

RS 707-5

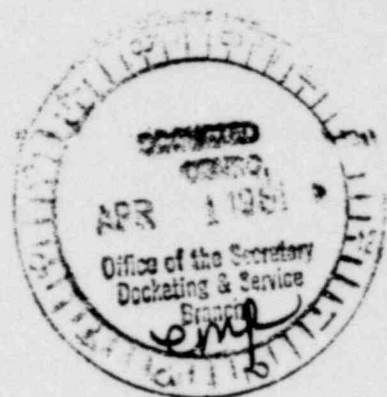
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VALLEY FORGE

PROJECT NUMBER  
PROPOSED RULE *PR-Misc. Notice*  
*(Reg. Guide)*

March 30, 1981

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



Attention: Docketing and Service Branch

Gentlemen:

Enclosed are comments from United Engineers &  
Constructors on Draft Regulatory Guide on NQA-1 Regulatory  
Guide 1.28 (Rev. 3).

Very truly yours,

*J.B. Silverwood*

J. B. Silverwood, Manager  
Reliability & Quality Assurance

JBS:Rad

Enclosure

cc: Mr. F. W. Knight - W

8104270483

March 31, 1981

COMMENTS ON REGULATORY GUIDE 1.28 REV. 3

- pp 3            B. DISCUSSION (2nd paragraph) ---, endorses only those requirements applicable to the design and construction phases -- do we assume from this that the unique operational quality assurance aspects of NQA-1 are not endorsed by the NPC since Reg. Guide 1.33 does not endorse NQA-1?
- pp 6    2.1.b    In addition, a candidate for Level I, II, or III certification should be a high school graduate or have earned the General Education Development equivalence of a high school diploma --- We believe the related inspection experience should be retained as an alternate for a high school diploma. Our past fourteen(14) years of nuclear inspection experience clearly indicates that related experience greatly outweighs the importance of a high school diploma. The resultant cost impact would be considerable without benefit to the industry.
- pp 6    2.2.a    Comments on 2.1.b (above) apply.
- pp 9    4.1.e    Verification of original designs and changes to designs should be performed in a timely manner -- this was not included in N45.2.11 which you recognized by Reg. Guide 1.64 - and was not included in Reg. Guide 1.64.

COMMENTS ON REGULATORY GUIDE 1.28 REV. 3 (Cont'd.)

pp 10 4.1.f -- In addition, controls should ensure that documents that are designated to become quality assurance records --- this was not in N45.2.11 which you recognized by Reg. Guide 1.64 and was not included in Reg. Guide 1.64.

pp 11 7.1.a -- documents that are designated to become quality assurance records --- recommend change to agree with 1981 addenda change to NQA-1 to read "documents that are to be designated records".

pp 13 7.2.a --- The provisions of Section 3.0 of Appendix 17A-1 concerning design and construction records should be met as part of Supplement 17S-1. --- You recognized N45.2.9 by Reg. Guide 1.88 where Appendix A List of Typical Lifetime Records is non-mandatory.

Also, you list radiographs as a "Lifetime Record", and this is impossible.

pp 14 8.1.1 -- in accordance with Regulatory Position 4 -- should be 3.

pp 14 8.1.3 --- shall include audit plans -- recommend change to audit checklist which is a universally accepted term.

pp 16 8.1.4 (c) If this section refers to CASE why not mention CASE specifically. NRC has approved Topical Report of CASE. Also, may a CASE survey be used instead of the original pre-award audit or is this only for the purpose of triennial evaluation?