





JOS. DYSON & SONS INC. 53 FREEDOM RD , PAINESVILLE. OHIO 44077 . 216-946-3500 216-352-4421

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TELEX NO 980-508

Nuclear Regulatory Commission 7920 Norfolk Avenue Montgomery County Bethesda, Maryland 20014

Attention:

Mr. Walter Haass

Chief of Q.A. Branch

Subject:

Q.A. Program Requirements

Dear Mr. Haass:

In your letter dated March 19, 1981 to Art Mazzarella, you responded to what your thought was meant by his questions, but since the meaning or intent was misconrued - we would like to reword the same questions and get a clearer understandng and interpretation from you.

The questions are:

Item 4 from Dyson's 2-23-81 letter and NRC response letter dated 3-19-81: A .

Can Nuclear Q.A. Programs such as ANSIN45.2 or 10 CFR50 Appendix B Question 1: be used or substituted by our customers (whether these customers are first tier, second tier, or further down suppliers or organizations) to take the place of the Q.A. Programs of NCA-3800, since they do not direct any attention to qualifying of stock material as stated in NCA-3867.4(e)? NOTE: This is being directed as if the customer is calling for a "Code Item".

Your response letter of 3-19-81 states that when manufacturing of a Question 2: Code item, adherence to NCA-3800 is required (per 10CFR Part 50.55a)then could you define for our customer purposes - what is the definition of a "Code Item"?

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- B. Item 5 from Dyson 2-23-81 letter and NRC response letter dated 3-19-81:
- Question 1: If a customer directs an order to a bolting manufacturer that said order is to be manufactured in accordance with a nuclear quality program of ANSI N45.2 or 10CFR50 Appendix B
 - a) Does stock material qualifications per NCA-3800, Paragraph NCA-3867,4(e) apply if parts are to be manufactured as a Code item?
 - b) Does stock material qualifications per NCA-3800 Paragraph N 867.4(e) apply if the customer is calling out parts to tested and manufactured to ASME Sec. III to one of the following Subsections NB, NC, ND, NE, NF or NG?
- Question 2: Your response letter of 3-19-81 states that material controls used in the Code satisfies the requirements of ANSI N45.2/Appendix B but Dyson's question is whether Do the material controls of ANSI N-45.2/Appendix B for Code Items satisfy the same controls used for NCA-3800 & stock material controls of paragraph NCA-3867.4(e)?
- Question 3: Can a customer call out nuclear quality programs of ANSI N45.2 / Appendix B FOR CODE ITEMS instead of NCA-3800?

Your acknowledgement of receipt of this letter, with a positive reply of your interpretation is <u>URGENTLY</u> needed, since we have <u>Many</u> customer orders pending upon your disposition

Very truly yours,

JOS. DYSON & SONS, INC.

Bill Sulhan

Asst.Q.A. Manager

cc: ASME

United Engineering Center

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Attention: Mr. John Millman - Asst. Secretary