

Public Workshop to Discuss Centralized Corporate Inspections

May 9, 2024

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Public Workshop

- This workshop will allow industry to expand on their views and ideas
- This workshop will also be a dialogue and include explanations on how an NRC team inspection implements inspections
- Constructive dialogue and openness is highly encouraged

Discussion Areas

- What NRC inspections could be considered for corporate inspection?
- How issues/violations would be adjudicated?
- How would those inspections fit into the ROP?
- How would corporate inspections increase effectiveness and efficiencies?
- Unintended consequences?

Industry Initial Thoughts

- Industry has centralized many of its engineering and other support from each individual site into corporate entities to reduce costs and attain efficiencies. Industry has ideas on how the NRC could conduct inspections to accommodate the centralization of industry resources
- Industry would like to have NRC inspectors conduct the most amount of inspection efforts at their corporate facility and then visit the site if warranted, with varying levels of effort between corporate and onsite discussed
- Industry's view on how much of NRC time is spent on corporate programs, processes and procedures vary

NRC Initial Evaluation

- NRC's time spent on corporate processes, procedures and programs vary but are generally in the 5 to 10% range of total inspection time and is part of the inspection prep(not onsite).
- NRC considered centralized functions when developing and implementing current inspections.(i.e, CGD, 50.69, FFD, Site Access Authorization)
- NRC and licensees can continue to leverage technology to decrease burden on the industry resources from centralized locations during inspections (i.e. calls or video conference NRC team onsite with corporate resources supporting inspections).

NRC Initial Evaluation continued

- Each licensee has different corporate structure and if we adopted the approach of conducting a bulk of inspections at the central location there would be a lack of consistent inspections for those larger corporations vs. smaller corporations.
- NRC inspections at corporate facilities would not be performance based and would be programmatic and would not be conducted at each licensee, therefore might not follow the ROP. (commission approval may be required)

Commercial Grade Dedication Inspection (CGD)

- IP 71111.21N.03, dated 2/16/23, section 02.02, Site Visit, part d, specifically states the following:

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.

It is recommended that the TL perform this trip at least one month prior to the onsite portions of the inspection. The TL shall make arrangements to transfer inspection-related information to other NRC staff assigned to the inspection.

Some licensees have consolidated their CGD program and/or procurement process under a corporate organization or location, if this is the case, the TL should consider conducting a visit/information gathering trip to that organization or location.

10 CFR 50.69, Risk Informed Categorization and Treatment of SSCs Inspection

- IP 37060, dated 10/18/22, section 05, Procedure Completion, specifically states the following:

37060-05 PROCEDURE COMPLETION

This inspection procedure is intended to be completed in phases or in its entirety. Sections 02.01 and 02.02 should be performed after the licensee has categorized a sufficient number of systems such that an appropriate risk-informed selection of three to five systems can be selected for inspection. Section 02.04 should be performed following licensee implementation of the feedback and process adjustment programs. This would be typically following the second refueling outage after system categorization. The systems selected for inspection during the performance of section 02.02 need not be the same selected for inspection during performance of section 02.04. Section 02.03 should be completed each time the licensee is inspected.

Satisfactory completion of this inspection procedure is accomplished through completion of individual sections of this IP or through a combination of multiple sections. Licensee notification of this inspection should include which sections of the inspection procedure will be performed.

Regions do not have to re-inspect licensee's programs or implementation of their programs previously found to be acceptable.

Access Authorization and Fitness for Duty

- IP 71130.01 (Access Authorization) and 71130.08 (FFD)
 - Some Inspections are partially conducted at centralized offsite locations due to the location of licensee records.
 - The offsite portion of the inspection is focused on the verification of performance based access authorization and fitness for duty decisions in accordance with regulatory requirements.
 - Licensee AA and FFD records are often kept at a central location due to information security requirements (e.g., personal and medical information)
 - The remainder of the inspections are performed on site to verify licensee site specific performance.

Proposed Recommendations

- NRC maintains the baseline inspection program as is, focused on licensee performance through risk informed sampling at each site under the ROP.
- NRC staff will continue to look for and consider the option of conducting (or partially conducting) inspections at corporate facilities whenever developing new inspections in the future.
- NRC staff will continue to look for ways to be efficient in the preparation of and conduct of inspections where they can.
- NRC staff will consider language to consider corporate consolidation of programs and ways to minimize unnecessary industry burden in IPs and IMCs that provide guidance on inspection development and implementation.

Steps completed and Next steps

- NRC staff evaluated options gathered during December 2023 workshop – input received from NSIR and the Regions – complete
- NRC management briefed on assessment and align on recommendations– January – March 2024- complete
- Inform Public and Industry of NRC’s results in public meeting, allow industry to provide input – March 2024 - complete
- 2nd Public workshop – May 2024
- NRC staff finalize recommendations after assessing further industry input, if provided - TBD

Open Discussion Time

Detail Time

Any Questions