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PROPOSED RULE PR-Misc Notice
Reg Guide

July 28, 1981

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

Attention: Docketing and Service Branch

Gentlemen:

Draft Regulatory Guide and Value/Impact Statement TASK
TP-019-4, "Establishing Quality Assurance Programs for Pack-
aging Used in the Transport of Special Form and Certain
Normal Form Radioactive Material".

This submittal is in response to the June 1981 publication
of the subject document soliciting comments. Our comments
are as follows:

1. The Regulatory Position and Draft/value Impact Statement
should acknowledge licensee Quality Assurance Programs
previously approved by the Commission in accordance with
10CFR71 Part 71.51(d).
2. The term, "licensee - user" is not defined in Annex 2 of
the guide. Licensee - user should be defined so that
applicability of Annex 2 to organizations other than the
licensee who owns the package may be determined.
3. The "graded" approach to quality assurance described in
Appendix A, should provide specific guidance for deter-
mining which structures, systems, and components are
Category A, B, and C.

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Acknowledged by card. 8/11/81 mdv

Secretary of the
Commission

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General Comments

The need for the two quality assurance programs described in Annex 1 and 2 is not justified in the Draft Value/Impact Statement portion of the guide. Since the two annexes comprise most of the guide, their impact and need should be evaluated and justified by the Commission.

Very truly yours,



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