

Learning Opportunity Reviews

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Nuclear Safety

- Nuclear safety undergoes constant examination.
- Nuclear safety is used to strengthen and improve performance.
- Nuclear safety is kept under constant scrutiny through a variety of monitoring techniques, some of which provide an independent fresh look.

Learning Opportunity Review Process

- New initiative for NUPIC to examine audit results for missed opportunities.
- NUPIC Document 43 has been issued.
- Working group formed with multiple utilities represented (ENT, NPP, DOM, UniStar).
- Review of findings for 23 NRC vendor inspections completed.
- A number of learning opportunities have been identified.

Learning Opportunity Review Process

- Items that are being reviewed:
 - NUPIC Audit Findings
 - NRC Inspection Results
 - NUPIC Industry Issues
 - Part 21 Notifications

Learning Opportunity Review Process

- Learning Opportunities are being binned, trended, and reported on at NUPIC meetings.
- The working group reports results to the Steering Committee and membership.
- Recommended actions are being considered:
 - Training
 - Enhanced communication
 - Procedure changes
 - NUPIC checklist changes

Why Learning Opportunity Reviews?

- NRC oversight increasing for licensees and vendors.
 - 30+ vendor inspections planned for 2014
 - 4 licensee inspections planned for 2014
 - NRC observation of 2 NUPIC audits
- NRC inspections are identifying vendor nonconformances.
 - Technical Justification for Designs Inadequate
 - Commercial Grade Dedication
 - Procedure Compliance
 - 10 CFR 21

Why Learning Opportunity Reviews?

- NUPIC audits are not always consistent in identifying and reporting issues.
 - NRC inspection findings after some NUPIC audits.
 - Findings are issued in NUPIC audits when the previous audit was SAT.
 - Corrective actions accepted in one NUPIC audit and the next audit identifies finding.

Learning Opportunity

- Learning Opportunity=Missed Opportunity

Definition:

- Learning Opportunity-Audit/Inspection deficiency that should have been identified during a previous audit but was not.

Learning Opportunity Reviews

- Any program deficiency that was not identified during a previous audit should be viewed/evaluated as Learning Opportunity.
- Why?
 - So we will not miss it next time.
 - So we can make sure it is not missed on other audits.
 - So there is more consistency between audits and inspections.
 - So acceptance criteria in audits will be consistent.
 - So we can improve audit team performance.

Review Criteria

- An identified deficiency should be assumed to be a Learning Opportunity until proven otherwise.
- Examples:
 - Procedure deficiency that existed during an audit but was not identified
 - Document deficiency that existed during an audit but was not identified
 - Process deficiency that existed during the audit that was not identified

Review Criteria

- Just because the audit team did not look at a particular area or sample the right objective evidence does not mean there was no Learning Opportunity

- Remember:

Learning Opportunity=Missed Opportunity

Results of Reviews

- Major Areas of Concern
 - Use of sampling during audits has resulted in missed deficiencies.
 - Technical review of supplier documents.
 - Focus on Commercial Grade Dedication:
 - Team expertise
 - Depth of review
 - Knowledge of CGD requirements

Learning Opportunity Reviews

- We all need to perform a harder look at audit deficiencies for Learning Opportunities.
- Historically, Learning Opportunity reviews performed by NUPIC have not been self critical to ensure improvement opportunities are found.
- NUPIC has recognized the reviews need to be more transparent and more intrusive.
- Learning Opportunities are a great chance for us all to improve, if we choose to.

Learning Opportunity Reviews

- Vendors are encourage to consider implementing a similar process.
- Internal audits that don't identify issues that NUPIC audits identify should be evaluated (are you getting your moneys worth).
- Customer nonconformances received may have learning opportunities.

Potential Benefits

- Improvement in Appendix B program implementation.
- Reduced oversight from customers and NRC.
- Reduced amount of time responding to nonconformances.
- Reduced cost of rework.

Learning Opportunity Reviews

- We may be at a crossroad.
- Credibility for vendor oversight for the industry will erode if we can't objectively review our activities with a critical eye.
- We are obligated to continually look for ways to improve.
- Using Learning Opportunity reviews as an improvement tool should be one of the highest priority activities we focus on.

Learning Opportunity Reviews

Questions

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