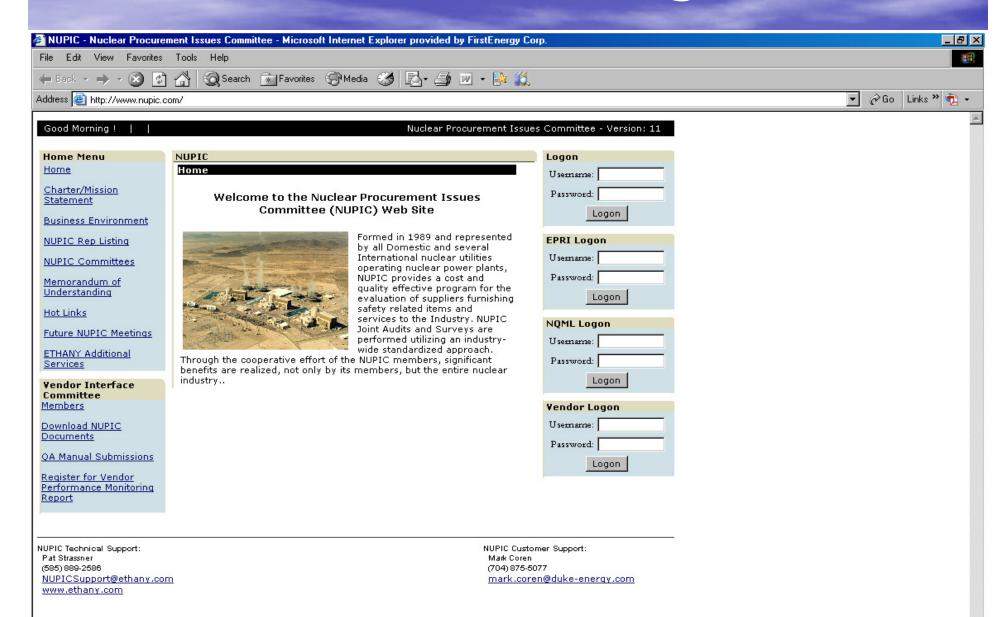
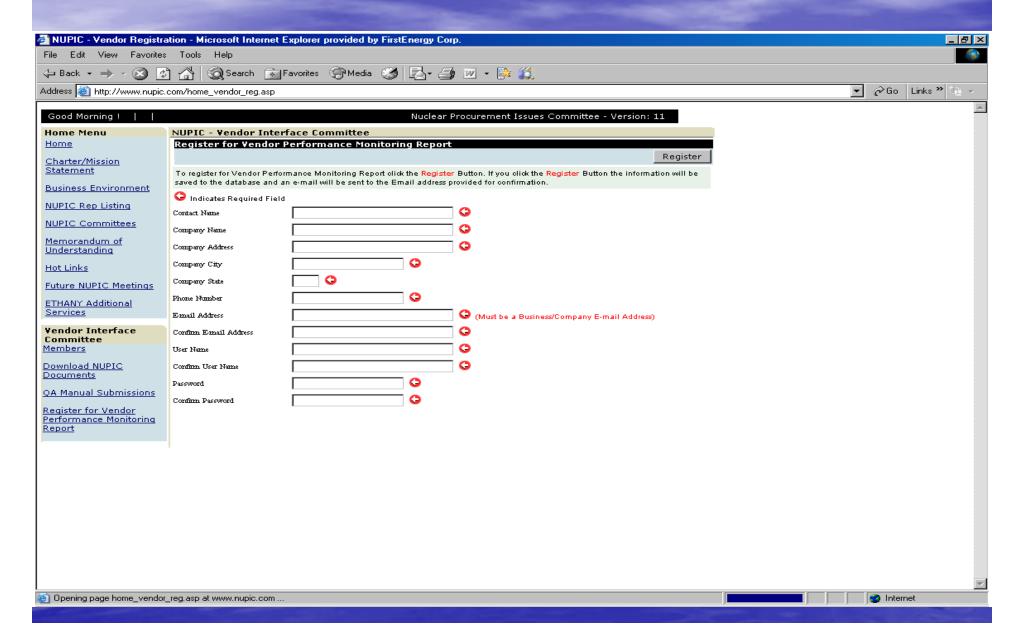


John Louwers - DTE
Jeff Wright-Entergy
Rajan John-Exelon
Harold Alewine-Duke
Hussain Al Jaberi – Emirates (ENEC)

### NUPIC Web Page



# **Enter your Information**



# VPM Report Data for Supplier XYZ Industry

**SQPDT** 

Last 12 Months

Supplier #	SR/ PR	Supplier Name	City	ST	Audit Date	Users	Plants	Total #	% Def	Audit Findings	CA Timeliness	NRC Insp.	NUPIC Industry Issues	and Part 21	
9999	SR/ PR	XYZ Industry	IRVIN	CA	05/20/2011	23	7	252	17.4	7 4	2311/2015 2312/2016	None	5	1	



NUPIC /Green Vendor - No Red or Yellow Criteria, up to 3 White Allowed

NUPIC /White Vendor - No Red Criteria, up to 3 Yellow Allowed

NUPIC /Yellow Vendor - No more than one Red Criteria

NUPIC /Red Vendor - More than one Red Criteria

## Receipt Inspection Results

(25 lots in last 12 months with 15% or more deficient) (Not all Utilities Participate in SQPDT)

- Green; less than 10% error rate
- White; 10% to 14.9% error rate
- Yellow; 15% to 24.9% error rate
- Red; 25% or more error rate

This performance window requires some research with the entering utility due to limited participation

# NUPIC Audit Findings (Last 3 years)

- Green; 3 findings or less
- White; 4 to 6 findings
- Yellow; 7 to 9 findings
- Red; 10 or more findings
- Any significant notification advances window two colors

The number of findings are updated from data entered into the database



- Green; less than 90 days
- White; 90-179 days
- Yellow; 180-364 days
- Red; 365 or more days

# NRC Inspection Results (last 3 years)

- Green; no Notice or Violation or Notice of Nonconformance
- White; 1 Notice of Violation or Notice of Nonconformance
- Yellow; 2 Notice of Violation or Notice of Nonconformance
- Red; 3 Notice of Violation or Notice of Nonconformance

# NUPIC Industry Issues (last Year)

- Green; 0 issues
- White; 1 issues
- Yellow; 2 issues
- Red; 3 or more issues

Industry issues are updated directly from the database. All issues entered should have been discussed with Vendor

# INPO Operating Experience and 10CFR21 Reports (last year)

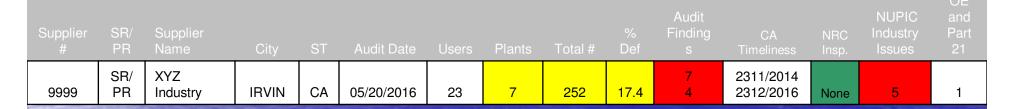
- Green; 0 issues
- White; 1 issues
- Yellow; 2 issues
- Red; 3 or more issues

This is researched and entered manually into the NUPIC Database by the VPMC

#### **VPMC** Review and Verifications

**SQPDT** 

Last 12 Months



Based on this example the overall rating criteria for this supplier would be Red. In this case, the VPMC will review red windows for further clarification. Example 11 Audit Findings are listed over a 3 year period – review indicates this window represents two audits.

2014 7 Findings were identified – Yellow Window

2016 4 Findings were identified – White Window (Improving Trend)

VPMC would not recommend a LSA based on the Audit Finding Window

#### Audit Team Recommends LSA

Vendor performance Committee Recommends LSA

NUPIC Members Vote YES / No

#### What is an LSA?

 Limited Scope Audit – A supplemental audit scheduled outside the normal NUPIC Audit Frequency, focused at specific performance deficiencies. Normally, NUPIC will look at scheduling within 15 months form the last audit. VPMC recommendations may be different.

# Vendor Performance monitoring Summary

Total number of vendors on Monitoring report 311

Green rating	150 Supplier	49%
White Rating	102 Suppliers	32%
Yellow Rating	50 Suppliers	16%
Red Rating	9 Suppliers	3%

# NUPIC VPM Trend Red/yellow

	Oct.	Feb.	June	Oct.	Feb.	June	Oct.	Feb.	June
	2013	2014	2014	2014	2015	2015	2015	2016	2016
Red	18	13	17	12	11	11	8	8	9
Yellow	52	55	53	60	59	57	61	61	50

# NUPIC Findings – Top Trends

• *Records/Document Control*2013 - 10.05% 2014 - 9.26% 2015 - 7.21% **2016 - 10.34%** 

Programmatic/Other Problems-Audits
 2013 - 8.18% 2014 - 8.89% 2015 - 10.36% 2016 - 12.64%

Nonconformance/Corrective Action – Failure to Follow Procedure
 2013 – 4.77% 2014 – 4.17% 2015 -6.31% 2016 – 4.6%

Failure to Follow Procedure

2013 - 5.96% 2014 - 6.17% 2015 - 7.21% **2016 - 4.02%** 

Commercial Grade Dedication-Inadequate Procedure
 2013 – 4.43% 2014 – 3.63% 2015 – 6.31% 2016 – 3.45%



• 10CFR Appendix B, Criterion XVIII. Audits - A comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program. The audits shall be performed in accordance with the written procedures or check lists by appropriately trained personnel **not having direct responsibilities in the areas being audited**. Audit results shall be documented and reviewed by management having responsibility in the area audited. Follow-up action, including re-audit of deficient areas, shall be taken where indicated.

- Independence "roots" are contained in 10CFR50, Appendix B, Criterion I with other regulations and standards addressing independence. Simply put, personnel performing quality assurance functions shall report to a management level so that they have the freedom to identify issues and follow up on their resolution. Personnel should not audit areas for which they have immediate responsibility.
- In the context of performing an audit of the suppliers QA Program implementation, an auditor independence concern would only occur if the auditor had been responsible for or performed activities that are the responsibility of the QA staff during the scope period. (e.g., Subsequent audits of the design program could be led by the same ATL, provided this individual has not performed any line functions/responsibilities in the design area since the last audit.)

• If the ATL/ATM was contracted or performed activities under the suppliers QA program during the period being evaluated, (subsupplier audit supporting the suppliers ASL, or an audit of the suppliers programs like procurement, design, etc., or performed other functions/responsibilities associated with the actual implementation of the suppliers quality functions, they could not perform the audit of the QA Program (e.g., audit of the auditors/inspectors, same individual assessing implementation of internal audit process).

The key aspect is that the individuals have not performed any direct duties or responsibilities under the QA program (performed activities implementing the suppliers QA program in the areas under evaluation.) If the ATL/ATM has only performed the audit of the Suppliers QA Program compliance to the regulatory/ program requirements, no conflict of interest or independence issues exist; regardless of the number of times the individual performs the audit for the supplier.

- Key facts to consider:
- The audit of the QA program administration/implementation needs to be treated differently
- If the supplier conducts one QA Program audit to examine all applicable 10CFR 50 appendix B criterion with the same auditor, an independence issue will exist.
- The audit of the QA program administration/implementation must be performed by an individual that was not directly involved in the QA Program.
- If the individual remains independent of the Supplier QA Program administration/implementation they can be utilized on subsequent audits of the QA Program administration/implementation

