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U. S. Nuclear Regulatory Commission
Office of Administration,
Regulatory Publications Branch,
Division of Freedom of Information and
Publications Services
Washington, DC 20555

Gentlemen:

Subject: Southern California Edison's Comments on the Proposed Revision 4
to Regulatory Guide 1.28, "Quality Assurance Program Requirements"
(DG-1010)
San Onofre Nuclear Generating Station Units 2 and 3

Reference: Letter, dated November 24, 1992, B. W. Sheron, "Specific Issues
for Comment"

The purpose of this letter is to provide the NRC Southern California Edison's (SCE) comments on the proposed revision 4 to Regulatory Guide 1.28. Comments were specifically solicited in the areas of risk-based application of QA requirements, annual supplier audits, and application of this standard to nuclear facilities other than power reactors.

SCE endorses the NRC's interest in incorporating risk-based techniques into the quality assurance program. We agree that the quality assurance efforts on structures, systems and components (SSC) should be tied to their importance to safety. Equipped with the results of the Individual Plant Examinations or "living" PRAs, each utility should be able to evaluate a plant SSC (or program) to determine its relative contribution to plant risk as well as the sensitivity of plant risk to it. Utilities should be encouraged to petition the staff for reduced surveillances, audits, and component procurement requirements based on low safety impact.

Similarly, utilities should be encouraged to increase attention paid to components, activities, or programs which their risk analyses indicate are more important. SCE has utilized risk assessments of refueling outages in the past to identify activities and SSCs with higher risk and has increased quality assurance attention accordingly.

In regard to Regulatory Position 3.2.2, the new requirement of basing the annual evaluations on directly observing work performed by the supplier seems to imply that visits to a suppliers facility are required on an annual basis. This additional audit burden would have a significant impact in relation to utility expenses without corresponding safety benefit. Regulatory Guide 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants," does not require annual visits to the supplier's facility, but provides for various methods of supplier evaluation (including supplier audits). Annual audits should remain an option, in keeping with the principle of "consistent with its importance to safety." We believe that Regulatory Position 3.2 is unnecessarily proscriptive and should be deleted from this document.

Regarding the Commercial Grade Issue, Regulatory Position 5, SCE believes it is premature to reference these positions in a Regulatory Guide. The NRC is presently conducting meetings with utilities in an effort to determine an appropriate position and intends to issue a new position paper at that time as well as conducting a utility workshop.

SCE does not foresee any problems in expanding the Regulatory Guide to other nuclear facilities. The use of a single Regulatory Guide to provide uniform guidance to all "facilities" would simplify the process and possibly avoid confusion and/or problems when facilities are operating to different guidelines.

Sincerely,

Harold C. Marsh