

# **Gibbs & Hill, Inc.**

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Rg. Guide

October 4, 1979

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Docketing and Service Branch

Subject: Draft Regulatory Guide and Value Impact Statement  
(Task RS 902-4)

Gentlemen:

Thank you for the opportunity to comment on proposed Revision 3 to Regulatory Guide 1.33 "Quality Assurance Program Requirements (Operation)."

Our review has resulted in one general comment. Appendix A to Regulatory Guide 1.33 Rev. 3 lists systems, components and activities which may, wholly or in part, not always be classified as nuclear safety-related.

Examples are:

- Item 3.e.
- Item 3.f. (3)
- Item 4.V.
- Item 8.a(1)(u)
- Item 8.a(1)(dd)

The statement on Page 3, Section C, Regulatory Position, Paragraph 1, "Procedures contained in Appendix A should be omitted only if they are not applicable because of the configuration of the nuclear power plant," appears to require inclusion of all items regardless of safety status. We suggest inclusion of a statement in the regulatory guide establishing that the quality assurance requirements are applicable to only those procedures which apply to nuclear safety-related systems and components.

Thank you for your attention to this matter.

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Very truly yours,  
GIBBS & HILL, INC.

Acknowledged by ca. 7/15/80 Jla...

*F. W. Gattler, Jr.*  
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FWG:cb

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