



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

October 5, 2023

Brad Berryman
Senior Vice President and Chief Nuclear Officer
Susquehanna Nuclear, LLC
769 Salem Blvd., NUCSB3
Berwick, PA 18603

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 –
NOTIFICATION OF COMMERCIAL GRADE DEDICATION INSPECTION
(05000387/2024011 AND 05000388/2024011) AND REQUEST FOR
INFORMATION

Dear Brad Berryman:

The purpose of this letter is to notify you that U.S. Nuclear Regulatory Commission (NRC) staff will begin conducting the onsite portion of the commercial grade dedication baseline inspection at Susquehanna Steam Electric Station, Units 1 and 2, on January 29, 2024. The inspection team will be composed of three personnel from the NRC Region I office. The inspection will be conducted in accordance with NRC inspection procedure (IP) 71111.21N.03, "Commercial Grade Dedication," dated June 28, 2022.

The inspection will evaluate the implementation of Susquehanna's process for dedicating commercial-grade items, as required in applicable portions of Appendix B to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 (Appendix B), to ensure reasonable assurance is provided that these items will perform their intended safety function. Additionally, this inspection will evaluate implementation of Susquehanna's procurement process for safety-related components as required in Appendix B.

The inspection will include an onsite information gathering visit by the team's lead inspector and two weeks of onsite inspection by the team. The schedule for the inspection is as follows:

- Onsite Information Gathering Visit: November 28 – 30 or December 12 – 14, 2023
- Offsite Preparation Weeks: January 8 – 12 and January 22 – 26, 2024
- Onsite Inspection Weeks: January 29 – February 2 and February 12 – 16, 2024

The purpose of the onsite information gathering visit is to meet with staff expected to support this inspection, and to become familiar with the process for dedicating commercial-grade items and the process for procuring safety-related components at Susquehanna. We are aware that portions of the commercial grade dedication and safety-related procurement process may be handled at locations other than your site, and we will coordinate the best dates, times and location(s) for the onsite information gathering visit with your staff. This visit may include a tour

of onsite commercial-grade item dedication facilities, receipt inspection facilities, storage facilities, and installed plant components associated with potential inspection samples. The team lead will also review your plans for onsite inspection logistics including resources that will be provided to the team while onsite (e.g., conference rooms, network access, printers, monitors, etc.) and how information requests will be tracked and processed.

To minimize the impact on your staff and to ensure a productive inspection, we have enclosed two separate requests for information needed prior to the onsite information gathering visit and offsite inspection preparation week. The first request (Enclosure 1) is generally for information that will be used to choose the inspection samples or information that will be applicable to all inspection samples throughout the inspection. This information should be made available to the team lead before January 5, 2024. The team lead will use this information to support preparation and selection of a list of potential inspection samples. The second request (Enclosure 2) is for information that is more specific to the selected inspection samples and should be made available before January 19, 2024.

Additional information requests, interviews with your staff, and/or walkdowns of facilities or installed plant components will be made by the team throughout the inspection to complete their review of the selected inspection samples. It is important that all documentation provided to the team is complete and up-to-date to minimize the number of additional documents requested during the preparation and/or the onsite portions of the inspection. Additionally, to facilitate an efficient inspection, we request that a contact individual be assigned to each inspector to ensure information requests, questions, and concerns are addressed in a timely manner.

We understand that Katie Brown from your Regulatory Assurance organization is our contact for this inspection. If there are any questions about the inspection or the information requested, please contact the team lead, Len Cline, by telephone at (610) 337-5373 or by email at leonard.cline@nrc.gov.

PAPERWORK REDUCTION ACT STATEMENT

This letter contains mandatory information collections that are subject to the *Paperwork Reduction Act of 1995* (44 U.S.C. 3501 et seq.). The Office of Management and Budget (OMB) approved these information collections (approval number 3150-0011). Send comments regarding this information collection to the Information Services Branch, Office of the Chief Information Officer, Mail Stop: T6 A10M, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0011) Office of Management and Budget, Washington, DC 20503.

PUBLIC PROTECTION NOTIFICATION

The NRC may not conduct nor sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Glenn T. Dentel, Chief
Engineering Branch 2
Division of Operating Reactor Safety

Docket Nos. 05000387 and 05000388
License Nos. NPF-14 and NPF-22

Enclosures:

1. Documents Requested Prior to Information Gathering Visit
2. Documents Requested Prior to Inspection Preparation Week

cc w/ encl: Distribution via LISTSERV

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 NOTIFICATION OF COMMERCIAL GRADE DEDICATION INSPECTION
 (05000387/2024011 AND 05000388/2024011) AND REQUEST FOR
 INFORMATION DATED OCTOBER 5, 2023

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OFFICE	RI/DORS	RI/DORS			
NAME	LCline	GDentel			
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Enclosure 1

Documents Requested Prior to Information Gathering Visit

The documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the information gathering visit. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Paper records (hard copy) are acceptable when necessary. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below.

Documents requested by January 5, 2024:

1. Licensing basis documents such as the updated final safety analysis report and technical specifications.
2. Procedures for dedicating commercial-grade items and for procurement of safety-related components. This should include procedure for controlling counterfeit, fraudulent, and suspect items and also, if applicable, procedures that address requirements associated with the parts quality initiative (PQI).
3. List of commercial-grade items (including services used, if applicable), with a brief description of application, that have been dedicated for safety-related applications. These items may be dedicated by Susquehanna or dedicated by a vendor (or other licensee) and procured by Susquehanna. The list should encompass the past six years of dedication activities. The list should identify the systems/components where the items were installed or were intended to be installed for use. It should also identify whether the item has been installed.
4. List of components procured as safety-related, with descriptions, if not included above. Please note whether the item has been installed in the plant. The list should encompass the past six years of procurement activities. The list should identify the systems/components where the items were installed or were intended to be installed for use. It should also identify whether the item has been installed.
5. List of corrective action program documents, with descriptions, associated with commercial-grade items, safety-related procurement, receipt, or storage. The list should include any items that failed while in service after completing the dedication or safety-related procurement process. It should encompass the past six years of these activities and should identify the systems/components where the items were installed. The list should also identify the vendor who supplied the associated item.
6. List components procured as safety-related or commercial-grade items intended to be dedicated for safety-related applications that are on hold because of concerns identified during receipt, dedication, or from operating experience/corrective action program as applicable. The list should identify the systems/components where the items were intended to be installed for use.

7. List of components procured as safety-related or commercial-grade items dedicated for safety-related applications, in the past six years, where the procurement/dedication process was expedited to support rapid turnaround (less than seven days). The list should identify the systems/components where the expedited items were installed or were intended to be installed for use. It should also identify whether the item has been installed.
8. List of systems, system numbers/designators, corresponding names, and risk-ranking.
9. Copies of any self-assessments/audits of the safety-related procurement or the commercial-grade dedication and procurement processes that were completed within the two-years prior to the start date of this inspection.
10. List of site contacts that will be associated with the inspection and a copy of qualifications, as applicable, of personnel who performed commercial-grade dedication, safety-related component procurement, and/or receipt inspection/testing activities within the past six years

Enclosure 2

Documents Requested Prior to Inspection Preparation Week

For the samples selected by the team lead and provided to your point of contact following the information gathering visit, the documents and information requested below should generally be made available to the inspection team for the team's use both onsite and offsite during the inspection. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access must allow inspectors to download, save, and print the documents in the NRC's regional office. Paper records (hard copy) are acceptable when necessary. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below. We also request that the information provided be sorted by the list below for each sample.

Documents requested by January 19, 2024 (Prior to Preparation Week):

1. Purchase requisition and purchase orders.
2. Other pertinent vendor/licensee correspondence.
3. Original and updated design specifications.
4. Catalog specifications.
5. Procurement basis evaluation such as like-for-like, equivalency, plant design change packages, drawing and specification updates.
6. 10 CFR 50.59 documentation, if required.
7. Material receiving reports, packing lists/invoices, and other shipping documents.
8. Receipt inspection reports and any related test reports.
9. Other documents to trace the item from the time it was dedicated to the time it was installed, tested, and accepted.
10. Certificates of conformance/compliance/quality.
11. Vendor test and inspection reports.
12. Third-party or sub vendor test and inspection reports.
13. Shelf-life information.
14. Vendor dedication/partial dedication information.

15. Design/material/process change history information.
16. Completed commercial-grade dedication document including safety classification, identification of safety functions/application requirements, identification of critical characteristics, identification of verification methods and acceptance criteria for the critical characteristics, evaluation of credible failure modes, if applicable, and identification of the supplier's quality assurance program that meets 10 CFR Part 50, Appendix B.
17. Any deviation from design, material, and performance characteristics relevant to the safety function (nonconformance dispositions).
18. Documents showing objective evidence such as special test and inspection procedures and results, commercial-grade survey reports -item, design, material, and specific performance characteristic (relevant to safety function), and source inspection reports.
19. Completed post-installation test procedure and results.
20. Completed stock or material issue forms and installation work orders or reports.
21. Historical performance information.