

THE VENDOR TIMES

NRC/NRR/DRO The Vendor Times

December 2023

The Director's Cut

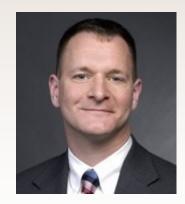
In Fiscal Year (FY) 2023, the U.S. Nuclear Regulatory Commission (NRC) vendor inspection staff conducted a total of 22 inspections for operating reactors, including audits and observations. In addition to 18 inspections, the vendor inspection staff observed three Nuclear Procurement Issues Corporation (NUPIC) audits, and participated in a licensing audit. During these inspections and audits, the NRC evaluated the vendors' and licensees' compliance with the applicable requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the Code of Federal Regulations (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," and 10 CFR Part 21, "Reporting of Defects and Noncompliance."

With the COVID-19 Public Health Emergency (PHE) now officially ended, the vendor inspection staff is fully implementing its oversight duties by continuing to perform on-site inspections at vendor facilities. In addition, licensees and vendors should be cognizant that exigent conditions no longer apply. This includes all of the regulatory alternatives approved during the PHE, e.g., audits, commercial-grade surveys, and source verifications conducted 100% remotely, and extending the grace period for these activities. More information about the NRC's expectations can be found in page 4 of this newsletter.

The vendor inspection staff continued to maintain communication with nuclear supply chain stakeholders via the 2nd Town Hall Meeting on Vendor Oversight, which was held virtually on June 21, 2023 with approximately 160 attendees participating in this half-day meeting. The NRC's 9th Workshop on Vendor Oversight is scheduled for June 2024. More details can be found in page 3 of this newsletter.

For more information about the NRC's Vendor Inspection Program, please visit the NRC's public Web site at: https://www.nrc.gov/reactors/new-reactors/how-we-regulate/oversight/quality-assurance.html. In here you will find a variety of resources, including our publicly available inspection reports, past NRC presentations made at industry meetings, past editions of this newsletter, etc.

In closing, licensees and vendors need to continue ensuring there is adequate oversight of the supply chain to fulfill its vital role of ensuring the public's health and safety.



Russell Felts,
Director,
Division of Reactor
Oversight

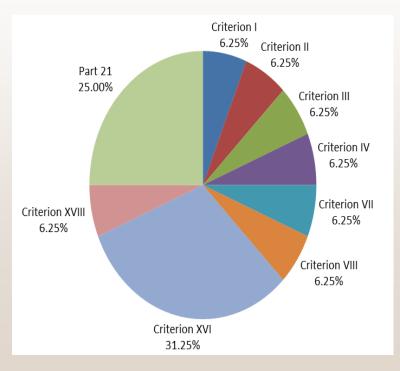
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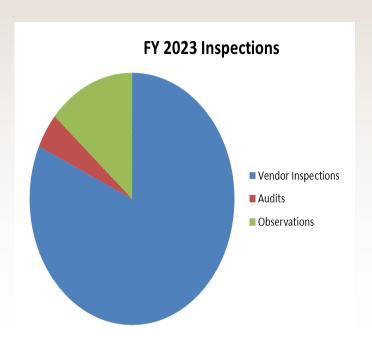
2023 Vendor Inspection Findings

The Vendor Inspection Program Plan (VIPP) verifies that reactor applicants and licensees are fulfilling their regulatory obligations with respect to providing effective oversight of the supply chain. It accomplishes this through a number of activities, including performing vendor inspections to verify the effective implementation of the vendor's quality assurance (QA) program, establishing a strategy for vendor identification and selection criteria, and ensuring vendor inspectors obtain the necessary knowledge and skills to perform inspections. In addition, the VIPP addresses interactions with nuclear consensus standard organizations, industry and external stakeholders, and international constituents. From October 1, 2022 to September 30, 2023, the vendor inspection staff completed a total of 22 vendor inspections. These included 18 vendor inspections, three NUPIC observations, and one licensing audit. inspections, **NRC** issued Durina the the nonconformances against vendors for their failure to adequately implement the applicable requirements of Appendix B to 10 CFR Part 50. In addition, the NRC issued four violations against vendors for their failure to adequately implement the requirements of 10 CFR Part 21.

FY 2023 Violations and Nonconformances



FY 2023 Vendor Activities



The nonconformances cited against vendors fell within various criteria of Appendix B to 10 CFR Part 50. including Criterion VII, "Control of Purchased Material, Equipment, and Services," and Criterion XVIII, "Audits," with Criterion XVI, "Corrective Action," being the most prevalent. While the NRC does not consider this to be indicative of any industry trend, the vendor inspection staff will place increased focus in these areas during future vendor inspections to ensure vendors understand how to adequately implement these requirements. during future interactions with addition, stakeholders (e.g., industry meetings), the vendor inspection staff will continue to highlight the importance of adequately implementing the 10 CFR Part 21, corrective action, commercial-grade dedication, and supplier oversight programs.

- Yiu Law, Reactor Operations Engineer



2023 Vendor Town Hall Meeting

On June 21, 2023, the Office of Nuclear Reactor Regulation (NRR), Division of Reactor Oversight (DRO), successfully hosted the 2nd Town Hall Meeting on Vendor Oversight. The Town Hall meeting was held virtually and had an audience of about 160 attendees representing companies and organizations from 10 countries including vendors, industry groups, and government regulatory agencies. The Town Hall meeting provided an opportunity to our stakeholders in the nuclear supply chain to engage directly with the NRC staff to discuss regulatory and technical issues of interest to them. The Town Hall meeting included a keynote address by the NRR/DRO Director, Mr. Russell Felts, as well as three presentations from members of NRR/DRO's Quality Assurance and Vendor Inspection (IQVB) Branch. The topics presented by the NRC staff included: (1) an update on the status of decaBDE and follow-up activities; (2) a discussion on 10 CFR Part 21; and (3) Sampling in the Commercial-Grade Dedication Process as well as issues identified with the use of the International Laboratory Accreditation Cooperation alternative. The rest of the Town Hall meeting was dedicated to an open Question & Answer session where the meeting attendees had an opportunity to ask questions to the NRC staff on a variety of QA topics. For more information, please visit the NRC's public Web site at https://www.nrc.gov/reactors/new-reactors/oversight/ quality-assurance/town-hall-meetings.html.

2024 Workshop on Vendor Oversight

The NRR/DRO/IQVB staff is currently planning its 9th Workshop on Vendor Oversight tentatively scheduled for June 13, 2024, in Baltimore, MD. These vendor workshops generate an audience of approximately 300 individuals, comprised of industry representatives, licensees, vendors, and members of the public. The past eight vendor workshops have been held in conjunction with the NUPIC Vendor Conference in order to generate maximum participation since both meetings share the same target audience.

If there are any topics you would like to suggest to the NRC for discussion during the 2024 Workshop on Vendor Oversight, please contact Mike Fitzgerald by January 12, 2024 at Michael.Fitzgerald@nrc.gov. For more information, please visit the NRC's public Web site at https://www.nrc.gov/reactors/new-reactors/oversight/quality-assurance/vendor-oversight.html

- Odunayo Ayegbusi, Reactor Operations Engineer



End of the COVID-19 Public Health Emergency

The end of the COVID-19 PHE, which was first declared on January 31, 2020, was announced by the President of the United States on May 11, 2023. Due to the travel restrictions caused by the COVID-19 PHE and in response to concerns by licensees and vendors, the NRC staff issued several safety evaluations that allowed for the performance of fully remote audits, commercial-grade surveys, and source verifications, as well as granting a 25% grace period extension for the performance of these activities, **during exigent conditions**. Due to the termination of the PHE, the ability to continue performing audits, commercial-grade surveys, and source verifications 100% remotely, as well as providing a 25% grace period extension, no longer applies. The NRC expects licenses and vendors will return to performing on-site audits, commercial-grade surveys, and source verifications within the specified frequency, in accordance with the applicable requirements of Appendix B to 10 CFR Part 50.

The NRC staff would like to remind licensees and vendors that Criterion VII of Appendix B to 10 CFR Part 50 states, in part, that "Measures shall be established to assure purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, <u>inspection at the contractor or subcontractor source</u>, and examination of products upon delivery."

The ability to continue performing fully remote audits, commercial-grade surveys, source verifications and/or extending the grace periods for performing these activities generally cannot be granted without a change to the regulations in Appendix B to 10 CFR Part 50. The process for adopting, revising, or withdrawing existing regulations is called a Petition for Rulemaking. Additional information regarding how to submit a Petition for Rulemaking at the NRC can be found by visiting the NRC's public Web site at https://www.nrc.gov/about-nrc/regulatory/rulemaking/petition-rule.html.

- Michael Fitzgerald, Reactor Operations Engineer



Revision 6 of Regulatory Guide 1.28



The NRC staff issued Revision 6 of Regulatory Guide (RG) 1.28, "Quality Assurance Program Criteria (Design and Construction)," in September 2023. Revision 6 of RG 1.28 endorses the use of the 2017, 2019, and 2022 editions of NQA-1, "Quality Assurance Requirements for Nuclear Facility Applications," including Parts I and II, subject to the regulatory positions included in the RG. Revision 6 also endorses the Nuclear Energy Institute (NEI) document No. NEI 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1, September 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20259B731). The majority of the previous regulatory positions from Revision 5 continue to be applicable in Revision 6.

Regulatory Position Changes

Regulatory position 2.a, "Laboratory Calibration and Testing Services," found under "Control of Purchased Items and Services (NQA-1 Requirement 7 and Subpart 2.19)," has been modified to direct users to use Revision 1 of NEI 14-05A for the procurement of calibration and testing services performed by domestic and international laboratories for use in safety-related applications. Although Subpart 2.19, "Quality Assurance Requirements for the Use of Supplier Accreditation for Calibration and Testing Services," lists some of the conditions from Revision 1 of NEI 14-05A, Subpart 2.19 is missing additional conditions documented in both Revision 1 of NEI 14-05A and the NRC staff's safety evaluation (ADAMS Accession No. ML20322A019). For example, Subpart 2.19 does not include a condition on the performance of remote accreditation assessments.

The first additional regulatory position involves Subpart 2.2, "QA for Packing, Shipping, Receiving, Storage and Handling of Items for Nuclear Facilities" of NQA-1. Section 309, "Marking," in Subpart 2.2 of NQA-1-2019, was revised to allow for electrochemical etching on specific materials. The NRC staff took exception to this change and included the following statement in Revision 6 regarding Subpart 2.2 of NQA-1: "Etching should not be used on nickel alloys, weld areas, or sensitized areas of stainless steel."

The second regulatory position involves Subpart 2.5, "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete, Structural Steel, Soils, and Foundations for Nuclear Facilities." Section 300, "Requirements," in Subpart 2.5 of NQA-1-2019, added a statement for codes and standards that are referenced or invoked throughout Subpart 2.5. The NRC staff took exception to this change and included the following statement in Revision 6 regarding Subpart 2.5 of NQA-1: "When the referenced or invoked code or standard becomes superseded or canceled, licensees or applicants need to submit their proposed alternative for NRC review and approval, as appropriate, for continued use of the code or standard or a proposed alternative."

The NRC staff's endorsement of NQA-1 addressed in Revision 6 of RG 1.28 excludes the Department of Energy Subparts 2.22, "Quality Assurance Requirements for Management Assessment and Quality Improvement for Compliance with 10 CFR 830 and Department of Energy (DOE) Order 414.1 for DOE Nuclear Facilities," and 2.25, "Quality Assurance Requirements for High-Level Waste Custodians." Subparts 2.22 and 2.25 are sponsored by the DOE and are outside of the NRC's regulatory jurisdiction.

- Andrea Keim, Reactor Operations Engineer

Status of the Office of the Inspector General's Recommendations on Counterfeit, Fraudulent, and Suspect Items

On February 9, 2022, the NRC's Office of the Inspector General (OIG) issued report No. OIG-22-A-06, "Audit of NRC's Oversight of Counterfeit, Fraudulent, and Suspect Items [(CFSI)] at Nuclear Power Reactors," ADAMS Accession No. ML 22040A058). This audit report documents the OIG's findings and recommendations for the NRC to improve its oversight of CFSI at nuclear power plants. The audit report identified two areas for improvement: (1) the NRC should clarify and communicate with stakeholders on how the NRC collects, assesses, and disseminates information regarding CFSI; and (2) the NRC should improve its staff's awareness on CFSI. The report included eight specific recommendations based on the audit findings as follows:

- Develop processes and guidance to collect, process, and disseminate CFSI information.
- 2. Communicate those processes across the agency, or at least to the divisions affected by CFSI.
- Develop a coherent agencywide approach for CFSI, identifying the agency's primary objective regarding mitigation of CFIS into agency-regulated equipment, components, systems, and structures.
- 4. Clearly define CFSI.
- 5. Include a CFSI category in the Allegation Management System.
- 6. Develop inspection guidance with examples pertaining to identifying CFSI in inspection procedures.
- 7. Develop CFSI training for inspectors.
- 8. Develop a knowledge management and succession plan for CFSI.



The NRC staff's proposed and completed actions are documented in the following status memos to the OIG: April 11, 2022 (ADAMS Accession No. ML22077A775), September 20, 2022 (ADAMS Accession No. ML22237A227) and May 26, 2023 (ADAMS Accession No. ML23122A164). The OIG has reviewed the NRC staff's proposed and completed actions and has issued its analysis for each recommendation in the following status memos to the NRC staff: April 26, 2022 (ADAMS Accession No. ML22116A020), October 6, 2022 (ADAMS Accession No. ML22180A058), and June 8, 2023 (ADAMS Accession No. ML23163A237). In the June 8, 2023 memo to the NRC staff, the OIG concluded that recommendations 1, 2, 3, 5, and 8 are closed and recommendations 4, 6, and 7 remain open and resolved. The NRC staff has since completed the remaining actions associated with recommendation 7. The NRC staff expects to complete all remaining actions associated with recommendations 4 and 6 by April 2024. The NRC staff will provide a status update to the OIG by the end of December 2023. The OIG has not yet reviewed the implementation of these recommendations. The NRC staff expects a status memo from the OIG with its analysis for each recommendation in the second quarter of 2024.

- Frankie Vega, Reactor Operations Engineer

Status of the Commercial-Grade Dedication Inspections at Licensees

The NRR/DRO/IQVB staff continues to support the implementation of Inspection Procedure (IP) No. 71111.21N.03, "Commercial Grade Dedication," which was revise in March 2023. The NRR/DRO/IQVB staff supported the technical process and inspection implementation training for regional inspectors, including tabletop scenario discussions. Also, the NRR/DRO/IQVB staff engaged in discussions with stakeholders, and lessons learned from the first inspection to provide clarity to the IP. The updated IP revision included clarification on the referenced guidance for the use of the Electric Power Research Institute Document No. 3002002982, "Plant Engineering: Guideline for the Acceptance of Commercial-Grade Items in Nuclear Safety-Related Applications," Revision 1, and the inclusion of Regulatory Guide (RG) 1.250, "Dedication of Commercial-Grade Digital Instrumentation and Control Items for use in Nuclear Power Plants," Revision 0, dated October 2022. Clarifications efforts by the NRR/DRO/IQVB staff also emphasized the importance of information requests for documents on the licensees' Appendix B to 10 CFR Part 50 program and the IP's scope of review. The NRC has completed 20 inspections as of October 2023. As with other IPs in the 71111.21N, "Design Bases Assurance Inspection (Programs)," dated February 5, 2019, series inspections, cross-regional review panels are convened before the inspection reports are issued. Though most findings identified from the first 20 inspections have been minor, there have been seven Green Non-Cited Violations (NCVs) identified.

Some common themes with the NCVs are:

- The lack of implementation for the control of parts and material that are signed out of the warehouse, transferred to the shop to the jobsite, and then returned to the warehouse if not used.
- The shelf-life of parts in the warehouse and the lack of controls to properly identify and update the item as needed.
- The NRC inspectors have noted a misunderstanding by some sites regarding compliance with 10 CFR Part 21 Sites reporting an event under 10 CFR Part 50.72, "Immediate notification requirements for operating nuclear power reactors," 10 CFR Part 50.73, "Licensee event report system," 10 CFR 73.1200, "Notification of physical security events," and 10 CFR 73.1205, "Written follow-up reports of physical security events" can do so, however, the information provided in the 50.72, 50.73, 73.1200, and 73.1205 report must include the required information in 10 CFR Part 21 to meet the reporting requirements.
- Licensees must still evaluate for defects in accordance with 10 CFR Part 21 along with evaluating for the other reporting requirements.
- When using commercial-grade surveys as part of the commercial-grade dedication process, a commercial-grade survey report is the dedication documentation and QA record and must be retained as a permanent record for the dedicated component.
- Properly translating all design requirements into critical characteristics.

These inspections will continue through 2026, with each site having an inspection.

- Aaron Armstrong, Reactor Operations Engineer



International Activities

As in years past, the NRR/DRO/IQVB staff participated in a variety of international activities. Below is a summary of some of these activities and its results:

Committee on Nuclear Regulatory Activities (CNRA) Working Group on Supply Chain (WGSUP) Multinational Inspection at Japan Steel Works (JSW) in Muroran, Hokkaido, Japan

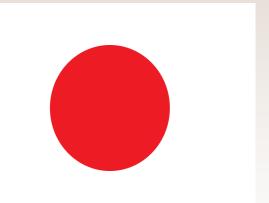
From June 5 through June 9, 2023, one member of the NRR/DRO/IQVB staff participated in a multinational inspection of Japan Steel Works (JSW) in Muroran, Hokkaido, Japan. The purpose of this inspection was to confirm the implementation of the corrective actions by JSW, and their primary purchaser, Framatome, as a result of CFSI issues identified at JSW. The inspection team concluded that JSW has processes in place to assure the nuclear safety of components, and that Framatome has implemented satisfactory processes to oversee manufacturing quality of products at JSW. The Executive Summary of the report is available at the United Kingdom's Office for Nuclear Regulation's public Web site at https://news.onr.org.uk/2023/08/sizewell-c-inspection-id-52797/.

The purpose of these joint inspections is to foster international cooperation regarding regulatory oversight of the supply chain of new and operating reactors through increased cooperation and communication. Through the CNRA WGSUP, international regulatory bodies share inspection experiences, observations, and inspection methodologies to ultimately leverage international regulatory inspection activities in support of effective and efficient regulatory oversight.

The collaboration between the inspectors from the participating regulatory bodies was seen as a positive attribute and will continue to strengthen the international regulatory cooperative efforts. WGSUP will discuss future plans and likely continue performing multinational inspections.

Vendor Inspection of Velan Inc. and Canadian Nuclear Safety Commission (CNSC) Observation in Montreal, Canada

From August 14 through August 18, 2023, the NRR/DRO/IQVB staff conducted an inspection at Velan, Inc.'s facilities in Montreal,







Canada. The purpose of this limited-scope routine inspection was to assess Velan's compliance with provisions of 10 CFR Part 21 and selected portions of Appendix B to 10 CFR Part 50. The NRC inspection team inspected Velan's implementation of their quality activities associated with the design, fabrication, and testing of safety-related valves and valve replacement parts being supplied to the domestic operating reactors. Within the scope of this inspection, no violations or nonconformances were identified.

Representatives from the CNSC observed the inspection and provided positive feedback on the performance of the NRC inspection team. The NRC's vendor inspection report is available at on the NRC's public Web site at: https://www.nrc.gov/docs/ML2324/ML23242A186.pdf

Observation of the Nuclear Procurement Issues Corporation's Evaluation of the Assessment by the Inter-American Accreditation Cooperation (IAAC) of the General Coordination of Accreditation (CGCRE) in Rio de Janeiro, Brazil

On September 24 through 29, 2023, two members of the NRR/DRO/IQVB staff observed the performance of NUPIC's evaluation of the assessment by the IAAC of the CGCRE to the requirements of the International Standard Organization (ISO)/International Electrotechnical Commission (IEC) standard No. 17011, "Conformity assessment - Requirements for accreditation bodies accrediting conformity assessment bodies," 2017 edition, and ISO/IEC No. 17025, "General requirements for the competence of testing and calibration laboratories," 2017 edition. Specifically, the NRC staff observed the evaluation of CGCRE as well as the renewal accreditation assessment of a calibration laboratory and of a testing laboratory. As part of this observation, the NRR/DRO/IQVB also witnessed field calibrations and field testing performed by the calibration and testing laboratories.

The NRR/DRO/IQVB staff independently evaluated how NUPIC performed its oversight of the assessment of CGCRE by IAAC as well as how CGCRE performed a renewal accreditation assessment of both a calibration laboratory and a testing laboratory. The NRR/DRO/IQVB staff's independent evaluation allowed the NRC to confirm that the International Laboratory Accreditation Cooperation (ILAC) accreditation process: (1) continues to equivalent alternative to a commercial-grade survey; (2) continues to be implemented consistent with ILAC requirements and procedures; (3) has not experienced any changes that could materially affect the manner in which it is used by the nuclear industry; and (4) continues to meet the requirements of Appendix B to 10 CFR Part 50, as applicable.



- Dong Park, Reactor Operations Engineer

Reactor Operations Engineers Yamir Diaz-Castillo and Dong Park with members of the NUPIC and IAAC Assessment Teams

Lessons Learned from a Software Vendor Inspection

The scope of the NRC's vendor inspections include safety-related components, items, and services supplied under a QA program that meets the requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21. The components may be related to activities including design, fabrication, handling, shipping, storing, inspecting, testing, operating, maintaining, and repairing, amongst others. One of these types of components may include software and how it's used at a licensee and/or vendor's facility. For example, licensees and vendors may use software in a safety-related application (e.g., fuel behavior, material performance, structural analysis, fluid dynamics, and seismic analysis). In this case, the software needs to be procured from a supplier implementing a QA program that meets the requirements of Appendix B to 10 CFR Part 50 as well as 10 CFR Part 21.

It may be difficult for software suppliers to know how their product may be utilized by a licensee and vendor, so it's of the utmost importance that software suppliers follow contractual requirements imposed in the procurement documents by their customers. These contractual requirements for a safety-related product include maintaining a QA program consistent with the requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21. When there are purchase orders with these contractual requirements, the NRR/DRO/IQVB staff will verify that the supplier's QA program complies with the applicable Appendix B to 10 CFR Part 50 and 10 CFR Part 21.

During a recent inspection of a supplier of software used in safety-related applications, the NRR/DRO/IQVB staff identified that the supplier's QA program did not fully comply with the applicable requirements of Appendix B to 10 CFR Part 50. As a result, the NRC issued a nonconformance against Criterion II, "Quality Assurance Program." The Criterion II nonconformance discussed the failure to meet provisions, including proper documentation of policies, procedures, and instructions. This included a failure to properly translate applicable regulatory requirements into specifications, providing controls for traceability, selection and review for suitability of application of materials, parts, equipment, and processes, specifically the integration of open source and freeware software into the software product, and ensuring activities affecting quality were properly prescribed by documents procedures, instructions, or drawings. Though the software lifecycle may be different than that of a traditional component (i.e., valve), regulatory requirements must still be maintained which include the necessary information that demonstrates that the software quality is being maintained

through each phase of the lifecycle, including traceability.

The issuance of a nonconformance against the requirements of Criterion II of Appendix B to 10 CFR Part 50 highlights a significant breakdown in supplier's QA program. The NRC would like to remind licensees and vendors of the importance of ensuring that suppliers of safety-related components and/or services are meeting, properly complying, and understand the applicable requirements invoked in procurement documents.

- Rebecca Romero-Devore & Andrea Keim, Reactor Operations Engineers

NQA Outstanding Service Award

Mr. Paul Prescott was a Senior Reactor Operations Engineer in the NRR/DRO/IQVB before he retired in December 2022 after 31 years of service with the NRC. Mr. Prescott was responsible for QA and vendor inspection activities related to the current operating reactors and new reactor construction.

In November 2023, Mr. Prescott was awarded the 2023 NQA Outstanding Service Medal from the American Society of Mechanical Engineers (ASME). Mr. Prescott was awarded this medal for his service to the NQA-1 Standards Committee and various subcommittees over a period of 18 years. During this time, Mr. Prescott consistently and tirelessly conveyed regulatory perspectives to help the committees produce standard language that is congruent with regulatory expectations. Mr. Prescott shared his sights gained through his career prior to NRC, as well as insights gained from this work on the ASME Section III Committees. Mr. Prescott always supported his commentary and recommendations with a detailed basis and explanation. In addition, Mr. Prescott fostered an environment where committee members could engage in open and honest communication with representatives of a regulatory body. Mr. Prescott provided significant technical knowledge transfer and retention to more recent members of NQA-1 Committees by relaying the historical basis and evolution of regulation and the intent of the regulatory language. Furthermore, Mr. Prescott was instrumental in providing regulatory perspective and guidance related to questions and interpretations in the area of commercial-grade dedication. Congratulations, Paul. We miss you!!



Mr. Paul Prescott being awarded the 2023 NQA Outstanding Service Medal by Ms. Taunia Sandquist, NQA Standard Committee Chair



Mr. Paul Prescott with the 2023 NQA Outstanding Service Medal

Would you like to be added to the newsletter distribution or suggest topics for next year's newsletter?

We welcome useful and informative feedback on the content of this newsletter. Please contact Yamir Diaz-Castillo, Reactor Operations Engineer, by email at Yamir.Diaz-Castillo@nrc.gov.