



**Consumers
Power
Company**

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U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Consumers Power Company appreciates the opportunity to comment on the proposed "Quality Assurance Guidance Related to Anticipated Transients Without Scram (ATWS) Equipment That Is Not Safety Related" (49FR44337, November 6, 1984). Consumers Power Company also fully endorses the comments submitted by the Utility Safety Classification Group. The following are our general and specific comments on the proposed Generic Letter.

First, while we commend the NRC for the approach taken in establishing specific quality requirements for non-safety-related ATWS equipment, we are concerned that the need for such requirements in this special case has not been demonstrated. In fact, the NRC Staff has concluded that: ". . . as a general matter, the quality practices now applied. . . would be adequate for . . . equipment encompassed by the ATWS rule." (49FR44338) Thus, it appears that the need for additional specific quality requirements for this equipment is driven more by the perceived need for documentation of licensee performance in this area rather than to address any significant safety concerns.

Second, it is our belief that the Generic Letter as written leaves us with no alternative but to apply our QA Program under 10CFR50 Appendix B to most, if not all, of the activities associated with complying with the ATWS rule. Whereas literal interpretation of the proposed requirements might permit a less rigorous program to be applied to these activities, past NRC inspection and enforcement practices indicate that the inspector will require written documentation as evidence that prescribed practices have been followed. It appears, therefore, that our QA program would have to be applied to design, procurement, installation, testing and maintenance activities in general, although commercial grade equipment would probably be acceptable under the proposed requirements.

Our specific comments on the Generic Letter follow:

- 1) The guidance specified under Requirement X - Inspection states that it is

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necessary to verify conformance to documentation. This is inconsistent with the main body of the letter which states "Documentation is not required . . .to verify procedures were followed for the purposes of satisfying internal control requirements."

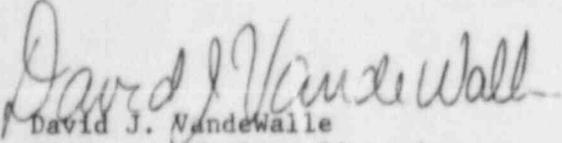
2) Similarly, the main body of letter includes ". . .(i.e., documentation that verifies that receipt inspections were conducted need not be retained)." This is contradictory to Requirement VII, Control of Purchased Items and Services that specifies the necessity to assure that all purchases conform to procurement documents (i.e., receipt inspection) and Requirement VIII, Identification and Control of Purchased Items that specifies the necessity to identify and control purchased items from receipt. The only documentation that Consumers Power Company has to verify receipt inspections were conducted is the receipt inspection file itself. Further, the item is controlled and identified (Criteria VIII) by documenting the status of the item (Hold, Reject, Accept, Issue Ticket-Installed Location) in the applicable receipt inspection file.

3) Guidance/requirements for ATWS non-safety related equipment should "stand alone" without reference to Appendix B.

4) It will be difficult to prove conformance to the guidance/requirements without a formal program that explicitly defines and describes the terminology used in the proposed Generic Letter, such as: "Document and evaluate results." (XI - Test Control); "Verify conformance to documentation." (X - Inspection); "Establish measures to assure design specifications are included or correctly translated. . ." (III - Design Control); ". . .measures to assure specifications and QA requirements are included. . ." (IV - Procurement Document Control).

5) Rather than expend resources to develop a program to define and describe the above, Consumers Power Company will no doubt implement applicable elements of our QA program. Therefore, the Draft letter should specifically state that its intent is satisfied by implementation of Appendix B.

6) Requirement V - Instructions, Procedures & Drawings - it is recommended that "activities that affect quality" be changed to "non-safety related ATWS equipment" as we already have a program that addresses "activities that affect quality" (i.e., our QA Program under Appendix B).


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