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Secretary of the Commission
U. S. Nuclear Regulatory Commission
Attention Docketing and Services Section
Washington, DC 20555

October 26, 1979

Gentlemen:

We are pleased to submit our comments on the proposed Revision 3 to Regulatory Guide 1.33 "Quality Assurance Program Requirements (Operation)," issued for comment in August 1979.

1. Paragraph C.5 of the proposed Regulatory Guide should include a reference to ANSI N 18.7-1976/ANS 3.2, similar to the references in paragraphs C.4 and C.6.
2. Section 8a of Appendix A should contain additional words restricting this concern to safety related equipment only. For example: "Procedures of a type...and testing devices, utilized to maintain safety related equipment, are properly controlled..."
3. In Section 9a of Appendix A the preparation of procedures for the performance of safety maintenance by itself constitutes preplanning. It is therefore redundant to require additional "proper preplanning."
4. The statement in Section 9.e.6 should be clarified to ensure that it relates only to safety related equipment, as intended. For example: "Method for ensuring that maintenance activities, involving safety related equipment, performed..."

Stone & Webster Engineering Corporation appreciates this opportunity to contribute to the improvement of the proposed Revision 3 to Regulatory Guide 1.33.

Very truly yours,



S. B. Jacobs
Chief Licensing Engineer

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Acknowledged by card *11/5/79*

