

D870915

The Honorable Lando W. Zech, Jr.
Chairman
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Chairman Zech:

SUBJECT: ACRS COMMENTS REGARDING PROPOSED INTERNATIONAL WORKSHOP ON
QUALITY IN DESIGN AND CONSTRUCTION OF NUCLEAR POWER PLANTS

In our June 10, 1987 letter to you we proposed an international workshop on quality in design and construction of nuclear power plants.

In a memorandum dated August 7, 1987 (attached), Mr. Stello agreed with the importance of assessing the contribution of quality assurance (QA) programs in assuring quality in nuclear power plants, but concluded that consideration of the proposed workshop should be deferred because the construction of new nuclear power plants in the United States is nearing completion and because the NRC Staff is concentrating on improving nuclear power plant operations.

The fact that there is a pause in the design and construction of new plants in the United States is one of the reasons we think that now is the time to evaluate the worth of existing regulations and associated regulatory guidance in attaining quality. The time for evaluation and possible change of the regulations and associated guidance is not after new applications have been submitted in accordance with existing regulations. We believe that the present hiatus in licensing actions and the near completion of construction of the present generation of nuclear power plants provides an excellent opportunity for the NRC to reexamine in an orderly fashion the question of how best to achieve quality in future plants. Further, we believe that such reexamination should take place before the agency's and the industry's memory of past difficulties with current regulations and guidance has been blurred or lost.

Although the part played by quality assurance in operation of power plants and in licensing of waste repositories was not made explicit in our letter of June 10, 1987, it was not our intent to exclude these important questions. In fact, we believe that the proposed international workshop on quality should specifically include discussion of these items. We believe that there is much that could be gained from better understanding of how quality in plant operations is achieved in the United States and abroad.

We believe that our recommendation to the Commission to reexamine at this time the question of how to achieve quality is consistent with the draft NRC Strategic Plan which specifically makes the assumption that quality problems can be expected in the future. Further, we believe that the recommendation is consistent with the goal of the NRC which is stated in the draft strategic plan to "ensure that nuclear power plants under construction are designed and constructed properly and are ready for safe operation," as well as being consistent with the stated goal to

"prepare for future reactor licensing activities."

We would be pleased to meet and discuss this matter in greater detail with you in the near future.

Sincerely,

William Kerr
Chairman

Attachment:

Memorandum from Victor Stello, Jr., EDO, to William Kerr, ACRS, dated August 7, 1987, "Proposed International Workshop on Quality in Design and Construction of Nuclear Power Plants"

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