

RULES REGULATIONS

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Quality Assurance Program Criteria (Design and Construction)

Comment On: NRC-2017-0079-0001
Quality Assurance Program Criteria (Design and Construction); Request for Comment on Draft Regulatory Guide

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Submitter Information

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(1)

General Comment

Comments to NRC DG-1326, ref Docket NRC-2017-0079

While my comments are made in the context of being an employee of a company that manufactures components used by licensees under Title 10 of the Code of Federal Regulations Part 50, the opinions expressed are my own and not necessarily those of my employer.

Component manufacturers are expected by licensees to implement a Quality Assurance Program compliant with the requirements of 10 CFR 50 Appendix B. Revision 4 of RG 1.28 provided guidance that meeting the requirements of NQA-1-2009 Addenda to NQA-1-2008 would satisfy the intention of 10 CFR 50 Appendix B. This was conveniently the same edition of NQA-1 which was required to be met by the ASME Boiler & Pressure Vessel Code (B&PVC) Section III according to which N-type certificates of accreditation are obtained. In the Background section as well as the preamble of Section C of DG-1326, this indicates that the NRC guidance is to address 10 CFR 50 Appendix B requirements through later versions of the NQA-1 standard than that which is mandated by the ASME B&PVC. Recently issued public drafts of updates to the ASME B&PVC Section III, Subsection NCA indicate that the ASME committees are not changing the edition of NQA-1 which needs to be satisfied. As a result, component manufacturers who construct components to ASME B&PVC Section III requirements will have to conform to multiple editions of the NQA-1 standard. This may also be an issue for licensees who obtain "Owner's Certificates" or N-type certificates of authorization from ASME in order to perform certain kinds of work in their plant.

I also think that referencing different editions of standards as all being acceptable introduces a risk. It is possible that unless language is included which specifies that the licensee should pick one edition and follow it fully, licensees may cherry pick the requirements from different editions in order to minimize the overall requirement to something less than if any one of the approved editions were followed fully. The allowance of

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multiple editions may also make NRC inspection work more complicated.

In Part C, 2.a.(1), accreditation is allowed in lieu of commercial-grade surveys for suppliers of calibration and testing services. I am happy to see testing services included and applaud this addition.

In Part C, 3.b.(1), I believe there are some words missing from the sentence. I believe it should read "For the management of electronic records, appropriate controls on quality assurance records include the following:".

In Part C, 4.b.(2), I think it would be better to specify that the triennial period starts on the day of the closing meeting of the performed audit. Also in this section is a sentence that reads "The licensee or applicant may perform an audit when the supplier has completed sufficient work to demonstrate that its organization is implementing a QA program that has the required scope for purchases palced during the triennial period."

This seems to me to be a bad idea. What is seems to say is that the licensee can issue a purchase order for some work to a supplier that has not been audited (and a pre-award survey has not been done) and then when some of the work has been completed, then perform the audit. I can certainly see the intention to allow a way to develop suppliers without the suppliers having to create some kind of a demonstration piece with related fake QA records to demonstrate their system as a way to capture business in the nuclear market. However, this approach would be highly risky for on-site work as well as engineering or computer application development. My recommendation is that the quoted sentence be struck.

In Part C, 4.b.(4).(c), I believe the wording here is incorrect. I believe is should read "operating experience of products furnished by the supplier and results of audits from other sources..." Also, as an additional source of audit information, Authorized Inspection Agency audits or other accreditation body audits could be considered.

Thank you for the opportunity to provide my comments.