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USNRC



Nuclear
Operations

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DOCKET NUMBER
PETITION RULE PRM 50-62
(60FR47716)

November 28, 1995
NRC-95-0131

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Secretary,
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
Attn: Docketing and Services Branch

- References:
- 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
 - 2) Federal Register, Vol. 60, No. 178, pages. 47716-47719, dated
September 14, 1995

Subject: Comments on Petition for Rulemaking Regarding Changes to Quality Assurance Program

Detroit Edison agrees with the petitioner that changes are needed in the process for Quality Assurance (QA) Program revisions. The current process is sometimes unnecessarily burdensome for minor changes. Changes should be made so that licensee and NRC resources can be better used on activities related to the health and safety of the public. However, rather than review future QA Program changes using the criteria in 10CFR50.59, as proposed by the petition, Detroit Edison believes a decrease in program effectiveness criteria should be used to screen future changes requiring NRC prior review. These criteria would be similar to those used for Security Plan changes, but adapted to be applicable to QA Programs. Such criteria can be better directed to issues of concern for QA Program changes than the criteria contained in 10CFR50.59. The NEI examples provided to the NRC could be easily adapted to a decrease in program effectiveness criteria.

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If there are any questions, please contact me at (313) 586-4097.

Sincerely,



Lynne S. Goodman
Director, Nuclear Licensing

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NEI