

Regulatory Guide Periodic Review

Regulatory Guide Number: 1.28, Revision 4

Title: **QUALITY ASSURANCE PROGRAM CRITERIA
(DESIGN AND CONSTRUCTION)**

Office/division/branch: NRO/DCIP/QVIB
Technical Lead: Ashley Thomas

Staff Action Decided: **Reviewed with issues identified for future consideration**

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

The NRC issued RG 1.28, Revision 4, in June 2010. The methods described in Revision 4 are generally equivalent to the methods described in Revision 3, which endorsed NQA-1-1983 through the NQA-1a-1983 Addenda. Revision 4 extends the scope of the NRC's endorsement to include NQA-1, Part II. Part II contains amplifying QA requirements for certain specific work activities that occur at various stages of a facility's life. The work activities include, but are not limited to, management, planning, site investigation, design, computer software use, commercial-grade dedication, procurement, fabrication, installation, inspection, and testing.

The NRC staff performed a review and identified that differences exist between the previously endorsed guidance (NQA-1-2008 and NQA-1a-2009 addenda) and the most recently issued guidance from the American Society of Mechanical Engineers (NQA-1b-2011, NQA-1-2012 and NQA-1-2015). Additional time and resources are required to understand the impact of these changes. The NRC staff continues to endorse the previous guidance and is not aware of any issues that would preclude its use.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

New and updated guidance has become available in the form of NQA-1b-2011, NQA-1-2012 and NQA-1-2015. There are no known issues identified with the current guidance, NQA-1-2008 and NQA-1a-2009 addenda. Therefore, any impact on internal or external stakeholders should be minimal.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

NRC staff requires approximately 0.5 FTE, over a period of two years, to complete a technical evaluation of the differences between (NQA-1-2008 and NQA-1a-2009) and the latest three revisions (NQA-1b-2011, NQA-1-2012 and NQA-1-2015). The two-year time frame provides sufficient resources to revise the RG if necessary. No contractor support is anticipated.

- 4. Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Reviewed with issues identified for future consideration.

- 5. Provide a conceptual plan and timeframe to address the issues identified during the review.**

A comparison of (NQA-1-2008 and NQA-1a-2009 addenda) against (NQA-1b-2011, NQA-1-2012 and NQA-1-2015) has been completed. Over the next two years, a technical review of the identified differences will be conducted. The results of this evaluation will be used to inform a decision on whether to revise RG 1.28, or not. Additionally, these results will be used to inform decisions regarding any potential endorsement of the new guidance.

NOTE: This review was conducted in April 2015 and reflects the staff's plans as of that date. These plans are tentative and are subject to change.