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PROPOSED RULE *PR-Misc. Notice*
(Reg. Guide)



Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

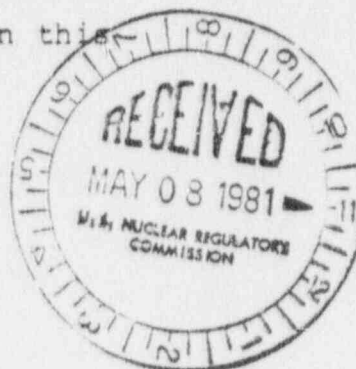
Dear Mr. Secretary:

We have reviewed the second proposed Revision 3 of Draft Regulatory Guide 1.33. Attached, find our comments on both ANSI/ANS 3.2 Standard, endorsed by the subject regulatory guide, and proposed revised regulatory guide. These comments have been forwarded to the responsible ANS 3-Subcommittee of the American Nuclear Society Standards Committee.

We appreciate the opportunity to provide comments on this matter.

Very truly yours,

R L Mittl



Attachments

HN4/1

IR-11

ATTACHMENT 1
PSE&G COMMENTS ON ANSI/ANS-3.2, DRAFT 5, AUGUST 1980

<u>ITEM</u>	<u>ANSI/ANS 3.2 PAGE/PARA.</u>	<u>REQUIREMENT, COMMENT</u>
1	26/3.3	<p><u>Requirement:</u> "In those situations where the review functions are performed by personnel not from the quality assurance organization, the quality assurance organization shall review and concur in the procedure associated with the review activities and shall perform audits to assure that the review activities have been properly accomplished" (added requirement).</p> <p><u>Comment:</u> NRC's second proposed revision 3 to R.G. 1.33 (Reg. Pos. 2) has extended the above requirement; i.e....the quality assurance organization should review and concur in the selection of personnel who perform the review." We believe that this added requirement creates an unnecessary administrative burden, and that the present ANS 3.2 requirement that "...the quality assurance organization...shall perform audits to assure that the review activities have been properly accomplished" is adequate to assure control of review activities. In addition, the term "review activities" is very broad and involves many people outside the QA organization. ANS 3.2 should clarify the requirement with respect to QA organization responsibilities and identify key review activities.</p>
2	27/3.4.1	<p><u>Requirement:</u> "Management shall periodically reassess the adequacy of the onsite operating organization in light of such considerations and shall assure that necessary changes are made in a timely manner." (added requirement).</p>

REQUIREMENT, COMMENT

3 28/3.4.2

Comment: NRC's second proposed revision 3 to R.G. 1.33 (Reg. Pos. 3) requires compliance with R.G. 1.58 which endorses ANSI N45.2.6 1978. Clarification required.

4 32/4.1(3)

Comment: The term "abnormal events" should be more clearly defined.

33,34/4.1,
41/4.3.4

CORRECTION:

ITEM	ANSI/ANS 3.2 PAGE/PARA.	REQUIREMENT, COMMENT
		Section II.B.2.6. Include ISEG duties and responsibilities in ANS 3.2 which are consistent with NUREG 0731.
6	47/5.1	<p><u>Requirement:</u> "Appendix A to this standard includes a listing of typical activities which should be covered in written procedures or orders to describe the program" (Added).</p> <p><u>Comment:</u> Revise to read "... a listing of operational QA Program activities...". The same change should be made to the first sentence of Appendix A. This change serves to clarify the fact that Appendix A procedures implement the operational QA Program. (Also see item 13).</p>
7	62/5.2.6	<p><u>Requirement:</u> "Equipment Control" (Sections added).</p> <p><u>Comment:</u> The requirement for independent verification of locking or tagging activities has been deleted from ANSI N18.7/ANS 3.2 - 1976. NRC's second proposed revision 3 to R. G. 1.33 (Reg. Pos. 11) adds the requirement that the above independent verification as well as proper equipment alignment be performed by an individual holding a valid reactor operator license. Reinsert the requirement for independent verification of locking or tagging in ANS 3.2. In addition the requirement for verification personnel to hold a reactor operator or senior reactor operator license is unnecessarily restrictive. This draft of ANS 3.2 presently requires</p>

ANSI/ANS 3.2
ITEM PAGE/PARA.

REQUIREMENT, COMMENT

8

70/5.2.8

an SRO to approve taking equipment out of service. This added NRC requirement also prevents qualified personnel outside the operating department (i.e., the quality assurance organization) from performing either or both verifications.

Requirement: "The requirement of Section 5.2.6 shall be met to ensure proper control of equipment undergoing surveillance testing. In addition, tests and inspections shall be conducted and/or witnessed by suitably qualified personnel (see also 3.4.2)." (Added).

Comment: NRC's second proposed revision 3 to R.G. 1.33 (Reg. Pos. 16) has extended the above requirement; i.e., "In addition, where the surveillance testing and inspections are performed by personnel who are not members of the quality assurance organization, the quality assurance organization should review and concur in the selection of personnel who perform the surveillance testing and inspections..." ANS 3.2 should address this requirement. The requirement for quality assurance review and concurrence should exclude inspection and test personnel holding a valid reactor operator or senior reactor operator license. In addition, concurrence by the quality assurance organization should be limited to the quality assurance aspects of personnel qualifications; i.e., technical qualification remain the responsibility of the certifying organization.

ITEM	ANSI/ANS 3.2 PAGE/PARA.	REQUIREMENT, COMMENT
9	73/5.2.13	<p><u>Requirement:</u> "These measures (Procurement and Materials Control) shall utilize...NQA-1 (was ANSI N45.2.13)."</p> <p><u>Comment:</u> NRC's second proposed revision 3 to R.G. 1.33 (Reg. Pos. 13) states, "In addition, procurement documents should specify the extent that suppliers should comply with ANSI N45.2 series standards." As in the case of item 3 above, clarification is required; i.e., NQA-1 either replaces the "daughter" standards or ANS 3.2 should specify which "daughter" standards remain in effect.</p>
10	78/5.2.13.2	<p><u>Requirement:</u> "Where required by law, regulation or contract requirements, documentary evidence that items conform to procurement requirements shall be available at the nuclear power plant..." (the word "law" was "code").</p> <p><u>Comment:</u> Revert to "code"; the term "law" is too general.</p>
11	80/5.2.13.3	<p><u>Requirement:</u> "When laws, standards or specifications require traceability of materials, parts or components..." (The word "law" was "code")</p> <p><u>Comment:</u> Same as item 11.</p>
12	86/5.2.17	<p><u>Requirement:</u> "Inspections" (No changes)</p> <p><u>Comment:</u> NRC's second proposed revision 3 to R.G. 1.33 (Reg. Pos. 16) has added the current requirements: i.e., "Where the inspections are performed by personnel who are not members of the quality assurance organization, the quality assurance organization shall..."</p>

ITEM	ANSI/ANS 3.2 PAGE/PARA.	REQUIREMENT, COMMENT
		<p>concur in the selection of persons who perform the inspections should review and concur in the procedure associated with the inspection, and should perform audits to ensure that the inspections have been accomplished in accordance with those procedures." ANS 3.2 should address this requirement. Concurrence by the quality assurance organization should be limited to the quality assurance aspects of personnel qualification; i.e., technical qualifications remain the responsibility of the certifying organization.</p>
13	122/App. A	<p><u>Requirement:</u> Under Section 1, "Administrative Procedures" item "q". Quality Assurance Program Implementation Procedures" has been added.</p> <p><u>Comment:</u> This is confusing. All procedures which implement requirements affecting nuclear safety/"health and safety of the public", comprise the QA program implementing procedures. To include this as a separate entry implies that the other Administrative Procedures (items "a" through "u") are outside the QA Program. Delete item "q".</p>
14	130/App. A	<p><u>Requirement:</u> "Radiation Control Procedures" (No change from R. G. 1.33, Rev. 2, Appendix A.)</p> <p><u>Comment:</u> Include "Packaging and Transport of Radioactive Material" to be consistent with implementing requirements of 10CFR71.</p>

ATTACHMENT 2

PSE&G COMMENTS ON REGULATORY GUIDE 1.33 PROPOSED REVISION 3, OCTOBER 1980

Reg. ANSI/ANS-
Pos. 3.2 Ref.*

Comment

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| 2 | 3.3 | <p><u>Requirement:</u> "In addition, the quality assurance organization should review and concur in the selection of personnel who perform the review."</p> <p><u>Comment:</u> This requirement is not explicit in ANS 3.2*. This requirement creates an unnecessary administrative burden. The added requirement that "... the quality assurance organization ... shall perform audits to assure that the review activities have been properly accomplished" is adequate to assure control of review activities.</p> |
| 5 | 4. | <p><u>Requirement:</u> "Appendix A should be used to establish the principal functions of the Independent Safety Engineering Group and whether the activity should be performed on site. In addition to the guidance of Appendix A, the ISEG should review the assessments required in Section 5.2.7 of the draft of ANS 3.2."</p> <p><u>Comment:</u> It is not clear how Appendix A of ANS 3.2* ("Typical Procedures for PWR and BWR") is to be used to establish the principal functions of the ISEG. ANS 3.2* does not address the duties and responsibilities of the ISEG. If requirements for the ISEG are to be addressed in Regulatory Guide 1.33, appropriate information (i.e., NUREG 0731, Section II B.2.b) should be incorporated in ANS 3.2.</p> |
| 5 | 4.3.4 | <p><u>Requirement:</u> "In addition, violations and deviations identified in NRC inspection reports should be reviewed by the ISEG. Also, plant records of all equipment repairs, adjustments, and replacements should be reviewed periodically to determine trends in the performance of personnel, systems, and components. From these reviews the ISEG should evaluate the need for design changes, replacement of components, training improvements, and procedure revision. Upon identification of such a need, the ISEG should interface with appropriate management and the cognate plant organization to assure satisfactory correction of the problem. Finally, the ISEG should review the effectiveness of the corrective actions."</p> |

APPENDIX 2

Reg. ANSI/ANS-
Pos. 3.2 Ref.*

Comment

5 4.3.4
(Cont'd)

Comment: Same as above.

8 5.2.1.4

Requirement: "The oncoming shift supervisor should perform a short tour of the plant prior to assuming the duty station with special attention paid to on-going maintenance and surveillance testing."

Comment: Requirement should be revised to read "The oncoming shift supervisor or an SRO reporting to him should perform..." This would allow the Salem Shift Supervisor (as opposed to the Senior Shift Supervisor) to perform the tour when more important priorities prevail.

11 5.2.6

Requirement: "Section 5.2.6 states that procedures must require control measures such as locking or tagging to secure and identify equipment in a controlled status. Verification by a second qualified person of the correct implementation of measures provided for control of equipment should be performed in all instances with an allowable exception in cases in which high radiation exposures may result; in such cases, other means may be used."

Comment: The requirement for independent verification of equipment tagging or locking, presently contained in AN 3.2/ANSI N18.7 - 1976, has been deleted from the reference draft of ANS 3.2* and should be reinserted.

11 5.2.6

Requirement: "The qualified person who performs the verification of correct implementation of equipment control measures or proper alignment prior to returning equipment to service should be qualified to perform such tasks for the particular systems involved should possess operating knowledge of the particular systems involved and their relationship to plant safety, and should hold a valid reactor operator or senior reactor operator license."

Comment: The requirement for verification personnel to hold a reactor operator license is unnecessarily restrictive. An SRO is presently required to operate taking equipment out of service. This same restriction also prevents qualified personnel outside the operating department (i.e., the policy assistance department) from assisting the operating department.

ATTACHMENT 2

Reg. Pos.	ANSI/ANS 3.2 Ref.*	Comment
12	5.2.8	<p><u>Requirement:</u> "In addition, where the surveillance testing and inspections are performed by personnel who are not members of the quality assurance organization, the quality assurance organization should review and concur in the selection of personnel who perform the surveillance testing and inspections..."</p> <p><u>Comment:</u> The requirement for quality assurance review and concurrence should exclude inspection and test personnel holding a valid reactor operator or senior reactor operator license. In addition, concurrence by the quality assurance organization should be limited to the quality assurance aspects of personnel qualifications; i.e., technical qualification remain the responsibility of the certifying organization.</p>
16	5.2.17	<p><u>Requirement:</u> Where the inspections are performed by personnel who are not members of the quality assurance organization, the quality assurance organization should review and concur in the selection of personnel who perform the inspections should review and concur in the procedure associated with the inspection, and should perform audits to ensure that the inspections have been accomplished in accordance with those procedures.</p> <p><u>Comment:</u> Concurrence by the quality assurance organization should be limited to the quality assurance aspects of personnel qualification; i.e., technical qualifications remain the responsibility of the certifying organization.</p>
25	Appendix A	<p><u>Requirement:</u> "The guidelines (indicated by the verb 'should') of the draft on ANSI N18.7/ANS 3.2 contained in the following sections have sufficient safety importance to be treated the same as the requirements (indicated by the verb 'shall') of the standard:</p>

ATTACHMENT 2

<u>Reg.</u> <u>Pos.</u>	<u>ANSI/ANS</u> <u>3.2 Ref.*</u>	<u>Comment</u>
28	Appendix A(Cont'd)	<p>...h. Appendix A--The guidelines in the introductory paragraph (page 121) concerning (1) coverage by written procedures of the typical activities addressed in the Appendix and (2) coverage by procedures of many other activities carried out during the operational phase of nuclear power plants that are not included in the Appendix."</p> <p><u>Comment:</u> The use of the mandatory "shall" appears to be inconsistent with deletion (from ANS 3.2*, Appendix A) of the term "safety related: (activities) presently contained in Appendix A of Regulatory Guide 1.33, revision 2. The term "safety related" or "activities affecting nuclear safety should be reinserted in the introductory paragraph of ANS 3.2*, Appendix A.</p>