

NUCLEAR UTILITY GROUP
ON EQUIPMENT QUALIFICATION

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August 31, 2022

VIA: U.S. Mail and email:

Thomas R. Hipschman, Chief
Reactor Inspection Branch
Division of Inspection and Regional Support
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Request for Near-Term Meetings and Initial Observations re: NRC Inspection
Procedure (IP) 71111.21N.03, “Commercial Grade Dedication”

Dear Mr. Hipschman:

The Nuclear Utility Group on Equipment Qualification (NUGEQ or Group)¹ hereby submits this letter in support of near-term meetings with the Staff to discuss the Focused Engineering IP 71111.21N.03, “Commercial Grade Dedication” (Attachment 21N.03).² Attachment 21N.03 includes within its scope environmental qualification, which is defined as a “critical characteristic to be verified.”³ Since its inception, the Group has been actively involved in the development and implementation of licensee EQ programs, and in interactions with the NRC, regarding evolving NRC requirements and guidance. The Group was actively involved in the NRC DBA EQ program inspections and worked with licensees and the NRC with respect to implementation issues associated with those inspections. It is the Group’s position that early interactions with external stakeholders akin to those that occurred before and during the aforementioned program inspections would benefit licensees who will need to begin preparations for the inspections that are scheduled to being in January 2023.

¹ The Group represents approximately 75% of the operating nuclear power plants in the United States. The Group was founded in 1981, as the NRC staff was evaluating and planning the ultimate promulgation of 10 CFR 50.49, “Environmental qualification of electric equipment important to safety for nuclear power plants.”

² NUGEQ also acknowledges EPRI’s request for such meetings in its letter dated August 16, 2022 (Accession Package No. ML22234A204).

³ Section 03.01(b)4(f)(3) also instructs inspectors to “[c]onsider if storage requirements are met for the components including preventive maintenance, surveillances, shelf life, environmental conditions, and environmental qualifications.”

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With those interactions in mind, NUGEQ also provides the following high-level observations based on an initial review of Attachment 21N.03:

1. Section 01.02 of the Attachment 21N.03 expands the scope of the inspection to include reviews of licensees' procurement process for safety-related components as required in 10 C.F.R. Part 50, Appendix B or 10 C.F.R. § 50.69—thus, broadening the scope of the inspection to include any procurement of a basic component as well as RISC-3 components for which Appendix B and Part 21 do not apply.
2. The last paragraph in Section 03.01(a)2 seems to contradict the wording in Section 03.01(a)1(g)(3) since it states that if the dedicating entity can demonstrate that the replacement items is identical, then the safety function, design requirements (including seismic or EQ) and critical characteristics need not be re-determined. To ensure consistency with RG 1.164, "Dedication of Commercial-Grade Items for Use in Nuclear Power Plants," Attachment 21N.03 should acknowledge differences in dedicating a "like-for-like" vs. an equivalent replacement item as reflected in EPRI 3002002982, Revision 1 to EPRI NP-5652 and TR-102260, "Plant Engineering: Guideline for the Acceptance of Commercial-Grade Items in Nuclear Safety-Related Applications."
3. Lastly, the Group notes that IP 43004, "Commercial Grade Dedication" on which Attachment 21N.03 is based was revised in April 2022 to include reference to RG 1.164, Dedication of Commercial-Grade Items for Use in Nuclear Power Plants. Since RG 1.164 endorses, in part, EPRI 3002002982, Attachment 21N.03 should be revised to address this inconsistency. Also, Attachment 21N.03 is based in part, on NP-6406, "Guidelines for the Technical Evaluation of Replacement Items in Nuclear Power Plants (NCIG-11)," which was superseded by EPRI 1008256, "Guidelines for the Technical Evaluation of Replacement Items in Nuclear Power Plants, Rev. 1) and NP-7218, "Guideline for the Utilization of Sampling Plans for Commercial - Grade Item Acceptance (NCIG-19)" (EPRI TR-017218-R1). Attachment 21N.03 should also be revised to address these inconsistencies.

We request this letter and any subsequent communications be placed into the public Agencywide Documents Access and Management System. We look forward to opportunities to discuss our more specific comments on Attachment 21N.03 during the public meetings or at your convenience.

Respectfully,



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