

ARIZONA



PUBLIC SERVICE COMPANY

P. O. BOX 21666 · PHOENIX, ARIZONA 85036

September 8, 1981
ANPP-18870-JEC/BSK

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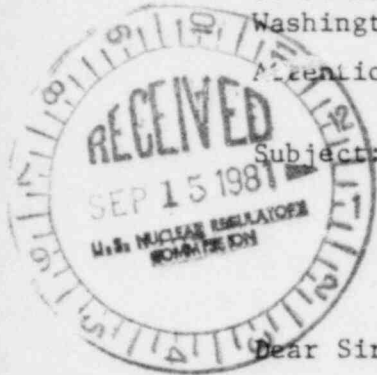
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

PROPOSED RULE -50

Attention: Docketing and Service Branch

(46 FR 34595)

Subject: Proposed NRC Regulation Change
Published in 46 FR 34595 on July 2, 1981
File: 81-057-026



Dear Sir:

Arizona Public Service Company has reviewed the proposed changes to 10CFR Part 50, published in the Federal Register, Volume 46, page 34595, concerning Reporting of Changes to the Quality Assurance Program, and offers the following comments for your consideration.

The proposed changes to Articles 50.54 and 50.55 would cause an unnecessary increase in documentation generated by the Licensee without a corresponding increase in effectiveness of the Licensee's quality assurance program. Paragraph 50.71(e) presently requires the Licensee to update periodically (annually) the Final Safety Analysis Report (FSAR) originally submitted as part of the application for the Operating License. Such periodic updating of the FSAR should provide the Commission with adequate assurance that the holders of Operating Licenses have not reduced the effectiveness of their approved quality assurance programs.

The proposed requirement for a written evaluation of all changes to the quality assurance program is also unduly stringent. Normally, changes to the quality assurance program will represent minor organizational changes, be editorial in nature, or merely clarify existing practices. The most significant changes will only modify the methods used to satisfy pertinent requirements of Regulations, Regulatory Guides, Codes and Standards. In any case, since it is the responsibility of the Licensee or Construction Permit holder to maintain a quality assurance program which satisfies the criteria of Appendix B to 10CFR Part 50, it should not be necessary to document the evaluation of each change to the quality assurance program or to submit such written evaluation to the Commission.

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Add: Steve
Richardson
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It should also be noted that the quality assurance program is available to the NRC Region V Inspectors and the Resident Inspector for their review at any time.

Very truly yours,



E. E. Van Brunt, Jr.
APS Vice President
Nuclear Projects
ANPP Project Director

EEVBjr/JEC:skc

cc: G. C. Andognini
A. C. Gehr
J. Vorees
F. W. Hartley
J. A. Roedel
J. M. Allen
A. C. Rogers
C. N. Russo
B. S. Kaplan
R. W. Kramer
W. F. Quinn