

NRC Inspection vs NUPIC Audit

**Comparing Preparation, Performance, and Post-Inspection/Audit Activities
from a Vendor's Perspective**

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Discussion Points



- Introduction – Why Listen to Me?
- Preparation Commonalities and Differences
- Inspection/Audit Performance Differences
- Post-Inspection/Audit Differences
- Closing Remarks

Introduction - Why Listen to Me?



- Extensive direct experience as head of QA at Sargent & Lundy since 1997
- Continued NRC Inspection and NUPIC Audit experience, including recent activities in 2019 and 2020
- Input from S&L staff with approximately 150 years of audit experience, including individuals with prior and current leadership involvement in ASME NQA-1, NUPIC, and NIAC

NRC Inspection vs NUPIC Audit: Preparation Commonalities

- The most important success factor was, is, and always will be that the organization performs high quality work day to day
- Preparation makes a difference and has benefits beyond audit/inspection performance
- Preparation activities must be owned by the line organization and include their active participation
 - Cannot be perceived as a QA Activity

NRC Inspection vs NUPIC Audit: Preparation Commonalities (cont'd)

- At S&L, these preparation activities include:
 - Confirming training and qualifications are current
 - Confirming records are filed and retrievable
 - Confirming work planning documents are current and reflect work scope
 - Resolving open Corrective Actions as applicable and appropriate
 - Housekeeping / Tidying work spaces
- Important to mutually pre-determine how to handle confidential/proprietary information

NRC Inspection vs NUPIC Audit: Preparation Differences

- NRC tends to use the work to challenge the program
 - Tendency is to dig deep into those attributes with safety significance.
- NUPIC tends to use the program to challenge the work
 - Tendency is to cover the full range of items/services covered by QA Program
 - Work performed for participating utilities
 - Anticipate what needs to be included in final report and prepare accordingly.
 - Order entry addresses
 - Infrequently performed items/services

NRC Inspection vs NUPIC Audit: Performance Similarities

- The NRC and NUPIC obtain and review procedures ahead of time.
 - No downtime while inspectors reviewed the procedures and become familiar with the program
- Professional approach and open communication throughout the process.
- Logistical support is an important success factor.

NRC Inspection vs NUPIC Audit: Performance Differences

- The NRC tends to remain focused on SR activities, while NUPIC may expand scope to complete the NUPIC checklist
 - NUPIC at times being checklist driven
 - To the NRC, 10CFR50, Appendix B is the ultimate checklist
- NUPIC teams may be larger
 - In our most recent experiences, we had 12 NUPIC Auditors vs 4 NRC Inspectors

NRC Inspection vs NUPIC Audit: Performance Differences (cont'd)

- The NRC team comes from one organization and tends to be more unified, while NUPIC may have various audit tactics, areas of focus, or acceptance levels based on their utility
- Level of Findings tends to be higher for NRC Inspection, while some NUPIC Findings may be of a less significant level
- NUPIC more likely to develop late emergence of new issues

NRC Inspection vs NUPIC Audit: Post-Audit/Inspection Differences

- Variance in format and information within NUPIC reports
 - Variance disappears when viewing full report package
- Differences in exit meeting results vs. final report
 - Natural part of NUPIC process due to management review
 - Differences are not typically consequential

Closing Remarks

Thank You
