



RS 902-4

Department of Energy  
Clinch River Breeder Reactor  
Plant Project Office  
P.O. Box U  
Oak Ridge, Tennessee 37830



PROJECT NUMBER *PR - misc rules* October 5, 1979  
PROPOSED RULE *Reg Guide*

Secretary of the Commission  
ATTN: Docketing and Service Branch  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Gentlemen:

REVIEW OF REGULATORY GUIDE 1.33

Proposed Revision 3 to Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," has been reviewed. We have the following comments:

Since N45.2, 2.6, 2.9, 2.10, 2.11, 2.12, 2.13, and 2.23 have been consolidated into ANSI NQA-1, it would seem appropriate for this guide to endorse NQA-1 instead of the older replaced standards.

Section 5.2.6 is unclear. It is not obvious whether the procedures for control of equipment shall be independently verified or whether the equipment lineup and tagout, done under these procedures, shall require independent verification. Independent verification of equipment lineup may be appropriate in the last paragraph where the equipment is ready to be returned to service.

Sincerely,

*Raymond L. Copeland*  
Raymond L. Copeland  
Acting Assistant Director  
for Public Safety

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Acknowledged by card... *10/12*

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