PMBelCOL PEmails

From: Ravindra Joshi
Sent: Monday, December 01, 2008 1:57 PM
To: andrea sterdis; bob Hirman; Eddie R Grant; Hastings, Peter S; Kim Slays; Ray, Phillip M; rgrumbir@gmail.com
Cc: BelCol Resource; Joseph Sebrosky; Kerri Kavanagh
Subject: FW: Revised Draft RAI (a portion) # 1425 related SRP section 1.0 (Regulatory Guide compliance) for Bellefonte Units 3 and 4
Attachments: Regulatory Guide 1.33doc.doc

To All
As a result of the October 23, conference call, the staff has revised the question related to Regulatory Guide 1.33 and the revised question is attached herewith. Please contact me if you desire a phone conference regarding the revised question (of RAI # 1425). If no response is heard by close of business December 4, 2008, the final RAI # 1425 will be issued.
Ravi Joshi
301-415-6191

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Subject: FW: Revised Draft RAI (a portion) # 1425 related SRP section 1.0 (Regulatory Guide compliance) for Bellefonte Units 3 and 4
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Regulatory Guide 1.33doc.doc	24570	

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Regulatory Guide 1.33- The conformance discussion in the revised Appendix 1AA provides an exception that states, “quality assurance requirements utilize the more recently NRC endorsed NQA-1 in lieu of the identified outdated standards”. It is noted that the NRC has previously approved the use of NQA-1-1994, as supplemented by the guidance of ANSI N18.7-1976, “Administrative Controls and Quality Assurance for the Operational Phase of nuclear Power Plants,” for the Exelon nuclear operating facility. The guidance of Part I and II of NQA-1-1994 is similar to that provided by the American National Standards Institute (ANSI)/ASME N45.2 daughter standards developed in the 1970s and early 1980s. Therefore, in addition to NQA-1-1994,TVA should also include a commitment to follow the guidance of ANSI N18.7-1976 (as endorsed by Regulatory Guide 1.33 in the QAPD.~~NQA-1 does not cover operational aspects. In addition, Regulatory Guide 1.33 endorses ANS 3.2, which has not been incorporated in NQA-1.~~. Please revise accordingly.~~clarify~~.