

The Leader in Thermal Processing Technology

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February 4, 1994

Mr. Leif J. Norrholm
Chief, Vendor Inspection Branch
Division of Reactor Inspection and Licensee Performance
United States Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
1 White Flint North
Mail Stop 9D9
Washington, DC 20555

99901272

Dear Mr. Norrholm:

SUBJECT: Clarification of 10 CFR Part 21

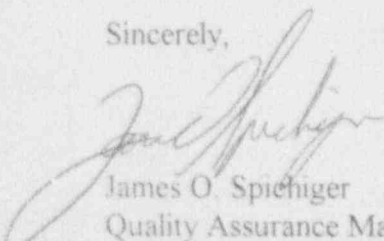
Cooperheat is a special process service contractor that provides on-site thermal processing (heat treating) to various industries. On occasion we will be contracted to perform our services at nuclear utilities. Our quality assurance program is in compliance with 10 CFR Part 50, Appendix B which automatically invokes 10 CFR Part 21 upon ourselves.

Since temperature control is vital to Cooperheat's service, we impose Part 21 requirements upon vendors who supply temperature measuring products (i.e., thermocouples and thermocouple wire) and calibration services. Our calibration vendors supply their services in accordance with Part 21 and MIL-STD-45662A. Please note that Section 5.6 of the military standard requires a contractor to notify the respective user if a significant out-of-tolerance condition is found.

Since Cooperheat imposes Part 21 upon our calibration vendor via a purchase order, is it necessary for that vendor to impose Part 21 via purchase order upon their calibration vendors? Can my vendor impose MIL-STD-45662A on his purchase order in lieu of Part 21? In some instances this vendor could be NIST. Neither my calibration vendor nor his calibration vendor has a quality program in compliance with 10 CFR Part 50, Appendix B.

Please send written correspondence to my attention at the address listed above. Should you have any questions regarding my inquiry, feel free to contact me at the above listed phone number.

Sincerely,


James O. Spiefiger
Quality Assurance Manager

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