Commercial Grade Dedication and NQA-1

IEEE SC-2 Meeting   Tucson, AZ

Milt Concepcion
Quality and Vendor Inspection Branch 1,
Division of Construction Inspection and Operational Programs, NRO

November 10, 2008

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.

ASME NQA-1/NRC Interactions (cont'd)

- 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).

ASME NQA-1/NRC Interactions (cont'd)

- 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).

ASME NQA-1/NRC Interactions (cont'd)

- 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.

ASME NQA-1/NRC Interactions (cont'd)

- 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.

ASME NQA-1/NRC Interactions (cont'd)

- 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
    - <u>Verifies</u> 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.

NRC Workshop
Don't miss it…sign up today !

http://www.nrc.gov/public-involve/conference-symposia/vendor-oversight/index.html

Questions?