



**James C. White Company, Inc.**

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26 November 1990

Mr. Uldis Potapovs  
Acting Branch Chief  
Vendor Inspection Branch  
Nuclear Regulatory Commission  
Washington, DC 20555

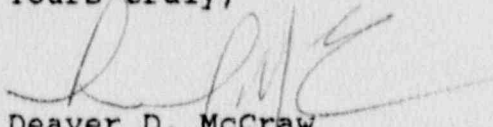
Dear Mr. Potapovs:

We hereby request that the NRC state its position on the following:

1. Is it necessary for a company which supplies safety-related items to the nuclear power industry to audit its suppliers of calibration services (other than the National Institute of Standards and Technology) for measuring and test equipment used in the production, inspection, testing, certification, etc., of the safety-related items?
2. In lieu of an audit, is it acceptable to review and evaluate the above calibration service supplier's qualifications and procedures?
3. If the NRC position on Question 1 above requires the material manufacturer to audit the calibration service supplier, please state the NRC position on ASME B&PV Code Interpretation III-80-132. A copy of this interpretation is attached for your convenience.
4. Is it necessary to invoke 10CFR21 on procurement documents for services such as those outlined in Question 1 above?

Thank you for your assistance in this matter. We look forward to hearing from you soon.

Yours truly,



Deaver D. McCraw  
Quality Assurance Manager

/pw

Attachment

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PDR 0A999 EMV JAWKI  
9901221 PDC

IE 09  
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ASME Boiler and Pressure Vessel Code  
An American National Standard

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INTERPRETATIONS

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No. 7  
Replies to Technical Inquiries  
January 1, 1980 through June 30, 1980

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**FOREWORD**

This publication includes all of the written replies issued between the indicated dates by the Secretarial Staff, speaking for the ASME Boiler and Pressure Vessel Committee, to inquiries concerning interpretations of technical aspects of the Boiler and Pressure Vessel Code. For the convenience of the reader, these are presented chronologically in groupings identified by the Code Sections to which they apply.

These replies are taken verbatim from the original letters except for a few typographical corrections and some minor editorial corrections made for the purpose of improved clarity. In some few instances, a review of the interpretation revealed a need for corrections of a technical nature; in these cases a corrected interpretation follows immediately after the original reply.

ASME procedures provide for reconsideration of these interpretations when or if additional information is available which the inquirer believes might affect the interpretation. Further, persons aggrieved by this interpretation may appeal to the cognizant ASME committee or subcommittee. As stated in the foreword of the Code documents, ASME does not "approve," "certify," "rate," or "endorse" any item, construction, proprietary device, or activity.

These replies apply to the latest Edition and Addenda at the time of the inquiry or the Edition and Addenda stated in the reply. Subsequent revisions to the rules may have superseded the reply.

THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS  
United Engineering Center    345 East 47th Street    New York, N. Y. 10017

**Interpretation: III-80-132**

Subject: Section III, Divisions 1 and 2, NCA-3866.3 Control of Purchased Material and Services

Date Issued: May 15, 1980

File: NI-79-263

Question: Is it a requirement of Section III, that suppliers of test equipment calibration and certification services to Material Manufacturers be audited by the Material Manufacturer?

Reply: No. However, Section III requires that Material Manufacturers be responsible for their test equipment, calibration, and procedures used. The Quality System Program of the Material Manufacturer shall describe the measures used to assure that purchased services are qualified to meet the requirements or the services to be performed.

**Interpretation: III-80-133**

Subject: Section III, Division 1, NCA-1280

Date Issued: May 15, 1980

File: NI-80-40

Question (1): Does Section III require that an NA stamp and nameplate be applied when component supports are attached by bolting to a component in the manufacturer's shop?

Reply (1): An NA stamp and nameplate is not required.

Question (2): Does Section III require that an N-5 Data Report Form be completed when component supports are attached by bolting to a component in the manufacturer's shop? If so, should the N-5 Data Report Form be modified to describe the shop assembly work?

Reply (2): An N-5 Data Report Form must be completed. Note that the N-5 Data Report Form was revised in the Summer 1979 Addenda to include shop assembly.

**Interpretation: III-80-134**

Subject: Section III, Divisions 1 and 2, NCA-3800 Quality System Program, NCA-2853 Evaluation of the Program

Date Issued: May 16, 1980

File: NI-79-243

Question: Is it permissible under the requirements of NCA-3800 for an N Certificate Holder to qualify a Material Supplier to survey, qualify, and audit the Quality System Program of a Material Manufacturer provided the Certificate Holder surveys, qualifies, and audits the Material Supplier's Quality System Program?

Reply: Yes.