



Issues Identified In The Procurement of Reverse Engineered Components

11/5/2015

Jeffrey Jacobson

Electrical Vendor Inspection Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors



Presentation Overview

- NRC Vendor Inspection Program Overview
- Reverse Engineering Issues
- Steris IN
- Questions

NRC Vendor Inspection Program

- Covers manufacturers, test facilities, suppliers, and other service suppliers for both new and operating reactors
- Completed 39 inspections last year
- Provides regulatory oversight of NUPIC/utility effectiveness
- <http://www.nrc.gov/reactors/new-reactors/oversight/quality-assurance/vendor-insp/insp-reports/2015/>

Typical Purchasing Methods for Replacement Components

- There are several methods for procuring replacement nuclear safety related components
 - Original safety related OEM replacement
 - “Identical” commercial component, dedicated by either a third party or the utility
 - “Similar” component, either safety-related or commercial grade and dedicated (may be considered a design change)
 - Reverse engineered component, purchased from a commercial supplier and dedicated
 - Reverse engineered component, purchased as an Appendix B safety related component

Reverse Engineered Components

- No real standard definition of what constitutes a reverse engineered component
- Criterion III “Design Control” of Appendix B still applies
- Requires at a minimum an Equivalency Evaluation
- Can not typically be considered equivalent unless:
 - Critical characteristics of the component are understood and documented
 - All relevant interfacing requirements are evaluated
 - Design verification, as required by Criterion III is re-performed
 - Qualification (as required) is re-established either through testing or analysis

Design Verification

- Design verification testing is different than production testing and is typically more comprehensive
- In order to verify the adequacy of the design of the reverse engineered component (as required by Criterion III of Appendix B to 10 CFR Part 50) the following factors need to be considered:
 - Environmental factors
 - All input and output interface requirements
 - Other design considerations

Environmental Factors

- Operating and accident temperatures/pressures/humidity/radiation (as applicable) including self heating contributions
- Seismic requirements
- EMI/RFI as applicable

Input and Output Interface Requirements

- Mechanical/electrical connections
- Input and output operating voltages/currents
- Other electrical and/or mechanical parameters

Other Design Considerations

- Failure rates
- Design life
- For mechanical components
 - Surface finishes
 - Heat treatment and other special processes
 - Specially selected mating components
 - Mechanical stresses/loads
 - Mechanical fits/tolerances
- For electrical components
 - Voltage/current withstand
 - Introduction of new failure modes(analog vs digital)

NRC Identified Weaknesses in Reverse Engineered Procurements

- Assuming equivalency without re-verification of design
- Not clearly specifying interface requirements to vendor performing reverse engineering
- Inadequate or incomplete design verification testing
- Taking credit for past qualification without performing a proper similarity analysis

Steris Information Notice

- Provides a summary of the issue and links to key documents
- Does not provide any new NRC positions
- Reinforces the need to include appropriate margins in the qualification process

Questions
