



KANSAS GAS AND ELECTRIC COMPANY

GLENN L. KOESTER  
VICE PRESIDENT-OPERATIONS

June 12, 1979

Mr. W.C. Seidle, Chief  
Reactor Construction and  
Engineering Support Branch  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76012

Re: (a) STN 50-482/Rpt. 78-13  
(b) Koester letter to Seyfrit 3/22/79  
(c) Seidle letter to Koester 4/26/79

Dear Mr. Seidle:

In your letter, Reference (c), you requested that, in addition to information which was provided in our initial response to Report 78-13, Reference (b), we provide the basis for our interpretation to finding No. 4 of Report 78-13.

Attached is a letter from Daniel's Mr. R.A. Bradshaw to Mr. Howard H. Newlon, who is the Chairman of ASTM Committee C-1 on Cement. In this letter Mr. Bradshaw requested a written interpretation of the intent of ASTM C-150, section 9, wherein time periods for testing are listed.

Also attached is Mr. Newlon's reply to Mr. Bradshaw dated May 24, 1979. We believe Mr. Newlon's reply with the interpretation previously provided by our A/E provides an adequate basis to conclude that the length of time used to conduct the user's test of cement samples did not violate ASTM C-150.

Yours very truly,

GLK:bb  
Attach

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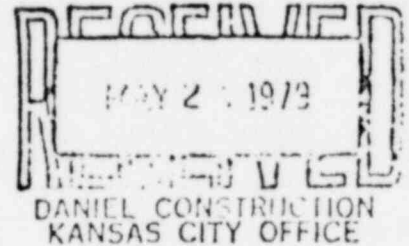
DANIEL CONSTRUCTION COMPANY  
DANIEL BUILDING  
GREENVILLE, SOUTH CAROLINA 29602  
(803) 298-2500

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MAY 29 1979  
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May 21, 1979

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Mr. Howard H. Newlon  
Virginia Transportation Research Council  
Post Office Box 3817  
University Station  
Charlottesville, Virginia 22903



Dear Mr. Newlon:

This letter is in confirmation of our telephone conversation of this date concerning interpretation of Section 9 of ASTM C-150. During a recent audit of Daniel Construction Company's construction activities at Kansas Gas and Electric Company's Wolf Creek Nuclear Power Plant Project the NRC cited a noncompliance with the requirements of Section 9 of ASTM C-150 in that some tests were not completed within the number of days as stipulated in Section 9. By this action the NRC has interpreted the number of days as being the maximum time permitted for completion of the tests.

Contrary to the above, Daniel had interpreted the number of days to be the minimum time which is to be allowed for a testing agency to sample the cement and complete the required testing before which test results can be required to be reported.

In order that an appropriate response can be made to the NRC audit finding a written interpretation of the intent of the time periods as stated in Section 9 of ASTM C-150 is requested from committee C-1. Your early response will be appreciated.

Yours truly,

R. A. Bradshaw, Jr.  
Manager Civil Technology

RAB:gop

cc: Leo Smith  
L. Pardi  
File 1-7.1

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ON  
CEMENT

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Box 3817, University Station  
Charlottesville, Virginia 22903  
File: 11.9.12

May 24, 1979

Mr. R.A. Bradshaw, Jr.  
Manager Civil Technology  
Daniel Construction Company  
Daniel Building  
Greenville, South Carolina 29602

Dear Mr. Bradshaw:

This is in response to your letter of May 21 asking for an interpretation of Section 9 of ASTM C-130. This section "testing time requirements" is Section 11 in the current version. According to my books it was Section 9 in the 1975 compilation. The wording is the same. The confusion arises clearly because of the statement "the following periods" without an indication as to whether these were minimum or maximum times. This question is being addressed by Committee C-1 as indicated later in this letter.

Based on my understanding of the history of this section and the actions currently being taken by Committee C-1, I will offer the following comment:

The times were included by Committee C-1 as guidelines to preclude a testing laboratory from taking samples, and then not proceeding expeditiously to initiate testing. In that sense they could be considered as minimum times, although I can see where they could likewise be interpreted as maximum times. In fact they were neither, but rather guidelines from which a testing agency and its client could negotiate. My own judgment is that they are closer to

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minimum time than so maximum time, and that the maximum time is a matter between the testing agency and the client. This matter is to be subsequently clarified as a result of actions currently in letter ballot of Committee C-1, the deadline date of which is June 1. While the outcome of this letter ballot is not applicable to your situation, it certainly clarifies the original intent of the sponsoring subcommittee.

The first action is to remove this section from C-150, and to place it as a requirement in C-183 "Sampling Hydraulic Cement", since it is clearly a matter of sampling and testing rather than the properties of the cement. The proposed wording in C-183 will appear as Section 5 as follows:

5. Testing Time Requirements

Cement Samples shall be forwarded to the testing agency within 48 hours of the completion of the sampling of a lot of cement. All tests required by the purchaser shall be in process within seven days of receipt of the samples by the testing agency.

This will clearly establish that the cement sample must be sent to the testing agency within 48 hours and that all tests must be in progress within 7 days of receipt of the sample.

This clearly is a minimum time requirement, and the maximum time for furnishing the test results would be a matter to be determined between the testing agency and the client. This is what I believe was meant all along.

By copy of this letter to Mr. L.U. Spellman, who is chairman of the subcommittee responsible for C-150, and to Mr. J.R. Dies, chairman of the subcommittee responsible for C-183, I am advising them of your inquiry, and should they wish to add any additional information, I would encourage them to do so.

I trust that this fulfills your needs and if I can add further clarifications, please let me know.

Sincerely,



Howard Newlon, Jr.  
Chairman, Committee C-1

HNJr/ea

cc: J.R. Dies  
L.U. Spellman  
K.C. Pearson

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