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The following comments concerning Regulatory Guide 4.15, Revision 1, "Quality Assurance For Radiological Monitoring Programs (Normal Operations) - Effluent Streams And The Environment," are presented for your consideration:

1. The last sentence of Section B (Discussion) should be reworded to state ". . . should address the quality assurance program elements presented in this guide." It is more appropriate to address the elements discussed in the Guide, and to include the guidance as necessary, in the organization's quality assurance program.
2. Regulatory Position C.4 states that record retention requirements "are given" in the plant technical specifications. This statement should be modified since this may not always be the case.
3. Regulatory Position C.9 describes the qualifications required for audit personnel. These qualifications indicate that the audit referred to is more technical in nature than normal quality assurance audits and therefore that most qualified QA auditors would not be qualified to perform them. Additional guidance and clarification in this area is needed.

Please consider these comments in future revisions of this Guide.

Terence J Sullivan  
Executive Engineer

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CC CJMaynard/RAWells/SHHowell  
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GJWalke

Acknowledged by card... *5/22*

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