

Regulatory Guide Number: 1.33, Revision 3

Title: Quality Assurance Program Requirements

Office/division/branch: NRR/DRO/IQVB

Technical Lead: Steven Downey

Staff Action Decided: Reviewed with issues identified for future consideration.

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

Regulatory Guide 1.33, Revision 3 (Rev. 3), "Quality Assurance Program Requirements (Operations)," issued in June 2013 describes methods that the Nuclear Regulatory Commission (NRC) staff consider acceptable for managerial and administrative Quality Assurance (QA) controls to be used for nuclear power plants during operations. This revision of RG 1.33 endorses the requirements included in ANSI/ANS 3.2-2012, "Managerial, Administrative and Quality Assurance Controls for the Operational Phase of Nuclear Power Plants" for implementation during the operation phase of nuclear power plants. One condition placed on the use of this standard is that ANSI/ANS 3.2-2012, Appendix A, "Typical Procedures for Pressurized Water Reactors and Boiling Water Reactors," should be used as guidance to assure the minimal procedural coverage for plant operating activities.

As part of this periodic RG review, the staff reviewed agency documents that could impact the RG to determine (i) whether the documents have been revised since the RG was last reviewed, and (ii) whether established staff positions, or other revisions, in these documents should be incorporated into the RG. The agency documents reviewed include applicable information notices, regulatory issue summaries, Standard Review Plans, IAEA standards, and other related RGs. The staff also performed a cursory search of applicable temporary instructions, bulletins, generic letters, and NUREGs. Based on this review, the staff identified two instances where content of RG 1.33, Revision 3 would be impacted. These issues are briefly discussed below.

First, the background section of RG 1.33, Revision 3, discusses the Agency's revision of RG 1.28 to endorse NQA-1-2008 and NQA-1a-2009 Addenda, "Quality Assurance Requirements for Nuclear Facility Applications." It is noted that the aforementioned standards are endorsed in RG 1.28, Revision 4, issued in 2010. However, since the publication of RG 1.33, Rev. 3, the Agency has endorsed later editions and addenda of NQA-1 in 10 CFR 50.55a and issued RG 1.28, Revision 5, which endorses the NQA-1b-2011 Addenda to ASME NQA-1-2008, NQA-1-2012, and NQA-1-2015, as providing the most current guidance for QA. As such, the discussion in RG 1.33, Revision 3 will need to be revised to align with the Agency's most recent endorsement efforts and revision to RG 1.28.

In addition, the discussion in RG 1.33, Revision 3, on the harmonization with international standards identifies IAEA Safety Requirement GS-R-3, "The Management System for Facilities and Activities," as providing similar administrative and QA controls

for the operational phase. However, since the publication of RG 1.33, Revision 3, Safety Requirement GS-R-3, issued in 2006, has been superseded by IAEA Safety Requirement GSR Part 2, "Leadership and Management of Safety," issued in 2016. The latter reference builds on the concepts introduced in GS-R-3 and takes into account lessons learned from events that have occurred. As such, the discussion in RG 1.33, Revision 3 will need to be revised to align with latest international standard for QA.

While the staff has identified issues that warrant revising RG 1.33, Rev. 3, those issues are not indicative of any safety concerns.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

The staff believes that the issues identified in Question #1 will have little or no impact on future licensing and inspection activities. Although some portions of the background discussion presented in RG 1.33, Revision 3, are outdated, the Agency's regulatory position presented therein is still valid. Specifically, the Agency's endorsement of ANSI/ANS 3.2-2012 as an acceptable method for complying with the requirements of 10 CFR 50, Appendix B, has not changed since the publication of RG 1.33, Revision 3. It is noted that ANSI/ANS 3.2-2012 is still the latest edition of the standard.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

NRC staff requires approximately 0.01FTE to revise the outdated sections of the RG. Additional resources will be needed to support the overall RG development process and coordination with applicable NRC program offices.

4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?

Reviewed with issues identified for future consideration.

5. Provide a conceptual plan and timeframe to address the issues identified during the review.

The staff is not aware of an ongoing effort to revise ANSI 3.2 but will continue to monitor any developments. The staff will re-evaluate the issues identified above and consider revising this periodic review within the next 5 years as needed.

NOTE: This review was conducted in July 2023 and reflects the staff's plans as of that date. These plans are tentative and subject to change.