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COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Regulatory Publications Branch DFIPS
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, CD 20555

Ancillary to the Colorado Department of Health's role as observer/participant in decommissioning at Public Service Company of Colorado's Fort St. Vrain Nuclear Generating Station, the following comments are offered on Draft Regulatory Guide DG-1010 circulated November 24, 1992.

1. Alternative 2, to endorse NQA-1-1989 and NQA-1b-1991 as soon as possible, appears prudent and helpful.
2. As suggested on page 1 of Mr. Sheron's 11/24/92 letter, advantages will accrue from "...using a single regulatory guide to provide uniform guidance on quality assurance programs for a broad range of activities..." In this regard, separately providing a forthcoming guide for types and disposition of decommissioning records (p. 4) appears to contradict the recognition in the Introduction (p. 1) that Appendix B to 10 CFR Part 50 includes decommissioning and (p. 2) that decommissioning is within the scope of Rg 1.28 Rev. 4. The advantage of a unified Table 1 would seem to be lost.
3. Despite mention of a "broad reorientation and update" of NRC's quality assurance approach, no meaningful discussion or citation, in the introduction or elsewhere, presents the potential implication of "risk-based techniques" (Sheron letter, p. 1) or of more "performance-based" quality assurance. The experience and reasoning that explains why NRC has "... reduced its emphasis on program, placing more emphasis in performing activities..." (p. RA-1) should be cited in the introduction.
4. How will NRC achieve "... keeping the endorsement of NQA-1 up to date by more frequent revisions of this guide..." (page RA-4), given the difficulties discussed in relation to Alternative 3 (page RA-5)?
5. The draft guide makes no mention of International Standards Organization (ISO 9000, 9001) quality requirements, nor is the relationship of quality assurance to quality control, quality improvement or quality management introduced.

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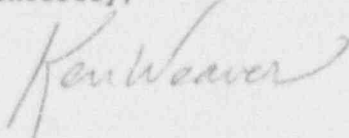
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I hope these comments from the perspective of a "downstream" consumer/observer of guidance modelled on NQA-1 (in low-level radioactive waste guides) are of use. Anachronistic regulatory guidance certainly has made planning for decommissioning more difficult at the Fort St. Vrain facility.

Thanks for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ken Weaver".

Kenneth L.K. Weaver
Senior Health Physicist
Radiation Control Division

KLKW/cnh