



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
131 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406
DEC 11 1984

MEMORANDUM FOR: Stephen M. Goldberg, QA Branch, DQASIP, IE

FROM: Thomas T. Martin, Director, Division of Engineering and Technical Programs, Region I

SUBJECT: QA GUIDANCE RELATED TO ATWS EQUIPMENT THAT IS NOT SAFETY-RELATED

This memorandum provides Region I comments on the proposed QA guidance (49 FR 44337-44339) for non-safety-related equipment that is associated with 10 CFR 50.62, "Requirements for Reduction of Risk from Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants," (49 FR 26044-26045). We believe the guidance is too negative with regard to quality assurance, i.e., it tells them you don't have to apply quality assurance. The negative aspect should be removed and the positive aspect that effective administrative controls to assure the suitability of non-safety related equipment is an adequate alternative to a formalized quality assurance program. For example, the negative statement that "audits are not required" should be replaced with a more positive statement such as "Periodic management reviews of the adequacy of quality assurance practices and/or internal administrative controls are an acceptable substitute for formal quality assurance audits."

Before the generic letter is issued, the IE staff should provide guidance to the regions concerning what is expected of the regions regarding this non-safety-related equipment. A basic question is whether or not the regions' limited inspection resources should be applied to this equipment. We note that significant resources have been and are being spent on licensee's fire protection programs which are also non-safety-related. Therefore, the guidance to the regions should be coordinated with the regions before it is formally issued.

The guidance to the regions could be an initiatory step toward re-orientating the NRC inspection program from a compliance-based program to a performance evaluation-based program in order to help prevent major quality-related problems and assist in their timely detection as suggested in the QA Program Plan of October 30, 1984. We would be pleased to work with you in developing this type of program for this equipment.

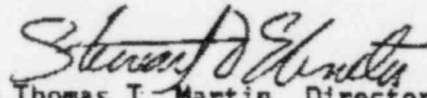
The summary of the QA guidance appears to be too restrictive where it states that "either the application of QA controls based on the guidance in this letter or the application of Appendix B requirements in their entirety is an acceptable method for satisfying NRC requirements," (underline added). Since Appendix B itself requires controls only to an extent consistent with an item's importance to safety, we suggest revising the summary to state that "either

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the application of QA controls based on the guidance in this letter or the application of comparable provisions of the licensee's Appendix B QA program is an acceptable method for satisfying NRC requirements."

Our contact on this matter is Stewart D. Ebnetter on FTS 488-1283.

for 
Thomas T. Martin, Director
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