

F1 0651 H2 1127

December 8, 1977

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MEMORANDUM FOR: B. H. Grier, Director, RI
FROM: J. H. Sniezek, A/D for Field Coordination, DROI, IE
SUBJECT: APPLICABILITY OF APPENDIX B TO SAFETY RELATED
CONSUMABLES (AITS F1 0651 H2)

It is the NRC position that 10 CFR 50, Appendix B, is applicable to safety related consumables. However, the definition of the scope and depth of applicability is essentially nonexistent. We also agree that a QA program as applied to consumables, as well as other items, should be in a graded or graduated fashion. Although the definition may not be to the degree that is desired at the present time, if RI is aware of an instance where the licensee is not technically doing an adequate job as relates to consumables, corrective action should be taken.

We have been part of a working committee assigned the task of preparing a paper entitled R.G. 1.XXX, "Applicability of the Quality Assurance Criteria of Appendix B to Structures, Systems, and Components of Nuclear Power Plants". This proposed Regulatory Guide addresses the application of a quality assurance program to consumables. Both NRR and SD are acutely aware of our concerns. Numerous meetings have been held to discuss this matter.

The draft Regulatory Guide was issued internally for IE comments on May 13, 1976. We plan to follow the progress of this Regulatory Guide closely and the Regional offices will have another opportunity to comment prior to finalization.

Since the issuance of the proposed Regulatory Guide should resolve the main areas of concern expressed in your memo, no further specific action appears warranted.

J. H. Sniezek, Assistant Director
for Field Coordination
Division of Reactor Operations
Inspection, IE

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