Licensee Performance Assessments

Methodology for Licensee Identification of Latent Design Issues

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1 PURPOSE

The purpose of this document is to provide consistent guidance to nuclear utilities for performing Licensee Performance Assessments (LPAs). The purpose of LPAs is to take an in-depth look at the chosen program(s). Nuclear utilities are required to establish and implement various programs to provide control over activities affecting the quality of the identified structures, systems and components (SSC(s)) to the extent consistent with their importance to safety. The LPA is used to gain confidence that implementation of programs at the site do not result in the introduction of latent conditions that could prevent proper operation of SSCs. Application of this guidance document ensures the licensee's safety performance is adequately assessed and allows the NRC to credit performance of specific inspections. Licensees in column 2 of the Reactor Oversight Process (ROP) Action Matrix can use an LPA to credit an NRC inspection if the performance deficiency that moved the plant to Column 2 is not in the area being assessed. Licensees in columns 3 and 4 of the ROP Action Matrix will not considered for NRC inspection credit, but are encouraged to use this guidance document to identify performance deficiencies in preparation for the NRC inspection.

The NRC principles of good regulation (independence, openness, efficiency, clarity and reliability) are incorporated throughout the LPA guidance document. Independence is attained through various steps in the process including the conduct of challenge boards, LPA team make-up and NRC observations. Openness is achieved through sharing a final report with the NRC, and NRC access and ability to observe licensee activities throughout the LPA process. The concept of LPAs is built around efficiency in that the conduct of an LPA allows the NRC the ability to credit a focused engineering inspection. Currently, licensees perform pre-inspection self-assessments, in addition to expending a significant amount of resources supporting the NRC team inspection. Conducting an LPA in lieu of preparing for and supporting an NRC team inspection is a more efficient use of licensee's resources, allowing licensee staff to focus on current plant work. Clarity in LPAs comes from reliance on existing NRC inspection procedures and consistent industry format for LPA plans and reports. LPAs are reliable because licensees will follow NRC-endorsed guidance to perform LPAs and any issues identified during an LPA may be subject to NRC enforcement, as appropriate.

2 SCOPE

This document provides high-level guidance that will focus on performance of the LPA. The guidance can be used to perform an LPA equivalent to the scope and content of an NRC Engineering Program team inspection. The LPA guidance is designed to bound the scope and content of the NRC inspection procedure that is being credited.

3 DEFINITIONS

Challenge Board – Meeting with Senior Leadership to review adequacy of the LPA and ensure appropriate actions are taken in response to any identified issues.

Condition Report – A mechanism, either paper or electronic, used to document an issue. This is a generic term for the purpose of this document; individual licensees may use different terms, based on their corrective action program.

Engineering Program – A program that a licensee establishes and implements to provide control over activities affecting the quality of SSCs to an extent consistent with their importance to safety.

Equipment Files – A compilation of documents that describe work on a piece of equipment such as completed work orders, PMs, surveillances, design changes and procedure changes. This is not to imply that there is an expectation for a distinct filing system. This is a descriptive term to identify latent issues on SSCs.

Issue – A well-defined observation or collection of observations potentially impacting an SSC's function documented in a CR, which may warrant further inspection, screening, evaluation or regulatory action.

Independent Team Member – A technically competent individual not associated with the plant being assessed.

Latent Design Issue – An unidentified issue that may impact the ability of an SSC to perform its safety function.

Licensee Performance Assessment (LPA) – An assessment performed by a team of licensee or industry personnel, using NEI 18-07 guidance to take an in-depth look at the chosen engineering program to gain reasonable assurance that SSCs can adequately perform their design basis function. The LPA is equivalent in scope and content to the NRC engineering program team inspection that can be credited based on performance of the LPA.

Licensee Performance Assessment Plan (LPAP) – A written plan for performing the LPA that includes the LPA schedule, a description of the team and scope of the LPA.

Program Element – A discrete topical area of the assessment referred by the NRC inspection procedure as a "sample." For example, for a fire program inspection a program element would be a discrete fire area, whereas in an NDE program inspection, a program element would be a method of examination such as volumetric.

4 ROLES AND RESPONSIBILITIES

1. Site Leadership Team (SLT) conducts Challenge Board of the LPA, attends daily briefings and ensures actions are taken to address issues identified during the LPA.

2. Executive Sponsor

    a. A member of the SLT.

b. Selects LPA Team Lead.

c. Ensures adequate resources are available to support the LPA, including team members and points of contact who can address technical questions raised by the team.

d. Approves LPAP.

e. Approves final LPA report.

3. LPA Manager

a. Manages or has authority of the program area being assessed.

4. LPA Team Leader

a. Under the direction of the LPA Manager, develops the LPAP including selection of the LPA team and LPA program elements to be assessed. Obtains an independent team member with expertise in the technical area being assessed to provide an unbiased view.

b. Takes computer based training (CBT) for team lead proficiency.

c. Performs technical briefings.

5. Regulatory Manager

a. Coordinates LPA schedule with NRC Region to allow NRC to credit an engineering programs team inspection and schedule observations of the licensee performed LPA, as deemed appropriate.

b. Provides LPAP to NRC Resident Inspector.

c. Informs NRC Resident Inspector of schedule for Challenge Board and other LPA activities.

d. Assigns a member of regulatory department to either serve as a team member or a supporting point of contact (POC).

5 PRE-ASSESSMENT ACTIVITIES

1. Team Selection

a. The LPA core team will consist of the team lead, an SME and an independent team member, at a minimum. Other personnel may be assigned as full or part time members, based on the scope of the LPA.

b. The LPA Team Leader is a member of management and takes the team leader CBT.

c. The Subject Matter Expert(s) is responsible for the topic being assessed. For example, if assessing the fire protection program, the SME is the fire protection program owner at the site being assessed. If this is a fleet function, then the SME is the fleet or corporate fire protection program owner.

d. The independent team member has knowledge and experience of the area being assessed. See definition for independent team member.

e. A member of the regulatory department may be assigned to the team or to act as a POC to support the team.

f. A member of the maintenance or operations staff may be selected, if appropriate for the program being assessed.

g. Points of contact should be established for questions and input to team activities. Consideration for the population of formal POCs is maintenance, operations, PRA, radiation protection, chemistry, training and records. Others may be appropriate based on the topic being assessed.

2. LPAP Development

a. Using the LPAP template, establish the schedule for the start and end dates of the LPA and the date for providing the approved report to senior management.

b. The NRC Inspection Procedure is used as guidance when establishing the program elements being assessed.

c. Additional program elements and samples may be added by site leadership at their discretion.

d. Document the qualifications of the team lead and assigned team members in a brief statement of qualification for each member.

3. Sample Selection (Documented in the LPAP)

a. Select 3-5 engineering program elements that are covered by the engineering area OR, if the LPA is being used to credit a focused engineering inspection then refer to the NRC's Inspection Procedure for guidance on sample selection. Recent changes in program elements is a consideration when selecting samples. The goal of the sample selection process is to apply resources to the areas of most importance to plant safety and management of the plant. The objective is not to be so prescriptive that there is a

blind selection, but to give management the guidance and flexibility to choose the appropriate areas based on risk insights or performance.

b. Other considerations under management discretion as to which samples to choose may include, but are not limited to, knowledge transfer for newly assigned engineers, upcoming major modifications, equipment performance metrics, and industry generic issues.

4. LPAP Approval – Approval of the LPAP is by the Team Leader, LPA Manager and Executive Sponsor.

5. Once approved, the LPAP is shared with the NRC Resident Inspector for awareness and planning of NRC engagement.

6 DOCUMENT COLLECTION

1. See the Program Review Template for specific documents to consider for collection.

2. Documents are placed in electronic files, and clearly named and organized for traceability. Documents are stored in a manner that allows for ease of retrieval and review by an NRC observer.

3. Unless otherwise noted, the timeframe for data relevance is three years. Shorter or longer timeframes may be used if evaluated and justified.

4. The list of documents used in the LPA is maintained for the final report and available for future review and NRC information.

7 CONDUCT OF ASSESSMENT

1. Using the approved LPAP and the Program Review Template perform the assessment for the engineering program being reviewed.

2. General Guidance for Walk-downs

a. Walk-downs are performed following good industrial safety practices, following licensee safety and proper use of PPE.

b. Continuously document items being reviewed and potential issues for ease of report compilation.

c. Walk-downs are performed following good radiation work practices, including ALARA considerations when selecting areas to walk-down.

d. Walk-down of the area for components located in a PWR containment area is not required while the plant is at power. Management must assess other areas for walk-down accessibility based on operations, radiation dose and safety. However, if there is a potential issue associated with a component being assessed in a specific area, then this should be taken into consideration during the LPA.

e. Visually inspect the component selected for inspection and note any material condition deficiencies.

f. Verify the installed equipment is the same as described in system and program documents.

g. Verify program requirements are being followed in the areas of the plant that are walked down.

h. Follow specific walk-down guidance described in the applicable NRC Inspection Procedure IP.

3. General Guidance for Problem Identification and Resolution

   a. Verify that issues related to the area being assessed are identified at an appropriate threshold and have been entered into CAP.

   b. Sample a selected number of CRs in the area being assessed and verify that corrective actions are appropriate.

4. Conduct end-of-day team meetings to debrief areas assessed during the day and potential issues identified. This debrief allows for internal team challenge and an opportunity for observation by the executive sponsor and NRC. The NRC (if assigned) is invited to team meetings to observe the objectivity and critical behavior of the LPA team.

5. Daily Management Briefings

   a. It is a good practice for the Team Leader to formally debrief the Executive Sponsor daily.

   b. Issues entered into CAP are the focus of management review as well as areas of open investigation. Enhancements and administrative issues should take second priority in briefings.

6. Treatment of Potentially Generic Issues

   a. When an issue under investigation results in questions that may have implications throughout the industry, special treatment is considered, depending on the significance.

b. There are industry groups that can help disposition such questions, such as the Nuclear Energy Institute, PWR and BWR Owners Groups, INPO, EPRI, etc. Industry help outside the LPA Team is engaged to assist in resolving the question and disseminating information.

c. Should such a potentially generic question or issue have some safety significance, then the NRC should also be engaged to enable them to perform their mission of assuring the health and safety of the public.

8 APPROVALS

1. Challenge Board

   a. The Challenge Board is required if credit is being sought for an NRC inspection. It is a good practice in whole or in part for all other uses of the LPA.

   b. Use the LPA Challenge Board Template to conduct the challenge meeting. The LPA Manager leads the meeting and the Regulatory Affairs Member maintains the records.

   c. The Challenge Board is held prior to final approval by the Executive Sponsor of the LPA and prior to final briefing to the NRC.

   d. Members of the Challenge Board should come prepared having reviewed the LPA and other applicable documents in advance of the meeting.

2. The Executive Sponsor approves the LPA following resolution of any items identified by the Challenge Board. The approved LPA is shared with the resident inspector.

9 REPORT WRITING

1. The team lead is responsible for writing the LPA report.

2. The report template contained in Attachment 1 is used as an outline for the LPA report with the approved LPAP in the front of the final LPA report.

3. The Executive Sponsor approves the final LPA report.

4. The LPA report with attachments are available for NRC review.

5. To ensure transparency, if the LPA is being used to credit an NRC inspection, the LPA report without the attachments is provided to NRC. The report without the attachments is written to the level of detail contained in an NRC inspection report and includes the areas assessed, identified issues that are conditions adverse to quality and condition report numbers that will correct those issues. See IMC 0611 for guidance as to level of detail contained in NRC inspection reports.

10 NRC ENGAGEMENT

1. The LPA schedule is shared with the resident inspector and the Region to allow NRC to credit an engineering inspection as deemed appropriate, and factor LPAs into the Region's engineering inspection schedule.

2. Once approved, the LPAP is shared with the Resident Inspector and the Region to keep the NRC informed of LPA activities and to facilitate NRC observations of the LPA, as the NRC deems appropriate.

3. NRC is invited to LPA team briefings for observation and feedback.

4. The NRC Resident Inspector and Branch Chief are invited to the Challenge Board following the LPA.

5. A summary LPA report highlighting any performance deficiencies and potential non-conformances is transmitted to the NRC for their information and appropriate disposition of identified issues.

11 ATTACHMENTS

1. LPA Plan Template

2. LPA Program Review Template

3. LPA Report Writing Template

4. LPA Challenge Board Template

Attachment 1: LPA Plan Template

Section I – Team	
Site:	**Executive Sponsor:**
LPA Number:[1]	**NRC Inspection Procedure:**
LPA Title:	
Assessment Reason: ☐ Performance Based ☐ Management Discretion ☐ NRC Inspection Credit[2] **(check all that apply)**	
Dates: Scheduled Start Date: **Scheduled End Date:** **Scheduled Report Due Date:**	
Self-Assessment Team (Name, Site, Title) **Required Members:** LPA Team Lead: Subject Matter Expert(s): Independent Member (Name and affiliation) **Other Members (may be part time):** • Regulatory Department • Engineering • Maintenance • Operations • Industry Peers/Observers	

[1] Site-specific self-assessment numbering system.
[2] Refer to the NRC Inspection Procedure that would be inspecting the program or topical area for sample selection.

Points of Contact (as required):

- **PRA**
- **Radiation Protection:**
- **Chemistry:**
- **Records Management:**
- **Other (list names and department):**

Section II – LPA Scope

If credit is desired for NRC direct inspections, then refer to the appropriate NRC Inspection Procedure, and match the sample selection number and process using the appropriate criteria.

Program Elements selected and basis for selection:[3]

1.

2.

3.

4.

5.

6.

Section III – Approvals

LPA Team Leader: _____ Date_____

LPA Manager: _____ Date _____

Executive Sponsor: _____ Date_____

[3] Refer to the NRC Inspection Procedure that would be inspecting the program or topical area for sample selection.

Attachment 2: Engineering Program Review Template

The purpose of this Template is to review the implementation of the selected Engineering Program regarding the condition of the equipment and treatment of the equipment covered under the Engineering Program. As required by the license, this template verifies that the condition and status of equipment is maintained and operated as required by the Engineering Program for the life of the plant (e.g. if operating license has been renewed or subsequent license renewal is approved). Primarily, this template reviews recent changes (within 3 years) to ensure that no latent issues were introduced, and the equipment documentation files show the equipment meets the applicable regulations and industry guidance expectations.

Pre-assessment Activities

- ☐ Obtain documents which describe the base requirements for the Engineering Program

  NOTE: It is preferred that in any selection process, the most risk significant elements or components are selected to assess. However, it is not required to only assess high risk areas according to the PRA, but to take a practical approach and assess important elements or components.

- ☐ Engineering Program Element Selection completed and is adequate as documented on the LPA Plan.
- ☐ Documentation Collection
  - o Obtain the equipment files for maintenance and operations for the last three years
  - o Obtain change documentation packages for Engineering Program elements
  - o Obtain relevant design basis calculations for the selected components
  - o Obtain relevant completed operating, maintenance, preventative maintenance and surveillance test procedures
  - o Obtain industry Operating Experience for the Engineering Program (INPO and NRC)
  - o Obtain Corrective Action documents including any self-assessments performed for the assessment period relevant to the Engineering Program
  - o Obtain any regulatory correspondence where commitments were made, or material facts described to the NRC about the Engineering Program (including any safety evaluation reports)

Assessment Activities

Documentation (a continuous activity as documents are reviewed)

- ☐ Verify as documents are reviewed or otherwise handled that the files and documentation packages meet expectations of records and retention requirements
  - o Records are legible and retrievable

- Records have required approvals
- Documentation is current and controlled

Engineering Program Implementation Review

☐ **Walk-down:** For selected SSCs covered by the appropriate program element, perform a general walk-down of the physical area in which the component is located. Note that all elements may not be conducive to a walk-down.

- Identify and document deficient conditions such as corrosion, missing fasteners, cracks and degraded insulation.
- For areas not normally accessible, obtain records of inspections for those areas (e.g., some areas where system piping is routed may not normally be accessible); however, the plant may have performed periodic inspections in the past and have recorded the inspection results. Review photographs or videos which may have been taken during these types of inspections, if available.
- Verify physically that the SSC is not degraded below an acceptable threshold.
- Determine if equipment surrounding the component could fail in a way that could prevent the device form performing its safety function.
- Verify the SSCs associated with the Engineering Program are installed in their tested configuration. And correctly depicted on the appropriate drawings used by Operations and Maintenance.
- Verify there are no high-energy line break locations that could change the environment to be different than evaluated for the component

☐ **Program Document:** Review the base Engineering Program document.

- Verify the program document continues to meet the base regulatory requirements.
- If UFSAR information was used as inputs for design, calculation or procedure change, inputs should be verified to be consistent with the design bases.

☐ **Identified Problems:** Review open and closed condition reports dealing with the Engineering Program during the assessment period.

- Verify the significance determination is appropriate for the level of causal analysis.
- Verify the causal analysis developed appropriate corrective actions to effectively fix the problem.
- Verify the corrective actions are complete or scheduled to be completed.
- Verify any operability determinations are documented with correct level of detail.

☐ **Operations Burdens:** Review outstanding Operations issues that involve the Engineering Program

- Include open/deferred or canceled engineering action items, temporary modifications, operator workarounds, and items that are tracked by the operations or engineering departments.
- Identify any instances of when and why the **Engineering Program** was operated out of their normal configuration by interviewing appropriate Operations and Engineering Department

personnel. For example, if an SSC is nominally operated automatically but was operated manually for an extended period due to a deficiency, ensure these instances are considered in program health assessment.

- Verify that off-normal conditions have not been institutionalized and accepted as normal practice.
- Verify that, in aggregate, the open issues do not cause an elevated significance or risk that is unacceptable or unrealized.

☐ **Maintenance Performance:** Verify the closed maintenance work orders for the selected components or elements have been effective in repairing the problem by the absence of repeat issues or additional open work orders. Document concerns with repeat or related failures or deficiencies.

☐ **Maintenance Backlog:** Verify that the component deficiencies in the maintenance backlog (including preventative maintenance activities) are being addressed and scheduled, and appropriate risk management is being applied. Document concerns with timeliness, lack of attention, lack of established plan to resolve, deep into grace or other issues that leave a question as to when the deficiency will be resolved.

☐ **Open Procedures Change Requests**: Verify that the change, test or experiment can be accomplished without obtaining a license amendment. For the changes, tests or experiments that are determined to not require an evaluation, verify that the conclusions were correct and consistent with 10 CFR 50.59.

Engineering Program Change Review

☐ **Engineering Program Document:** Engineering Program changes made to the Engineering Program including modifications to any equipment and verify the Engineering Program requirements were appropriately applied to the change and the resulting configuration including the "return-to-service" activities.

- A general walk-down of any physical change selected should meet expectations of the change package and there are no collateral or proximity issues created (such as HELB, Jet Impingement, seismic interaction, etc.)
- Determine whether changes to the Engineering Program meet the design basis and is consistent with the current licensing basis.
  - This is done by assessing the change(s) properly translate the design into the installed and tested configuration.
- The change package should have sufficient justification for the resulting regulatory engagement requirement

☐ **Calculation Changes:** Review changes/revisions to calculations relating to the Engineering Program

- Verify that inputs and assumptions were properly chosen from the design and licensing basis
- Verify the outputs are reasonable and are properly translated to procedures and licensing documents (UFSAR, ITS, ODCM, etc.)

☐ **Procedure Changes**: Review procedure changes that relate to the operation and maintenance of the Engineering Program.

- Verify that the change was made in accordance with the correct change process as described, if applicable, by the Engineering Program.
- Verify the change translated Engineering Program requirements to the end user.
- For all other procedures, ensure the changes do not cause a conflict in guidance and provide clear and human-factored instructions.

☐ **Drawings:** Determine whether changes to the Engineering Program and interfaces between safety related and non-safety related components are properly translated onto effected drawings.

☐ **Interfacing Programs:** Review relationships with other Engineering Programs to ensure changes made during the period did not cause an inconsistency or latent error.

- Quality Assurance Plan
- IST Engineering Program Plan
- ISI Engineering Program Plan
- Fire Protection
- Environmental Qualification
- High Energy Line Break
- Flood Protection
- Independent Spent Fuel Storage Facility
- Security Plan
- Emergency Plan
- Offsite Dose Calculation Manual
- License Requirements Manual (or equivalent)

Additional Guidance
☐ Obtain the appropriate and current NRC inspection procedure(s) and ensure the attributes of what an inspector would assess is subsumed in the guidance above. If additional or different guidance is provided to the inspector, establish a requirement to address this below: Comments on Conduct of Assessment:
Template Exceptions: Completed By: _____

Attachment 3: Report Writing Template	
Section 1 – Title	
Site:	
LPA Number:[4]	**NRC Inspection Procedure:**
LPA Title:	
Section II - Report Format	

Subject: Plant Name and Title of LPA

1. Name of Engineering Program Element assessed

   a. Assessment Scope

   The assessment consisted of the following review and assessment:

   - Brief paragraphs summarizing Engineering Program Implementation Review
   - Brief paragraphs summarizing Engineering Program Changes Review
   - Brief paragraph summarizing identified issues (Note: CRs will be in Attachment 2)

2. Name of Engineering Program Element assessed

   a. Assessment Scope

   The assessment consisted of the following review and assessment:

   - Brief paragraph(s) summarizing Engineering Program Implementation Review
   - Brief paragraph(s) summarizing Engineering Program Changes Review
   - Brief paragraph summarizing identified issues (Note: CRs will be in Attachment 2)

3. Summary paragraph. Include a paragraph to accurate describe the report regarding areas reviewed and issues identified.
4. Challenge Board. Write a brief summary describing the Challenge Board. Include the name and title of the most senior person on the Challenge Board. Summarize any items the Challenge Board identified and how those items were dispositioned.

[4] Site-specific self-assessment numbering system.

5. Report Attachments:

a. Attachment 1 should contain the CR numbers and summaries identified during the assessment.

b. Attachment 2 should contain any learning opportunities that are not conditions adverse to quality identified during the assessment.

c. Attachment 3 should contain any strengths or good practices identified during the assessment.

d. Attachment 4 should have the completed templates used during the assessment.

Section III – General Guidance

1. Use plain language that a person not familiar with the technical area being assessed can understand.
2. Develop a table of contents when the report is considered complicated or lengthy.
3. Identify any proprietary information contained in the report, so it can be redacted under 2.790 if the NRC elects to place the report on the docket.
4. Use graphics (drawings, diagrams, photos or photocopies) if their inclusion will simplify describing a complex condition that would otherwise require substantially more text.

Section IV – Approvals

LPA Manager: _____ Date _____

Challenge Board Chair has reviewed the final LPA report to confirm items identified by the Challenge Board have been sufficiently addressed in the final report:

Challenge Board Chair: _____ Date _____

Executive Sponsor: _____ Date_____

Attachment 4: LPA Challenge Board Template	
Meeting Preparation	
Site:	**Challenge Board Date:**
LPA Number:[5]	**NRC Inspection Procedure:**
LPA Title:	
Quorum Check: **Management Personnel Required:** **LPA Manager (Chair of Board): _____** **Regulatory Department Representative: _____** **Operations Management Representative: _____** **Maintenance Management Representative: _____** **Nuclear Oversight Representative: _____** **Independent Technical Representative (fleet or another site): _____**	
Presenters: **LPA Team Lead: _____** **SME: _____**	
Others in Attendance:	

[5] Site-specific self-assessment numbering system.

Conduct of Challenge
☐ LPA Plan requirements, attributes and team make-up are as expected as described in Section XXXX. ☐ The LPA includes noted differences in actual configuration and current licensing basis descriptions and requirements. ☐ The LPA analysis compares actual performance of the SSC or engineering program with the relevant NRC Inspection Procedure(s) and identifies what actions are necessary to bridge the gap between current performance and desired performance. ☐ Issues have been entered into CAP and are appropriately categorized. ☐ Administrative items, issues of little or no consequence, and enhancement opportunities have been entered into the appropriate action tracking system. ☐ Management has been kept abreast of and knowledgeable of all findings on a daily basis to ensure transparency of the assessment activities. ☐ NRC observers or resident inspectors have had adequate access to the team and documentation. ☐ NRC observers or the resident inspectors are aware of and briefed on the assessment results. ☐ Appropriate industry groups and if necessary NRC have been engaged for potentially generic issues. ☐ Operating Experience from other industry inspections has been addressed. ☐ Actions from previous inspections have been properly closed or action plans are acceptable.
Section III – Review High Level Objectives
☐ The LPA was critical, comprehensive and as intrusive as an NRC inspection activity. ☐ The LPA Report is written for understanding and completely identifies the issues. ☐ The LPA document to be provided to the NRC is appropriate for public viewing and provides a level of detail at least commensurate with an NRC inspection report. ☐ Open issues are being pursued to resolution commensurate with the safety significance. ☐ Other Comments:

Section IV – Approvals
LPA Manager: _____ Date _____ The LPA performed was sufficiently objective and documented and the challenge board was effective in assuring that an adequate assessment was performed. **Nuclear Oversight Manager: _____ Date _____** **Executive Sponsor has been briefed and advised of the outcome of the Challenge Board and QA Review:** **Executive Sponsor: _____ Date_____**