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THE FUTURE TODAY

NUPIC PROCUREMENT ISSUES COMMITTEE

February 18, 2011

The NUPIC Audit Program for 2011 is underway. NUPIC Auditors are working hard to schedule early and plan effectively to make the best use of all our resources.

Last week in Charleston SC, 130 NUPIC Auditors met at our Annual Auditor Training Conference. Also participating were a team from the NRC, a representative from the Canadian Nuclear Safety Commission, EPRI, NIAC, NEI Access Authorization, and the Nuclear Quality Management Leadership (NQML) Committee. The training covered a wide range of topics, but focused on two that I want to share with you. If your company is being audited this year, expect to be challenged on the following topics:

1. Dedication of Commercial-Grade Software used in Safety-Related Analysis. 10CFR50, Appendix B, Criteria III requires that “(Design Control) Measures shall be established for the selection and review for suitability of application of materials, parts, equipment, and processes essential to the safety-related functions ...” Where commercially-purchased software has been accepted for use for safety-related applications, auditors were instructed to assess recognition of safety function and the validity of dedication methods, using the guidance found in EPRI NP-5652. The NRC conditionally endorsed this guidance in Generic Letter 89-02 and 91-05. EPRI NP-5652, and the Supplemental Guidance, may be downloaded at no charge online at www.epri.com. Deficiencies in this area will be documented as audit findings.
2. Internal Audit Effectiveness. Continuing a theme from 2010, our checklist drives NUPIC Audit Teams to evaluate your ability to self-identify problems. When documented as ineffective, auditors will write audit findings and may ask you to perform a “missed opportunity review”. The missed opportunity review should be part of the evaluation determining cause and preventive action of a quality program violation to identify needed improvements in existing oversight processes (e.g., internal audits, management reviews, trending, etc.).

These topics are in addition to an ongoing focus on 10CFR21 implementation and the detection of counterfeit and fraudulent parts. The NRC webpage, www.nrc.gov, recently added the hyperlink <http://www.nrc.gov/reading-rm/doc-collections/cfr/part021/> to subscribe to updates to 10CFR21.

The 2011 NUPIC Vendor Conference is scheduled for June 15-16, in Oakbrook IL. Within the next few weeks you will be receiving an invitation to attend. Your ideas and suggestions for topics are welcome. If for some reason you do not receive an invitation, feel free to contact me, or Earl Mayhorn of Ameren UE, and we'll send you the information you need. This is an important conference for sharing our experiences and our concerns. I hope you'll all attend. Presentations being planned include the NRC, the International Laboratory Accreditation Committee (ILAC), NIAC, and the NUPIC Leadership Team. As always, keep an eye on the NUPIC website at www.NUPIC.com for current developments.

Thanks for your participation.

John Larson
Chairman