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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION V  
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WALNUT CREEK, CALIFORNIA 94596

May 12, 1988

MEMORANDUM FOR: Robert L. Baer, Chief  
Engineering Issues Branch  
Division of Engineering  
Office of Nuclear Regulatory Research

FROM: Dennis F. Kirsch, Director  
Division of Reactor Safety and Projects

SUBJECT: COMMENTS ON EPRI NP-5652 "GUIDELINES FOR THE UTILIZATION  
OF COMMERCIAL GRADE ITEMS IN NUCLEAR SAFETY RELATED  
APPLICATIONS"

In accordance with your memorandum of April 14, 1988, we have reviewed the EPRI document, NP-5652, and offer the following comments for your consideration. It appears that this document only addresses the procurement of Commercial Grade Items specifically intended for use in safety-related applications. Therefore, the dedication process is essentially complete, and the item is considered to be a basic component, when it has been properly received and stored in the warehouse. The EPRI document should address the need for a new dedication, including an engineering evaluation, whenever the item is utilized in an application or environment for which it was not originally intended. This dedication process should also apply to all commercial grade items located in the warehouse, prior to their release, if for any reason the item is requested for use in a safety-related system.

In regards to Appendix A, "Technical Evaluation", scenario 1 addresses like-for-like commercial grade replacement. This scenario states that if the part number is the same it can be reasonably assured that the item has not been modified, therefore, no special engineering evaluation is required. We feel that an engineering evaluation, not an engineering approval, is a necessity whenever items are ordered by part number. The reason is that an item originally ordered in 1978 may have the same part number in 1988, but may have been modified internally or externally to a degree which may significantly affect its original properties. Additional assurance regarding modification could be provided if the Purchase Order required the supplier to inform the purchaser if any design, processing or material changes have occurred since the original purchase.

Should you have any questions regarding our comments, please contact W. J. Wagner at FTS 463-3731.

*D.F. Kirsch*

Dennis F. Kirsch, Director  
Division of Reactor Safety and Projects