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June 14, 1985

Mr. Gary G. Zech
Chief Vendor, Program Branch
Division of Quality Assurance
Vendor and Technical Training Center
Programs
Office of Inspection and Enforcement
United States Nuclear Regulatory Comm.
Washington, DC 20555

Dear Mr. Zech:

With regard to your letter of 8 May 1985, the questions were brought before Subcommittees A01.09 and A01.10 at their recent meetings in Los Angeles, CA. The replies to these questions, noted below, were unanimously approved by the subcommittees:

QUESTION 1 (FIRST PARAGRAPH)

ANSWER: Yes. 20.5.5 and 15.5.1 are subheadings of 20.5 and 5.5, respectively.

QUESTION 2 AND SECOND PARAGRAPH OF QUESTION 1

ANSWER: The specifications do not require the measurement of wall thickness, except in 20.5.1 of A 106 and 15.5.1 of A 333.

Should you have further questions, please don't hesitate to contact me.

Very truly yours,

A handwritten signature in cursive script, reading "Earl R. Sullivan", is positioned above the typed name.

Earl R. Sullivan
Director, Standards Processing
Standards Development Division

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

MAY 8 1985

Mr. Ernest A. Jonas
Chairman
Subcommittee A-1.09
P.O. BOX 1428
Bethlehem, PA 18016

Dear Mr. Jonas:

During a recent inspection of a manufacturer of seamless pipe, a difference of opinion arose over the interpretation of the portions of ASTM A-106, A-333, and A-530 dealing with minimum wall thickness. I am requesting that you provide an interpretation of the requirements for assuring that minimum wall thickness requirements are met.

A-106 and A-333 both reference A-530. In addition to referencing A-530, A-106 includes a requirement for minimum wall thickness, while A-333 does not. A-106, paragraph 18.3 and A-333 through paragraph 11.1 of A-530, require that; "The minimum wall thickness at any point shall not be more than 12.5% under the nominal wall thickness specified."

Neither paragraph 18.3 of A-106 nor paragraph 11.1 of A-530 specify what method of measurement should be used to assure that the wall thickness produced is not more than 12.5% under the nominal wall thickness specified. The manufacturer was performing a mechanical measurement of the wall thickness at each end of the pipe and using paragraph 20.5.1 of A-106 and paragraph 15.5.1 of A-333 as justification for this method of assuring wall thickness.

The questions for which we need an interpretation are as follows:

1. Do the measuring techniques specified in paragraph 20.5.1 and 15.5.1 of A-106 and A-333, respectively, apply only to measuring wall thickness where imperfections or defects have been removed by grinding as implied by paragraphs of 20.5 and 15.5 of A-106 and A-333 respectively,

or,

Do the measuring techniques specified in paragraph 20.5.1 and 15.5.1 of A-106 and A-333, respectively, also apply to assuring that the minimum wall thickness at any point (emphasis added) is not more than 12.5% under the nominal wall thickness specified?

2. In establishing a measuring technique and acceptance criteria for minimum wall thickness, must the manufacturer consider the variance in wall thickness inherent in his manufacturing process?

45-6509-1007

Any efforts on your part in assisting us in resolving this matter promptly are greatly appreciated.

Gary G. Zech, Chief
Vendor Program Branch
Division of Quality Assurance, Vendor,
and Technical Training Center Programs
Office of Inspection and Enforcement