

NEI QA Task Force Status Update

Mark Harvey
NEI – Senior Project Manager



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Oak Brook, Ill

Agenda

- **ILAC Certification**
- **Software QA – Dedication**
- **Long Lead Item Qualification**
- **NEI QAPD – Reg Guide 1.28, Rev. 4**

ILAC Certification

- International commercial *calibration* and *testing* facility use prohibited in safety related applications:
 - Current regulations do not recognize certification under the ILAC MRA
 - Inability of users (licensees and suppliers) to gain facility access to qualify programs and services
- Domestic commercial *testing* facility use limited in safety related applications:
 - NRC domestic calibration laboratory SE did not address “testing”, even though addressed by approved certification process (NVLAP, A2LA)

ILAC Certification

- **OIG Audit of NRC Vendor Inspection Program - 9/28/10**
 - **Calibration Laboratories Approval Guidance Could Be Clarified**
 - **Approving Accredited Commercial-Grade Calibration Laboratories Is Confusing**
 - **Calibration Laboratories Approval Process Guidance Is Disparate**
 - ***Vendor Confusion Might Lead To Inadequate Implementation of Appendix B and Part 21 Requirements***

ILAC Certification

Proposed Solution

- **Act as ILAC stakeholder – Facilitation function**
 - **Develop a process for acceptance of ILAC accreditation process**
 - **Coordinate a single review of ILAC process using industry experts and document results**
 - **Initial assessments of accreditation activities**
 - **Develop method for ongoing monitoring**

ILAC Certification

Benefits

■ Improve Quality

- Expanded supplier database including industry leading labs
- Use of highly trained and skilled technical professionals
- Ability to modify survey checklists
- Laboratory access in event additional oversight is warranted
- Establish regulatory precedent

■ Reduce Cost

- Allows utilization of testing data obtained on standard designs
- Eliminates surveys of accredited testing facilities (domestic and international)
- Reduces project cost by enabling use of local laboratories



ILAC Certification

Next Steps

- **NEI Management direction to proceed**
 - Supplier Task Group Poll
 - Licensee feedback
- **Document approach and submit to NRC for concurrence and feedback**
- **Begin assessment of ILAC Processes – 10/11**
- **NRC must address OIG Report – Effort to resolve in a manner that meets industry needs**
 - Opportunity to define process, preclude NRC action



Software QA – Dedication

- EPRI to issue Software Dedication document
- Initial review complete – May 2011
- QA Task Force Review and Resolution
- Submittal to NRC as Industry Standard – endorsement through Safety Evaluation
- Key issue – Alignment with NQA documents
 - NEI engagement in NQA effort
 - Participation in EPRI TAG efforts

Long Lead Item (LLI) Qualification

- **Licensee - Significant procurement oversight**
 - Schedule risk
 - Additional cost – Logistical issues
 - Challenges to perform oversight
- **Project delays and schedule changes**
 - Manufacturing facility schedules
 - Material availability
 - Qualification for multiple projects

Long Lead Item Qualification

- **Additional controls needed during all phases of design through construction**
- **No existing model endorsed by regulator**
- **Initial efforts to develop approach that can be endorsed**
 - **Similar process used for some international projects to allow use at multiple projects**

NEI QAPD – Reg Guide 1.28, Rev. 4

- **QA Task Force developed QAPD to comply with latest standard endorsement by NRC**
 - **NEI 11-04, New Plant Deployment QAPD sent to NRC in May 2011**
 - **NRC reviewed process to make change**
 - **Changes to existing template**
 - **Awaiting results of review**
 - **New document number to allow for simple modifications if warranted**



Questions