

**From:** [Paul Carman](#)  
**To:** [CJCOLLIN@southernco.com](mailto:CJCOLLIN@southernco.com)  
**Subject:** Commercial Grade Dedication Inspection Information Request  
**Date:** Tuesday, January 17, 2023 12:53:00 PM  
**Attachments:** [2023 HNP - CGD Inspection Information Request.pdf](#)

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Hi Jimmy,

Attached is the information request for the commercial grade dedication inspection we spoke about last week. The inspection is schedule for the weeks of April 24 and May 8 with an information gathering trip the week of March 13. As we discussed, I'm available to discuss any changes / logistics to the information gathering week and setup additional communications to make sure the information is best processed. Thanks a lot for all your help.

Regards,  
Paul

**Paul Carman**

Senior Reactor Inspector  
U. S. Nuclear Regulatory Commission - Region II  
404-997-4471 (o)  
[Paul.Carman@nrc.gov](mailto:Paul.Carman@nrc.gov)

**Edwin I. Hatch Nuclear Plant - Design Bases Assurance Inspection (Programs)  
Initial Information Request**

**Inspection Procedure:** 71111.21N, "Design Bases Assurance Inspection (Programs)," Attachment 21N.03, "Commercial Grade Dedication," dated June 28, 2022 (ADAMS ML22075A251)

**Inspection Dates:** Information Gathering Visit: March 13-17, 2023  
Preparation Week: April 17-21, 2023  
Onsite Week 1: April 24-28, 2023  
Onsite Week 2: May 8-12, 2023

**Inspection Report:** 05000321/2023010, 05000366/2023010  
(Standalone Inspection Report)

**Inspectors:** P. Carman (Lead, Mechanical)  
P. Braxton (Electrical)  
J. Hamman (Electrical)

The purpose of this letter is to notify you that three inspectors from Region II will conduct an inspection at your site in accordance with Inspection Procedure 71111.21N, "Design Bases Assurance Inspection (Programs)," Attachment 21N.03, "Commercial Grade Dedication." This is not considered a team inspection. The inspection will evaluate Hatch's process for dedicating commercial-grade items, as required in applicable portions of Appendix B to Title 10 of the Code of Federal Regulations (10 CFR) Part 50 (Appendix B), to ensure reasonable assurance is provided that these items will perform their intended safety function. Additionally, this inspection will evaluate implementation of Hatch's procurement process for safety-related components, as required in Appendix B. The inspectors will select samples of components that are risk significant and within the scope of the program.

On March 13, 2023, Mr. Paul Carman, a Senior Reactor Inspector from the NRC's Region II office, will begin the inspection with an information gathering visit to the site. The purpose of the visit is to become familiar with the process for dedicating commercial-grade items and the process for procuring safety-related components at Hatch. This visit may include a tour of onsite commercial-grade item dedication facilities, receipt inspection facilities, storage facilities, and installed plant components associated with potential inspection samples. During the visit, the team lead will also review the information provided in the initial information request to select a list of potential inspection samples. The team lead may also identify other information needed to support the inspection during this visit.

To minimize the impact on your staff and to ensure a productive inspection, we have enclosed two separate requests for information needed prior to the onsite information gathering visit and offsite inspection preparation week. The first request is generally for information that will be used to choose the inspection samples or information that will be applicable to all inspection samples throughout the inspection. This information should be made available to the team lead prior to the information gathering visit. The second request is for information specific to individual samples and should be made available prior to the inspection preparation week.

Please provide the information requested for the information gathering visit to the Region II Office or a file sharing site by March 3, 2023. Additional documents may be requested during

the information gathering visit. The inspectors will try to minimize your administrative burden by specifically identifying only those documents required for inspection preparation. The additional information should be provided to the inspectors in the Region II office or a file sharing site by April 14, 2023.

During the information gathering visit, Mr. Carman will also discuss the following inspection support administrative details: (1) availability of knowledgeable plant engineering and licensing personnel to serve as points of contact during the inspection, (2) method of tracking inspector requests during the inspection, (3) computer access, (4) working space, (5) arrangements for site access, and (6) other applicable information.

#### PAPERWORK REDUCTION ACT STATEMENT

This letter contains voluntary information collections that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). The burden to the public for these information collections is estimated to average 60 hours per response. Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: T6A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to [Infocollects.Resource@nrc.gov](mailto:Infocollects.Resource@nrc.gov), and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

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**Information Request for Edwin I. Hatch Nuclear Plant Design Bases Assurance  
Inspection (Programs)  
(Commercial Grade Dedication)**

Please provide the information electronically in “.pdf” files, Excel, or other searchable format on CDROM (or FTP site, SharePoint, etc.). The CDROM (or website) should be indexed and hyperlinked to facilitate ease of use.

**Contact Information:** Paul Carman  
(404) 997-4471  
[Paul.Carman@nrc.gov](mailto:Paul.Carman@nrc.gov)

**Information Gathering Visit:** An information gathering visit is currently scheduled the week of March 13, 2023. During this visit, we would like to identify the component samples for this inspection. We'd like to meet with procurement and dedication specialists to discuss the upcoming inspection and our sample selection process. Purposes of the site visit are to (a) discuss the scope of the planned inspection; (b) obtain advance information to review in preparation for the inspection; (c) ensure that the information to be reviewed is available at the beginning of the inspection; and (d) verify that logistical issues (such as obtaining both site and computer system access and arranging the location of the inspection team working area) will be resolved prior to inspector arrival. Please reserve a room during the scheduled inspection dates. We request the room have a telephone, wireless internet access, and a licensee computer with access to procedures, corrective action program documents, and a printer.

**Logistics:**

Information gathering visit: March 13-17, 2023  
Onsite inspection weeks: April 24-28, and May 8-12, 2023

Please schedule an entrance meeting for around 2:00 p.m. on Monday, April 24, 2023 (approximately 15 minutes). The date and time of the exit meeting will be discussed at a later date. In addition, I'd like to have a daily debrief with your inspection support staff at a convenient time in the afternoons for both onsite inspection weeks (Time TBD, approximately 30 minutes).

We will need a conference room as workspace for the inspectors. We will also need an area available for conducting interviews. Please provide access to your document system (preferably at least one computer in our conference room), nearby printers, and Wi-Fi access.

During the information gathering visit, please provide info on (1) conference room location & phone number, (2) cafeteria location/hours, and (3) procurement and engineering staff normal working hours. Also, please let me know if there are any potential resource conflicts during our scheduled inspection weeks (Fridays off, EP drills, management retreats) and we'll do our best to accommodate.

**Team Members:** Paul Carman (Inspection Lead, Mechanical)  
Pauline Braxton (Electrical)  
Jeff Hamman (Electrical)

Please verify the status of access authorization and requirements for unescorted access for each inspector. Please provide me with a list of exceptions, and I will address them.

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### **Documents Requested Prior to Information Gathering Visit:**

The documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet-based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, it is not meant to imply that any specific plant is required to have all the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below.

### **Documents requested by March 3, 2023:**

1. Licensing basis documents such as the updated final safety analysis report and technical specifications.
2. Procedures for dedicating commercial-grade items and for procurement of safety-related components. Procedure controlling counterfeit, fraudulent, and suspect items.
3. List of commercial-grade items, with a brief description of application, that have been dedicated for safety-related applications. These items may be dedicated by Hatch Nuclear Plant or dedicated by a vendor (or other licensee) and procured by Hatch Nuclear Plant. Please note the dedicating entity and whether the item has been installed in the plant. The list should encompass the past six years of dedication activities.
4. List of components procured as safety-related, with descriptions, if not included above. Please note whether the item has been installed in the plant. The list should encompass the past six years of procurement activities.
5. List of corrective action program documents, with descriptions, related to commercial-grade items, procurement, or storage, including any items that failed after completing the dedication process. The list should encompass the past six years of these activities.
6. List components procured as safety-related or commercial-grade items intended to be dedicated for safety-related applications that are on hold because of concerns identified during receipt, dedication, or from operating experience/corrective action program as applicable. If possible, the list should identify the systems in which these items were intended for use.
7. List of components procured as safety-related or commercial-grade items dedicated for safety-related applications, in the past six years, where the procurement/dedication process was expedited to support rapid turnaround (less than seven days). If possible, the list should identify the systems in which these items were intended for use.
8. List of systems, system numbers/designators, and corresponding names.
9. List of site contacts that will be associated with the inspection.
10. Copy of any self-assessments or audits related to commercial grade dedication or procurement activities performed within the past six years

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### **Documents Requested Prior to Inspection Preparation Week:**

For the samples identified by the team lead, the documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the inspection. Electronic format is the preferred media. If electronic media is made available via an internet-based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, it is not meant to imply that any specific plant is required to have all the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

### **Documents requested by April 14, 2023:**

1. Purchase requisition and purchase orders.
2. Other pertinent vendor/licensee correspondence.
3. Original and updated design specifications.
4. Catalog specifications.
5. Procurement basis evaluation such as like-for-like, equivalency, plant design change packages, drawing and specification updates.
6. 10 CFR 50.59 documentation, if required.
7. Material receiving reports, packing lists/invoices, and other shipping documents.
8. Receipt inspection reports and any related test reports.
9. Other documents to trace the item from the time it was dedicated to the time it was installed, tested, and accepted.
10. Certificates of conformance/compliance/quality.
11. Vendor test and inspection reports.
12. Third-party or sub-vendor test and inspection reports.
13. Vendor manuals.
14. Shelf-life information.
15. Vendor dedication/partial dedication information.
16. Design/material/process change history information.
17. Completed commercial-grade dedication document including safety classification, identification of safety function/application requirements, identification of critical characteristics, identification of verification methods and acceptance criteria for the critical characteristics, evaluation of credible failure modes (if applicable), and

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identification of the supplier's quality assurance program that meets 10 CFR Part 50, Appendix B.

18. Any deviation from design, material, and performance characteristics relevant to the safety function (nonconformance dispositions).
19. Documents showing objective evidence such as special test and inspection procedures and results; commercial-grade survey reports - item, design, material, and specific performance characteristics (relevant to safety function); and source inspection reports.
20. Completed post-installation test procedure and results.
21. Completed stock or material issue forms and installation work orders or reports.
22. Historical performance information.
23. Copy of qualifications, as applicable, of personnel who performed commercial-grade dedication, safety-related component procurement, and/or receipt inspection/testing activities within the past six years.