

# PUBLIC SUBMISSION

SUNSI Review Complete  
Template=ADM-013  
E-RIDS=ADM-03  
ADD: Michael Eudy,  
Bridget Curran, Mary  
Neely

**As of:** 1/19/24, 8:27 AM  
**Received:** January 19, 2024  
**Status:** Pending\_Post  
**Tracking No.** lrk-fz76-gpat  
**Comments Due:** January 19, 2024  
**Submission Type:** Web

Comment (1)  
Publication  
Date:12/14/2023  
Citation: 88 FR 87967

**Docket:** NRC-2023-0216

Draft Regulatory Guide: Installation, Inspection, and Testing for Class 1E Power, Instrumentation, and Control Equipment at Production and Utilization Facilities

**Comment On:** NRC-2023-0216-0001

Draft Regulatory Guide: Installation, Inspection, and Testing for Class 1E Power, Instrumentation, and Control Equipment at Production and Utilization Facilities

**Document:** NRC-2023-0216-DRAFT-0003

Comment on FR Doc # 2023-27961

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## General Comment

See attached file(s)

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## Attachments

Comments DG-1419 YWilliams

Page 2, 2<sup>nd</sup> bullet on page – editorial comment

The bullet addresses GDC 1, and is led into by the 1<sup>st</sup> bullet; it is subordinate to the first bullet. Suggest either indenting this bullet for GDC 1 or moving the content up into the end of the first bullet. This second suggestion would result in the GDC bullet ending with:

The GDC related to quality assurance (QA) is GDC 1, “Quality standards and records,” which requires, in part, that SSCs important to safety be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety functions to be performed.

Page 4, Background, 2<sup>nd</sup> paragraph – typo correction needed

The second paragraph states “The revised IEEE Std 336-2010 incorporates ...” The correct date for the revised IEEE standard is 2020.

Page 6, last paragraph – more technical comments

1. It is not clear why RG 1.28 Rev 5 is referenced instead of Rev 6 (which endorses later versions of NQA-1). Note also that Reference 10 on page 8 is to Rev 6 of RG 1.28.
2. The Foreword of ANSI/ANS 3.2-2012 (page ii, last paragraph) indicates that “the working group developed a major revision to the standard that separated the quality assurance controls from the managerial and administrative controls. Since the combination of ANSI/ASME NQA-1-2008 and NQA-1a-2009 Addenda and ANSI/ANS-3.2-2012, “Managerial, Administrative, and Quality Assurance Controls for the Operational Phase of Nuclear Power Plants,” provides the quality assurance requirements and the managerial controls necessary for safe operation of nuclear facilities, **the working group continued with the objective to have ANS-3.2 supplement NQA-1 for operating plants.** This industry guidance was fully coordinated with the ASME NQA-1 Standards Committee.”  
This supplementing between ANSI/ANS 3.2-2012 and ASME NQA-1 is why IEEE Std 336-2020 references both of them in Clause 4.1 for the operations phase.  
I do not currently have access to ANSI/ANS 3.2 to see whether or how it references ASME NQA-1, so I can only share why the working group for IEEE Std 336 included both standards for the operations phase.

Comments by Yvonne Williams

I am a retired engineer, working on nuclear power plants and related nuclear facilities.

I also have volunteered for approximately 15 years on NPEC Working Group 3.1, which handles IEEE Std 336, and have been the WG Chair for most of those years.