SOUTH CAROLINA ELECTRIC & GAS COMPANY
POST OFFICE BOX 764
COLUMBIA, SOUTH CAROLINA 29218

T. C. NICHOLS, JR.
VICE PRESIDENT AND GROUP EXECUTIVE
NUCLEAR OPERATIONS

January 30, 1981

Secretary of the Commission
ATTENTION: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

DOCKET NUMBER
PROPOSED RULE PR misc notice Reg guide

Subject: Regulatory Guide 1.33
Proposed Revision 3
Nuclear Eng. File 2.8600

Dear Mr. Secretary:

South Carolina Electric and Gas Company has reviewed the proposed revision 3 to Regulatory Guide 1.33 "Quality Assurance Program Requirements (Operation)" and offers the following comments:

1. Introductory Comments

An on-site Quality Assurance organization reporting off-site to quality assurance management rather than reporting functionally to the Plant Manager does not represent an area of concern for the V. C. Summer Nuclear Plant.

Rather than separately establishing independent groups performing oversight evaluation of operating experiences and similar matters, a Quality Assurance group could effectively accomplish this task provided they are appropriately qualified based on guidance the NRC could provide. The qualification requirements should be similar to those specified for I&C Technicians, Inspection, Examinations and Testing Personnel, and Operator personnel.

Re-organization of Quality Assurance would not necessarily result in a more effective implementation of a QA program.

Many of NRC's positions outlined in the proposed revision 3 to Regulatory Guide 1.33 state that when the individuals performing a given task are not from the QA organization, that the QA organization, should review and concur with certain aspects of the implementation of the program. This position is reflected in regulatory positions C.2, C.12, C.14, and C.16 of this proposed revision.

A-P-11

1. Introductory Comments (con't)

Throughout our comments we have taken the position that Quality Assurance should review and concur with criteria established for implementing certain aspects of the overall QA program and then to perform audits to verify implementation. This would be effective only if QA personnel are appropriately qualified and trained.

The following comments correspond to section C of the proposed revision and are numbered accordingly:

2. Comments on Regulatory Positions

(a) Regulatory Position C-1 - From this position it is apparent that the NRC does not wish to endorse the 3.2 standard intent to use the recently developed NQA-1 document in lieu of the 45.2 series standards NQA-1 was developed to replace. This fact is evident from the list of 45.2 series standards listed in the position. As such, the endorsement of NQA-1 in addition to the complete 45.2 series is redundant and will create interpretation problems. NRC should indicate via their positions that 45.2 series standards (as endorsed by Reg Guides) are to be used in lieu of NQA-1 for references to NQA-1 in ANSI/ANS 3.2; or, the NRC should accept the NQA-1 references in ANSI/ANS 3.2 without superimposing the same 45.2 series standards NQA-1 was written to replace.

(b) Regulatory Position C-2 - SCE&G does not believe it is necessary for the quality assurance organization to review and concur in the selection of "personnel" performing reviews when the reviews are not performed by the quality assurance organization. The quality assurance organization should concur with the alternate organization that performs the review and feel that concurrence with the procedure associated with the review, as well as the quality program, enables the quality assurance organization to perform the function at SCE&G. Also, by virtue of verification of training and qualifications of personnel within an alternate organization, the quality assurance organization has in essence concurred with the persons involved.

Position C.2 states in part that....the areas of training and radiation protection should be independent from operating pressures. This position should clarify independence from operating pressures by adding "when opposed to safety consideration."

The amended position would be more in agreement with NRC position in other areas regarding independence from operating pressures.

The final sentence of C.2 should read, "In addition, the quality assurance organization should review and concur with the "Criteria Used" in the selection of personnel who perform the review."

Matters such as the selection of personnel for any purpose is and should remain the responsibility of management.

(c) Regulatory Position C-3 - See Introductory Comments.

(d) Regulatory Position C-4 - Draft 5 of ANSI N18.7/ANS-3.2, section 3.4.3 "Technical support for the On Duty Operating Staff" implies that...a properly qualified person such as an on-duty Shift Technical Advisor, could be adequate technical support for the operating staff. Clarification is requested.

The two-hour report time supported by ANSI N18.7/ANS-3.2 is adequate in lieu of the more restrictive requirements of NUREG 0654.

(e) Regulatory Position C-5 - The last sentence in paragraph C-5 of Regulatory Guide 1.33, paragraph 3, which reads, "Furthermore, the ISEG should review the disposition of nonconforming items", should be clarified as to why the disposition is reviewed. Suggest the following wording: "Furthermore, the ISEG should periodically review technical dispositions to nonconforming items to determine trends in performance of personnel, systems and components, and the need for design changes, replacement of components, training improvements, and procedure revisions."

The establishment of another independent review group performing the functions outlined in the position is not warranted. The function proposed could logically be included into presently established groups with some technical upgrading and little impact on the utility, but also providing the value you seek to achieve.

Also see Introductory Comments.

(f) Regulatory Position C-6 - Clarification is requested as to whether a conference telephone situation would satisfy your position to "formally convene a quorum."

(g) Regulatory Position C-7 - SCE&G does not believe it is necessary for the quality assurance organization to have purview to supervisory evaluations of facility staff. By being able to verify the acceptability of the staff's indoctrination and training program, its state of implementation with respect to personnel, the past qualifications of personnel, and the acceptability of the functions performed by personnel, the facility staff capabilities can be properly assessed by the appropriate management receiving this input. Therefore the supervisory evaluation that connote individual performance appraisals and salary considerations can be kept confidential.

The last sentence reads in part,"...the audit of performance of the facility staff should include training records and supervisory evaluations.

Audits should include training records, but the adequacy of actions taken or planned resulting from supervisory evaluation should be utilized as opposed to audits of actual supervisory evaluation forms.

Supervisory evaluations are confidential and should be restricted to management only.

(h) Regulatory Position C-8 - Draft 5 of ANSI N18.7/ANS-3.2, Section 5.2.1.4, presently defines what information is required for an adequate transfer of responsibility and allows the utility to develop a program consistent with these requirements. As proposed, the NRC position 8 is too specific, too restrictive, and allows the utility no latitude to develop a turnover procedure consistent with the overall administrative controls program of the plant. The position 5.2.1.4 as proposed by the NRC would require a turnover checklist several pages long, most of which would be redundant to existing requirements. A "plant tour" would add little to the turnover and would probably lengthen the turnover to at least one hour.

(i) Regulatory Position C-10 - Draft 5 of ANSI N18.7/ANS-3.2 provides adequate guidance for procedure change reviews. The term "plant management staff" in your proposal as opposed to the ANSI's "plant supervision" is not necessary. Plant management should control by administrative procedures when management review is required consistent with the existing requirements.

It is not necessary for all procedures to require SRO approval. For example, an SRO may not be knowledgeable in areas such as maintenance, NDE, Chemistry, etc. These procedures would not necessarily be improved as a result of an SRO review and approval. Technical Specifications provides requirements for procedural reviews and approvals.

(j) Regulatory Position C-11 - SCE&G does not agree in total that only the on-duty Shift Supervisor has the authority to release and accept equipment. The Shift Supervisor must be aware and knowledgeable of plant status at all times, but a literal interpretation could tie the Shift Supervisor up in more non-essential administrative paperwork. The Control Room Foreman (2nd SRO per shift) should have same authority as long as the Shift Supervisor is kept informed. Part of the justification for requiring 2 SRO's per shift was to free the Shift Supervisor from some of the routine responsibilities and administrative workload. ANSI N18.7/ANS-3.2, Section 5.2.6 recognizes this fact. Ultimately it should be the facility's decision as to how the division of responsibility and authority should be made.

(k) Regulatory Position C-13 - SCE&G does not believe that procurement documents should specify the extent that suppliers should comply with ANSI N45.2 and applicable 45.2 series standards, as can be perceived by the literal reading of this position. The 45.2 standard and daughter standards allow for the using organization to develop procedures that address the requirements of the standard commensurate with the item of service supplied. As such the procurer cannot be expected to be all knowing and be able to stipulate which sections of standards or requirements apply and to what extent, especially if complete systems or vendor designed equipment is involved. The procuring organization need only stipulate that the supplier utilize the standards in conjunction with a procurement by direct reference as the use of appropriate quality specifications. It is then up to the suppliers to implement the standards utilizing appropriate procedures, and the procuring agency to verify procedure adequacy and implementation.

(l) Regulatory Position C-14 - SCE&G believes that the quality organization should ensure that procedures have been prepared, reviewed, and approved in accordance with established procedures (which define those requiring QA concurrence prior to issue and which the QA organization has concurred with) on an audit basis in lieu of "prior to implementation." To require this function to be performed "prior to implementation" by the quality assurance organization would involve QA participation (100%) in procedures not requiring involvement; defeating the purpose of permitting reviews by other parties responsible for implementing the quality program (See B above); and put a checkpoint in the procedure issuance process that may be counterproductive to other parts of the standard and safety if emergency approvals and implementation are necessary.

(m) Regulatory Position C-15 - SCE&G believes that the requirement for calibration of equipment at intervals specified for each item based on its use and function is sufficient provided the intervals are documented, reviewed, and approved within the quality assurance program. SCE&G does not believe that the three intervals in this position can be considered all inclusive and sufficient for all equipment.

(n) Regulatory Position C-16 - Where this position required concurrence of personnel by the quality assurance organization, we comment as in Position C-2.

(o) Regulatory Position C-14 - The term "activities affecting quality" in the first sentence of this position needs clarification. Quality encompasses a broad spectrum of activities. QA should not necessarily be involved in ensuring, "prior to implementation," that turbine generator procedures, for example, meet the requirements outlined in your position.

It is not always practical or possible to perform a step by step walk-through of procedures for initial or follow-up review as outlined by your proposed positions. Examples of restrictions are, ALARA, location of the equipment needed for a detailed step by step walk-through, plant conditions, could prohibit such a process.

ANSI N18.7/ANS-3.2 as written, provides appropriate and adequate means for follow-up reviews.

SCE&G's present method of review and approval has designated which procedures require QA review and also which are reviewed by QA prior to implementation. This includes all administrative, Technical Support, Quality Control, surveillance test, and special processes which is consistent with ANSI N18.7/ANS-3.2.

The establishment of still another review group as an independent activity is unwarranted.

For comments concerning SRO involvement in procedure approval, see C.10.

Also see Introductory Comments.

(p) Regulatory Position C-15 - Request the definition of "equipment acceptance tests" as used in subparagraph b. of this position.

(q) Regulatory Position C-16 - See Introductory Comments.

(r) Regulatory Position C-22 - Memorization by plant operators of "off-normal" procedures should not be necessary. Operators presently are required to memorize immediate actions in Emergency Procedures. To further require memorization of the "off-normal" sections of procedures that do not constitute actual emergencies places an unrealistic burden on the operators. These type functions can best be impressed on the operators via their extensive training and operating experience. A clarification of what is considered "Emergency Procedures" should be established if NRC disagrees with the following position: "Emergencies" are those events addressed in Chapter 15, FSAR and classified as Condition III and IV events and some of the Condition II events such as reactor trip. SCE&G has further addressed as "Emergencies" those conditions identified by the Vendor Owners Group.

(s) Regulatory Position C-23 - Presently, procedures classified as emergency procedures list from 5 to 20 plant parameters that are symptomatic of a given emergency condition. To include additional plant parameters which are not expected to change would expand the list considerably and would cause confusion. To list parameters that are not expected to change is impractical due to the multitude of parameters that could fall into this category. The parameters presently listed are referenced in the owners group EOI's as diagnostic aids.

Also see the comments submitted on Regulatory position C.22.

We appreciate the opportunity to provide comments on regulatory guides. If you have any questions regarding these comments, please let us know.

Very truly yours,

T. C. Nichols, Jr.

RBC:TCN:glb

cc: B. A. Bursey
V. C. Summer
G. H. Fischer
W. A. Williams, Jr.
T. C. Nichols, Jr.
E. H. Crews, Jr.
H. N. Cyrus
D. A. Nauman
O. S. Bradham
O. W. Dixon, Jr.
J. B. Knotts, Jr.
R. B. Clary
A. R. Koon
J. L. Skolds
NPCF/Whitaker
File