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Regulatory Publications Branch
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Office of Administration
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: NRC Regulatory Guide 1.28
"Quality Assurance Program Requirements"
Bechtel Comments to Proposed Revision 4
File: QAS-93/011

As solicited by the NRC, we are submitting the following comments to the proposed Revision 4 to Regulatory Guide 1.28.

1. Section B, DISCUSSION, contains material which goes beyond the intent of the Regulatory Guide process and which should, if that is the NRC's position, be contained in Section C, REGULATORY POSITION. Specifically, following the discussion on Regulatory Position 7, the application of Supplement 3S-1 of NQA-1 to procurement documents is incorrect. Supplement 4S-1 currently requires that reviews of procurement documents, and changes thereto, be performed by personnel who have an adequate understanding of the requirements and intent of the procurement document. Accordingly, if the contents or changes involve technical requirements, the design organization should review them. There is no need to invoke review in accordance with 3S-1 and it is recommended that the material on the application of 3S-1 to procurement documents be deleted from Section B.
2. The requirement for annual evaluation of suppliers based on direct observation of the operation of the suppliers' quality assurance program in Regulatory position 3.2.2 will have an impact. This will put a tremendous burden on A/E and construction firms since procurement activities in the current "non-construction" atmosphere do not take place continually. Therefore, in absence of an active contract with a supplier, direct observation of supplier's work is difficult, costly, and not feasible. In view of these limiting factors, annual evaluation of suppliers should not include direct observation of



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the operation of the suppliers' quality assurance program as a criteria.

3. Is it the intent, in the introductory paragraph of Regulatory position that those licensees who have committed to ANSI/ASME N45.2 will have to follow Revision 2 of Regulatory Guide 1.28, since the supplementary requirements and/or modifications to ANSI/ASME N45.2 are included in Revision 2 and not in Revision 3 or 4?
4. The applicability of the Regulatory Guide is extended in "Introduction" to modifications and decommissioning. In Regulatory Position C, Section 2.2, nonpermanent record re required to be kept for at least 3 years after completion of the activity and at least until the date when full-power operation begins. What is the criteria for determining "the date when full-power operation begins" for modifications to operating plants and decommissioning?

If you have any questions concerning the above comments, please contact me at (301) 417-3777.

Sincerely yours,

BECHTEL CORPORATION



H. Hollingshaus
Manager of Quality Assurance

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