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RG 1.33
REV 3

2 VALUE/IMPACT ASSESSMENT ON
3 QUALITY ASSURANCE REQUIREMENTS FOR THE OPERATION OF NUCLEAR POWER PLANTS

4 I. The Proposed Action

5 A. Description

6 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants
7 and Fuel Reprocessing Plants," to 10 CFR Part 50, "Licensing of
8 Production and Utilization Facilities," establishes quality assur-
9 ance requirements for the operation of nuclear power plant safety-
10 related structures, systems, and components. The proposed action
11 will provide updated guidance for compliance by the applicant
12 with quality assurance program requirements for the operation
13 phase of nuclear power plants.

14 B. Need for the Proposed Action

15 Regulatory Guide 1.33, Revision 2, "Quality Assurance Program
16 Requirements (Operation)," dated February 1978, provides guid-
17 ance on quality assurance program requirements for the operation
18 phase of nuclear power plants and endorses National Standard ANSI
19 N18.7-1976/ANS-3.2. With the implementation of the SD/IE Feed-
20 back Program between the Offices of Standards Development and

1 Inspection and Enforcement, several problem areas (discussed in
2 Section C of this Preliminary Value/Impact Statement) with regard
3 to guidance on quality assurance program requirements for the
4 operations phase of nuclear power plants have been identified.
5 Current NRC guidance should be updated to provide more concise
6 guidance and reflect experience in the use of this Regulatory
7 Guide.

8 C. Value/Impact of the Proposed Action

9 1. NRC

10 Guidance for complying with the Commission's Regulations
11 with regard to overall quality assurance program requirements
12 for the operation phase of nuclear power plants is currently
13 contained in Regulatory Guide 1.33, dated February 1978 and
14 is being used by the NRC staff in the evaluation of applica-
15 tions for operating licenses. Since the purpose of the pro-
16 posed action is to provide updated guidance to reflect
17 experience with the use of current guidance, the value/impact
18 will be based on changes proposed to guidance contained in
19 Regulatory Guide 1.33 (Revision 2).

20 The following is a list of the significant changes to be made to
21 the Regulatory Guide and the associated value/impact assessment
22 for each change.

1 (a) Regulatory Position 1 will be reworded to specifically state
2 that the identified procedures should be omitted only if they
3 are not applicable to an applicant due to the configuration
4 of the nuclear power plant.

5 The present wording of the Regulatory Position allows for
6 the misinterpretation that the applicant can omit procedures
7 without careful justification.

8 The value of the proposed change will be less time spent by
9 the NRC staff informing applicants of the requirements for
10 having detailed written procedures. Since there is no change
11 in staff position, the impact will be minimal.

- 12 (b) To provide a more complete list of typical procedures in
13 Appendix A of the Guide, the following items will be added:
- 14 (1) Quality Assurance Program implementation procedures
 - 15 (2) Inservice Inspection
 - 16 (3) Hydrogen Explosions

17 The addition of these procedures to Appendix A will provide
18 improved guidance concerning which activities should be
19 covered by written procedures. The value will be less time
20 spent by the NRC staff to inform applicants of those activities

1 which require detailed written procedures. Since the addi-
2 tional guidance is a present staff position, the impact will
3 be negligible.

4 (c) Identification of the types of instruments that require
5 periodic calibration and procedural coverage will be clari-
6 fied to specifically include both portable and installed
7 equipment.

8 Subdivision 8.a of Appendix A is intended to apply to
9 installed instruments as well as portable equipment. How-
10 ever, there is some confusion within the industry concerning
11 the application of the subdivision. The value of the change
12 will be the clarification of a present staff position. This
13 will reduce the amount of time spent by the NRC staff to
14 inform applicants of the types of instruments that require
15 periodic calibration and procedural coverage. The impact
16 will be negligible since there will be no change in staff
17 position.

18 (d) Clarification of the position that procedures should be
19 prepared for all Technical Specification required surveil-
20 lance, whether included in the surveillance section or not,
21 will be accomplished.

1 The value of this action will be the removal of confusion
2 that results from the use of older technical specifications
3 which do not apply to Subdivision 8.b of Appendix A. The
4 NRC staff will spend less time to inform applicants of the
5 true staff position. The impact will be negligible since
6 the result of this action is the clarification of a staff
7 position.

8 (e) A change will be made to more clearly specify the need to
9 establish procedures which cover all aspects of reactor
10 engineering surveillance.

11 The expansion of these procedures will provide additional
12 guidance to the industry. The value will be less time spent
13 by the NRC staff to inform applicants of the need for written
14 procedures in this area. Since there will be no change in the
15 staff position, the impact will be negligible.

16 (f) Subdivision 9.a of Appendix A will be modified to state that
17 even though minor, routine maintenance activities may not
18 require detailed procedural coverage, they are still subject
19 to general administrative procedural controls.

1 This change removes the misleading implication that major
2 maintenance activities could be accomplished without proce-
3 dures. The value of this proposed action will be less time
4 spent by the NRC staff to inform applicants of activities
5 which require detailed procedural coverage. Since this
6 change does not effect the present staff position, there will
7 be negligible impact.

8 (g) To remove the implication that only the activities listed
9 in Subdivision 9.d of Appendix A could be considered either
10 maintenance or operating procedures, it will be stated that
11 the items listed are only examples of such activities.

12 Due to the wording of this subdivision, confusion has arisen
13 within the industry concerning procedures that could be
14 categorized either as maintenance or operating procedures.

15 The value will be less time spent by the NRC staff to inform
16 the applicant of the true intention of the subdivision.

17 The impact will be minimal since the change corresponds to
18 the present NRC staff position.

19 (h) Additional areas which should be addressed by administrative
20 procedures will be included in Subdivision 9.e of Appendix A
21 to assist in solving the problems of inadequate retest

1 of significant vendor work,
2 and procedures for significant mainte-
3

4 This will be improved guidance in the
5 With the issuance of more useful
6 the industry, the NRC staff should
7 within the industry of quality
8 This improvement of guidance
9 on NRC staff.

10 (i) Part A which deals with chemical and radio-
11 procedures will be expanded to provide addi-
12

13 Additional guidance will be less time spent
14 to inform applicants individually of this
15 as this guidance is presently a staff position,
16 negligible.

17 The result in more efficient license evalua-
18 tion and guidance for compliance with quality
19 assurance requirements for the operation phase of nuclear
20 power

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POOR ORIGINAL

- 1 2. Other Government Agencies
2 Not applicable, unless the government agency is an applicant,
3 as TVA.
- 4 3. Industry
5 The changes to be made to Regulatory Guide 1.33 will not
6 alter present regulatory bases for license evaluations.
7 The value of the proposed action will be to provide more
8 specific guidance concerning quality assurance program
9 requirements. In addition to removing confusion within
10 the industry, the proposed action will facilitate the
11 development of a method acceptable to the NRC staff for
12 complying with the Commission's Regulations with regard
13 to quality assurance program requirements for the opera-
14 tion phase of nuclear power plants. The expansion of
15 guidance presented in the Regulatory Guide may initially
16 appear to increase the requirements for compliance with
17 the Commission's regulations. However, since the addi-
18 tional guidance is presently used by the NRC staff in
19 license evaluation, the impact on industry will be minimal.
- 20 4. Workers (ALARA Considerations)
21 Not Applicable.

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5. Public

The value to the public will be more efficient license application preparation by industry which could reduce the cost of nuclear power plants. Additional value would be more efficient use of tax dollars as a result of the increased guidance for license evaluations by the NRC staff.

D. Decision on Proposed Action

Updated guidance should be furnished on quality assurance program requirements for the operation phase of nuclear power plants.

II. Technical Approach

This section is not applicable to this value/impact statement since the proposed action is an update of previously issued guidance.

III. Procedural Approach

Since the proposed action is an update of information contained in an existing regulatory guide, the only appropriate procedural alternative is a revision to the existing guide.

IV. Statutory Considerations

A. NRC Authority

This guide would fall under the authority of the Atomic Energy Act. In particular, under 10 CFR Part 50, Appendix B, which establishes

1 quality assurance requirements for the operation of nuclear power
2 plant safety-related structures, systems, and components.

3 B. Need for NEPA Assessment

4 The proposed action is not a major action, as defined by 10 CFR
5 51.5(a)(10), and does not require an environmental impact
6 statement.

7 V. Relationship to Other Existing or Proposed Regulations or Policies

8 The relationship of the guidance furnished by the proposed action to
9 guidance provided by other Regulatory Guides is discussed in Regula-
10 tory Position C.2 of Regulatory Guide 1.33.

11 VI. Summary and Conclusions

12 A revision to Regulatory Guide 1.33, "Quality Assurance Program³
13 Requirements (Operation)," should be prepared.