



Washington Public Power Supply System
A JOINT OPERATING AGENCY

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DOCKET NUMBER
PROPOSED RULE *PR - Miss Notice Reg Guide*

Mr. Samuel J. Chilk
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, "INSERVICE INSPECTION CODE CASE ACCEPTABILITY, ASME SECTION XI," DIVISION 1, TASK SC 721-4, AUGUST 1979



Dear Mr. Chilk:

The Washington Public Power Supply System has reviewed the subject regulatory guide, which was issued for public comments. We have noted that there may arise a potential conflict between the proposed regulatory guide and the NRC Standard Review Plan (SRP) Section 5.2.1.2, Revision 1, entitled "Applicable Code Cases".

The conflict would arise from the fact that the SRP approves, without any conditions noted and on a generic basis, code cases 1646 (N-72), 1647 (N-73), 1738 (N-118), and N-210. The proposed regulatory guide, however, places conditions on the use of these code cases. It is suggested that the NRC discuss in the regulatory guide the fact that certain code cases are also listed in the SRP and clarify to the plant owners, which document-the SRP or the regulatory guide-will be used as a basis for licensing reviews.

We appreciate the opportunity to review and comment on draft regulatory guides and trust that our comments will be of benefit in the further staff efforts on this guide.

Very truly yours,

D. L. Renberger
D. L. RENBERGER
ASSISTANT DIRECTOR--TECHNOLOGY

DLR:DWP:GCS:crw

Acknowledged by card *of 10/22*

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