

# STONE & WEBSTER ENGINEERING CORPORATION



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



January 27, 1981

Dear Sir:

REGULATORY GUIDE 1.33, NRC TASK RS 902-4  
QUALITY ASSURANCE PROGRAM REQUIREMENTS (OPERATION)

We are pleased to submit our comments on the second proposed Revision 3 to Regulatory Guide 1.33, November 1980 as listed below:

- Paragraph C.12 and  
Paragraph C.16: Approval for the use of personnel not members of the QA organization should be strengthened. We suggest that the applicable sentences be changed to read, "...are performed by personnel who are not members of the quality assurance organization, the quality assurance organization should review and approve the selection of personnel who perform..."
- Paragraph C.15.a: Delete "At least every six months during plant construction." Calibration requirements for measuring and testing equipment used during plant construction should not be included in a regulatory guide intended for use during plant operation.
- Paragraph C.26.b: The Classes of Emergency Action Levels are already specified in Appendix 1 to NUREG-0654. In addition, these are classes of Emergency Action Levels and not particularly amendable to procedures. The identification and classification of Emergency Levels is currently part of the Emergency Plan Implementing Procedures and should not be required as an administrative procedure also.



Administrative Stamp

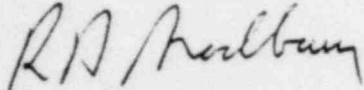
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Stone & Webster appreciates this opportunity to contribute to the improvement of Regulatory Guide 1.33.

Very truly yours,



R. B. Bradbury  
Chief Licensing Engineer

RBB:mra