



Carolina Power & Light Company

DEC 14 1984

SERIAL: NLS-84-508

Mr. Stephen M. Goldberg  
Quality Assurance Branch  
Division of Quality Assurance, Safeguards, and Inspection Programs  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

REFERENCE: Issuance for Comment of Quality Assurance Guidance  
Related to Anticipated Transients Without Scram  
Equipment that is not Safety-Related

Dear Mr. Goldberg:

Carolina Power & Light Company has reviewed the proposed generic letter referenced above. Several general comments follow; detailed comments are attached.

The proposed guidance goes well beyond the scope originally specified for the Quality Assurance (QA) of non-safety-related Anticipated Transients Without Scram (ATWS) equipment. The Company agrees with the proposed letter's statement that "... as a general matter the quality practices now applied to non-safety-related equipment would be adequate for non-safety-related equipment encompassed by the ATWS rule." The letter goes on to state the NRC's desire to "... minimize the proliferation of QA programs as opposed to the establishment of new and separate QA programs for non-safety-related equipment." Carolina Power & Light Company agrees with the goal of minimizing QA program proliferation. The proposed letter, however, then goes on to contradict this goal by setting forth guidelines which will either result in the setting up of a separate QA program for the ATWS equipment or in the imposition of clearly excessive QA requirements through the safety-related QA program. Once again, the Company supports the NRC's findings that industry already has acceptable programs in place for non-safety-related equipment and concludes that the expanded scope described in the proposed generic letter is unjustified.

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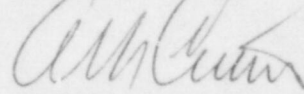
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Mr. Stephen M. Goldberg

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Specific comments are detailed in the attachment. If you have any questions concerning this letter, please contact Mr. S. R. Zimmerman at (919) 836-6242.

Yours very truly,



A. B. Cutter - Vice President  
Nuclear Engineering & Licensing

ABC/ccc (935PPC)

Attachment

cc: Mr. H. R. Banks  
Mr. G. P. Beatty  
Mr. C. S. Bohannon  
Mr. P. P. Carrier  
Mr. G. S. Cashell  
Mr. N. J. Chiangi  
Dr. T. S. Elleman  
Mr. K. E. Enzor  
Mr. R. J. Fasnacht  
Mr. S. D. Floyd  
Mr. P. W. Howe

Dr. J. D. E. Jeffries  
Mr. S. A. Laur  
Mr. D. C. McCarthy  
Mr. C. L. McKenzie  
Mr. C. H. Moseley  
Mr. D. C. Stadler  
Mr. R. A. Watson  
Mr. S. R. Zimmerman  
File: R-2-0205  
B-X-0202  
H-X-0210

Carolina Power & Light Company's specific comments to the referenced proposed Generic Letter are broken into two major sections: First, comments on the proposed body of the Generic Letter are addressed; Secondly, specific comments are provided on the proposed summary of the QA guidance.

Comments on the Generic Letter

1. In general, the guidance goes beyond the scope specified in the statement of considerations associated with the ATWS rule. In that statement the explicit Quality Assurance guidance which the staff was to provide was limited to eight sections/criteria of Appendix B as they are associated with the areas of testing, maintenance and surveillance. In the NRC staff's proposed generic letter, requirements are specified (including requirements specified by "if" and "provided" statements) for 1) organization; 2) QA program; 3) design control; 4) procurement document control; 5) control of purchased items and services; 6) identification and control of purchased items; 7) control of special processes; 8) handling, storage and shipping; 9) nonconformances; and 10) audit in addition to those associated with testing, maintenance and surveillance. It should be noted that the generic letter imposes portions of all eighteen sections/criteria of 10CFR50 Appendix B. This expanded scope is not justified or warranted. In fact, the NRC staff's conclusion that quality practices now applied to non-nuclear safety related equipment would be adequate for non-safety related equipment encompassed by the ATWS rule supports the position that this expanded scope is not necessary.
2. Contrary to the NRC staff's stated desire to minimize the proliferation of QA programs, this proposed generic letter could be misconstrued to encourage utilities to either establish separate QA programs for non-safety related ATWS equipment or impose excessive QA requirements through their safety related QA program.
3. The letter provides exceptions to the Appendix B criteria with provisions that line management be responsible for program control, inspections, test control, corrective action and audits. The statement is then made that "In summary the staff concludes that either the application of QA controls based on the guidance in this letter or application of Appendix B requirements in their entirety is an acceptable method for satisfying NRC requirements." This does not allow for other acceptable alternatives such as the QA organization providing the necessary controls but without the application of Appendix B requirements in their entirety.

Comments on the Summary of QA Guidance

The Company does not see the need for the "Summary of QA Guidance" and it should be eliminated; the body of the Generic Letter is sufficiently well defined. The Summary of QA Guidance does not summarize the statements in the body of the letter, but makes additional guidance statements which go beyond



the statements in the main letter. The comments below are examples of this problem and should be considered in the event you do not eliminate the summary altogether.

1. The Summary of the QA Guidance contains the following which are inconsistent with the body of the letter:

Requirement III, "Design Control," requires supervisor's "safety evaluation" whereas the body of the letter states (p. 3 of 11) "no design verification other than normal supervisory review." The summary requirement should be reworded to state that "normal supervisors review is sufficient."

Requirement VIII, "Identification and Control of Purchased Items and Services," contains the phrase "i.e., traceability from receipt at plant." This infers a different meaning than the statement in Appendix B which allows identification of items by records traceable to the item. Also, Appendix B indicates the purpose of this identification is to prevent the use of incorrect or defective materials, parts and components. If the term "traceability" were replaced with the phrase "material control starts" this concern would be resolved.

Requirement X, "Inspection," contains the statement "Verify conformance to documentation" which has a different meaning than the Appendix B requirement to "verify conformance with documented instructions, procedures and drawings" and the guidance statement is not clear on what documentation is meant.

Requirement XI, "Test Control," requires test "prior to installation" which goes beyond what is required for some safety related items since Appendix B uses the phrase "as appropriate."

Requirement XIII, "Handling, Storage and Shipping," requires measures in accordance with "manufacturers recommendations" which is not required by Appendix B and does not give the utility appropriate flexibility in cases where manufacturers may be overly conservative.

Requirement XVI, "Corrective Action," requires measures to preclude repetition for conditions adverse to quality. Appendix B requires action to preclude repetition for significant conditions adverse to quality.

2. The summary of QA guidance for Requirement IV requires measures to assure QA requirements are included in procurement documentation. Since contractors and subcontractors are not required to establish QA controls, it is not apparent what QA requirements are required to be included in procurement documentation.
3. Footnote 1 to the summary of QA guidance states that "the utility is responsible for ensuring that design control measures are applied at contractor or subcontractor organizations" which could be interpreted to imply that a contractor QA program and utility QA audits would be required. This would be contrary to the statement in the body of the letter that "contractors and subcontractors are not required to establish QA programs as a condition of the contract."

4. Requirement X of the summary of QA guidance, "Inspection," should clarify that inspection could be performed by the line organizations.
5. Requirement XI, "Test Control," Guidance suggests tests periodically. It is not clear if this means these tests should be covered by In-Service Inspection or Operation Surveillance Testing programs.
6. Requirement XVII, "Corrective Action System," should be reworded to state: "Establish measures for prompt correction of significant conditions. . ."