

RulemakingComments Resource

From: Margaret Harding <margaret@4factorconsulting.com>
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I am a 35 year veteran of the Nuclear industry in the United States. This issue comes up in numerous subtle ways when managing NQA and safety categorization. I can't provide a specific dollar figure, but many hours are spent between Utility and Vendor determine which items are truly safety related and which fall into these "intermediate" categories. It is also problematic when defining the level of quality requirements as 10 CFR 50 Appendix B is applicable only to "Safety-related" and no real scaled approach to quality is available within the regulation.

That said, rather than a direct revision to the regulation, this seems like an area where a standard would be more useful and applicable. One that clearly defines these terms, provides examples of SSCs in each category and what is expected in terms of QA, and other actions related to the appropriate regulation.

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