

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION  
WASHINGTON, DC 20555-0001

August 6, 2025

NRC INFORMATION NOTICE 2025-04: USE OF APPROVED QUALITY ASSURANCE  
ALTERNATIVES DURING EXIGENT CONDITIONS

**ADDRESSEES**

All holders of, and applicants for, a construction permit for a production or utilization facility, including a medical radioisotope facility, under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities."

All holders of, and applicants for, an operating license for a nuclear power reactor issued under 10 CFR Part 50.

All holders of, and applicants for, a nuclear power reactor early site permit, combined license, standard design approval, or manufacturing license under 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants."

All applicants for a standard design certification, including such applicants after initial issuance of a design certification rule.

All contractors and vendors that supply basic components to U.S. Nuclear Regulatory Commission (NRC) licensees under 10 CFR Part 50 or 10 CFR Part 52.

Holders of, and applicants for, a fuel cycle facility license under 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material," with an approved Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50 quality assurance program, or approved management measures program under 10 CFR 70.62(d), "Management measures."

All licensees, certificate holders, and applicants for a certificate of compliance for an NRC-approved quality assurance (QA) program that must conform to the requirements of Subpart H, "Quality Assurance," to 10 CFR Part 71, "Packaging and Transportation of Radioactive Material." This includes those licensed under another part of Title 10 that have been issued an NRC QA program approval under 10 CFR Part 71 that limits the scope of their activities solely to the use of NRC-approved packaging.

All holders of, and applicants for, a license or certificate of compliance with an NRC-approved QA program that must conform to the requirements of Subpart G, "Quality Assurance," to 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste."

**PURPOSE**

The NRC is issuing this information notice (IN) to inform addressees of the potential for inappropriate implementation of the QA alternatives approved for use during exigent conditions.

**ML25121A128**

This potential includes the use of the QA alternatives to qualify new suppliers, or a licensee, applicant, or vendor incorrectly determining when an exigent condition exists. The NRC expects that recipients will review the information for applicability to their facilities and consider actions, as appropriate, to avoid similar problems.

INs may not impose new requirements, and nothing in this IN should be interpreted to require specific action; therefore, no written response is required.

## DESCRIPTION OF CIRCUMSTANCES

Criterion VII, “Control of Purchased Material, Equipment, and Services,” of Appendix B, “Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” to 10 CFR Part 50, states, in part, the following:

Measures shall be established to assure purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, **inspection at the contractor or subcontractor source**, and examination of products upon delivery. [emphasis added]

During the Coronavirus Disease 2019 (COVID-19) public health emergency, first declared on January 31, 2020, licensees and applicants could meet neither the requirements for inspection at the source or subcontractor source nor their quality assurance program description (QAPD) commitments for the frequency of these inspections.<sup>1,2</sup> Because of national and international restrictions and recommendations to protect people during the public health emergency (e.g., travel restrictions and social distancing), the NRC approved several QA alternatives for performing fully remote audits, fully remote commercial-grade surveys, and fully remote source verifications. The NRC also granted a 25 percent grace period extension for the performance of these activities during exigent conditions (i.e., the COVID-19 pandemic).

The QA alternatives were approved as reductions in commitment due to exigent conditions under 10 CFR 50.54(a)(4), which sets forth the NRC’s regulatory requirements regarding changes to a QAPD. The NRC considered and granted these QA alternatives and certain temporary exemptions to allow the operating fleet to continue operating safely during the unprecedented global crisis caused by the COVID-19 pandemic.<sup>3</sup>

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<sup>1</sup> See U.S. Department of Health and Human Services, “Determination that a Public Health Emergency Exists,” dated January 31, 2020, <https://aspr.hhs.gov/legal/PHE/Pages/2019-nCoV.aspx>. The President declared a national emergency on March 13, 2020. See “Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak,” 85 FR 9994 (March 18, 2020).

<sup>2</sup> See, for example, U.S. Department of State, “COVID-19 Impact on Travel and Consular Operations,” dated March 20, 2020, <https://travel.state.gov/content/travel/en/News/Intercountry-Adoption-News/covid-19-impact-on-travel-and-consular-operations.html> (noting that the “Department of State recommends against any travel” and that “[m]any countries have taken or are taking action limiting traveler mobility, including mandatory quarantines and border restrictions, with little advance notice”).

<sup>3</sup> See, for example, NRC COVID-19 Update (archived), <https://www.nrc.gov/about-nrc/covid-19/security-ep/emergency-preparedness.html>.

On April 10, 2023, the President of the United States ended the national emergency declared because of the pandemic.<sup>4</sup> The Federal public health emergency for COVID-19 expired on May 11, 2023.<sup>5</sup> Due to the termination of the national emergency and the public health emergency, the ability to continue performing fully remote audits, fully remote commercial-grade surveys, and fully remote source verifications, and providing a 25 percent grace period extension, no longer applies. Licensees, applicants, and vendors that have these NRC-approved QA alternatives based on COVID-19 exigent conditions in their QAPDs or in an implementing procedure, or both, may no longer implement these QA alternatives unless a new exigent condition exists.

## BACKGROUND

The safety evaluation report (SER), “Safety Evaluation by the Office of Nuclear Reactor Regulation, Request for Change to the Columbia Operational Quality Assurance Program Description, Energy Northwest, Columbia Generating Station, Docket No. 50-397,” dated July 22, 2020 (Agencywide Documents Access and Management System Accession No. ML20203K876), documents the NRC staff’s approval for using Electric Power Research Institute (EPRI) Technical Report No. 3002019436, “Remote Source Verification During a Pandemic or Similar State of Emergency,” issued April 2020, for performing fully remote source verifications during exigent conditions.

The SER, “Safety Evaluation by the Office of Nuclear Reactor Regulation, Change to the Operating Quality Assurance Manual, Revision 34b, Union Electric Company, Callaway Plant, Unit No. 1, Docket Nos. 50-483 and 72-1045,” dated August 6, 2020 (ML20216A681), documents the NRC staff’s approval, with conditions, for providing a 25 percent grace period extension for conducting onsite audits and onsite commercial-grade surveys, during exigent conditions.

The SER, “Safety Evaluation by the Office of Nuclear Reactor Regulation, Request for Change to the Quality Assurance Topical Report, Edwin I. Hatch Nuclear Plant, Units 1 and 2; Joseph M. Farley Nuclear Plant, Units 1 and 2; Vogtle Electric Generating Plant, Units 1 and 2; Southern Nuclear Operating Company, Docket Nos. 50-231, 50-348, 50-424, 50-366, 50-364, 50-425, 71-333, 71-521, 71-726, 72-036, 72-042, and 72-1039,” dated June 22, 2021 (ML21161A201), documents the NRC staff’s approval for using EPRI Technical Report No. 300202020796, “Remote Assessment Techniques: Planning and Conducting Audits and Surveys Using Remote Techniques During Exigent Conditions,” issued April 2021, for performing fully remote audits, provisional audits, and fully remote commercial-grade surveys during exigent conditions.

## DISCUSSION

This IN is intended to inform licensees, applicants, and vendors that the requirements of Criterion VII have not changed and, therefore, that there is potential for inappropriate implementation of the NRC-approved QA alternatives during exigent conditions now that the COVID-19 public health emergency is over. The potential for inappropriate implementation includes (1) using NRC-approved QA alternatives to qualify new suppliers using fully remote

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<sup>4</sup> Joint Resolution Relating to a National Emergency Declared by the President on March 13, 2020, Pub. L. No. 118-3, 137 Stat. 6 (2023).

<sup>5</sup> See, for example, U.S. Department of Health and Human Services, “COVID-19 Public Health Emergency,” <https://www.hhs.gov/coronavirus/covid-19-public-health-emergency/index.html>.

audits and (2) a licensee, applicant, or vendor incorrectly determining when an exigent condition exists.

As documented in Section 6.1.9, “Eligibility Requirements for Fully Remote Assessment,” and Section 6.13.1, “Eligibility Requirements for Provisional Remote Assessment,” of EPRI Technical Report No. 300202020796, the NRC-approved QA alternatives during exigent conditions may be used only for suppliers that were previously qualified by an in-person assessment at the source or subcontractor source, and they may not be used to qualify new suppliers. The NRC staff also documented this condition in its SER dated June 22, 2021.

With respect to determining when an exigent condition exists, EPRI Technical Report No. 300202020796 defines “exigent conditions” as follows:

extreme circumstances where it is not possible to perform on-site verification or assessment. For example, (1) Conditions that threaten the health and safety of individuals performing the verification or assessment; (2) local, national, or global declaration of an emergency; and (3) local, national, or global restrictions on travel.

The SERs approving EPRI Technical Reports No. 300202020796 and No. 3002019436 state, in part, that “use of this method of verification will only be applicable when a pandemic or similar state of emergency has been declared restricting access or travel to and/or from those locations affected by State and National declarations.”

The NRC-approved QA alternatives may only be used when an exigent condition exists. For the United States of America and its territories (Puerto Rico, the U.S. Virgin Islands, Guam, Northern Mariana Islands, and American Samoa), a national exigent condition may be declared only by the President of the United States or by the Office of the President of the United States, similar to how the COVID-19 national emergency was declared. Likewise, an exigent condition at the State level may be declared only by a State governor or the mayor for the location where the exigent condition exists. For international locations, an exigent condition may be declared only by a duly authorized government official of the country where the exigent condition exists.

Licensees, applicants, and vendors that have these NRC-approved QA alternatives documented in their QAPDs or in an implementing procedure are not required to change their documents to remove the NRC-approved alternatives. However, licensees, applicants, and vendors should be aware that the alternatives may no longer be implemented unless a new exigent condition exists and is declared consistent with the guidance provided above.

If a licensee, applicant, or vendor has a question about whether the NRC-approved QA alternatives for an exigent condition in its QAPD or in an implementing procedure can be exercised in a particular circumstance, please contact the NRC staff.

## CONTACTS

Please direct any questions about this matter to the technical contact listed below.

**/RA/**

Philip McKenna, Acting Director  
Division of Reactor Oversight  
Office of Nuclear Reactor Regulation

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**INFORMATION NOTICE 2025-04, "USE OF QUALITY ASSURANCE ALTERNATIVES  
DURING EXIGENT CONDITIONS," DATE: August 6, 2025**

**ADAMS Accession No.: ML25121A128**

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