AUG 15 1972

Lester Rogers, Director of Regulatory Standards
John F. O'Leary, Director of Licensing

APPLICABILITY OF 10 CFR 50 APPENDIX B

Our field inspection experience has identified a situation involving standards and the application of standards which should be corrected. We have found that the designation of systems, components and structures to which 10 CFR 50 Appendix B apply, varies widely from reactor site to reactor site, for similar facilities. This situation leads to confusion for our field personnel and leaves us in a weak position relative to obtaining corrective action.

The systems, components and structures to which Appendix B of 10 CFR 50 are to be applied are delineated in the PSAR and FSAR for each facility. We find that the lists of systems, components, and structures are not consistent, in that they vary greatly for similar type facilities. Safety Guide 26 - "Quality Group Classifications and Standards," and Safety Guide 29 - "Seismic Design Classification," give some guidance, however, they refer to 10 CFR 50 Appendix A, "General Design Criteria for Nuclear Power Plants," and not 10 CFR 50 Appendix B, "Quality Assurance for Nuclear Power Plants." Therefore, there is nothing that requires the utility to fabricate and install these systems in accordance with Appendix B requirements, unless they are listed in the PSAR - FSAR as a Class I system or sturcture.

We request that the following action be taken:

1. The Safety Guides, where applicable, be tied back to Appendix B of 10 CFR 50.

2. The utilities be required to reference the applicable Safety Guides in the PSAR and FSAR.

3. Establish review standards to assure that all Class I systems and structures are uniformly listed or referenced to Safety Guides in the PSAR - FSAR for similar facilities.

Original signed by
F. E. Kruesi
Frank E. Kruesi
Director of Regulatory Operations

NT9.6
XL4.1.17

OFFICE ▶	RO:I&EPB	RO:RT&OB	RO:AA/DP	RO:DIR		XIDR12.1
SURNAME ▶	FADreher:cln	JGKeppler	HDThornburg	FEKruesi		
DATE ▶	8/11/72			8/15/72		

Form AEC-318 (Rev. 9-53) AECM 0240

U.S. GOVERNMENT PRINTING OFFICE: 1968 O—296-617

8007210234