

September 12, 1989

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Mr. Anil S. Gautam
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: ASME Section III Component and Replacements
NRC Generic Letter 89-09 (8 May 89)
"N" Stamp Air Cooling Coil Availability

Dear Mr. Gautam:

American Air Filter/SnyderGeneral Corporation continues to hold valid "N" and "NPT" ASME Certificates of Authorization numbers N-2661 and N-2662 for AAF design, manufacture, testing, and stamping of air to liquid heat exchangers in accordance with ASME Section III Classes 2 and 3.

Therefore, there is no need to derate or downgrade cooling coils or compromise with "dedicated" commercial cooling coils because of lack of an accredited ASME "N" stamp supplier.

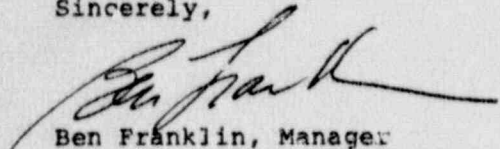
AAF has provided "N" stamped air cooling and heating coils to most U.S. and many foreign nuclear plants as original equipment, including the containment coolers for Three Mile Island which operated successfully continuously during and after the accident. AAF has also designed, manufactured, and tested equivalent coils to replace or upgrade those of other coil manufacturers who no longer maintain a valid "N" stamp. We maintain a full time staff to perform engineering, design, seismic analysis, quality assurance, manufacturing, and project management to assist Nuclear Utilities in the replacement of ASME code-stamped coils to ensure proper fit, function and performance. All work is done at AAF premises.

In addition, AAF performance calculations are based on full scale LOCA tests conducted by AAF on full scale AAF cooling coils as documented in AAF Topical Report TR-7101A accepted by the NRC.

It is commendable that the NRC has recognized that a problem does exist in the replacement of ASME Section III "N" stamped components. However, in the case of air cooling coils, compromises do not have to be made.

For additional information please contact me.

Sincerely,



Ben Franklin, Manager
Environmental Safety Systems

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