



**Commonwealth Edison**  
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RS 902-4  
 SCARBROUGH

DOCKET NUMBER  
 PROPOSED RULE PR - Misc. Notice  
Reg. Guide

October 15, 1979

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

Attention:  Docketing and Service Branch



Dear Sir:

Attached are our comments on Division 1 Task RS 902-4  
 Proposed Revision 3 to Regulatory Guide 1.33. "Quality  
 Assurance Program Requirements (Operation)."

We appreciate having been given the opportunity to comment.

Very truly yours,

*Perry L. Barnes*

Perry L. Barnes  
 Nuclear Licensing Dept.

Attachment

Acknowledged by *me* 10/29

CIS DATE

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Reg. Guide 1.33 Rev. 3, Quality Assurance Program Requirements

The NRC staff concludes in the value impact section that the additional cost of this revision would be minimal. The review of this revision by Commonwealth Edison Company concurs with this conclusion that changes indicated merely clarify present NRC policy and do not impose significant additional requirements.

The measures specified such as independent verification in all instances of measures to control equipment is being done at the stations.

The additional procedures contained in Appendix A are such presently in place.

1. Quality Assurance Program Implementing Procedures
2. Inservice Inspection Procedures
3. Operating procedures for electrical circuits between off-site transmission networks and on-site class IE distribution
4. Control of measuring and test equipment
5. Core physics surveillance
6. Administrative controls for maintenance work
7. Handling of chemical reagents subject to degradation
8. Hydrogen explosion

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