

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

April 16, 1985

TO ALL POWER REACTOR LICENSEES AND ALL APPLICANTS FOR POWER
REACTOR LICENSES

Gentlemen:

SUBJECT: QUALITY ASSURANCE GUIDANCE FOR ATWS EQUIPMENT THAT IS
NOT SAFETY-RELATED (Generic Letter 85-06)

On June 1, 1984, the Commission approved, publication of a final rule, 10 CFR 50.62, regarding the reduction of risk from anticipated transients without scram (ATWS) events for light-water cooled nuclear power plants (49 FR 26036). At the same time, the Commission directed the staff to complete and issue in the form of a generic letter explicit quality assurance (QA) guidance for non-safety-related equipment encompassed by the ATWS rule. Section 50.62(d) of the ATWS rule requires that each licensee develop and submit (to the Director of the Office of Nuclear Reactor Regulation) a proposed schedule for meeting the requirements of the rule within 180 days after issuance of the QA guidance. The NRC staff issued a proposed generic letter in the Federal Register (49 FR 44337) on November 6, 1984. The staff has considered the comments from 22 interested parties that were received by December 31, 1984, and has revised the proposed generic letter.

To develop QA guidance for non-safety-related ATWS equipment, the NRC staff both surveyed quality practices applied to non-safety-related equipment at some operating nuclear power plants and reviewed the comments from utilities, industry organization, and other concerned parties. As a result, the staff continues to view the observed industry practices as acceptable for non-safety-related ATWS equipment. The practices that were observed during the plant visits or were described by utilities in their comments generally consisted of the application of quality controls comparable to selected portions of their Appendix B program. However, utility procedures and practices did not specifically reference such controls as Appendix B requirements.

The QA controls in Appendix B to 10 CFR 50 describe one form of a comprehensive management control system for a complex task. While Appendix B describes only one such system, licensees and applicants have expressed a desire to minimize proliferation of different kinds of management control systems for their plants. The NRC staff concurs with this desire not to establish new and separate management control systems for non-safety-related ATWS equipment.

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Accordingly, Appendix B is viewed as a useful reference in which to frame the staff's guidance for non-safety-related ATWS equipment. However, this does not mean that the Appendix B QA program, including the adopted regulatory guides and the industry standards, or an equivalent to such a program is required to meet the intent of this generic letter. Further, the use of Appendix B as a reference does not indicate that the guidance in this letter imposes any Appendix B requirements on non-safety-related ATWS equipment, and, therefore, NRC would not judge compliance with this generic letter by using Appendix B or its associated regulatory guides. Instead, NRC's inspections will focus on the implementation and effectiveness of the quality controls whose attributes are described in this letter.

The enclosure to this letter provides the explicit QA guidance required by 10 CFR 50.62. The lesser safety significance of the equipment encompassed by 10 CFR 50.62, as compared to safety-related equipment, necessarily results in less stringent QA guidance. We have incorporated this lesser degree of stringency by eliminating requirements for involvement of parties outside the normal line organization and requirements for a formalized program and detailed recordkeeping for all quality practices.

Issuance of this QA guidance shall be considered the reference date initiating the schedule in 10 CFR 50.62(d).

Reporting requirements relating to the ATWS rule are presented in 10 CFR 50.62. There are no additional reporting requirements associated with this letter.

Information collection requirements under the ATWS rule were approved by the Office of Management and Budget under clearance number 3150-0011, which expires April 30, 1985 (49 FR 26036, p. 260441). Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management, Room 3208, New Executive Office Building, Washington, DC 20503.

Sincerely,

Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation

Enclosure:
QA Guidance
List of Generic Letters