

Subject: Comments on Draft DOE G 424.X

I. INTRODUCTION

2nd paragraph: The second sentence adds nothing beyond what is in the first sentence and in fact is confusing as written. Delete the second sentence.

II. APPLICATION

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3. TESTS OR.....

Since test and experiments are simply new, temporary operations, and considering the titles of the first two subsections, we suggest the following as a replacement subsection, including the title:

3. TEMPORARY OR PERMANENT CHANGES TO THE OPERATIONS

Written USQ determinations are required for new or modified operations not described in the existing safety analyses. New or modified operations should be broadly interpreted to include tests and experiments. For preoperational tests, surveillance tests, functional tests, and startup tests that are performed regularly, USQDs are not required every time a test is performed. However, one-of-a-kind tests used to measure the effectiveness of new techniques or a new system configuration that might be reasonably expected to affect safety SSCs will require evaluation before they can be conducted. Postmodification testing should be considered and included in the USQD for the modification.

4. DISCOVERY.....

First sentence; delete the last phrase - "or may be otherwise inadequate." It seems that the first part of the sentence is all inclusive and there is not a need for this "catch-all" phrase.

Next to last paragraph, last sentence; replace with: "*The USQ process starts when facility management has information that gives reason to believe that the Documented Safety Analysis might be inadequate.*" The reasoning for this minor word change is that "the potential" coupled with "might be" would tend to include anything possible as opposed to what might reasonably be expected based on professional judgment.