

J. E. Lonergan COMPANY MANUFACTURERS OF SAFETY-RELIEF VALVES

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ESTABLISHED
1872

June 13, 1980

Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76012

Subject: Docket No. 99900245/80-01

Gentlemen:

We appreciate your comments regarding fillet radii on our 150 lb. Valve Bonnet, however, we do not believe the specific part deviated from Drawing B-2460 Rev. 9, (attached) or deviated from Code Paragraph NB-3544.1 (c) of Section III.

1. The 5/16 inch radius is a casting dimension which may be partially removed when backfacing a flange. Dimension tolerance on the drawing remove 1/8" of the radius.
2. The radius for all shop tool bits is greater than or equal to 1/32 inch, unless otherwise specified. Since the backfacing is done to provide a flat surface for the stud nuts, this backface would be considered typical of features shown in Figure NB-3544.1(c)-1. The requirements of this Figure allows the 1/32 inch radius to be used with machining depths of .31" maximum and minimum wall thicknesses of 0.625" maximum. Per Table NB-3542-1 the 1/32" R tool bits would be useable on all Class 150 and Class 300 components sold as catalog items by J. E. Lonergan.

Since the backfacing operation removes only a small amount of metal from the cast radius, we do not consider the flange forming details of Appendix XI Figure XI-3120-1 "GENERAL NOTE" as applicable to the subject Valve Bonnet. However, we are reviewing our detail drawings and incorporating the "GENERAL NOTE" requirements if applicable, to avoid any future differences of interpretation of these subject Code Paragraphs and Figures.

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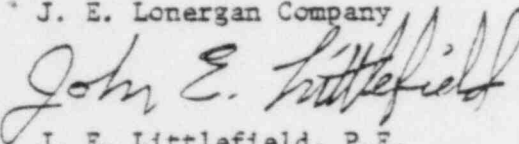
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3. Since we did not consider the backfacing machining details as a deviation no Defective Material Report would have been written; and
4. Since the as-built condition did conform with the drawing, no reconciliation required in Article NCA 3554 of Code Section III would have been necessary.

Again, gentlemen, we appreciate your review and clarifications as this helps us produce a better product.

Respectfully,

J. E. Lonergan Company

J. E. Littlefield, P.E.
Engineering Manager

JEL/rb