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RICHARD P. CROUSE
Vice President
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(419) 259-5221

Mr. Stephen M. Goldberg
Quality Assurance Branch
Division of Quality Assurance, Safeguards,
and Inspection Programs
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Goldberg:

This letter is in response to the Nuclear Regulatory Commission's request for comments on Quality Assurance (QA) Guidance Related to Anticipated Transients Without Scram (ATWS) Equipment that is not Safety Related.

Toledo Edison concurs with the NRC Staff's desire to minimize the proliferation of QA Programs. We are opposed to the establishment of new and separate QA Programs for non-safety-related equipment. In this light, Toledo Edison recommends that the QA Program requirements for non-safety-related ATWS equipment contained in the guidance letter should be deleted. In their place, the NRC should endorse INPO Good Practice OA-104, "Quality Program to Enhance Reliable Station Operation" as an acceptable basis for developing quality requirements for non-safety-related equipment.

Yours truly

RPC/CTD

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cc: DB-1 Resident Inspector

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