

Bethlehem Steel Corporation

BETHLEHEM, PA 18016

STEEL OPERATIONS

W. F. WILLIAMS
SENIOR VICE PRESIDENT
R. E. JOHNSTON
VICE PRESIDENT



G. S. HARTMAN
ASST. TO VICE PRESIDENT AND
CHIEF METALLURGICAL ENGINEER

November 10, 1978

COCKET NUMBER

PROPOSED RULE

⑤
PR-21(43FR48621)

Mr. W. E. Campbell, Jr.
Office of Standards Development
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Campbell:

We request clarification of the supplementary information to Federal Regulation 10CFR21 which appeared in the October 19, 1978 edition of the Federal Register.

We understand that most if not all steel mill products come under the definition of "commercial material" and on that basis are exempt from the requirements of 10CFR21. However, many orders from our customers include administrative quality assurance requirements such as 10CFR50 App. B, ANSI N45.2 and ASME Section III NCA 3800. Do such requirements, since they are "unique to facilities or activities licensed by the Commission", require 10CFR21 compliance?

Very truly yours,

D. A. Olsson
Assistant to Chief
Metallurgical Engineer

DAO:as



Acknowledged by card.....

12/13/78

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