

1/13/04
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COMMENTS ON DRAFT REGULATORY GUIDE DG-7003

1. Section B, under "Revisions," third paragraph: "date of change and..." should be revised to "date of change or...". There is no need to include both a date of change and a revision or amendment number on each page. They are equally suited to provide the necessary information.
2. Section B, under "Physical Specifications", last paragraph: The drawings do not need to include signatures or initials to indicate approval of the drawing and revisions if manual signatures on the drawings are not used. The current state of the art allows electronic "signatures" on drawings (e.g., in the form of a numeric identifier) to avoid manually signing drawings that are otherwise electronically generated. I suggest a more flexible statement such as "and an indicator of approval of the drawing and each revision."
3. Section C, Subsection 1.4: Should this Subsection be entitled "Drawings" rather than "Appendix"? If so, in the first sentence, "Appendix 1.3" should be "Section 1.3."
4. Section C, Subsection 1.4: Drawings do not need to specify welder and welding procedure qualification requirements or the method of nondestructive examination and acceptance standard IF the Code to which the package will be constructed (such as ASME III) includes these requirements, is documented in the SAR and NRC approval of any alternatives to the Code is required. Including this information on the drawings when it is already in the Code is superfluous when the Code must be complied with as described in the supporting SAR.

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