



NUCLEAR ENERGY INSTITUTE

Anthony R. Pietrangelo
DIRECTOR, LICENSING
NUCLEAR GENERATION DIVISION

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Mr. Theodore R. Quay, Chief
Quality Assurance, Vendor Inspection,
Maintenance, and Allegations Branch
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Quay:

This letter is in response to the June 7, 2000, workshop, titled 10 CFR 50.54 (a) Direct Final Rule, Consideration of Voluntary Option Development. The workshop agenda targeted industry feedback on implementation of the revision to 10 CFR 50.54 (a), the gathering of information to determine if additional rulemaking is needed based on the June 8, 1995, NEI petition, and the discussion of the feasibility of an alternative rulemaking.

The direct final rule was promulgated thirteen months prior to the workshop, providing adequate time for the industry to ascertain the short-term worth of the rule in reducing unnecessary burden while maintaining the integrity of a comprehensive QA program. It was evident to the industry participants during the course of the workshop that the direct final rule has been beneficial. A separate rulemaking on 10 CFR 50.54 (a) is not needed since QA special treatment requirements are being addressed under the Risk-Informing Part 50, Option 2 initiative.

Based on the above, we believe it is not necessary to pursue the use of 10 CFR 50.59 as a vehicle to address changes to licensee QA programs. Finally, we believe future changes to 10 CFR 50.54 (a) should be considered following implementation of the revised Regulatory Oversight Process.

Thank you for the opportunity to both attend the workshop and provide industry feedback on important QA-related topics.

Sincerely,

Anthony R. Pietrangelo

cc. D. Dorman
R. Pettis

Q005
ADD: Michael Buss
to erids
filed as needed
from M. Buss
9/28/00