

RS 707-5



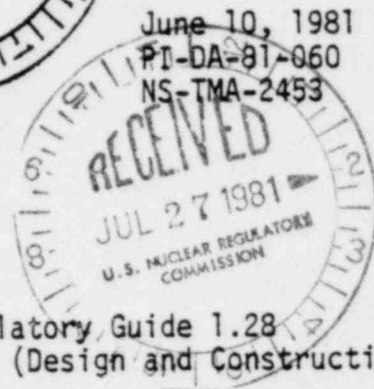
Westinghouse Electric Corporation

Water Reactor Divisions

Nuclear Technology Division
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DOCKET NUMBER
PROPOSED RULE PR-Misc Notice
Reg Guide



Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

SUBJECT: Comments to Proposed Revision 3 to Regulatory Guide 1.28
"Quality Assurance Program Requirements (Design and Construction)"

Dear Mr. Chilk:

This letter is submitted by Westinghouse Electric Corporation, Water Reactor Divisions to submit comments on Proposed Revision 3 to Regulatory Guide 1.28 "Quality Assurance Program Requirements (Design and Construction)" as requested in 46 Fed. Reg. 21872 dated April 14, 1981.

Westinghouse agrees overall with the provisions of Proposed Revision 3 of Regulatory Guide 1.28. The endorsement of NQA-1-1979 is a positive step in the reduction and consolidation of regulatory matter in the nuclear industry.

However, Westinghouse believes that adopting the appendices, which are nonmandatory guidance (Ref: Regulatory Positions 2.1, 3, 4.2, 6, 7.2 and 8.2) is neither productive nor justified as an addition to NQA-1-1979 requirements. The basic requirements and the supplement sections of NQA-1-1979 were developed to be responsive to the regulatory requirements of 10CFR50, Appendix B. The appendices were prepared as examples of content normally required to address a given area and were never intended to be mandatory or exclusive in any way. Further, expansion of the examples contained in the appendices by the NRC in an attempt to be all inclusive has resulted in regulatory requirements that are redundant and over specified. This will place an unnecessary burden on industry of justifying any departure from Regulatory Guide 1.28 with no compensating benefit to safety as well as possibly over saturating the QA systems to the point that control of those areas where control is warranted may be less effective.

Attachment A provides the Westinghouse comments on specific regulatory positions.

T. M. Anderson
for T. M. Anderson, Manager
Nuclear Safety Department

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Attachment

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ATTACHMENT A

Regulatory Position 2.1.b

Section 3.0, "Education and Experience Qualifications," of Appendix 2A-1 specifies a set of education and experience recommendations and states that factors other than those specified may provide reasonable assurance that a person can competently perform a particular task. In addition, a candidate for Level I, II or III certification should be a high school graduate or should have earned the General Education Development equivalence of a high school diploma.

Westinghouse WRD Comment

W WRD disagrees with Regulatory Position 2.b that recognition of the General Education Development is the only equivalence to a high school diploma. Criteria II of 10CFR50, Appendix B states "The (Quality) program shall provide control over activities affecting quality to an extent consistent with their importance." W WRD sees Appendix B as requiring industry to establish requirements to be consistent with the type of work they perform. Industry should have the prerogative to rely on factors other than high school graduate or the GED to provide reasonable assurance that a person can competently perform a particular task. Industry has indicated the minimum requirements via NQA-1. If industry chooses to exceed the minimum requirements of NQA-1 by complying with Appendix 2A-1 or any other alternate, that should be their prerogative.

Regulatory Position 4.1.a and 4.1.b

4.1.a Section 4.2.1 "Design Reviews" of Supplement 3S-1, "Supplementary Requirements for Design Control," lists six items to be addressed in the design review process. In addition to the six items listed in Supplement 3S-1, the following items should be addressed in the design review process: (List of 15 items omitted for brevity).

4.1.b The items listed in Section 4.2.1 of Supplement 3S-1 and those listed in 4.1.a above should also be addressed for those designs that are verified by means other than design review (for example, alternative calculations or qualification tests).

Westinghouse WRD Comment

W WRD disagrees with the Regulatory imposition of the checklist items in 4.1.a and 4.1.b based on several reasons. First, such over specification may lead the designer to assume that those lists and suggestions are all that is required, rather than providing a means of triggering his thinking. Second, they overburden the system with records that define why the "requirement" is not applicable to specific items. Third, although the checklist appears exhaustive, it is reasonable to expect that sufficient items are not included to address all potential items required to be addressed in all design verifications.

Regulatory Position 7.1.b

Section 2.8, "Retention of Record's" of Supplement 17S-1 states that the retention period for nonpermanent records is required to be established in writing. Programmatic nonpermanent records should be retained for 3 years and product nonpermanent records should be retained for 10 years. For nonpermanent records generated prior to commencement of commercial operation, the retention period should be considered to begin on the date of commercial operation of the Nuclear Power Plant.

W WRD Comment

There are parts of the reactor such as the fuel whose life time is less than 10 years. W WRD would recommend the following word change as a minimum: ". . . Product Nonpermanent Records should be retained for 10 years or the life of the product if less than 10 years." However, the requirements to maintain nonpermanent records for 10 years commencing from the commercial operation date appears excessive and arbitrary. The costs associated with maintaining follow-up records needed to establish commercial operation date and the costs of extra retention times are relatively high versus the benefits gained from additional retention. Additionally, it appears that regulatory position 7.1.b is counter to the Paperwork Reduction Act of 1980. W WRD recommends that the last sentence of 7.1.b be deleted.

Regulatory Position 7.1.c

Section 4.3 "Safekeeping" of Supplement 17S-1 contains requirements related to actions to be accomplished in the event that a record is lost or damaged and requires "prompt" record replacement. These actions should be accomplished within 30 days after the determination that either (1) a record has been lost or (2) a record has been damaged to a degree that it is no longer complete or legible.

Westinghouse WRD Comment

WRD recommends that "30 days" be changed to "90 days". To replace lost or damaged records may require significant effort including reanalysis or reconstituting drawings and specifications. For non-emergency problems, there should be no reason to require less than 90 days as a reasonable amount of time to reconstruct records.