



STANDARDS STEERING COMMITTEE
 AMERICAN NUCLEAR SOCIETY

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 PROPOSED RULE *PR-Misc Notice*
(Regulatory Guide)

June 1, 1983

Secretary of the Commission
 United States Nuclear Regulatory
 Commission
 Washington, D. C. 20555

ATT: Docketing and Service Branch

Subject: QA Programs for Computer Software
 (Task IC 127-5)

Gentlemen:

I have reviewed the draft regulatory guide on program-
 mable digital computer systems software (Task IC 127-5)
 and offer a few comments related to the options provided.

I strongly suggest that Option A be selected. Since
 1975 I have been deeply involved in the development
 of the agreements among ASME, ANS, and IEEE on impor-
 tant interfacing projects. In addition, I balloted
 ANSI/IEEE-ANS-7.4.3.2-1982 and have reviewed P730 as
 part of my ballot review process. As a result I feel
 particularly well qualified to comment on the relation-
 ship among the several documents referenced in Karl Goller's
 letter accompanying the draft reg guide.

In selecting Option A, consideration was given to several
 items. First of all, the ANS-4.3.2 project was specifically
 designed to meet the purpose of the draft reg guide to
 promote high reliability for safety systems using computers.
 Secondly, the responsibility for developing QA programs
 belongs with the NQA Committee of ASME. This committee
 has initiated action to develop a QA software program;
 this appears appropriate. It is especially important
 that guidance provided be consistent with 10CFR50,
 Appendix B; the NQA Committee will ensure this consis-
 tency. P730 is not related to the regulations, nor does
 it cover several of the criteria in Appendix B.

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Acknowledged by 6/3/83
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Thirdly, P730 is not a QA plan that can be applied to safety systems using computers, but is a general document related to the development of programs (software). Furthermore, the IEEE Standards Board specified that the standards not be applied to nuclear power plants; their judgment should be respected. This document uses a different set of terminology that would be very confusing in the nuclear industry.

I appreciate this opportunity to comment.

Very truly yours,



James F. Mallay

gm.
c