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Office Of Nuclear Reactor Regulation
Attention: Mr. Harold M. Denton
Director
United States Nuclear Regulatory Commission
Washington, D.C. 20555

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Director

SUBJECT: Comments on NRC/EG&G Draft Report "Graded QA"

REFERENCE: EG&G-EA-6109 dated November 1982 entitled "Identification and Ranking of Nuclear Plant Structures, Systems and Components and Graded Quality Assurance Guidelines - Draft"

Dear Mr. Denton:

Thank you for the opportunity of permitting GPUNuclear/Nuclear Assurance Division to comment on the referenced document. As you know, GPUNuclear was one of the first utilities to expand its existing QA program to cover added hardware systems, components and activities under the expanded scope identified as "important to safety". The new program's scope was defined in our Operational QA Plan, which along with the GPUNuclear Quality Classification List, was approved by the NRC. A fundamental principle defined in that new program was that engineering functions would define req irements based on a number of factors that apply to the item being procured, installed, tested, operated, etc. These factors concern themselves with the functional and operational manner by which the item was to perform its important to safety function. Hence, good engineering judgement would be applied for the specific application and used to determine the requirements for the important to safety activity that we are trying to control. It is our experience at GPUNuclear that this approach is far more pragmatic and meaningful when viewed from a safety significance point of view. I have included a copy of a paper presented on this subject by Messrs. N. C. Kazanas, Director - Quality Assurance and B. E. Ballard, Sr., Manager - QA TMI Modifications/Operations at the most recent ASQC meeting in Orlando, Fla. on October 14, 1982.

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My specific comments related to the draft report are included below:

1. Contrary to the introduction, the draft makes "grading" too rigid an operation. It should provide the necessary flexibility for grading out specific requirements. There is very little to no latitude left to the engineer in selecting and grading quality assurance requirements for a specific application.

   The draft philosophy suggests that quality assurance requirements can be graded from minimum limits to maximum. However, this is not reflected in the guideline table. If anything, the table tends to extend quality assurance program coverage to items of lesser significance. The basis for including QA program requirements is not given and the proposed approach tends to place the engineer into a position of nonsensical imposition of requirements which may not be necessary. Additionally, the necessary flexibility for grading as illustrated from the totals is simply not there, as seen from the difference in the first three levels:

I Max	- 374
I Min/II Max	- 365
II Min/III Max	- 263
III Min	- 36

2. There is no functional and operational logic to the identification of structures/systems/components as to safety significance. The only purported logic is that the items are identified in one or more SRP's. The absence of functional logic precludes any meaningful extension to components or parts not included in the list. Further, the document suggests that uniform licensing basis requirements are being imposed, thus ignoring plant unique features and design bases.

3. The proposed listing of items is strictly hardware oriented. The absence of any functional logic precludes extension to activities important to safety.

4. No classification category explicitly addresses those items covered by 10CFR Appendix A. There must be some ability to relate one or more categories to the requirements of these design criteria.

In summary, although it proposes admirable objectives on how to grade QA requirements, GPUNuclear feels the proposed draft report from EG&G does not present an acceptable way for implementing the concepts. If you feel you need additional clarification of our views on the "important to safety" classification and/or "grading" QA requirements for specific applications, a number of my staff members, including Mr. N. C. Kazanas and Mr. B. E. Ballard could be made available to discuss this subject.

Very truly yours,

Robert L Long

Robert L Long
Vice President
Nuclear Assurance

RLL/NCK:jlm

Attachment

cc: B. Ballard
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