

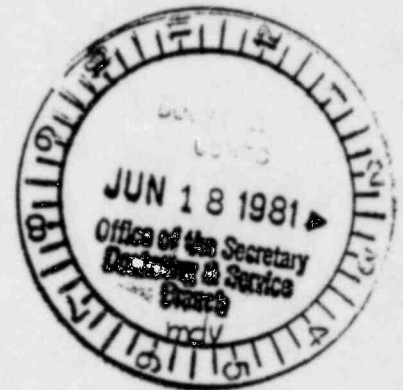
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PROJECT NUMBER
PROPOSED RULE PR-Misc Notice
Reg Guide

June 15, 1981
LD-81-030



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

ATTN: Docketing and Service Branch

Subject: Comments on Regulatory Guide 1.28

Gentlemen:

In March, 1981, the Commission published a proposed revision 3 of Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)" for comment. This letter provides Combustion Engineering's comments on that proposed guide for your use.

The NQA-1 document, to which this regulatory guide refers, was developed by a consensus with the NRC represented. As part of that process a great deal of guidance was clearly established as non-mandatory. In reviewing the regulatory guide, however, we note the use of the words "should be met" in many places when referring to sections of NQA-1 designated as "Non-Mandatory Guidance" and in referring to other "guidance" from the Commission staff. We are concerned that the words "should be met" may be interpreted to mean more than a recommended and acceptable method to the Commission. Deviation from these statements might be read as requiring a justification of the applicant's intended course of action. If this is the Commission's intent (i.e., if the Commission essentially intends to require implementation of these items) we strongly recommend that the existing Regulatory Guide be rewritten to reflect that position (e.g., the use of the word "shall" in place of the word "should") and the guide should be re-released for public comment. The following items are specific examples of places in the Regulatory Guide where such statements appear.

C.1: The NCA-4000 section of the ASME Boiler and Pressure Vessel Code Section III is mandatory. The items listed in Section C.1 are presently inferred from NCA-4000, however, the ASME has begun to incorporate the requirements of NQA-1 into NCA-4000. It is expected that ASME will include these requirements in a forthcoming addenda to the Boiler and Pressure Vessel Code. It is recommended that the recommendations in the subject guide referring to the use of NQA-1 to supplement NCA-4000 of the ASME Boiler and Pressure Vessel Code Section III be deleted since NCA-4000 will soon be revised to incorporate the requirements contained in NQA-1.

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Comment*

C.2: A three-level system of inspection and test personnel is not in place in many manufacturing facilities at present. The currently existing QA organizations and expertise of the personnel utilized combine to give a system wherein the three-level requirements are met. Since the intent of the three-level system is met and since they are not currently in place, it is recommended that the references to a three-level system in C.2 be deleted.

C.2.1.b: In establishing arbitrary education and experience requirements the NRC seems to be saying that only a certificate of completion or a diploma from some formalized program is acceptable proof of meeting the necessary knowledge requirements for a specific job. We take exception to this inference. In many cases, there are inspectors without a high school education performing superbly in our manufacturing facilities. These individuals prove that a high school education is in no way necessary to perform excellently as a QA inspector.

These requirements (since they are uniform) also neglect to take into account the fact that some tests (optical alignments) are much more difficult than others (a go-no-go gaging). For these reasons, these educational and experience recommendations should remain as perhaps desirable goals but not firm criteria.

C.3: The comments on C.2 also apply to this section on auditors. Additionally, if this requirement is implemented it could have the opposite effect of its intent, i.e., it could reduce the number of auditors and consequently the number of audits. Therefore, the recommendations on the education and experience of auditors should be deleted.

C.4: Organizations subject to 10 CFR 50 Appendix B have all had their QA of Design Procedures reviewed and approved by NRC. It is therefore unnecessary to duplicate the intent of a checklist that has already been approved. Additionally, the proliferation of paperwork to substantiate these changed requirements would add no additional measure of quality or safety. It is therefore recommended that the list in Section C.4 be deleted.

C.4.1.e: It is our opinion that whether the documentation of a design verification is completed before or after the point in the construction phase where installation would become irreversible (i.e., require extensive demolition and rework) does not change the quality or safety of the plant. We agree that commercially, it is wiser to perform this verification prior to attaining an "irreversible" situation. However, this recommendation should be deleted because it has no quality or safety implication.

C.7.e: NFPA 232-1975 has been replaced by a 1980 version. Since the 1980 version is an improvement over the 1975 version, it is recommended that NFPA 232-1980 be referenced as opposed to NFPA 232-1975.

Section 7.2: The requirement to maintain radiographs is contained in the ASME Code 4134.17. The recommended maintenance of radiographs not required for ISI and Section XI requirements is an administrative burden that provides no enhancement of safety or quality. Therefore, this recommendation should be deleted.

It was determined on the basis of a telephone conversation between Mr. T. G. Scarbrough of the NRC staff and Mr. J. E. Rogers of my staff, that if the above comments were received by June 19, 1981, they would be considered timely.

If there are any questions please contact myself or Mr. J. E. Rogers of my staff at (203)688-1911, Extension 3028.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer
Director
Nuclear Licensing

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