# **Delivering the Nuclear Promise:**

Minimize NUPIC Vendor Audit Frequencies

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Previous NUPIC Audit/Survey Frequency

NSSS/Fuel Vendors – 24 months

Non-NSSS/Fuel Vendors – 30 months

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Minimize NUPIC Vendor Audit Frequencies

Color Code: Red

Due: December 2017

This initiative utilizes the regulatory allowance to audit vendors at a frequency of 36 months. Additionally, flexibility will be achieved by the adoption of an Safety Evaluation Report that allows a grace period of up to 25 percent.

#### **Desired End-State**

Maximize audit periodicity of NUPIC NSSS, Fuel Vendors and all other NUPIC Vendors to a <u>nominal</u> 36 months. This requires that NUPIC members adopt a grace period acceptable to regulators and license commitments. If applicable, revise utility QA plan to allow a 25 percent or 90-day grace period for the performance of vendor audits. The grace period will be utilized for audit completion when necessary.

#### Why is it Important?

- Aligning vendor audit periodicities with current regulatory requirements reduces cost associated with maintaining vendors on the approved vendors list.
- Performance of required vendor evaluations along with current rigorous governance ensures there is no reduction in effectiveness.
- Should vendor performance decline, the ability to perform limited scope audits remains intact.

#### **NSSS/Fuel NUPIC Audits**

- These audits will be scheduled 36 months from the previous audit end date and are expected to be performed during the month scheduled.
- Only one NSSS/Fuel vendor will be scheduled for a NUPIC audit each year

#### **NSSS/Fuel NUPIC Audits**

The audit package must be made available to the NUPIC members no later than the first day of the 39th month from the previous audit end date or the first day of the 39th month from the previous triennial audit due date if the previous audit was performed past the triennial audit due date.

#### Non-NSSS/Fuel NUPIC Audits and Surveys

- Non-NSSS/Fuel NUPIC Audits/Surveys will be scheduled 33 months from the previous audit/survey end date.
- These audits/surveys are expected to be performed no less than 33 months and no later than 35 months from the previous audit/survey end date.
- The audit/survey package must be made available to the NUPIC members no later than the 36th month from the previous audit/survey end date.

#### NUPIC Audit/Survey Schedule Impact

- 2017 NUPIC Audit and Survey Schedules were reissued using the new audit/survey frequencies which resulted in 21 audits and 4 surveys being removed from the 2017 schedule.
- Approximately 25 fewer vendors will be audited/surveyed each year resulting in reduced utility resources and travel costs to support the NUPIC process.

#### Key Takeaways

- The window for the expected performance date of the audit/survey is now smaller so early planning is critical for ensuring that the audit can be performed during the desired time frame.
- Vendor support for scheduling of NUPIC audits/surveys during these windows is essential for obtaining the maximum benefit of this frequency change.

#### Key Takeaways

- Provisions exist to perform audits/surveys outside these windows should conflicts arise with management approval and notification to NUPIC committees.
- Limited Scope Audits (LSA) will still be considered when performance weaknesses are identified during audits

# QUESTIONS?