

VALUE/IMPACT ASSESSMENT FOR REGULATORY GUIDE 1.28,
REVISION 2, "QUALITY ASSURANCE PROGRAM REQUIREMENTS
(DESIGN AND CONSTRUCTION)"

The final value/impact assessment presented with the Background Information memorandum (G. A. Arlotto to R. B. Minogue dated February 10, 1978, copy attached), Section C; Value/Impact of the Proposed Action, is valid for the guide at this stage of development. Public Comments resulted in only two changes other than editorial corrections. The value/impact of these changes is discussed below.

Value/Impact of Changes to Regulatory Position C.2.b and e

Regulatory Position C.2 provides guidance on the guidelines of the endorsed standard which should be treated as requirements by applicants who commit to the guide. Public comments indicated that the sections relating to when audits should be conducted were subjective and unenforceable. They also commented that requiring audits as specified would lead to conducting an audit to verify corrective action when other methods may be more acceptable. We agree that this may be unnecessary and, therefore, Regulatory Positions C.2.b and e were deleted and a new section C.3 was added. This section specifies that the recommendations of the indicated sections and the subject of audit scheduling is addressed in more detail in a separate regulatory guide.

The value of this change is to delete inadequate guidance from the regulatory position. Scheduling of audits is properly addressed

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in WASH 1283, Revision 1, Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants and WASH 1309, Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants. These documents contain Rev. 3, Draft 4 of a proposed standard N45.2.12, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." The approved standard, ANSI/ASME N45.2.12-1977, is the subject of a regulatory guide currently being prepared by the staff.

There is no impact on the staff. As indicated, audit scheduling is addressed in other NRC documents in more detail. No guidance will be lost due to the subject change.

The value of the change to industry is to eliminate subjective and potentially confusing guidance that could lead to an unnecessary proliferation of audits. There is no impact to industry as guidance is available in other documents.

Value/Impact of the Change to Regulatory Position C.2.d.

The subject section recommended preparation of an audit plan for each audit. Public comments indicated that this may be unnecessary in some cases. The value of deleting this section is that an audit plan is not required for all audits, and the time required to review audit plans for all audits may be better used in other areas. The impact on the staff is negligible. The first paragraph of Section 19 of the standard requires that audits be performed in accordance with written procedures or checklists.

whether or not this documentation takes the form of an audit plan is not essential.

The value to industry is to remove the requirement for an audit plan for each audit. There is no impact on industry.