AMER
INDUSTRIAL
TECHNOLOGIES INC.

February 21, 1996

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Subject: 10CFR Part 21 - Notification re: Bechtel Job 21464
Calvert Cliffs Nuclear Power Plant
Diesel Generator Project
Bechtel P. O. CCDG 0065 and CCDG0767
Safety Related Fuel Oil Filters
Bechtel File No. DG80382 - CCDU-96/008

Reference: Letter - A.E.Amer (A.I.T.) to R.F. Yamrus (Bechtel) dated 2/5/96
Letter - R.F. Yamrus (Bechtel) to A.E.Amer (A.I.T.) dated 2/6/96

Sirs:

Based upon the above referenced letters and our review of the A.I.T. procurement documents associated with the oil filter cartridge used in the Fuel Oil Filters, we have concluded that the cartridge element and associated O-Rings may not have been properly qualified by commercial grade dedication activities as per Bechtel's latest requirement.

We are corresponding with Bechtel and B. G. & E. to determine the best methods to accomplish a proper commercial grade dedication.

A.I.T. is also to notifying Baltimore Gas & Electric and Bechtel Power Corporation via letter or fax of this condition.

Point of contact for this action item is A. E. Amer at (302) 652-3900. Should you have any further comments or questions, please refer them to myself.

Sincerely,

A.E. Amer
President

AEA:rsc

cc: N392 File
Part 21 File
QA Chron

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1000 S. MADISON ST., WILMINGTON, DELAWARE 19801 TEL (302) 652-3900 FAX (302) 652-6400

AMER
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TECHNOLOGIES INC.

February 5, 1996

Bechtel Power Corporation
Calvert Cliffs Diesel Generator Project
Job No. 21464
9801 Washingtonian Blvd.
Gaithersburg, Maryland 20878-5356

Attention: Mr. Ram Yelamanchi

Reference: Fuel Oil Transfer Filters
Specification No. SP-760 Revision 1
Procurement Specification DG-80382
Purchase Order No. CCDG0767
A. I. T. Project 523

Dear Mr. Yelamanchi:

Per the requirements of the above referenced procurement specification DG-80382, A.I.T. would like to identify the safety-related non-Code part of this contract as the filter cartridges. In accordance with the specifications A.I.T. will identify all steps taken to control the step by step processing of the cartridges

A.I.T. issued Purchase Order No. 20808 (copy attached for your review and information) to our vendor requiring strict compliance to the Bechtel Power Corporations procurement specifications, including but not limited to Certificate of Conformation, shelf life of the filter cartridge, engineering information (flow vs DP), storage requirements i.e. temperature, ultraviolet light, etc. Also, A.I.T. will issue their Certificate of Compliance to certify that we furnished these items in accordance with our Q.A. Program, your purchase order requirements and ASME B & PV Code Section III, Division 1, Class 3, 1986 Edition, no addenda, 10CFR21 applied.

Please advise A.I.T. of Bechtel's acceptance of this process. Should you have any further questions or comments, please contact me.

Sincerely,

AMER INDUSTRIAL TECHNOLOGIES, INC.

A. E. Amer
President

AEA:rsc

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Bechtel

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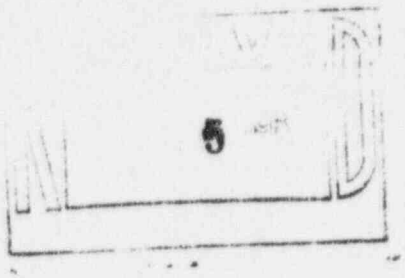

February 13, 1996

Mr. A. E. Amer
Amer Industrial Technologies
1000 S. Madison Street
Wilmington, Delaware 19801

Dear Mr. Amer:

Subject: Bechtel Job 21464
Calvert Cliffs Nuclear Power Plant
Diesel Generator Project
Bechtel P. O. # CCDG 0065 & CCDG 0767
Safety Related Fuel Oil Filters
Bechtel File Nos.: DG80382
CCDV-96/010

Our review of your letter dated February 5, 1996, and the information furnished with the letter, identified the following inconsistencies:

The Amer Industrial Technologies Inc. (AIT) Purchase Order No. 20808 furnished with the above letter does not appear to invoke safety related quality program requirements. Item 3 of Attachment B to the purchase order states that material shall be in compliance with ASME III, Class 3, 1986 Edition. However, the filter cartridges are exempt from the requirements of ASME III, since the filter cartridges are not associated with the pressure retaining function. Item 9 of Attachment B to the purchase order states that 10 CFR 21 applies to the order. Our review indicates that, there is no objective evidence that the sub-supplier had a safety related quality program, and implemented the program in the manufacture of filter cartridges.

Based on the information furnished with your letter, we can not make a determination, that the controls used by AIT in procurement of filter cartridges are acceptable. The only acceptable methods for procurement of safety related filter cartridges are, either to purchase them as safety related parts from an approved supplier with a ANSI N 45.2 (10 CFR 50, Appendix B) quality program, or to purchase them as commercial grade items and dedicate them for safety related application in accordance with EPRI NP-5652.

Further information in the following areas is necessary to determine the acceptability:

1. Did your sub-supplier, Norman Ultraporous Filters, have a approved safety related quality program?

2. Did Norman Ultraporous Filters acknowledge your purchase order as a safety related order and accept the reportability requirements under 10 CFR 21?

3. Did you procure the filter cartridges as commercial grade items?

4. If the filter cartridges were procured as commercial grade items, was a dedication plan consisting of critical characteristics, acceptance criteria and verification methods developed and implemented in accordance with EPRI NP-5652?

5. Was Bechtel filter data sheet included with your procurement documents? If it was not included, how did you provide the full range of design conditions including the viscosity to Norman Ultraporous Filters?

We request that you contact Bechtel to discuss the answers to the above questions and take the necessary actions to document the controls used in the procurement of filter cartridges in an expeditious manner.

Very truly yours,

R. F. Yamrus
Project Engineer

RY/ry

cc: Mr. C. R. Mahon
Mr. E. S. Broczkowski
Mr. F. J. Reedy