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71FR 7079
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From: Clinton L. Eldridge <cle1@pge.com>
To: <nrcrep@nrc.gov>
Date: Wed, Feb 8, 2006 5:05 PM
Subject: Response from "Comment on NRC Documents"

Below is the result of your feedback form. It was submitted by

Clinton L. Eldridge (cle1@pge.com) on Wednesday, February 08, 2006 at 17:04:30

Document_Title: NUREG 0800 - SRP 17.5, Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants

Comments: I am providing these comments as a member of the public, and not as a representative of the Pacific Gas and Electric Company.

Comment 1
Page 17.5-6, B.1. "Management of other organizations..." What does "other" refer to? Recommend deleting "other".

Comment 2
17.5-14, F.12. Requires QA personnel to review and concur with all safety-related procedures. These reviews were eliminated at many sites because they added little value and were a severe cost burden. At least one plant's QA organization reviewed the results of several hundred of their procedure reviews and determined that their only comments were editorial. Recommend limiting required QA reviews to programmatic procedures that establish QA program requirements and procedure changes that affect those requirements. The reviews should also focus on alignment of the procedures with QA program commitments, as opposed to technical, format, and editorial correctness. Other reviewers already check technical, editorial, and format correctness.

Comment 3
17.5-14, F.13. Requires program provisions for providing the best possible work instructions. Recommend changing this sentence to read, "Provisions are in place to continually improve work instructions through reviews and incorporation of feedback from users."

Comment 4
17.5-19, I.4. This paragraph deals with special handling tools and equipment, not control of special processes. Recommend moving it to section M, "Handling, Storage, and Shipping."

Comment 5
17.5-20, I.9. This paragraph deals with operators of special handling tools and equipment, not control of special processes. Recommend moving it to section M.

Comment 6
17.5-22 L.6. The term, "out of calibration," can mean that the equipment is simply past its calibration due date. Recommend using the term, "out of tolerance," in three places in this paragraph. These actions should only be required if the equipment is found to be reading outside of its tolerance band.

Comment 7
17.5-22 L.10. This requires all standards to be traceable to NIST. This is not always practical and is inconsistent with paragraph L.5. Recommend replacing NIST with, "nationally recognized standards or accepted physical constants. When this is not possible, the basis for the calibration shall be documented."

Some types of standards are not calibrated by NIST. They sometimes refer you to another country's

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national laboratory, such as the National Resource Council of Canada, which NIST has formally recognized. Some types of standards are calibrated through accepted ratio techniques and no calibration standard is used.

Comment 8
17.5-22 M.3. Change "perceiving" to "receiving."

Comment 9
17.5-23 N.1. This long sentence tries to cover two paragraphs from Criterion XIV of Appendix B. It doesn't make sense, as written. For example, you can't verify test status before receipt and doing so wouldn't prevent inadvertent operation. Recommend separating inspection and test status from operating status and using the words from Appendix B, Criterion XIV.

Comment 10
17.5-23 N.5. This paragraph on temporary modifications doesn't fit in the "Inspection, Test, and Operating Status" section. Recommend moving it to section C. You may also want to specify more stringent controls. Jumpers and temporary modifications have sometimes been left in place for extended periods of time without being reviewed for compliance with 50.59. I believe measures should be in place to verify that they are not a change to the Technical Specification, and do not require prior NRC approval.

Comment 11
17.5-24 O.1. The last sentence states, "Corrective actions include actions to prevent repetition of the nonconformance." This is not always true for minor nonconformances. Appendix B requires this for significant conditions adverse to quality. Recommend changing this to say, "For significant conditions adverse to quality, corrective actions include..."

Comment 12
17.5-24 O.4. As written, this sentence requires QA personnel to provide solutions for the problems they identify. Requiring this is inappropriate and can create a conflict of interest. It may discourage identification of a problem in a situation where the QA person doesn't know how to solve it. Recommend changing this to read, "The program requires all personnel to identify conditions adverse to quality and specifies how resolution is verified, and by whom. Anyone may suggest or recommend solutions to problems they identify, if known."

Comment 13
17.5-25 Q.3. The last sentence in this section states, "The applicant's program must implement Generic Letter 88-18, "Plant Record Storage on Optical Disks."" This Generic Letter is obsolete and only allows electronic storage on optical disks. Storage technology has changed significantly since 1988 and magnetic storage media are now in common use for important record storage. The draft SRP lists several NIRMA standards on page 17.5-38 which provide more current controls for electronic record storage. If you feel compliance with the Generic Letter is still necessary, I recommend changing the requirement to, " If the applicant proposes to use optical disk storage, his program shall implement Generic Letter 88-18, " Plant Record Storage on Optical Disks," for this type of record storage."

Comment 14
17.5-29 R.7. The first sentence requires auditing all aspects for the applicant's QA program within a two-year period. The Commission has relaxed this requirement for several existing plants. They may extend audit intervals for specific program elements, if not prohibited by other regulations, when historical audit results indicate it is appropriate. Recommend adding this flexibility to SRP 17.5.

Comment 15
17.5-31 R.13.b.(7) Recommend adding a paragraph (7) to allow use of calibration labs without performing audits if they provide commercial grade calibration services and are accredited to ANSI/ISO/IEC 17025 by NVLAP or A2LA.

Comment 16

17.5-45 Y This section provides QA program criteria for what I assume to be RISC-2 SSC's. Were requirements for RISC-3 SSC's inadvertently omitted, or were they left out intentionally? I understand that, for new generation plants, the AE may not identify low-risk SSC's as safety-related, so there may be no RISC-3 SSC's to control.

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Mail Envelope Properties (43EA6AF5.D88 : 14 : 11656)

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Creation Date:	Wed, Feb 8, 2006 5:04 PM
From:	Clinton L. Eldridge <cle1@pge.com>
Created By:	cle1@pge.com

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