Commercial Grade Dedication and NQA-1

IEEE SC-2 Meeting Tucson, AZ

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Agenda

- NRC participation in ASME NQA-1 Subcommittee.
- Changes in commercial-grade dedication process.

ASME NQA-1/NRC Interactions

- NRO, NMSS, and NRR staff participate in ASME NQA-1 Committee meetings.
- The NRC staff had identified issues during a side-by-side evaluation of the 1994 and 2004 editions of the NQA-1 standards.

- 200+ NRC comments were identified.
- Two outstanding issues that needed resolution:
 - Commercial-Grade Dedication (Requirement VII of NQA-1)
 - Software Verification & Validation (V&V)
 (Subpart 2.7).

- NQA Task Group formed to address these two issues.
 - Task group on CGI dedication included member from EPRI, dedicating entities, and utilities.
 - Software V&V issues involved lack of consistency with existing regulatory guidance (e.g., RG 1.152 and RG 1.168).

- NRC issues have been resolved at the NQA Subcommittee level.
- The NRC staff reached final resolution of the issues during balloting at the NQA Main Committee level.
- NQA Task Groups addressed commercial-grade dedication and software QA issues and will be included in the NQA-1-2009 addenda.

- Reached consensus on CGI dedication in April 2008.
 - New Subpart 2.14 in NQA-1-2008.
- Reached consensus on software V&V in October 2008.
 - Updated Subpart 2.7.
 - Software QA Subcommittee was formed in April 2008.

- NRR staff is in the initial stages of developing a revision to RG 1.28 for potential endorsement of the NQA-1-2008 Edition and 2009 Addenda.
- RG 1.28, "Quality Assurance Program Requirements – Design and Construction," Revision 3, August 1985.

Commercial-Grade Dedication Process Changes

From a regulatory perspective....NONE!!!!

Commercial-Grade Item (CGI) Dedication Process

- NRC perspective is that the rules have not changed.
- Rules for the vendor are the same as to the licensee.

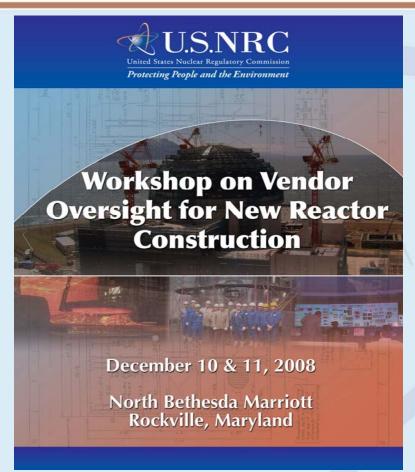
CGI Dedication Process (cont'd)

- An acceptable dedication program involves:
 - Technical Evaluation
 - Technical requirements
 - Quality requirements
 - Acceptance Process
 - Verifies that technical and quality requirements have been met.
 - EPRI-5652 acceptance methods.

NRC Inspection of Commercial-Grade Dedication Programs

- Inspection Procedure 43004, "Inspection of Commercial-Grade Dedication Programs," published in October 2007.
- Procedure combined guidance contained in EPRI-5652, GL 89-02, GL-91-05, IP 38703, and related guidance.

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Questions?