



COOPER-BESSEMER RECIPROCATING

March 31, 1988

Our Ref: QCG-4577

Mr. Peter Prescott  
Reactor Engineer  
Nuclear Regulatory Commission  
Mailstop EWW332  
Washington, D.C. 20555

Subject: Interpretation of Regulations

Dear Mr. Prescott:

Currently our nuclear Q. A. program recognizes only two categories of components:

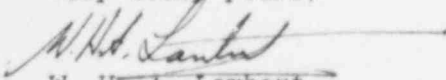
1. "Safety Related", referred to as "critical" by Cooper-Bessemer and concerning which a full "18 criteria" program applies.
2. "Commercial", to which the "18 criteria" program does not apply.

We are about to introduce a third category, "Commercial Qualified" which is defined as --- a standard commercial product requiring only traceability as evidenced by a Certificate of Conformance to ensure its compliance to the approved seismic, environmental, or similar qualification. Environmental and seismic qualification of a given item does not necessarily make such an item "safety related". No "safety related" parts will come under the "commercial qualified" classification.

For "commercial qualified" we will require from our vendor a Certificate of Conformance as assurance that no changes in the part(s) being purchased have been made which would negate the original qualification. Will it be necessary for us to perform a vendor survey (on a tri-annual or other basis) to support the validity of the C of C, or will we be able to rely solely upon past vendor performance and marketplace reputation?

An early response would be appreciated.

Very truly yours,

  
W. H. A. Lambert  
Manager, Q.C.

cc: T. W. Kearns  
R. L. Spetka  
File: K-5h

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