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October 29, 1979

Docketing and Service Branch
Secretary of the Commission
U. S. Nuclear Regulatory Commission
WASHINGTON D. C. 20555

Gentlemen:

Re: Regulatory Guide 1. 137, Rev 1, Oct 1979

Allow me to offer some comments on the Regulatory Guide No. 1. 137.

- 1 Using design base rather than performance requirements limits the flexibility and control in enforcement. Regulatory Position c. 1. d permits manufacturer requirements to prevail over possible USNRC performance requirements. There could well be some safety criteria of the Commission which could be more important than the manufacturer's requirements.
- 2 Prescribing actual cleaning materials, rather than stating desired performance criteria for such actions, limits flexibility of USNRC enforcement and improvements in the system, per C. 2. f. Again performance would be better than specification of actual design or process requirements.
- 3 Use of actual testing, such as loss of pressure as indication of possible deterioration, eliminates the use of NDE or even visual examination as measures of possible conditions prior to actual leakage or loss of pressure, as in C. 1. e (1) and (2). For visual examination to be limited to being conducted during pressure test precludes obvious testing and inspection techniques of advantage.
- 4 Obviously Quality Assurance requirements are desirable and especially to be considered in identification of the important criteria and elements to be performed in such quality actions. It would appear desirable for the C. 1. b reference to pick up the desired specific items for consideration from the performance viewpoint to provide for an effective and efficient system.

Thank you for the opportunity of permitting these observations.

Cordially,

Harvey Schock

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Acknowledged by card. 11/16