

EW ELLIS & WATTS

May 9, 1997

Mr. Anil Gautam
U.S. NRC
11555 Kockville Pike
Rockville, MD 20852-2738

Subject: E&W Commercial Dedication Procedure ENG-109

Dear Mr. Gautam:

As you are aware, Ellis & Watts has been working with TVA to resolve issues regarding our Commercial Grade Dedication Procedure. In our last revision of ENG-109, Rev. 4 (currently in your possession), we added the following section to paragraph 5.1D:

"Materials, in most cases, will be listed as a critical characteristic. The function and application of the commercial grade items will be reviewed with respect to the seismic and environmental conditions to determine whether material is a critical characteristic."

We have now received the attached letter from Mr. Frank Tanner of TVA dated May 1, 1997 requesting E&W to revise paragraph 6.1.C. Our proposed revision is to change the word "identified" to "considered" in paragraph 6.1.C. I have included an additional copy of ENG-109 for your easy reference.

Please advise whether this change is warranted or E&W's procedure should remain as stated that "materials of construction must be identified as a critical characteristic".

In regard to the general TVA comment, E&W will revise paragraph 4.2.5 to read "Independent technical review of the Commercial Dedication Plan will be provided by Engineering and Quality Assurance". Please provide your recommendations at your earliest convenience.

Best regards,

ELLIS & WATTS



Richard D. Porco
Senior Director
Thermal/Power Plant Products



RDP:jhy
9705160063 970509
PDR ADOCK 05000259
P PDR