

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D C 20555

Part 2 11 DRAFT
4/6/81

MEMORANDUM FOR: Ray Smith, Director
Office of Standards Development

FROM: Harold R. Denton, Director
Office of Nuclear Reactor Regulation

SUBJECT: PROPOSED AMENDMENT TO 10 CFR PART 50
APPENDICES A AND B TO CLARIFY QUALITY
ASSURANCE REQUIREMENTS

By routing slip dated December 22, 1980 from S. Richardson of your office to me, NRR was asked to concur in or comment on the subject rule change. We have reviewed your proposed change and request that you revise it to incorporate the enclosed comments. These comments have been discussed with your staff.

I understand that your staff is concerned that the revised SRP Sections 17.1 and 17.2 to be issued this spring may have language that conflicts with the proposed clarification of the regulations and may result in confusion about the NRC position.

To avoid a perception of potential incompatibility, be assured that we will not issue these SRP revisions until the proposed amendment is promulgated. At that time revision 2 to these SRP sections will be made compatible with the revised regulations.

rule is amended.

For your information, please be aware that NRR plans to create a new SRP section whose purpose is to define certain terminology with wide usage. Terms to be defined include important to safety, safety related, and safety grade.

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Enclosure
NRR Comments

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NRR COMMENTS ON PROPOSED AMENDMENT TO CLARIFY QUALITY ASSURANCE REQUIREMENTS

1. Make the following changes to Appendix B to 10 CFR 50, either in addition to or instead of the changes to Appendix A proposed by OSD:

a. Introduction

Change the third, fourth, and fifth sentences of the first paragraph to read as follows:

"Nuclear power plants and fuel reprocessing plants include structures, systems, and components important to safety; that is, structures, systems, and components shall be provided in accordance with Appendix A 10 CFR 50 to give reasonable assurance that the facility can be operated

including
, and that postulated accidents can be prevented or the consequences mitigated,
without undue risk to the health and safety of the public.
This appendix establishes quality assurance requirements for the design, construction, and operation of those structures, systems and components and for related plans (e.g., emergency plan, security plan) addressed in other parts of 10 CFR 50.

*Consensus design
Case is neutral
Have believed
not provided
minimum
checkpoints
Let's discuss
Structure OECD*

b. Paragraph "I. Organization"

In the third and fifth sentences, delete the words "...safety-related functions of structures, systems, and components...", and replace with the words "...structures, systems, and components important to safety...."

c. Paragraph "III. Design Control"

In the last sentence of the first paragraph, delete the words "...safety-related functions of structures, systems, and components...", and replace with the words "...structures, systems, and components important to safety...."

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2. Make the following change to the Introduction of Appendix A to 10 CFR 50:

Second sentence of first paragraph:

Delete the words following the semicolon and replace with the following:

"...; that is, structures, systems, and components provided in accordance with these principal design criteria, and related plans addressed in 10 CFR 50, to give reasonable assurance that the facility can be operated, and that postulated accidents can be prevented or the consequences mitigated without undue risk to the health and safety of the public."

Wherever mention of structures, systems & components is made in Appendix A of 10 CFR 50, the words "and related plans" should be added.

Same comment as above

Can make not appropriate for App. A.

3. ~~2~~. On pages 4 and 5 of Enclosure A, it is stated that "...Criterion 1 to 10 CFR Part 50 is revised to read as follows:..." But in the revised GDC 1, the last sentence has been omitted. It is suggested that the entire revised GDC 1 be presented.

4. ~~3~~. On page 5 of Enclosure A,

- a. Line 1, "Criterion 1 - Quality..."
- b. Line 8, "...required safety function."

5. ~~4~~. On page 3 of Enclosure B (second sentence of first full paragraph), the example is not appropriate for elucidating the "graded approach." Rather, it demonstrates that alternate means can be used to substitute for normally imposed QA controls. If examples are to be used, it is suggested that the following example be used in its stead:

"For example, extensive quality assurance requirements are imposed on suppliers of reactor pressure vessels, whereas quality assurance requirements of a more limited nature are imposed on suppliers of radioactive waste management systems due to the difference in safety significance inherent in these items. "