



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 7, 1997

Mr. James Longenberger
5313 President Dr.
Toledo, OH 43611

Subject: YOUR LETTER OF APRIL 10, 1997, CONCERNING AUTHORIZED NUCLEAR
INSPECTION AGENCIES

Dear Mr. Longenberger:

This is in response to your letter of April 10, 1997, inquiring about Authorized Nuclear Inspection Agencies (ANIA) performing inservice inspections at nuclear plants in the United States.

The preface to your first question notes that Factory Mutual System is an Authorized Inspection Agency, but fails to meet the criteria stated in Section XI of the ASME Code, since they do not have authorization to write boiler and pressure vessel insurance in the state of Ohio. You, therefore, question how can they legally be authorized to do inservice inspections at the Davis-Besse and the Perry plants.

The NRC has determined that the ASME-accredited ANIA providing inspection services to the Davis-Besse and Perry nuclear power plants is Protection Mutual Insurance Company of Park Ridge, Illinois, d/b/a (doing business as) Factory Mutual Engineering Association, Norwood, MA. Protection Mutual Insurance Company is authorized to write boiler and pressure vessel insurance in the United States.

The last paragraph of your letter questions whether the NRC endorses these inspections and Factory Mutual Systems as meeting the legal responsibility for the Nuclear Regulatory Commission Requirements.

NRC does not endorse inspection agencies. Although Sections III and XI of the ASME Code (with modifications) are incorporated by reference into Section 50.55(a) of Title 10 of The Code of Federal Regulations, the interpretation of specific ASME Code requirements is the responsibility of ASME.

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It is our understanding that the broader issue of the "d/b/a companies" with respect to ANIA accreditation is currently being considered by the ASME Qualifications for Authorized Inspection (QAI) Committee. We recommend that you contact ASME for more specific information and/or interpretation of the ASME Code requirements related to organizational interfaces of accredited organizations.

If you have additional questions of the NRC concerning this issue, please contact Mr. John Craig at (301) 415-6982

Sincerely, ^{Original signed by} Samuel J. Collins

Samuel J. Collins, Director
Office of Nuclear Reactor Regulations

cc: Kenneth I. Baron, Secretary
ASME QAI Committee

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