

NRC INSPECTION MANUAL

IPSB

INSPECTION PROCEDURE 35020

INSPECTION OF APPLICANT'S SURVEILLANCE OF CONTRACTOR QUALITY ASSURANCE (QA) ACTIVITIES

PROGRAM APPLICABILITY: 2502, 2504

35020-01 INSPECTION OBJECTIVE

To determine if the applicant's implementation of QA responsibilities relating to surveillance of contractors is consistent with the QA program described in the application for a combined license (COL).

35020-02 INSPECTION REQUIREMENTS

02.01 Review of Applicant Planning Activities. With the assistance of appropriate members of the applicant's organization, perform the following examinations:

- a. Review the procurement documents related to scope of QA responsibilities delegated to the contractor.
- b. Review applicant plans and activities relating to the attainment of overall (reviews, inspections, audits) contractor surveillance objectives.
- c. Review information on previously identified deficiencies, including planned corrective actions.
- d. Review surveillance plan with applicant.
- e. Assess the adequacy of the plan in consideration of the stated scope and overall surveillance objectives.
- f. Review records related to qualifications of individuals assigned to perform the surveillance activity.

02.02 Audit of Applicant Surveillance Activities. Observe and evaluate the adequacy of QA program implementation relating to the applicant's conduct of the following contractor surveillance activities:

- a. Pre-surveillance conference.
- b. Execution of surveillance by members of the applicant's organization.
- c. Identification and summarization of deficiencies.

- d. The attainment of planned surveillance objectives.
- e. Exit interview as related to the attainment of required and timely contractor corrective actions.

35020-03 INSPECTION GUIDANCE

General Guidance

In preparation for conducting this inspection:

- review applicable guidance in Section 17.1-3 of NUREG 0800, as appropriate.
- obtain approval of Regional supervision.
- allow the Region to complete a review of the technical bases for selection of contractors.

- a. This inspection is conducted to follow up on substantive deficiencies or concerns about the adequacy of the applicant's execution of contractor surveillance responsibilities which may have been identified during earlier QA inspections.
- b. If the concerns are related to the general or generic adequacy of the applicant's execution of its surveillance responsibilities, then the inspector and regional supervision may be rather selective in choosing an applicant/contractor surveillance activity for audit.

In another case, the justification for such an inspection may relate to a single contractor; such as the need to verify applicant execution of followup surveillance responsibilities relating to resolution of substantive deficiencies identified in a single contractor's established and/or executed QA program.

In all cases, the selection of contractors for which the Region will conduct an evaluation of applicant execution of surveillance responsibilities shall be as necessary to provide appropriate resolution of previously identified concerns.

This inspection may be warranted to follow up on conditions like the following:

1. Examination of applicant/contractor surveillance records discloses substantive deficiencies, or issues, relating to the adequacy of applicant execution of contractor surveillance responsibilities.
2. The applicant's surveillance activities are insufficient to determine the general status of the contractor's implemented QA activities for the specific contract.
3. The general adequacy of a contractor's QA program has not been previously established by a regional (routine or generic) inspection.
4. The applicant has identified numerous and substantive deficiencies in the contractor's implementation of the QA program for ongoing or near-future activities; but neither the applicant nor the contractor has initiated timely corrective action.
5. The applicant's surveillance records do not provide sufficient evidence that the licensee is adequately verifying contractor adherence to material, test, inspection, and procurement document requirements.

Specific Guidance

03.01 The inspector must at all times keep in mind that this is an inspection of the applicant and not of the contractor. The primary purpose of the inspections will be to examine the implementation of applicant's QA program surveillance responsibilities.

03.02 When performing this procedure, the inspector's observations and conclusions when determining the adequacy of the applicant's surveillance activities, shall be based on applicable guidance.

35020-04 RESOURCE ESTIMATE

This procedure supports the review of a COL application per the guidance contained in Section 17.1-3 of NUREG 0800. The resource estimate for this inspection procedure is approximately 80 hours per inspection of direct inspection effort.

35020-05 REFERENCES

NUREG 0800, Standard Review Plan, Section 17.1-3, "Quality Assurance Program"

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