

# FORD 1

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9306090002      DOC. DATE: 93/05/21      NOTARIZED: NO      DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power      05000397  
 AUTH. NAME      AUTHOR AFFILIATION  
 PARRISH, J.V.      Washington Public Power Supply System  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Division of Freedom of Information & Publications Services

SUBJECT: Comments on proposed Insp Procedure 38703, "Commercial Grade Procurement Insp."

DISTRIBUTION CODE: DS09D      COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 2  
 TITLE: SECY/DSB Dist: Public Comment on Proposed Rule (PR)-Misc Notice; Reg G

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
INTERNAL: OGC/DR 15-B-18	1    1	OGC/SAIP15-B-18	1    1
<u>REG FILE</u> 01	1    1	RES DIR	1    1
RES/DSIR	1    1	RES/PMPDAS	1    1
EXTERNAL: NRC PDR      02	1    1		

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK.  
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR    7    ENCL    7

*Ex-2*

R  
I  
D  
S  
/  
F  
O  
R  
D  
  
1  
  
D  
O  
C  
U  
M  
E  
N  
T

DS09

U. Polapous  
58E215167

WASHINGTON PUBLIC POWER SUPPLY SYSTEM OF ADMINISTRATION

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

'93 MAY 28 P2:53

3/19/93

(24)

May 21, 1993  
G02-93-117

Docket No. 50-397

Chief, Rules Review and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

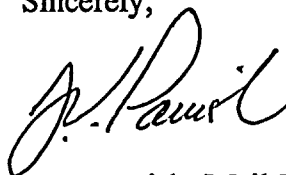
Subject: COMMENTS ON DRAFT COMMERCIAL GRADE PROCUREMENT  
INSPECTION PROCEDURE 38703

The Washington Public Power Supply System (Supply System) has reviewed proposed Inspection Procedure 38703, "Commercial Grade Procurement Inspection." Our comments are attached for your consideration.

The Supply System also endorses the NUMARC comments on the draft Inspection Procedure.

If you have any questions, please contact Mr. Douglas Coleman at (509) 377-4342.

Sincerely,



J.V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

cc: B. Bradley, NUMARC

9306090002 930521  
PDR ADDCK 05000397  
H PDR

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

11-11-61

SUPPLY SYSTEM COMMENTS ON DRAFT NRC INSPECTION PROCEDURE 38703  
"COMMERCIAL GRADE PROCUREMENT INSPECTION"

1. Specify that random failures due to normal wear, etc. should not trigger a reactive inspection.
2. Add the flow charts that were presented at the April 21-22, 1993 NRC workshop to the Inspection Procedure.
3. Revise the Dedication Examples that are presented in the Inspection Procedure to correct concerns raised by the industry at the April 21-22 workshop.
4. The term "failure" in the Inspection Plan should be defined, particularly in consideration of comment #1 above.
5. Put guidance in the Inspection Procedure stating that older commercial grade dedications should be evaluated against the processes in effect at the time they were prepared and not against today's standards (processes).
6. In Appendix A, Section 2.b, delete the words "and at essentially the same time" since other conditions (i.e., type, grade, class, size, etc.) are all encompassing.
7. The NRC should formally endorse EPRI N-7218, "Guideline for the Utilization of Sampling Plans for Commercial Grade Item Acceptance."
8. The NRC should revisit their definitions of critical characteristics, dedication, and reasonable assurance keeping in mind that reasonable assurance was never intended to equal absolute or total assurance.
9. Remove the "like-for-like replacement" definition from the Inspection Procedure since it is a design change consideration and is not within the commercial grade dedication scope.
10. In Appendix A, Section 3.a, clarify the term "physical possession" since, for example, it would be inappropriate to survey or audit the trucking company that delivered the item.

