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NUCLEAR ENERGY INSTITUTE

B/27/2017
82 FR 15242

May 22, 2017

Ms. Cindy K. Bladey
Chief, Rules, Announcements, and Directives Branch
Office of Administration
Mail Stop: OWFN-12H08
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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RULES AND DIRECTIVES
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USNRC

Subject: Comments on Draft Regulatory Guide DG-1326 "Quality Assurance Program Criteria (Design and Construction)" Docket ID NRC-2017-0079

Project Number: 689

Dear Ms. Bladey,

In a March 27, 2017 Federal Register Notice (82FR15242), the U.S. Nuclear Regulatory Commission (NRC) requested public comments on Draft Regulatory Guide DG-1326, "Quality Assurance Program Criteria (Design and Construction)" The proposed DG revision updates guidance to endorse, with clarification or exceptions, multiple revisions of the American Society of Mechanical Engineers standard NQA-1 titled "Quality Assurance Requirements for Nuclear Facility Applications." The proposed revision describes methods that the NRC considers acceptable for establishing and implementing a quality assurance program for the design and construction of nuclear power plants and fuel reprocessing plants. Nuclear Energy Institute (NEI)¹ appreciates the opportunity to submit the attached comments, on behalf of the industry, for NRC consideration.

The attached comments include suggested changes to statements identified DG-1326, intended to improve clarity and reduce potential ambiguities. Since Regulatory Guides are not used to express a new NRC position, this proposed revision is not imposed upon licensees and its use is voluntary.

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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SUNSI Review Complete
Template = ADM - 013
E-RIDS= ADM-03

Add= *A. Thomas (adta)*
S. Burton (sxb3)

Ms. Cindy Bladey

May 22, 2017

Page 2

If you have any questions or require additional information, please contact me at 202-739-8106,
mar@nei.org.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Richter". The signature is written in a cursive style with a large, prominent "M" and "R".

Mark A. Richter, Ph.D.

Comments on DG-1326 "Quality Assurance Program Criteria (Design and Construction)"

ID	Section, Page, and Line #	Comment	Proposed Resolution
1	Sec: C.1.a(1) Page 6	The alternative demonstration of ability discussed in this section should include a statement concerning acceptance of this demonstration.	Include the following statement at the end of the section (taken from NQA-1, Requirement 2, Section 303.3): "Such demonstration shall be subject to review and acceptance by the organization responsible for quality assurance audits and / or the certifying authority prior to their use for qualification."
2	Sec: C.3.b(1)(e) Page 7	"Random inspections" is non-specific and may lead to different interpretations of what is required.	NIRMA TG 15-2011, Section 8.4.5 provides suggested specific actions and intervals and should be recommended as the basis for any review of possible record degradation.
3	Page 4, Background, first paragraph, last sentence	As stated, this sentence appears to equally assign preference to NQA-1b-2011 Addenda to ASME NQA-1 2008, NQA-1 2012, and NQA-1 2015 above all previously endorsed revisions of NQA-1.	Change "provide the most current guidance for QA" to "provide adequate guidance for QA".
4	Page 6, Audit Participation (1)	Comparable industry experience may be very loosely translated. Translation could offer latitude that may allow qualification of individuals who lack the in-field practice necessary to perform as a lead auditor.	<p>Allow flexibility that is more in line with NQA-1, requirement 2, section 303.3, such as:</p> <p>Prospective lead auditors must participate in at least one nuclear audit within the year preceding the date of qualification. Participation in independent assessments may be used to satisfy the other four quality assurance audits required within a period of 3 years prior to the date of qualification, provided that the activities can demonstrate the following:</p> <ul style="list-style-type: none"> • Independence from the functional areas being assessed. • Planning that establishes the scope of the activities and evaluation criteria. • Performance by technically qualified personnel. • Results that are documented and reported. • Appropriate corrective action initiated and tracked to resolution.