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Subject: Detroit Edison Comments on Draft Regulatory Guide DG-1010 - Proposed Revision 4 to Regulatory Guide 1.28

Detroit Edison appreciates the opportunity to provide comments on Draft Regulatory Guide DG-1010 entitled "Quality Assurance Program Requirements." Our comments are as follows:

1) The scope of this Regulatory Guide includes modifications. However, Regulatory Guide 1.33 addresses the QA program during the operations phase of nuclear power plants. It is unclear whether Regulatory Guide 1.28 would need to be used in addition to Regulatory Guide 1.33 for modifications to nuclear power plants during their operational phase. The interface between these guidelines needs to be clarified or "modifications" deleted from scope of Regulatory Guide 1.28.

2) On page 12, Section 7, "Configuration Management," the DG indicates that "congruence" between facility features and design outputs is needed. The term "congruence" implies a level of identity and detail which is not achievable nor necessary. It is more appropriate to ensure that the facility features are correctly described to an adequate level of detail by design outputs.

3) Also, in Section 7, the proposed terminology on configuration management regarding periodic verification of current design outputs against design input requirements and current physical facility against design outputs is open to many interpretations. This position could lead to very costly repetitive design basis reverification programs. The terminology should be clarified and the costs of performing these activities addressed in the

cost/benefit analysis, since this would be a new regulatory position.

4) In reviewing the Regulatory Analysis for the DG, we fail to understand the benefit of revising the Regulatory Guide which will only apply to new QA programs. If in the interim, before new plant orders occur, further changes are deemed necessary then the revision process must be repeated. We believe the revision process should be suspended and recommended at a time when the new guidance will likely be needed.

The Regulatory Analysis indicates that the new guidance will address continuing deficiencies and problems found by inspection. If this is the case, then the appropriate regulations should be promulgated following the appropriate backfit and other regulatory analyses. The current Regulatory Analysis appears to indicate that the new revision of the RG is intended to place new requirements on currently operating plants without following the proper process.

Additionally, the Regulatory Analysis does not address the cost/benefit of the activities being added by this Regulatory Guide above and beyond NQA-1. A reasonable option would be to update the Regulatory Guide to endorse the current version of NQA-1 without additional provisions. One costly new provision is the position in Section 3.2.2 concerning annual supplier evaluations. If the annual evaluation were to need to include direct observation of work within the 12 month period, additional costs would be incurred by licensees in travel, time and cost of material. The latter would be due to the need for the supplier to cover the cost of supporting additional licensee visits. The cost of this new position could easily be in the millions of dollars per year. This cost does not appear to be justified.

If you have any questions on this matter, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,

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