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PROPOSED RULE PR- Misc Notice Reg Guide

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October 12, 1979

Secretary of the Commission
US Nuclear Regulatory Commission
Attention Docketing and Service Branch
WASHINGTON , D.C. 20555

Gentlemen:

Re: USNRC Task RS 902-4, August 1979, Div 1
Proposed Revision 2 to Regulatory Guide 1.33
Quality Assurance Program Requirements
(Operation)

I offer my personal comments which are aimed at recognition of need for clear distinction of difference between quality control and quality assurance areas. Unfortunately the Regulation relates to quality assurance without parallel identification of needed quality control activities. This is further a problem with the identification of Audit Program which in the proposed regulation is directed to a periodic scheduling rather than also requiring adjustment for recognition of immediated or related causes potentials. (Sect 4.5)

I further recognize a potential problem, in such areas as equipment control, where integral verification would be in many cases better than independent verification alone. (Sect 5.2.6)

Replacement parts should be controlled for source and inspection as well as for adequate design and testing. Sect 5.2.7.1)

Control and assurance of immediate operator actions to mitigate consequences of a serious condition would be improved with control and assurance of such possible action alternatives prior to their emergency use. (Sect 5.3.9)

In general I find stress on the verification of written requirements rather than relation to actual needs or value benefits, both economic and safety related, to achieve a system safety approach. Instead I would prefer to see increased use of reviews to real needs in the assurance role and relegate the conformance to detailed requirements to what I would call a quality control function.

The Appendix A, under Administrative Procedures, should be revised to show Responsibilities BEFORE Authorities (Item 1.b) to indicate the proper order. Likewise rather than concentrating on surveillance tests and calibration (which quality control functions) I would prefer to see quality assurance relate to performance needs and measurement needs. Also, I would add the element of "corrective and correction action" to the listing of Administrative Procedures to close the loop on a quality assurance basis. Further, I would add assurances for site and general alerts for effectiveness and efficiency of results.

Acknowledged by card 10/22

Cordially,

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