

**From:** [Adam Ruh](#)  
**To:** [Boyce, Laura](#); [McDaniel, Sarah A](#); [Hershkowitz, Mike](#)  
**Subject:** HNP & ONS - Request for Information - Commercial Grade Dedication Inspection  
**Date:** Wednesday, January 8, 2025 11:36:00 AM  
**Attachments:** 2025 HNP OCO CGD Inspection Information Request.pdf

---

Hello all,

I'll be leading the group of inspectors performing the Commercial Grade Dedication (CGD) inspections in August/September. As part of preparing for this, I've attached a request for information with two parts. Documents requested in Enclosure 1 are to support my upcoming information gathering visits at each site. I am planning to perform these visits April 21-25, 2025 (Harris) & May 27-30, 2025 (Ocone). My goal for the trips is to get a big picture understanding of how your CGD processes work at each site and to narrow down which items we should take a deeper look at during the inspection. During the trips I plan to perform the following to accomplish that goal:

- Meet available onsite staff that support CGD activities (e.g. procurement engineering & warehouse staff) to discuss the following:
  - Examples of dedication plans
  - CGD acceptance methods utilized
  - Special Tests methods in use (including procedures used)
  - Methods used to establish and maintain traceability
  - Sampling plans for dimensional/visual inspection and/or testing
  - Calibration methods of measuring and test equipment (and how these are traceable to nationally recognized standards)
  - Qualification of personnel or vendors used to perform the tests
  - Examples of vendor-certified material test reports and certificates of conformance/compliance
  - Examples of acceptance of dedicated CGI that were provided by a supplier or sub-supplier
- Tour the following areas:
  - areas used for dedication/acceptance activities (including observation of any ongoing procurement activities such as testing, inspection, receipt inspection, etc.)
  - warehouse/storage facility areas
- Request additional information which may be needed to support the inspection which has not already been requested
- Go over inspection logistics:
  - Inspection and interview rooms
  - Response team contacts
  - Site access for inspection team
  - Licensee computer access
  - Meeting times and locations
  - Wifi access

In terms of efficiencies and the corporate nature of the processes at both sites, I expect to

resolve much of the procurement engineering & CRDF process aspects during my visit at Harris. My visit at Oconee will be shortened due to a holiday, and I expect to use that time primarily for warehouse tours and finalizing sample selections for the sites.

The remainder of the information requested (Enclosure 2) will only be needed after I have identified to you or your staff the specific inspection samples (at a future date).

Please let me know if you have any questions.

Adam Ruh

USNRC

R2/DORS/EB1

864-533-5756

**Shearon Harris Nuclear Power Plant & Oconee Nuclear Station – Focused Engineering  
Inspections (Commercial Grade Dedication)  
Initial Information Requests**

**Inspection Procedure:** 71111.21N, “Design Bases Assurance Inspection (Programs),” Attachment 21N.03, “Commercial Grade Dedication,” dated February 16, 2023 (ADAMS ML23005A288)

**Inspection Dates:** Information Gathering Visit: April 21-25, 2025 (Harris)  
Information Gathering Visit: May 27-30, 2025 (Oconee)  
Preparation Weeks: August 11-22, 2025  
Onsite Week 1: August 25, 2025 (Harris)  
Onsite Week 2: September 8, 2025 (Oconee)  
Tentative Onsite Week 3: September 22, 2025 (TBD)

**Inspection Reports:** 05000296, 270, 287/2025010 (Oconee)  
05000400/2025010 (Harris)  
(Standalone Inspection Reports)

**Inspectors:** Adam Ruh (Lead), (404)-997-4699, [adam.ruh@nrc.gov](mailto:adam.ruh@nrc.gov)  
Mark Hagen (Electrical)  
Chase Franklin (Mechanical)

The purpose of this letter is to notify you that three inspectors from Region II will conduct an inspection at your sites 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 inspections at Shearon Harris Nuclear Power Plant and Oconee Nuclear Station will evaluate the processes used 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 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.

In line with the inspection dates described above, Adam Ruh, a Senior Reactor Inspector from the NRC’s Region II office, will begin the inspections with an information gathering visit to the sites. 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 each site. 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 inspection lead will also review the information provided in the initial information request to select a list of potential inspection samples. The inspection 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

inspection 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 April 16, 2025 (Harris) & May 20, 2025 (Oconee). 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 for both sites should be provided to the Inspectors in the Region II office or a file sharing site by August 4, 2025.

During the information gathering visits, 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 the following logistical issues will be resolved prior to inspector arrival: (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.

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. We will also need an area available for conducting interviews. Additionally, please verify the status of access authorization and requirements for unescorted access for each inspector and notify the lead inspector of any exceptions.

#### 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](mailto: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 for 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 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 April 16, 2025 (Harris) & May 20, 2025 (Ocone):

1. Current updated final safety analysis report (UFSAR), technical specifications (TS), and technical specification bases (TSB).
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. Provide in the list whether these items were dedicated by the site (PQL-2) or dedicated by a vendor (or other licensee) and procured by the site (PQL-1). Please note whether the item has been installed in the plant and the applicable structure, system, or component. 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, meaning the item was considered a basic item following dedication, and later failed either during testing or upon an actual demand. The list should encompass the past six years of dedication activities.
5. List of components procured as safety-related (PQL-1), with descriptions, if not included as specified 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 components procured as safety-related or commercial-grade items dedicated for safety-related applications, in the past six years, where the procurement/dedication process was expedited to support rapid turnaround (less than seven days). If possible, the list should identify the systems in which these items were intended for use.
7. 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.
8. List of systems, system numbers/designators, and corresponding names

9. Current copy of the quality assurance topical report
10. List of site/corporate contacts that will be associated with the inspection
11. Copy of any self-assessments or audits related to commercial grade dedication or procurement activities performed within the past six years.
12. List of Over, Short, Damaged & Discrepant (OSD&Ds), Procurement Engineering Evaluations (PE EVALs) and Procurement Engineering Equivalency Evaluations (PE EQVRs) associated with the PQL-1 and PQL-2 procurements identified in items #3 and #5 above. Provide a brief description / title if available.

## **Enclosure 2**

### **Documents Requested Prior to Inspection Preparation Week**

For the samples identified by the inspection lead, the documents and information requested below should generally be made available for 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. Please ensure information provided is readable and word searchable. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents 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 August 4, 2025:

If the selected inspection samples were not reviewed using the current procedures for dedicating commercial-grade items and for procurement of safety-related components (previously requested), provide the procedure revisions that were applicable at the time of procurement and/or dedication.

1. Purchase requisition and purchase orders
2. Dedication Plan / Commercial Grade Item Technical Evaluation, including any supporting attachments
3. Documents demonstrating the dedication method criteria were satisfied such as: (1) special test and inspection procedures and results; (2) commercial-grade survey reports showing: item, design, material, and specific performance characteristics (relevant to safety function); and (3) source inspection reports
4. Receiving Inspection Report, including any results of testing/inspection of the item performed upon receipt, if not provided in response to request 3, above.
5. Procurement basis evaluation such as like-for-like, equivalency, plant design change packages, drawing and specification updates, including any 10 CFR 50.59 documentation
6. Other documents to trace the item from the time it was dedicated and/or procured to the time it was installed, tested, and accepted by operations, e.g., completed stock or material issue forms and installation work orders or reports, including completed post installation test procedure and results
7. Shelf-life information.
8. Historical performance information (list of work orders and NCRs written for the item prior to and since the newly procured item was installed)

9. Other pertinent item/ vendor information, such as:

- a. System design basis document and related operations/system training materials
- b. Component drawings, system flow diagram, electrical one-line diagrams, or control circuit drawings, where applicable
- c. Vendor/supplier/licensee correspondence
- d. Original and updated design specifications (i.e., design/procurement specification for the original item that is being replaced and any new design/procurement specifications for the replacement item)
- e. Vendor manual(s) for installation/operation/maintenance of the item
- f. Catalog specifications / item data sheets
- g. Certificates of conformance/compliance/quality
- h. Vendor test and inspection reports (records of inspections/tests performed by the supplier prior to shipment to the site)
- i. Vendor dedication/partial dedication information
- j. Any information showing design/material/process changes done by the manufacturer/supplier to the purchased item
- k. Any deviation from design, material, and performance characteristics relevant to the safety function (nonconformance dispositions)
- l. Training records for the individuals that performed the dedication/procurement activities of the samples selected.

10. If sample is a PQL-1 item:

- a. Records identifying that the supplier's quality assurance program meets 10 CFR Part 50, Appendix B, including any audit reports performed by the licensed facility.
- b. Records showing the supplier is/was listed on the site's quality supplier list (QSL). Provide the supporting information used to add the entity to this list.