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FPL
FLORIDA POWER & LIGHT COMPANY

January 29, 1981
L-81-27

Mr. Samuel J. Chilk
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing Service Branch

Dear Mr. Chilk:

Re: Florida Power & Light Company
Review of Second Proposed Revision 3 To
Regulatory Guide 1.33, Quality Assurance
Program Requirements

Florida Power & Light Company has reviewed the second proposed Revision 3 to Regulatory Guide 1.33 and offers our comments. We agree with your draft value/impact statement that the regulatory positions will cause significant organizational modifications. The changes imposed would impact virtually every facet of activity at the nuclear plant. Areas of Quality Assurance activities which have evolved and been fine tuned over a period of years and are now working smoothly would be totally redone. This action would be taken despite the fact that NRC resident inspectors and QA auditors have not expressed safety concerns regarding our existing administrative controls.

It is our opinion that the increased personnel and organizational modifications required by the Regulatory Guide do not provide any corresponding increase in the safety of plant operations nor does it guarantee an improvement in the quality of safety related functions. The significant changes made by this Regulatory Guide are concentrated in the areas of subsequent verification and review. In an effort to establish "independence" these new review organizations would be required to report offsite. It is our opinion, that these modifications will tend to separate safety and operational quality assurance responsibility from the plant staff, and actually reduce the level of quality assurance and operational safety now provided.

The prime responsibility for safe operation and quality assurance should reside in the line management responsible for plant operations. It is the operations and maintenance staff of the plant which performs the operations discussed by the Regulatory Guide and it is these groups which are required to understand the applicable regulations, carry them out, and perform all required functions in a safe manner. With the exception of the audit function now performed by site QA, it is our opinion that these functions should rightly be the responsibility of the Plant Manager.

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In addition to the above general comments, we offer the following specific comments:

1. General: The document is based on and endorses Draft 5 of ANSI/ANS 3.2 (August 1980). In effect, this treats Draft 5 as if it were an approved industry standard and imbeds it in concrete, thus subverting the whole intent of the industry standards process. In reality, a document in draft form is not an industry standard and should not be treated as if it were, especially in an area with such far reaching ramifications as administrative controls. In fact, Draft 6 to the standard is now out for comment. The NRC has made no case that the matter of upgrading administrative controls is urgent enough to preclude awaiting an approved industry standard.

2. Position 2:

(a) The document requires that training and health physics be organizationally independent of the plant staff so they will be immune to operating pressures. It is not apparent or evident that immunity from such pressures is beneficial for reactor safety. In fact, we feel strongly the opposite is true. The training and health physics organizations should be responsive to the needs of the operating organization because their pupose is to support the operating organization. Our experience has shown that nuclear safety is not adversely affected but is enhanced by having the training and health physics groups organizationally closely tied to the operations and maintenance groups. Divorcing training and health physics would make the overall plant organization more cumbersome, less effective and no safer.

(b) The regulatory guide would require that the quality assurance organization review and concur in the selection of personnel in other organizations. Selection of personnel is unquestionably the role of the management of the organization containing the personnel. Having QA responsible for selecting personnel in other departments would not improve reactor safety in that the QA organization is neither qualified, nor staffed to perform such a review. To the extent that reactor safety is affected by effective review and inspection organizations, this new requirement would degrade reactor safety because it would dilute line management authority, morale, and individual effectiveness.

3. Position 3: Pre-operational and Start-up testing personnel will be required to be qualified in accordance with the requirements of ANSI/ASME NQA-1-1979. The regulatory guide has subverted the intent of the standard by regressing to the ANSI N45.2 daughter standards and the regulatory guides which endorse them. The standard's intent is clear - to use the new NQA-1 standard (which has been aproved by industry) in lieu of the old detailed and cumbersome N45.2 daughter standards. The NRC would be better advised to spend their time reviewing and endorsing the approved NQA-1 standard than writing a regulatory guide endorsing the unapproved draft to the ANSI/ANS 3.2 standard. Regulatory Guide 1.33 should be held in abeyance until the Commission endorses NQA-1 because to endorse in the regulatory guide standards superseded by NQA-1 (which is endorsed by the draft ANSI/ANS 3.2) is directly contrary to the position of the industry and would hopelessly mire utilities and the NRC in any attempt to sort out exactly what would be required by the new Regulatory Guide 1.33 and the associated ANSI/ANS 3.2.

4. Position 4: This position refers to NUREG 06541 and requires certain support within 30 minutes and more within 60 minutes. Even now, with completed plants required to be semi-isolated, this is difficult. In the future as more plants come on line in more isolated areas, this will be even more difficult. It is not justified within the value/impact analyses how this improves safety. We feel that such a requirement is misplaced in a QA Regulatory Guide.

5. Position 4: This position requires an Independent Safety Engineering Group. It is our opinion, as expressed above, that this group is an unnecessary burden to safe plant operations. Additionally, this requirement will actually reduce the amount of experienced engineers otherwise available to the industry.

6. Position 5: This position requires audits and the determining of trends in the performance of equipment and personnel. We feel that trends in these areas are misleading, particularly trends concerning personnel. It is our opinion that problems in these areas are best handled by the affected groups.

7. Position 8: This position requires the on-coming shift to come in at least 1/2 hour early to complete and sign a relief turnover check list. This is contrary to present practice in most industries. Normally, the off-going shift fills out the shift turnover check list.

8. Position 9: It is our opinion that the overtime situation for plant personnel involved in safety-related actions is sufficiently different from that of licensed operators such that we do not feel additional restrictions are required, and do not feel that safety would be enhanced by their addition.

9. Position 10: This guide requires a verification by a second licensed operator for tag outs and return of systems to operation. We do not feel that it is necessary, or any more effective to restrict verification to licensed operators than to have personnel knowledgeable in the systems performing the task.

10. Position 14: (a) This position takes much of the authority away from the Plant Manager and on-site review group. It shifts the responsibility for review and concurrence of procedures to the Quality Assurance Department. It also provides the quality assurance organization with approval authority in the selection of personnel who perform surveillance testing and inspection. As documented previously, it is our opinion that this action that does not serve to enhance safe operation.

(b) This position would also remove approval authority from the Plant on procedures unless he was licensed. We feel this is neither appropriate, nor an enhancement of safe operations.

11. Position 15: Calibration intervals for measuring and testing equipment have been reduced. The guide requires that eqiupment, valve, and switch line-ups be accomplished and verified following testing and prior to conducting plant start-up for operation. It is our opinion that the current Technical Specification requirements covering these areas are sufficient.

12. Position 23: The position requires emergency procedures to specify plant parameters that are not expected to change. This would be cumbersome and virtually impossible in most cases.

13. Position 27: A new, separate, written procedure would be required to cover each annunciator with safety-related systems. This will require approximately 450 new off-normal procedures.

14. C.3 Delete the addition of Regulatory Guide 1.8 and 1.58 requirements to those personnel whose qualifications do not meet those specified in N18.1 and who are performing inspection, examination, and testing activities. Should the NEC consider the provisions of ANSI/ASME NQA-1-1979 not sufficient for these personnel, the specific additions should be identified. This is preferable to invoking general Regulatory Guides such as 1.58 which endorses a standard ANSI N45.2.6 that will no longer be updated (i.e., ANSI/ASME NQA-1-1979 has incorporated and updated the provision of ANSI N45.2.6 for over a year already).

15. C.5 Delete the Appendix A, Table 1, responsibility of the Independent Safety Engineering Group (ISEG) for evaluating the effectiveness of the QA program. The envisioned expertise and personnel makeup of the ISEG is geared towards the technical versus quality assurance aspects of plant operations. It is therefore inappropriate to assign this responsibility to the ISEG. Furthermore, Section 4.1 of the draft N18.7/ANS 3.2 standard assigns this responsibility to management.

16. C.7 Including supervisory evaluations in the audit of performance of the facility staff is unnecessary and undesirable. Performance of the facility staff can be audited using objective evidence such as records, reports, observations of activities and related trend analysis. Supervisory evaluations are subjective in nature, and may also include evaluations of an individual's nonsafety-related duties. Therefore, it is doubtful that they would be suitable as an audit basis.

17. C.12 Delete the requirement for the quality assurance organization to either perform surveillance testing and inspection or review and concur in the selection of personnel who do perform surveillance testing and inspection. Surveillance testing and inspection is an operations function to verify systems operability and therefore should be the responsibility of the operations group.

18. C.13 Change the last sentence to read, "In addition, procurement documents should specify the extent to which suppliers should comply with the applicable provisions of any N45.2 series standards which were not incorporated in NQA-1." The NQA-1 standard consolidated the provisions of N45.2 and the programmatic standards in the N45.2 series. It represents the latest industry thinking on QA requirements and therefore is preferable to the N45.2 series which will not be updated.

19. C.14

The added requirement to have the quality assurance organization perform an in-line function of ensuring that, prior to implementation, each procedure has been prepared, reviewed, and approved in accordance with established procedures is excessive. Our experience has shown that an assurance activity of this type can adequately be accomplished by periodic audits, which are already required by this proposed Regulatory Guide.

Section 5.2.16 - Regulatory Position 15

20.

Establishing arbitrary calibration periods will impose severe hardships on operating utilities without any compensating increase in plant safety. Measuring and testing equipment should be recalibrated at regular intervals and those intervals should be adjusted, as far as possible, to ensure that an item will not drift outside the allowable calibration range between calibrations. This can be achieved by revising the regulatory guide and or standard to require, "The period between calibrations to be regularly reviewed and revised to reduce the possibility of measuring and test equipment drifting outside of calibration limits between calibrations."

Thank you for the opportunity to comment in this draft. If you wish to discuss our comments further, we will be available to meet with you.

Very truly yours,

J a de Mosbey
pr

Robert E. Uhrig
Vice President
Advanced Systems & Technology

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