

813-79

Docket No. 99900109/79-01

Pittsburgh-Des Moines Steel Company
Eastern Division-Neville Island
Attn: Mr. B. J. Hughes
Quality Assurance Manager
Neville Island
Pittsburgh, PA 15225

Gentlemen:

Thank you for your letter of July 20, 1979, in response to our letter dated June 15, 1979. As a result of our review, we find that additional information is needed, as discussed with you in our telephone call on July 31, 1979. The additional information needed is in regards to item C of the Notice of Deviation. Your response that there was no evidence that the PDM Quality Program had been violated, and no further action is necessary, is unacceptable for the following reason.

1. Your Engineering Department's evaluation, and determination that the wiring in question was light wiring, and therefore not covered by the part of the Customer's specification, identified in the citation, did not consider the fact that the conductors of the light circuits, are conductors of electrical penetration of the access opening of the containment structure as defined by IEEE-317.
2. IEEE-317-1976, paragraph 4.1, Service Classification, states in part; "The conductors of each circuit of an electric penetration assembly shall be assigned one of the following service classifications based on its use. - -
 4.1.2 Low Voltage Rower
 4.1.3 Low Voltage Control,
 - - - -"
3. In compliance with the above, the customer's specification at paragraph 8.5.3,k, reiterates that there are but three (3) electrical penetrations, 1-power, 1 control and 1 communication.

Please note that neither the IEEE standard or the specification provides for a service classification for lights, but rather the lighting circuits, to be in compliance with the code and with the customer's specification, would be assigned a service classification of being power conductors for general illumination lighting, or control conductors for those light circuits whose functions are to provide warning indications, or display the status of control units; regardless as to whether the controls themselves are completely mechanical or electrical.

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To substantiate your claim that the customer waived the requirement for the verticle flame test, and has approved the wire, as ordered, as being acceptable for the intended service, it will be necessary for you to submit appropriate documentation supporting this statement.

We have no further questions relating to items A, B and D in the Notice of Deviation.

Please provide the additional information within twenty (20) days in order that we may complete our review in a timely manner.

Sincerely,

Uldis Potapovs, Chief
Vendor Inspection Branch

bcc
Central Files
PDR HQS
WEVetter
JWSutton

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