

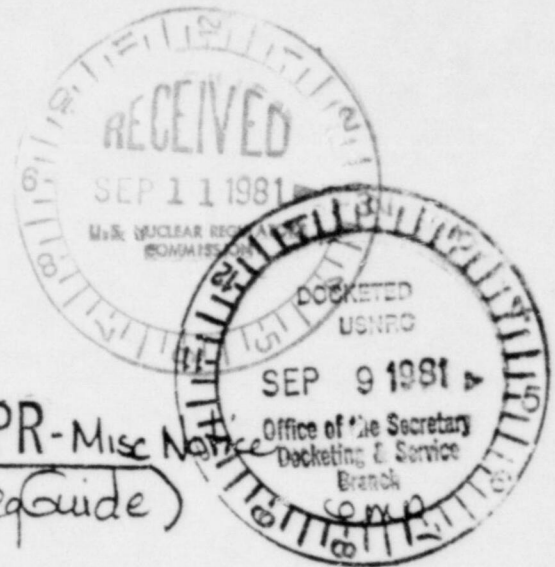


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September 1, 1981

DOCKET NUMBER
PROPOSED RULE

PR-Misc Notice
(RegGuide)



Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20553

Attention: Docketing and Service Branch

The Atomic Industrial Forum's Committee on Power Plant Design, Construction and Operation has reviewed proposed Revision 3 to Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)", and offers the following comments.

The industry standard ANSI/ASME NQA-1, is a consensus document in which the NRC participated. There are many exceptions in the proposed revision to the regulatory guide. It is not in the best interest of safety to have an industry approved standard endorsed by a regulatory guide which then sets forth an extensive set of additional technical requirements. This would indicate that there are serious problems between the ASME/NQA Committee and the NRC that should be resolved prior to the formal promulgation of their respective documents.

The previous N45.2 and daughter standards were incorporated into NQA-1. It is our understanding that the intent of NQA-1 was to consolidate these several programmatic standards to avoid redundancy, but without changing the intent. The regulatory guide changes the intent and could cause major perturbations to ongoing programs.

Also, we take exception to the many areas where NRC has changed guidance to requirements. We believe the NRC has taken an excessively rigid stance and has not demonstrated the necessity to change "shoulds" to "shall".

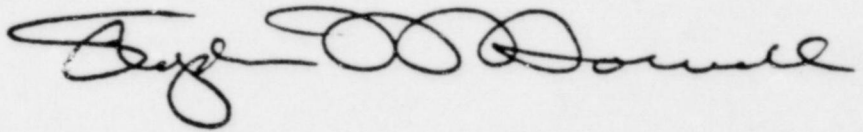
We are of the opinion that NQA-1 is a satisfactory document as written. However, if the NRC still feels that changes are warranted, then we recommend that the NRC and NQA-1 Committee

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5/10 Add: Ed Hill
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hold joint meetings for the purpose of resolving these differences before any revision to the regulatory guide is issued. If any further changes are to be made to NQA-1 as a result of such negotiations they should be based on sound technical rationale.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen H. Howell". The signature is fluid and cursive, with a large initial "S" and "H".

Stephen H. Howell, Chairman
Committee on Power Plant Design,
Construction and Operation

SH:beu

cc: J. E. Vessely, Chairman
NQA Committee, ASME