

LIFT TRUCK
FORKS
LARGE
FORGED FASTENERS



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TELEX NO. 980 508

February 19, 1981
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Nuclear Regulatory Commission
7920 Norfolk Ave.
Montgomery County
Bethesda, Maryland 20014

Attention: Mr. Walter Haass
Chief of Q.A. Branch



Dear Mr. Haass:

We would like your formal clarification and interpretation on the following subject matter. We would appreciate answers to be clear and to the point without questionable or vague interpretations since this subject matter has been misconstrued by outside pros to often in the past.

Dyson is a bolting manufacturer of large fasteners, (Studs, Nuts or Bolts). Our process can require us to either upset or hammer forge or machine from bar stock. Normally the material is purchased green (un-heat treated) and then up-graded to meet a particular SA material spec., which would include heat treating and performing tensiles, charpies, hardness, etc., whatever is required by the material spec.

Material is purchased under the following conditions and provisions:

- A. The Mill source has been surveyed and their Quality Assurance Program accepted for Melting Practice, Chemical and Physical testing, Manufacturing Process and Control of traceability as applicable to the services being purchased.
- B. Steel ordered (raw material to chemistry only) Per AISI specification and is bundled, tagged or stamped with applicable heat number.
- C. Our Quality Assurance Program provides for inspection upon receipt, verification of marking and performs random check analysis of one per heat to verify compliance to AISI grade ordered.

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- D. Our Quality Assurance Program provides a designated Code number to be stamped on each part upon start of manufacturing which represents the particular shop order and each heat number used on said shop order.
- E. All other tests are performed as required by the material spec. on each heat and lot of material - such as tensiles, charpies, hardness, etc.

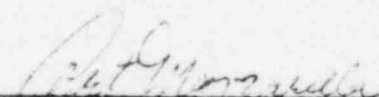
Under the current conditions and requirements of the ASME Code Section III - would the controls as stated above satisfy the rules governing up-grading of stock material by a Material Manufacturer of Bolting per NCA-3800, especially:

- A. Paragraph NCA-3867.4(e)
- B. Subparagraph (1) (a) of NCA-3867.4 (e)
- C. Subparagraph (2) of NCA-3867.4 (e)

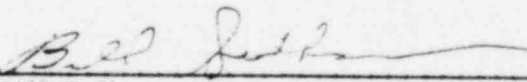
Your acknowledgement of receipt of this letter, with a positive reply of your interpretation is URGENTLY needed, since we have Many customer orders pending on your disposition.

Very truly yours,

JOS. DYSON & SONS, INC.



Art Mazzearella - Q.A. Manager



Bill Sulhan - Asst. Q.A. Manager

cc: ASME
United Engineering Center
345 E. 47th Street
New York, New York 10017
Attention: John Millman - Asst. Secretary of ASME