

# NRC Pilot CDBI EQ Inspections



Fall 2015 EQ Technical Conference

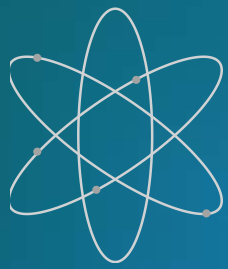
Nuclear Utility Group on Equipment Qualification

November 4-6, 2015

Clearwater, Florida

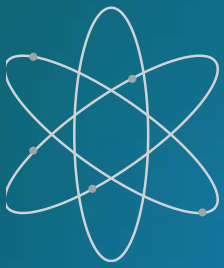
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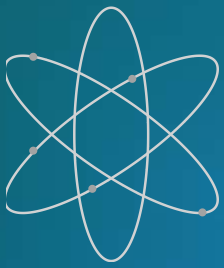
# NRC Pilot CDBI EQ Inspections

Overview, History and Update on activities related to the NRC Pilot CDBI Inspections of EQ Programs under IP 71111.21P



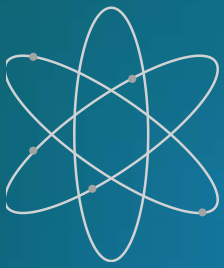
# Current Schedule for Pilots

- Calvert Cliffs 12-14 thru 12-18-2015
- Fitzpatrick 2-22 thru 2-26-2016
- Browns Ferry 4-11 thru 4-15-2016
- St. Lucie 4-25 thru 4-29-2016



# Current Schedule for Pilots

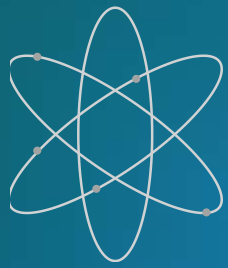
- Cook 5-09 thru 5-13-2016
- Dresden 6-20 thru 6-24-2016
- South Texas 3-21 thru 3-25-2016
- Columbia 5-09 thru 5-13-2016



# Procedure Development

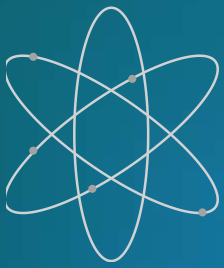
8-31-15 Industry EQ representatives (NUGEQ, Sciencetech, Individual Group Members) participated with NEI in a conference call with NRC to discuss submittal of comments on the draft version of IP 71111.21P.

NRC acknowledged willingness to accept comments from the industry.



# Procedure Development

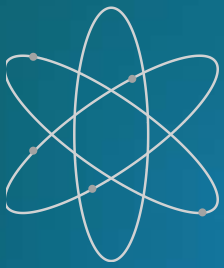
- 9-4-15 We coordinated the development of comments on the draft version of IP 71111.21P, forwarded to NEI on 9-4-2015
- 9-5-15 NEI forwarded the comments to the NRC.



# Procedure Development

## Follow-Up Activities:

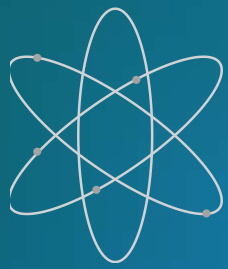
- Subsequent follow-up with NRC, through the NEI the Reactor Oversight Process Task Force (ROPTF)



# Summary of Industry Comments

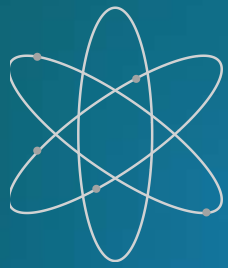
- The overall focus and intent of the comments was to refocus the procedure back to the original intent of this new inspection.
  - Low Resource Programmatic Inspection
  - Focus on EQ Program maintenance and preservation activities vs. repeating the original EQ Program compliance inspections.
- Subsequent discussions with Staff confirmed the purpose/scope, despite broad procedure.





# Summary of Industry Comments

- Comments are posted on WSPLUS at:  
*Resource Library/Regulatory/NRC Inspection Procedures & Guidance*
- Comments were “binned” into eight (8) general categories.
- Each general category included specific examples.



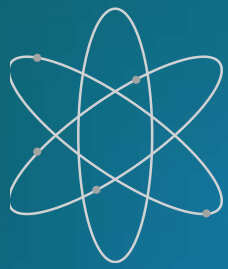
# Summary of Industry Comments

Comment 1: Purpose and Objective of Inspection

Comment 2: EQ Licensing Basis

Comment 3: Terminology Consistency

Comment 4: High Energy Line Break



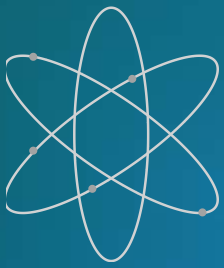
# Summary of Industry Comments

Comment 5: Risk Informed Perspectives and Sample Selection Process

Comment 6: Additional Areas of Review Focused on Ongoing Implementation and Maintenance of EQ Program

Comment 7: Clarification and Editorial Notes

Comment 8: Comments Intended to Improve the Effectiveness of the Pilot Inspections

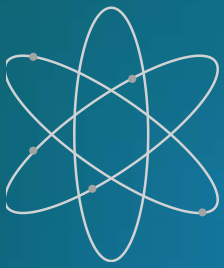


# Summary of Industry Comments

Overall, the comments focused on the following themes:

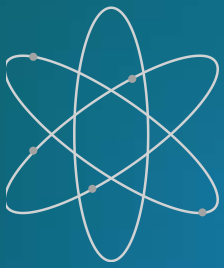
- The focus of 21P appears to be more of a baseline inspection - rather than program maintenance implementation confirmation.

[IP is largely based on TI 2515/76 and IP 51080]



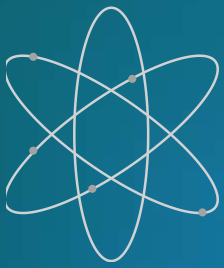
# Summary of Industry Comments

- The inspection resource allocation of 96 hours would not support a full compliance inspection.
- Suggested the inspection focused on verification of EQ Program implementation in field, perhaps reviewing plant modifications, maintenance and corrective actions would be more in line with the objectives of the new engineering programs inspections.



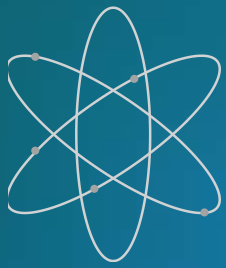
# Summary of Industry Comments

- Additional observations:
  - No recognition of differences in EQ Licensing Bases - between sites or between units at the same site.
  - Insufficient guidance for regional inspectors that may not be skilled in the history and evolution of EQ requirements.



# Summary of Industry Comments

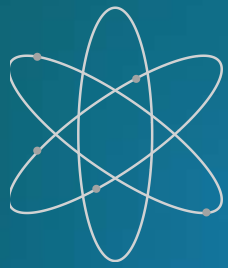
- Noted that the focus on HELBs may be as complex and diverse, or more so, than EQ Licensing Bases. Suggested may be more involved than allocated by Staff resource guidance.
- Some technical comments, e.g., linkage of QL with storage time given 50.49(e)(5), NUREG-0588 and IEEE 323-74 direction on preconditioning to an “end-of-installed” life condition



# Current Status

- NRC acknowledged receiving comments.
- NRC made no commitment to amend the procedure prior to the first EQ Pilots.
- NRC committed to training of inspectors to prepare them for EQ inspections.





# NRC Pilot CDBI EQ Inspections

Questions or Comments?