

Preliminary Value/Impact Assessment on Quality
Assurance Program Requirements for Nuclear Power Plants

PG 1.28

I. The Proposed Action

A. Description

The applicant (licensee) of a nuclear power plant is required by the Commission's regulations to establish and implement a quality assurance program. The proposed action will provide updated guidance for establishing and implementing a quality assurance program for nuclear power plants.

B. Need for the Proposed Action

Guidance on establishing and implementing the quality assurance program is contained in Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)," dated June 7, 1972. The regulatory guide endorsed ANSI Standard N45.2-1971. On April 7, 1977, ANSI approved Revision 1 to N45.2-1971 and designated the standard ANSI N45.2-1977. The revision makes the standard applicable to all nuclear fuel cycle facilities. Present NRC guidance should be updated to reflect experience in use of the present guidance and to establish an NRC position on the approved National Standard.

C. Value/Impact of the Proposed Action

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1. NRC

Guidance on quality assurance program requirements for the design and construction phases for nuclear power plants is presently contained in Regulatory Guide 1.23 (Safety Guide 2S,

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dated June 7, 1972) and is being used by the NRC staff in the evaluation of applications for construction permits as specified in Sections 17.1 and 17.2 of the Standard Review Plan. Since the purpose of the proposed action is to provide updated guidance to reflect experience with use of present guidance and to establish an NRC position on an approved national standard, the value/impact will be based on changes proposed to the guidance contained in Regulatory Guide 1.28.

Since the primary purpose of this revision of the ANSI standard was to make the standard applicable to both nuclear power plants and other fuel cycle facilities, most changes were in this area. The proposed action will be limited to application to nuclear power plants and coordinated with other SD efforts in other areas. Therefore, the impact of this change will be negligible.

The previous version of this standard, ANSI N45.2-1971, contains both requirements and guidelines. A letter was received from General Electric (W. D. Gilbert) to A. Giambusso dated February 20, 1975, asking for clarification of the intent when NRC endorses both requirements and recommendations of a standard. The NRC replied (R. B. Minogue to W. Gilbert, dated May 6, 1975) to G.E. and in the reply

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stated that we were undertaking a reexamination of some of the regulatory guides which endorse ANSI standards, particularly in the quality assurance area, to determine whether it might not be appropriate to qualify our endorsement of at least some of the guidelines since not all have substantive safety importance. A copy of this correspondence is attached. Also attached is an excerpt from the minutes of the January 21, 1976 Interoffice Quality Assurance Task Force meeting which outlines the total project. This area was considered by NRC personnel during the process of revision of the standard. Action, consistent with current licensing practice as specified in Sections 17.1 and 17.2 of the Standard Review Plan, to resolve this problem was made during revision of the standard and will serve as the basis for staff positions in the proposed action. Therefore, the impact to the NRC staff will be negligible. The resolution of this problem will be of value to the staff in that a commitment by the applicant to the proposed action will be specific and will not require point-by-point analysis of each question in the license review process.

The only other substantial change is in the requirements for records retention. Retention of records which correctly identify the "as-built" condition of items in the nuclear

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facility are required by ANSI N45.2-1971 to be maintained for the life of the facility. The revision requires they be maintained only for the life of the particular item while it is installed in the nuclear facility and stored for future use by or for the owner. This change is consistent with current staff requirements and therefore the impact will be minimum. Since record retention provisions must be reviewed regardless of the change, the time and effort expended by the staff in the review will not be more or less than that previously expended.

2. Other Government Agencies

Not applicable, unless the government agency is an applicant, as TVA.

3. Industry

The value/impact of the changes to make the standard applicable to fuel cycle facilities will be the same as for the NRC staff.

The action to resolve the confusion existing due to endorsement of both the requirements and recommendations of the present standard will have no impact on the industry.

The applicant must comply with all requirements and recommendations unless an exception is granted in the license review. The value to industry will be that those recommendations which are not considered to have substantial

safety significance will be identified, and applicants will no longer have to address them.

The proposed change in the requirement for records retention will have no impact on industry. The action will be of value in that the licensee will not be required to maintain records on items which have been removed from the plant and no longer reflect the "as-built" condition of the plant.

4. Public

Since all requirements related to safety of the plants will still be in effect, no impact to the public is foreseen. The only identifiable values are a minor decrease in cost of nuclear power plants and a slight acceleration in the review process.

D. Decision on the Proposed Action

Updated guidance should be furnished on quality assurance program requirements for the design and construction phases.

II. Technical Approach

This section is not applicable to this value/impact statement since the proposed action is an update of previously issued guidance. The technical issues have been previously discussed.

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.

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IV. Statutory Considerations

A. NRC Authority

This guide would fall under the authority and safety requirements of the Atomic Energy Act. In particular under 10 CFR Part 50, Appendix B which establishes quality assurance requirements for the design and construction of nuclear power plant structures, systems, and components.

B. Need for NEPA Assessment

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

V. Relationship to Other Existing or Proposed Regulations or Policies

No existing or proposed regulations or policies, other than Regulatory Guide 1.28, will be affected. Implementation of the proposed action will be discussed in Section D of the proposed guide.

VI. Summary and Conclusions

A revision to Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)," should be prepared. The revision should endorse, with certain exceptions, ANSI Standard N45.2-1977.

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