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GOLDBERG,S.M. Director's Office, Office of Inspection and Enforcement

SUBJECT: Amplifies comments submitted in 841210 ltr & clarifies final statement of previous comments re ATWS equipment QA guidance,Proposed generic ltr should be revised to endorse normal util practice.

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JAN 3 1985

Mr. Stephen M. Goldberg
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON ATWS EQUIPMENT QA GUIDANCE
ER 100450 FILE 842-03
PLA-2383

Reference: PLA-2372, same subject, dated December 10, 1984.

Dear Mr. Goldberg:

The purpose of this letter is to amplify the comments submitted in the reference and to clarify the final statement of our previous comments.

The proposed generic letter (49FR44337) enumerates specific quality assurance requirements for non-safety related ATWS equipment. While much of the proposed guidance appears consistent with PP&L practices for non-safety related equipment, there are a number of requirements which are not consistently applied to all non-safety related equipment, such as inclusion of QA requirements in procurement documents or requiring a review specifically by a designer's supervisor (review by someone else may be more appropriate). We expect that this will be the case with other utilities also. Further, much of the terminology used in the proposed generic letter has come to have special and specific meaning in the regulatory documents and standards dealing with Quality Assurance programs (inspection, nonconformance, and QA requirements for example) so that use of these terms in this context may later be construed to be a requirement for the same rigidly structured programs used for safety related equipment. Consequently, we suggest that the final generic letter simply endorse normal utility practice and not attempt to enumerate specific requirements.

The generic letter should make no attempt to standardize normal utility quality assurance practice for non-safety related equipment. Enumeration of specific quality assurance requirements for non-safety related equipment in a regulatory document will require each licensee to do a detailed comparison of

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his quality assurance practices with those specified, and will undoubtedly reveal the need for changes or exceptions. For the reasons given in our original comment letter we believe that such a process is not justified.

The proposed generic letter recognizes the adequacy of current utility practices. PP&L's normal practice for quality assurance of non-safety-related equipment consists of a program containing the elements of 10 CFR 50 Appendix B tailored to the application. We believe the PP&L approach is representative of the rest of the industry. We further believe that PP&L's quality assurance program for non-safety-related equipment will provide for adequate quality of ATWS equipment. We suggest that the proposed generic letter be revised to endorse normal utility practice and not attempt to standardize the elements of the program.

Very truly yours,

N. W. Curtis
Vice President-Engineering & Construction-Nuclear