

DOCKET NUMBER

PROPOSED RULE

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Reg. Guide*

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YANKEE ATOMIC ELECTRIC COMPANY

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WYC 79-27



20 Turnpike Road Westborough, Massachusetts 01581

October 17, 1979



Secretary of the Commission
United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Docketing and Service Branch

Dear Sir:

Subject: Proposed Revision 3 to Regulatory Guide 1.33 "Quality Assurance Program Requirements (Operation) - Task RS 902-4"

Yankee Atomic Electric Company has reviewed the subject document and prepared the following comments for your consideration.

Regulatory Position 1 requires the preparation of many procedures to carry out an effective quality assurance program for nuclear power plants. As a mechanism to achieve this effort, the position establishes minimum typical "safety-related" activities, determined by the NRC, that should be covered by written procedures. It is our opinion that the determination of which activities require procedural control and the extent of such controls must continue to be the responsibility of the applicant. The position also does not permit deletion of procedures which do not "conform to the applicants procedures plan" which was allowed by Revision 2. This should be reinstated in Revision 3.

Regulatory Position 5 requires an independent verification of equipment control "in all instances". It must continue to be the applicant's responsibility to evaluate the appropriateness of the independent verification as was previously permitted by Revision 2.

Section D, Implementation states that backfitting decisions will be made by the NRC staff on a case by case basis to ensure that adequate quality assurance requirements are being imposed for operation of nuclear power plants. We believe that this should be deleted from the guide since backfitting regulatory guides is a fundamental practice of the NRC although rarely mentioned in any guide.

We appreciate the opportunity to comment on Regulatory Guide 1.33. Should you have any questions, please contact Mr. David B. Pike at (617)366-9011.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

W. P. Johnson
Vice President

RTT/smw

Approved by card... 10/29

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