EQ Activities Impacting EQ Part 21

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

William Horin, Winston & Strawn, LLP (Counsel to NUGEQ (whorin@winston.com))

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



NRC Activities Impacting EQ Part 21

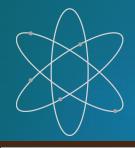
- Industry/NEI, Interested Parties: Ongoing interface with NRC Related to Part 21
 - Part 21 interpretation issues
 - Rulemaking versus guidance issues
- Benefit to utilities, including EQ, procurement groups, from clarifications of guidance with respect to, for example:
 - Vendor understanding of obligations
 - Related clarification of good practices in contracts



NRC Activities Impacting EQ Part 21

- Industry Guidance NEI 14-09, "Guidelines for Implementation of 10 CFR Part 21 Reporting of Defects and Noncompliances"
- Draft Revision 1 in preparation, meeting later this week
- Dialogue Regarding NRC Comments for additional clarification, including:
 - More guidance for vendors, suppliers and sub-suppliers
 - Overseas suppliers/Part 21 responsibility transfer to purchasers
 - Supply of safety-related hardware
 - Contractual reminders of Part 21 applicability
 - Records retention
 - "Failure to comply" clarification





NRC Activities Impacting EQ Part 21

QUESTIONS?

