

Commercial Grade Dedication Inspections - Update

EPRI PeARTS Meeting

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US NRC

Status of Commercial Grade Dedication Inspections

- First thirty-one inspections completed with 17 Non-cited Violations (NCVs) identified.
- NRC holds cross-regional review panels before the inspection reports are issued.
- Inspections will continue through 2026, with each site having the inspection.
- NRC Technical and Programmatic leads.
 - Technical Lead- Aaron Armstrong
 - Programmatic Lead- Doug Bollock

Reminders

- First time inspecting these areas, so it could be the first time many staff are interacting with the NRC.
- Early, clear communication between the NRC inspection team and licensee staff is essential.
- Get the right people involved.
- If you aren't sure what the NRC is looking for, ask the NRC inspectors.

Everyone benefits when we all understand what the NRC is looking for.

Issues so far?

Commercial Grade Surveys

- When using Method 2, a commercial grade survey is the dedication documentation.
- Must retain Commercial Grade Surveys
 - These are your permanent records for the component.

*The commercial grade survey can be part of your audit of commercial suppliers

Issues so far?

Critical Characteristics and Acceptance

Criteria

- Translating adequate critical characteristics from technical evaluations (not all safety functions would be met).
- Using appropriate acceptance criteria to verify the critical characteristics.

Issues so far?

Minor issues or observations

- The lack of control of parts and material that are signed out from the warehouse, transferred to the shop then to the jobsite, and returned to the warehouse if not used.
- The shelf-life of parts in the warehouse and the lack of controls to properly identify and update the item as needed.

Anything else?

10 CFR Part 21 compliance

- Reporting an event under 10 CFR Part 50.72, 50.73 or 73.71.
- Must include information on defect in 50.72, 50.73 or 73.71 report (meet the Part 21 reporting).
- Must still evaluate for defects (Part 21).
- See Grand Gulf Nuclear Station inspection report 05000416/2023001.

What's next?

Information Notice

- NRC is drafting an Information Notice to share the lessons learned from the first two years of implementation of CGD inspections.
- The information will share the performance deficiency and general information (for both minor and more-than-minor violations.)
- NRC will also hold a public meeting to share the information.

Questions?

For Future Questions

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Key Takeaways

- Ensure clear communications between licensee staff and NRC inspectors
- CGD inspections are being implemented properly.
- Licensees are conducting CGD adequately, with mostly minor issues identified so far.
 - Understand Part 21 evaluation and reporting requirements.
 - Maintain Commercial Grade Surveys
 - Adequate critical characteristics and acceptance criteria used