

Value/Impact Assessment for Regulatory Guide 1.28, Revision 1,
"Quality Assurance Program Requirements (Design and Construction)"

The value/impact assessment presented with the Task Initiation Form dated May 19, 1977 (copy attached), Section C, Value/Impact of the Proposed Action, is valid for the guide at this stage of development. Staff review of the proposed guide resulted in only editorial revision. One additional topic was discussed in the working paper of the proposed guide which was forwarded for staff review that was not considered in the preliminary value/impact assessment. The value/impact of this addition is discussed below.

Value/Impact of Regulatory Position C.1.

Regulatory Position C.1 provides guidance on implementing Section 2 of ANSI N45.2-1977 which requires that applicable sections and elements of the standard shall be established at the earliest practical time consistent with the schedule for accomplishing the activities. The guidance clarifies the applicability of the standard to those safety related activities which are initiated by the applicant prior to submitting its application for a construction permit (CP).

The value of this position to the NRC staff is the assurance that the activities initiated prior to application for a CP are controlled by a quality assurance program acceptable to the staff. This allows more systematic review of the information submitted with the CP application. The value to the applicant will be that the activities he has undertaken prior to CP application will be properly controlled and documented and, therefore, more likely to be acceptable to the NRC staff. This could prevent delays in review of the application.

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The impact on both NRC staff and applicants is expected to be negligible. The guidance provided was included in WASH 1283, Revision 1, May 29, 1974 (Grey Book) and has been used by the staff and applicants since that time. It represents no change in NRC staff practice and is included in the guide to provide more complete guidance in the guide without relying on other supporting documents. Additionally, should the staff withdraw WASH 1283 when the guidance provided by the draft standards included in it is updated, the guidance on activities prior to CP application would no longer be available to applicants, unless it is included in a regulatory guide.