

## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

SEP 3 0 1980

Mr. R. L'Italien HQ USAF/RDCM Pentagon, Room 4C283 Washington, D.C. 20330

Dear Mr. L'Italien:

As requested in your correspondence of July 18, 1980, the following are our comments on the NATO Quality Control System Requirements for Industry, AQAP-1, Edition 3 (Draft) dated November 22, 1979.

If you desire any clarification of these comments or if we can provide any additional assistance on this document, please feel free to contact the Quality Assurance Branch directly. Bill Belke was the principal reviewer on this document and can be reached on (301) 492-7741.

Sincerely,

Walter P. Haass, Chief Quality Assurance Branch Division of Engineering

Enclosure: Comments on NATO Quality Control System Requirements for Industry, AQAP-1

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1-1, 1-2 Paragraphs 101, 102, 103

## Substantive Comments

We recommend the addition of "equipment" to wherever "material and services" are used. The reason being that standard contract definitions for material and equipment are significantly different and can be misinterpreted unless accurately defined.

Material covers basic raw materials and some fabricated materials as furnished for general construction and manufacture; that is, a substance or combination of substances forming components, parts, pieces, and equipment items. (Intended to include such items as machinery casting, liquid, formed steel shapes, cement, etc.)

Equipment means completed manufactured assemblies, units, systems, or components.

2-1, Paragraph 202

- Second sentence, after "Personnel assigned to quality control functions shall," add, "report to a management level such that they," and continue with remainder of sentence.
- 2. After the second sentence, add a new sentence to read, "Personnel performing quality control functions are qualified in their respective disciplines and are free from direct pressures resulting from cost and schedules."

The above additions will assure personnel performing quality functions will report to an appropriate management level with sufficient authority to carry out the quality function and also require qualified personnel to be sufficiently independent to perform the quality function in an effective manner.

2-3, Paragraph 208.a After the third sentence add a new sentence to read, "A master list or equivalent document control system inclusive of devices for making copies of drawings and prints is established to identify the current revision of instructions, procedures, specifications, drawings, and procurement documents."

2-6, Paragraph 215

Last sentence, after "non-conformance and," insert "signature approval of the disposition."

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## Editorial/Clarification Comments

1-i, Paragraph 101.d	Change first sentence to read, "are complete and clearly delineated.
1-1, Paragraph 101.d	Add to end of second sentence, "are properly inspected and tested."
2-1, Paragraph 201	Fifth sentence, after "inspection," insert "testing."
2-1, Paragraph 202	Third sentence, after "organizational freedom," add, "including stop work authority."
2-1, Paragraph 203	First sentence, after "contractor to," add "objectively evaluate and."
2-1, Paragraph 203	First sentence, after "effectiveness of," insert, "all quality aspects of."
2-2, Paragraph 206	First sentence, after "inspecting," insert "testing."
2-4, Paragraph 210.b(3)	After "inspection," insert "testing."