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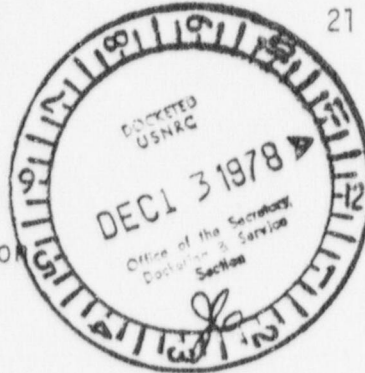
A DIVISION OF INTERNATIONAL TELEPHONE AND TELEGRAPH CORPORATION

DOCKET NUMBER 011

PROPOSED RULE - 21(43FR48621)

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21 November 1978

Office of the Secretary
Docketing and Services Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: 10CFR Part 21 - Reporting of Defects and Noncompliance

Reference: W. H. McLean Telecon with W.E. Campbell, Jr. 11/20/78

ITT Cannon Electric manufactures electric penetration assemblies for nuclear containment vessels. We have an "NPT" stamp and the assemblies come under the requirements of IEEE 317 and ASME Section III. Part 21 has been imposed on us by our customers. In light of the recent amendment to Part 21, we need to know the extent of the application of Part 21 to our sub-tier suppliers.

From discussions with Mr. Campbell, I have learned that some materials and services come under Part 21 and some do not. For our application, materials which do not come under ASME Section III requirements also do not come under Part 21. Section III materials which are produced for specific use, such as castings and forgings, come under Part 21. However, Section III materials which are not produced with a specific application in mind, such as bar stock, plate, pipe, tubing, bolting materials, fasteners and welding materials, do not come under Part 21. Also, subcontracted services where we perform the inspection, such as machining and plating, do not come under Part 21. However, subcontracted services which could hide a defect, such as preparation of stress analysis, welding and nondestructive examination, come under Part 21.

We need to have you tell us in writing that the foregoing interpretation of Part 21 as it applies to us is correct so we can be assured that we are in compliance with its requirements.

Very truly yours,

ITT CANNON ELECTRIC
Phoenix Division*William H. McLean*William H. McLean
Sr. Quality Engineer
(WHM-117-78)

WHM:js



Acknowledged by card...

11/13/78

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cc: Mr. W. E. Campbell, Jr.
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