which all members at least generally accept the position, agreement, or decision reached. Each panel member may question or challenge any of the information and analyses presented. If consensus is not reached at the conclusion of the panel, the issue will be elevated by the regional branch chief responsible for the inspection, to a discussion with the decision makers (regional (Division of Reactor Safety)/(Division of Operating Reactor Safety) Division Directors or their designees, with the Division of Reactor Oversight Director/Deputy Director facilitating the decision making. For potentially greater than green issues, the SERP process will be followed (IMC 609, Attachment 1, Significance and Enforcement Review Panel (SERP) Process). The panel's decision will serve as the final minor/more-than-minor determination for these performance deficiencies.

Following the meeting, the lead inspector or inspection team leader will document the final findings in RPS and the inspection report in accordance with NRC policies and procedures. The CGD and ARD programmatic lead will document meeting minutes to capture final decisions made during the panel and save the minutes on a DRO SharePoint site.

This CGD and ARD panels are intended to be temporary and can be disbanded once there is sufficient familiarity and consistency with how to disposition such inspection findings and issues(6 months to 1 year). This will be indicated when the panel provides little to no added value to the findings the inspectors have prepared. Disbanding of the panel will be at the discretion of the Director, Division of Reactor Oversight.

Enclosure:

1. Attachment 1
2. Attachment 2

SUBJECT: ESTABLISHMENT OF POWER-OPERATED VALVE CROSS REGIONAL PANEL
Dated: March 23, 2023

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NRR-106

OFFICE	NRR/DRO/IRIB	NRO/DRO/IRIB	NRR/DRO
NAME	DBollock	THipschman	RFelts
DATE	3/13/2023	3/20/2023	3/23/2023

OFFICIAL AGENCY RECORD

Attachment 1

Table 1: List of Participants

Panel Member	Role
IRIB/IRAB Branch Chief or designee*	* **Chair/Participant
Regional DRS/DORS Branch Chief responsible for inspection or designee*	* Participant
Inspection Team Leader or inspector knowledgeable in the inspection and findings*	* Presenter
Other regional BCs and inspectors	Observers/Participants
Enforcement Representative, as needed	Participant
NRR technical leads for CGD, as needed	Participant
Regional Senior Reactor Analyst, as needed	Participant
Regional Counsel, as needed	Participant

*required for quorum

**only one DRO BC is required

Attachment 2 Commercial Grade Dedication Panel Worksheet

Note: RPS in lieu of this worksheet.

Date of Panel		Inspection Date	
Licensee		Exit Date	
Region		Report Number	
Lead Inspector			

Performance deficiency (including regulation or standard not met)

Brief summary of the issue

Minor/more-than-minor (including basis) and proposed significance

Cross-cutting aspect and basis(optional)

Enforcement (if applicable)

Comments