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## Introduction to 3002002982, Updated Commercial Grade Item Dedication Guidance



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**U.S. NRC Regulatory Information  
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### Why was the guidance updated?

What has changed	What has <i>not</i> changed?
<ul style="list-style-type: none"> <li>Dedication is no longer used only as a last-resort</li> <li>Suppliers started to use dedication</li> <li>Devices being dedicated are more complex</li> <li>Additional EPRI guidance has been written over the years on related topics</li> <li>Other organizations have published guidance and requirements</li> <li>NRC published inspection procedures</li> </ul>	<ul style="list-style-type: none"> <li>Intent 10CFR, Part 21 (subsequent to a revision in 1995)</li> <li>Requirements</li> <li>Expectations</li> <li>Intent of EPRI dedication process               <ul style="list-style-type: none"> <li>Provide reasonable assurance the item being dedicated is capable of performing its safety-related function(s)</li> </ul> </li> </ul>

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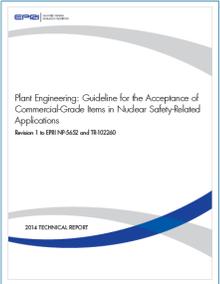
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### Revision to EPRI Dedication Guidance

- 3002002982
  - Supersedes NP-5652 and TR-102260
- References other associated documents
  - Computer Program Dedication
    - 3002002289 (12/2013)
  - Use of sampling in dedication
    - TR-017218-R1 (01/1999)
  - Acceptance of digital devices
    - TR-106439 (11/1996)
    - TR-107339 (12/1997)
    - 1009659 (3/2005)
    - 1001452 (9/2001)
  - Accepting Calibration and Laboratory Services
    - NEI 14-05A



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### Diverse Technical Team Developed the Guidance

- Licensee, supplier, regulator and construction perspectives



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### 416 years of dedication experience on the guidance revision team



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### Guidance Preview Team – Final Review of Document



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**Updates linked to the 1995 revision to 10CFR21**

- Use of the term “critical characteristics” in place of “critical characteristics for acceptance” and “design characteristics” in place of “critical characteristics for design”
- A shift in focus from “identifiable and measurable characteristics” to “characteristics necessary to perform safety function”
- Clarification that a failure modes and effects analysis (FMEA) is an effective tool to determine critical characteristics when complete design information is not available

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**Discussion related to the Supplier's Perspective**

- Discussion related to the two paths a supplier can use to provide a basic component
  - Control in accordance with a 10CFR50, Appendix B-compliant QA program *without* dedication
  - Control in accordance with a 10CFR50, Appendix B-compliant QA program *with* dedication
- Difference between establishing specification compliance and dedication
- Options for dedication when the dedicating entity has design information and knowledge
- Focus on documenting engineering decisions

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**Discussion related to the Supplier's Perspective**

- Unqualified source material upgraded via ASME NCA-3855.5
  - Does *NOT* require dedication
  - Satisfies 10CFR50, appendix B through meeting ASME & Material Specification Requirements
- Clarification that product identification attributes are not necessarily “critical characteristics” as defined in 10CFR, Part 21
  - However, product identification attributes such as part and model number, nameplate data, and so forth are important and should always be verified as part of the receipt inspection process.

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**Discussion related to identified problem areas**

- Concept of dedication “at the level of supply”
- Clarification that a completed and accepted design (including seismic and environmental qualification) is required prior to beginning the commercial grade dedication process
- “Dedication” is not the same as “qualification”
  - The difference between *qualification* and *dedication*
  - *Qualification* must be maintained during the dedication process

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**Discussion related to identified problem areas**

- Services – Calibration example
  - Use of ILAC accreditation in lieu of commercial grade survey
  - **NOT** in lieu of commercial grade dedication
- Commercial-grade survey versus audit – Survey involves:
  - Use of Critical Characteristics (CCs)
  - Link between CC’s and supplier’s controls
  - Appropriate technical, quality, and certification requirements in the purchase order
    - Includes specifying the supplier’s controls accepted via the survey and requesting certification that the controls were applied
- References to applicable content in ASME NQA-1 (in addition to ANSI N42.2-1978)

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**Contents:**

1	•Background and Introduction
2	•Baseline Terminology
3	•Overview of Commercial Grade Dedication
4	•Generic Technical Evaluation & Acceptance Process
5	•Commercial Grade Dedication Process
6	•Critical Characteristics
7	•Method 1 - Special Tests and Inspections
8	•Method 2 - Commercial Grade Survey
9	•Method 3 - Source Verification
10	•Method 4 - Item/Supplier History
11	•Commercial Grade Services
12	•Use of Dedication to Accept Accredited Calibration Services
13	•Reasonable Assurance
14	•Digital Equipment and Computer Programs
15	•References and Bibliography

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**How can a copy of the updated guidance be obtained**

- Available to the public at [www.epri.com](http://www.epri.com)
- [3002002982 - Plant Engineering: Guideline for the Acceptance of Commercial-Grade Items in Nuclear Safety-Related Applications: Revision 1 to EPRI NP-5652 and TR-102260](#)
  - <https://membercenter.epri.com/abstracts/Pages/ProductAbstract.aspx?ProductId=00000003002002982>
- [3002006066 - Typical Format for Documenting Commercial-Grade Item Dedication Technical Evaluations](#)
  - <http://www.epri.com/abstracts/Pages/ProductAbstract.aspx?ProductId=00000003002006066>

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**For more discussion**

- EPRI Joint Utility Task Group meetings are available to the public
  - August 2-4, 2016 SandPearl Hotel, Clearwater Beach, Florida
  - Discussion topics:
    - Commercial Grade Dedication
    - Equivalency Evaluation
    - Critical Spare Parts programs
    - Maintaining qualification during dedication
    - Undeclared digital content
    - Quality of procured items

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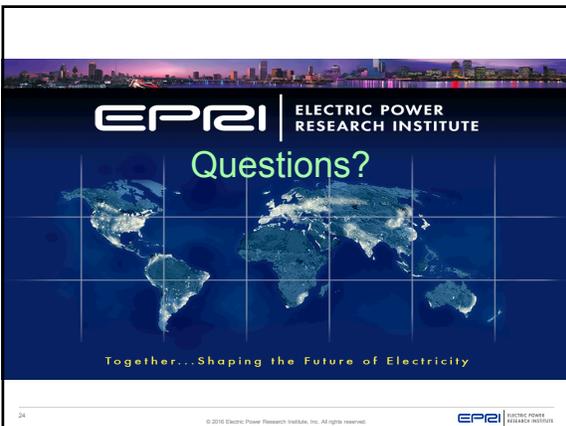
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