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

Attention: Docketing and Service Branch

Dear Sir:

This letter is to provide comments on the Second Proposed Revision 3 to Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation). It is hoped that the attached information will prove helpful in correcting some very serious problems for the utility industry with the revision as now written.

Your consideration of these comments is appreciated.

Very truly yours,

Dalwyn R. Davidson
Dalwyn R. Davidson

Enclosure



Acknowledged by card... *1/29/81*

IR-11

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Comments of
D. R. Davidson
Cleveland Electric Illuminating Company

Second Proposed Revision 3 to Regulatory Guide 1.33
Quality Assurance Program Requirements
(Operation)

C. REGULATORY POSITION

- "3. Section 3.4.2, 'Requirements for the Onsite Operating Organization,' lists the various fields in which individuals in the onsite operating organization are required to be knowledgeable. In addition, the onsite operating organization should include individuals knowledgeable in heat transfer, fluid flow and thermodynamics."

Comment

This supplementary requirement to Draft 5 of ANSI/ANS-3.2 is completely unnecessary in view of existing requirements for qualifications of onsite operating organizations. Plant staffs have always employed individuals with these qualifications and as of January 1, 1981, each shift is required to have one or more individual with these qualifications.

Recommendation

Delete this redundant Regulatory Position.

- "8.

In addition, procedures that require a detailed explanation of plant status to the oncoming shift crew should be prepared. The oncoming shift supervisor should perform a short tour of the plant prior to assuming the duty station with special attention paid to ongoing maintenance and surveillance testing. The oncoming shift should report to their duty station at least one-half hour prior to shift change to complete and sign a relief turnover checklist...."

Comment

This Regulatory provision is needlessly restrictive in that the objectives can be accomplished by other equally acceptable good operating practices more appropriate to commercial plant operation. A shift supervisor's "short tour" of a ten-acre plant at shift change would be hardly productive if the point is to observe ongoing maintenance and surveillance testing. An extensive tour, after shift change when maintenance and surveillance testing is in progress would accomplish far more than the approach described.

Requiring the oncoming shift to report to their duty stations at least one-half hour prior to shift change is likewise too restrictive

and very unlikely to accomplish anything of itself. The Standard describes very well the objectives of ensuring proper, careful shift turnover. Prescribing a specific time to the process does not recognize the wide variation in circumstances surrounding the shift turnover event. Commercial nuclear power plants are normally uneventful steady-state operation. In such circumstances, shift turnover activities will not require 30 minutes. In other circumstances, shift turnovers during transient operations will require that the entire shift to be relieved remain on duty for more than 30 minutes. Good operating practice by dedicated professionals should be the objective rather than compliance to arbitrary time clock accounting. This Regulatory Position promotes the latter and should be deleted.

Recommendation

Delete the second and third sentences from the above quote from Regulatory Position 8.

- "9. Section 5.2.1.6, 'Human Factors Considerations,' establishes actual work time limitations for certain plant personnel. In addition, these limitations should be applied to all station personnel who maintain or operate any structures, systems, or components important to safety...."

Comment

This extension of an hours-of-work restriction to a much broader and poorly defined portion of the plant staff will be extremely difficult to administer and accomplish little real benefit. Over-time work rules are generally a very carefully studied question in management/labor relations resulting in a delicate balance between economic penalties and equitable distribution. Many different tasks are encompassed by this new requirement, and it cannot be established that all work areas are equally critical to the safety of the plant operation or affected somehow by the individual working more than 12 hours at a time. Arbitrary work hour limitations, especially in the maintenance area, can be detrimental to ALARA concepts inasmuch as work crews will be required to turn over partially completed jobs to others who will receive more radiation exposure than the original crew would have in finishing a job with which they are more familiar.

The regulatory guide stresses that these limitations should be applied to station personnel. To be completely logical, it is hardly less important to safety that all the activities that go into bringing a plant into operation be likewise subjected to similar restrictions if that alone would add a measure of safety to the end product. Because these preceding activities such as design and construction can be demonstrated to have been properly conducted by testing of the end product, additional restrictions such as suggested here are not required. Outside of the licensed operator

activity in matters critical to the safety of the plant, arbitrary work hour restrictions described here are likewise unnecessary and discriminatory.

Contrary to the statement in 4.2 Need for NEPA Assessment, this action is indeed major and should require an environmental impact statement prior to implementation.

Recommendation

Delete the second sentence from the above quote from Regulatory Position 9.

- "11.Permission to release plant systems or equipment for maintenance or surveillance tests should be granted only by the on-duty shift supervisor...."

Comment

This requirement for authorizing surveillance tests and maintenance work is unduly restrictive. Routine surveillance testing associated with plant evolutions ordered by the shift supervisor should not require continual review at each step. Likewise, where dual unit plants have supervisors subordinate to the shift supervisor responsible for a generating unit, this authority should lie with the unit supervisor who is likewise licensed as a senior reactor operator.

Recommendation

Revise the quoted sentence from Regulatory Position 11 to read:

"Permission to release plant systems or equipment for maintenance ~~or surveillance tests~~ should be granted only by the on-duty shift supervisor or senior reactor operator in charge of the unit."

- "11.The qualified person who performs the verification of correct implementation of equipment control measures or proper alignment prior to returning equipment to service should be qualified to perform such tasks for the particular systems involved, should possess operating knowledge of the particular systems involved and their relationship to plant safety, and should hold a valid reactor operator or senior reactor operator license."

Comment

Commercial nuclear power plant design precludes this activity from being performed from the control room, the normal duty station for these licensed personnel. Requiring verification by licensed personnel in effect extends the license requirement to activities far beyond the existing 10 CFR definitions of activities requiring a reactor operator or senior reactor operator license. Extension

of licensed operator duties to these tasks is likewise a major action and should require an environmental impact statement prior to implementation. These duties should not be limited to licensed operators.

Recommendation

Revise the quoted sentence to read:

"The qualified person who performs the verification of correct implementation of equipment control measures or proper alignment prior to returning equipment to service should be qualified to perform such tasks for the particular systems involved, should possess operating knowledge of the particular systems involved and their relationship to plant safety, ~~and should hold a valid reactor operator or senior reactor operator license.~~"

- "14.The only method that should be considered acceptable to meet the requirement for routine follow-up review of plant procedures is the review of procedures by a designated review group as an independent activity that is as least as rigorous as the initial procedure review."

Comment

With the vast volume of procedures required for the operation and maintenance of a nuclear power plant today, improved operation and fewer operating errors will result by minimizing procedure changes. The approach recommended in Draft 5 of ANSI/ANS-3.2 seeks to accomplish that while ensuring that necessary improvements are undertaken as determined by those most familiar with the need for improvement. Increasing the review workload in accordance with Staff Position 14, last sentence quoted above, will most likely result in more change due to employing review groups less familiar with the activities covered. A constant state of flux this requirement engenders is hardly conducive to enhanced safety.

Recommendation

Delete the last sentence from Staff Position 14.

- "19. Section 5.3.3, "System Procedures," requires that system procedures contain checkoff lists, where appropriate, that are prepared in sufficient detail to ensure an adequate verification of the status of the system. System procedures should, in all instance, contain checklists or reference documents that contain checklists."

It is difficult to understand how the Staff Position 19 improves in any way the ANSI/ANS 3.2 Draft 5 Standard. Frequently required routine control room operations require the operator be thoroughly familiar with the system procedure without recourse to checklists. In fact, the design of modern control rooms demands that familiarity

by the operator. Examination of the operator on simulator control boards is conducted to ensure that the operator has attained that skill prior to certification and license application. Procedures written to cover such operation appropriately do not contain checklists and the result of such a requirement would be to add a reference to a document containing a checklist to no good purpose.

Recommendation

Delete Staff Position 19.

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