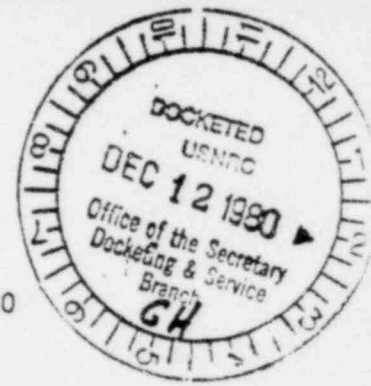


RS C35-2

TENNESSEE VALLEY AUTHORITY

CHATTANOOGA, TENNESSEE 37401

400 Chestnut Street Tower II



December 8, 1980

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

DOCKET NUMBER PR *misc notice*  
PROPOSED RULE *Reg Guide*

Attention: Docketing and Service Branch

Dear Sir:

In accordance with provisions for public review and comment indicated in the Federal Register on January 17, 1979, the Tennessee Valley Authority (TVA) is pleased to provide comments on the following draft regulatory guide:

Regulatory Guide 1.144  
Revision 1

"Auditing of Quality Assurance  
Programs for Nuclear Power Plants"

Regulatory Position C.7 states that in addition to the records required in ANSI/ASME N45.2.12-1977, audit records ". . . should include documents associated with the conduct of audits that support audit findings (for example, audit checklists or procedures)."

We believe audit checklists are not always in a form consistent with official quality assurance records. Many times the audit checklist contains working notes entered in pencil which are meaningful only to the auditor. Audit checklists are retained for information, but we do not agree that they should be retained as official quality assurance records.

Since the content and interpretation of regulatory guides have a large impact on TVA's extensive nuclear commitment, we welcome the opportunity for review and comment. TVA comments on additional regulatory guides will be forthcoming as a part of a continuing program.

Very truly yours,

TENNESSEE VALLEY AUTHORITY

*L. M. Mills*  
L. M. Mills, Manager  
Nuclear Regulation and Safety

cc: See page 2

Acknowledged by card . . . . . *12/12/80*

*IR-11*

Secretary of the Commission

December 8, 1980

cc: Executive Secretary  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
1717 H Street, NW  
Washington, DC 20555

Mr. Fred Stetson  
AIF, Inc.  
7101 Wisconsin Avenue  
Washington, DC 20555