

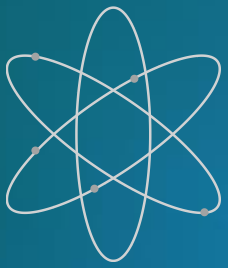
Operating Experience Generic Communications



Fall 2015 EQ Technical Conference
Nuclear Utility Group on Equipment Qualification
November 4-6, 2015
Clearwater, Florida

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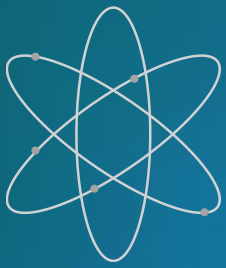
Ron Wise, NEQ Consulting (NUGEQ Technical Consultant (ronwise@aol.com))



Operating Experience

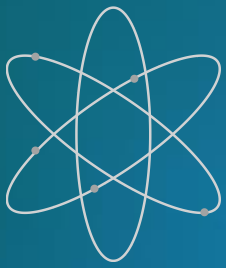
TOPICS

- **Information Notices**
- **Regulatory Issue Summary**



NRC Information Notices

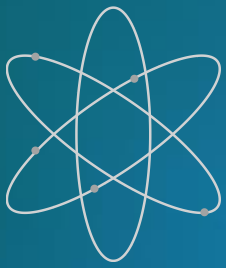
- IN 2015-01, Degraded Ability to Mitigate Flooding Events
- IN 2015-02, Antifreeze Agents in Fire Water Sprinkler Systems
- IN 2015-03, Improper Operation of Spent Fuel Transfer Cask Neutron Shield Equipment Leading to Elevated Radiation Levels Adjacent to Spent Fuel Transfer Cask
- IN 2015-05, Inoperability of Auxiliary and Emergency Feedwater Auto-Start Circuits on Loss of Main Feedwater Pumps
- IN 2015-09, Mechanical Dynamic Restraint (Snubber) Lubricant Degradation Not Identified Due To Insufficient Service Life Monitoring



NRC Information Notices

IN 2015-01, Degraded Ability to Mitigate Flooding Events issued on January 9, 2015

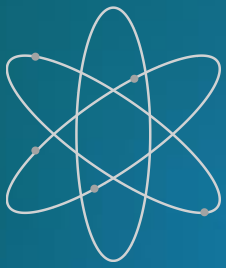
- Informs industry of recent OE related to external flood protection where deficiencies with equipment, procedures, and analyses relied on to either prevent or mitigate the effects of external flooding at licensed facilities have resulted in degraded ability to mitigate flooding events.



NRC Information Notices

IN 2015-02, Antifreeze Agents in Fire Water Sprinkler Systems, issued February 4, 2015

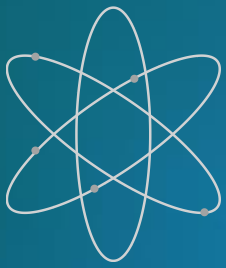
- Informs industry of recent Tentative Interim Amendments issued by the National Fire Protection Association (NFPA) Standard Council to NFPA Standard 13, “Standard for the Installation of Sprinkler Systems”, and NFPA Standard 25, “Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems”



NRC Information Notices

IN 2015-03, Improper Operation of Spent Fuel Transfer Cask Neutron Shield Equipment Leading to Elevated Radiation Levels Adjacent to Spent Fuel Transfer Cask, issued February 9, 2015

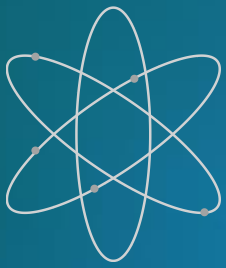
- Informs industry of: (1) improper operation of spent fuel transfer cask neutron shield equipment that resulted in elevated area radiation levels and unplanned dose to personnel; and (2) vulnerabilities in procedures and equipment design that could inadvertently cause unexpected high levels of radiation from improper operations



NRC Information Notices

IN 2015-05, Inoperability of Auxiliary and Emergency Feedwater Auto-Start Circuits on Loss of Main Feedwater Pumps, issued May 12, 2015

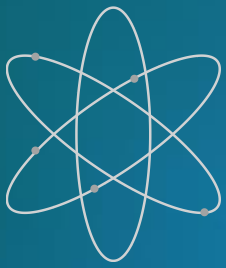
- Informs industry of several instances between 2006 and 2012 where licensees operated their main feedwater systems in such a manner that the automatic initiation of auxiliary or emergency feedwater on loss of all main feedwater pumps was disabled – applies to PWRs w/turbine-driven main feedwater pumps.



NRC Information Notices

IN 2015-09, Mechanical Dynamic Restraint (Snubber) Lubricant Degradation Not Identified Due To Insufficient Service Life Monitoring, issued September 24, 2015

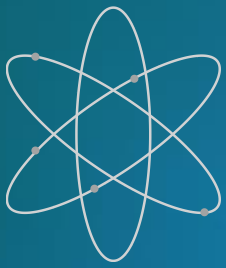
- Informs industry of potential degradation of the lubricant (grease) in mechanical dynamic restraints(snubbers) not identified due to insufficient service life monitoring.



NRC Regulatory Issue Summary

RIS 2015-08, Oversight of Counterfeit, Fraudulent and Suspect Items in the Nuclear Industry, issued June 24, 2015

- Issued to heighten awareness of the existing NRC regulations and how they apply to counterfeit, fraudulent, and suspect items (CFSI) within the scope of NRC's regulatory jurisdiction to prevent CFSI from entering their supply chains, prevent possible installation or use of CFSI and raise awareness of the potential for CFSI to be used in the manufacture, maintenance, or repair of items.

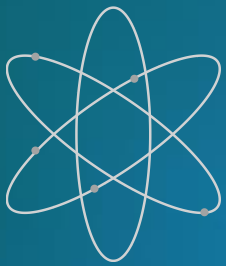


NRC Regulatory Issue Summary

RIS 2015-08

Summary of Issue

- An increasing prevalence of CFSI in other industries may present challenges to the nuclear industry's supply chain. Although, it is the NRC's position that adherence to existing NRC regulations provides adequate protection of the public health and safety. As new occurrences and methods of counterfeit and fraudulent activity increase in other industrial sectors, it is in the interest of the nuclear industry to re-evaluate its approach in this area.

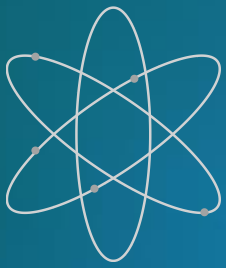


NRC Regulatory Issue Summary

RIS 2015-08

Points of Emphasis

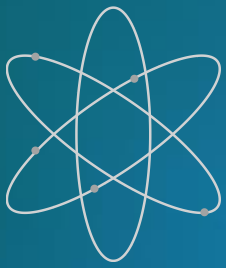
- The NRC relies on QA programs to provide confidence that applicable SSCs will perform their specified safety function(s) in accordance with 10 C.F.R. Part 50, Appendix B.
- Because a licensee or applicant may not be in a position to immediately determine if a suspect item is counterfeit or fraudulent; it is more likely that either a deviation from a procurement spec or a component failure is all that will be evident. Appendix B CRIT XVI, “Corrective Action,” states that licensees must take corrective actions for conditions adverse to quality, and to perform root cause evaluations for significant conditions adverse to quality.



NRC Regulatory Issue Summary

Points of Emphasis, Cont'd

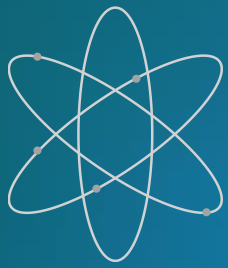
- Licensees are responsible for classifying conditions adverse to quality in terms of their significance. Throughout that process licensees may consider that, while certain suspect components may not in and of themselves present a significant impact on plant safety, the fact that a vendor has provided suspect components to a nuclear plant *may warrant an extent of condition review to ensure that components with a higher safety significance are not similarly affected*
- As more industry experience concerning a specific condition adverse to quality becomes available (e.g., CFSI), it is in the industry's interest to incorporate the insights from that experience within their program reviews.



NRC Regulatory Issue Summary

Points of Emphasis, Cont'd

- Generic Letter 89-02, “Actions to Improve the Detection of Counterfeit and Fraudulently Marked Products,” describes three characteristics of effective procurement programs, one of which is involvement of engineering staff in the procurement process. Engineering staff can help establish the importance of the procured item to nuclear safety and an effective acceptance process.
- As a minimum, a procedure (or procedures) should include selective inspections and testing of products to verify compliance with procurement requirements when products are suspect.
- In general, it is the effect of the condition on the safety of the plant that drives the determination of reportability and corrective action warranted by licensees.



Generic Communications

QUESTIONS?