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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

**Document:** NRC-2017-0079-DRAFT-0003  
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### Submitter Information

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**Name:** Byron Frank  
**Address:** United States,  
**Email:** byron.frank@ieee.org

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### General Comment

It is good to see that the Nuclear Regulatory Commission continues to recognize and endorse the current versions of the NQA-1 standard as an adequate basis for complying with 10 CFR 50 Appendix B.

Specific comments:

1. Section B, Background, 2nd para: Suggest changing "computer software use" to "computer software development." Software development (along with acquisition, operation, maintenance, and retirement of software) in Subpart 2.7 of NQA-1. Use of computer software is discussed in NQA-1 Requirement 3 Section 400.
2. Section B, Background, 2nd para: Nomenclature. Change "Subsection 2.22" to "Subpart 2.22"
3. Section C. Suggestion. It would be helpful for Items 1, 2, 3, and 4 to identify which part of NQA-1 the exception or clarification refers to. E.g., Item 1, QA Program, refers to NQA-1 Requirement 3, Item 2 to NQA-1 Requirement 7, etc.
4. Section C. With this revision of RG 1.28, the NRC is approving for use the four NIRMA Technical Guides listed in Item 3 (b). This is a noteworthy addition to the RG. Suggest making this more visible by noting this in the summary paragraph introducing Section C. Example, "In addition, the 2011 editions of NIRMA Technical Guides TG 11, TG 15, TG 16, and TG 21 are approved by the NRC staff for use to establish appropriate quality controls for implementation of electronic media management of quality assurance

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Call = A. Thomas (ADTA) - S. Burton (5x63)

records." (or similar)

The opinions expressed above are my own, and do not necessarily represent the opinions of my employer or the NQA-1 Standards Committee's Subcommittee on Software Quality Assurance, of which I am a member.