



U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: REVISIONS TO PREVIOUS REPLIES TO NOTICES OF
NONCONFORMANCE

REFERENCE: NRC INSPECTION REPORT 99900879/2008201

Pursuant to the provisions of 10 CFR 2.201, attached is our response to your Letter postmarked 8/12/08; regarding your request for additional information for previously submitted responses relative to the inspection of the Tioga Pipe Supply facilities in Philadelphia, PA and Easton, PA on March 3-7, 2008.

All the items for which additional information has been requested have been reported and processed in accordance with the Tioga Pipe Supply Corrective Action Program. Corrective Action Reports (CAR) were revised to address NRC concerns and to document the probable cause, corrective action, action to prevent recurrence, and date for implementation for each item as follows:

Nonconformance 99900879/2008-201-02 is addressed in our CAR 279, Rev. 1
Nonconformance 99900879/2008-201-04 is addressed in our CAR 281, Rev. 1
Nonconformance 99900879/2008-201-05 is addressed in our CAR 280, Rev. 1

Some of these corrective actions have been taken and the balance is in process. Tioga Pipe Supply recognizes the importance of these activities and is committed to the ongoing improvement of all of our operations. If additional information or documentation is needed, please contact me in our Easton, PA office.

Sincerely,

A handwritten signature in black ink that reads 'Steven T. DiMauro'.

Steven T. DiMauro
Quality Assurance Manager
Tioga Pipe Supply Co., Inc.

CC: Chief, Quality and Vendor Branch 1
Division of Construction Inspection and Operational Programs
Office of New Reactors

Vendor
 Internal

**TIOGA PIPE SUPPLY CO INC.
CORRECTIVE ACTION REPORT**

Vendor Name: Tioga Pipe Supply Co IncCAR # 279, Rev. 1Location: Easton, PADate: 8/28/08**Requirement:**

Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50 requires, in part, that test procedures shall include provisions for assuring that all prerequisites for the given test have been met, that adequate test instrumentation is available and used, and that the test is performed under suitable environmental conditions. Test results shall be documented and evaluated to assure that test requirements were satisfied.

Finding:

1. On March 6, 2008, the NRC inspectors found that Tioga personnel performing tension testing in accordance with Tioga Testing Instruction 3 (TI-3), "Tension Testing," Revision 1, did not perform step 6.6.2, performed steps 7.1 through 7.3 out of sequence, and performed step 7.4 incorrectly.
2. On March 5, 2008, the NRC inspectors found an unanalyzed, "dirty water" supply was used for conducting hydrostatic test activities at Tioga's Easton, PA facility. Exposing test piping to this environment could be detrimental to austenitic stainless steel piping material.

(See attached Supplemental Sheet)

Reported by: NRC Inspection IssueDept. NADate 3/6/08Corrective Action Responsibility Steve DiMauroRequested Reply Date 9/8/08**Probable Cause and Corrective Action:**

(See attached supplemental sheet)

Date Corrective Action

To Be Completed 09/31/08

Signature

Steven I. DiMauro**Verification of Corrective Action
Comments:**

By _____

Dept. _____

Date _____

Finding (cont'd):

3. On March 5, 2008, the NRC inspectors found the acceptance criteria of TI-1, "Hydrostatic Testing," Revision 1 required holding hydrostatic pressure between a minimum and maximum pressure for a specified minimum "hold time." However, TI-1 does not require testing personnel to document maximum allowable test pressure or use an appropriate time measuring device to record the start and stop times of the test.
4. On March 5, 2008, the NRC inspectors found that QSP-36, "Ultrasonic Thickness Gauging," Revision 2, does not require a post-test calibration check of the ultrasonic thickness instrument to verify that the instrument does not drift outside its calibration range during testing. This calibration check is specified in the test equipment manufacturer's operating instructions.

These issues have been identified as Nonconformance 99900061/2007-201-02.

Probable Cause and Corrective Action (cont'd):

1. The methods used, although deviating slightly from that specified in TI-3 would be considered to be within the judgement of the skill of the craft and were conducted by a qualified test engineer. TI-3 will be revised by **07/31/08** to allow test personnel more flexibility when applicable.
2. Tioga Pipe Supply personnel did not consider the use of recycled water to be deleterious. However, when the NRC addressed the concern, the use of unanalyzed water was immediately halted. Subsequently, a decision was made to resume testing of all but stainless steel pipe with the existing method but to use only potable water when testing stainless steel pipe (see attached e-mail).

To ascertain the significance of the unknown water quality, samples of the hydro water from the reservoirs for both hydro machines were sent to our approved vendor for analysis. The analysis indicated halogen levels < 7 ppm and sulphur levels < 33 ppm, both well below limits specified in customer purchase orders. All other elements analyzed were < 1 ppm. However, to be prudent, Tioga Pipe Supply's method of hydro testing stainless steel pipe will continue to be with the use of potable water only.

Tioga Pipe obtained the latest Water Quality Report for the Easton Suburban Water Authority which identified that all monitored parameters were below the limits established by the Environmental Protection Agency and the PA Department of Environmental Protection. To ensure continued acceptable water quality, Tioga will obtain the latest Water Quality Report annually.

Test Instruction TI-1, Hydrostatic Pressure Testing **will be revised by 07/31/08** to reflect this method of testing.

3. ASTM A450, Standard Specification for General Requirements for Carbon, Ferritic Allow, and Austenitic Alloy Steel Tubes and ASTM A530, Standard Specification for General Requirements for Specialized Carbon and Alloy Steel Pipe both require that the test pressure be held for a minimum of only 5 seconds. For conservatism, Tioga Pipe elected to specify a 15 second hold time and determined that a duration of 15 seconds, well in excess of the required hold time could be easily determined by an estimate of the operator without the need for a timepiece.

TI-1 will be revised by **07/31/08** to require documentation of maximum allowable test pressure as well as the use of an uncalibrated timepiece still using the conservative hold time of 15 seconds. Tioga has purchased an uncalibrated timepiece with a digital display for use when conducting hydro tests. TI-1 will also be revised to require recording the test pressure hold time duration.

4. Failure to include the conduct of a post-test calibration check in QSP-36 was an oversight during procedure development. QSP-36 has been revised to require a post-test calibration check of the ultrasonic thickness instrument ("D" meter) in accordance with manufacturer's instructions.

Vendor
 Internal

**TIOGA PIPE SUPPLY CO INC.
 CORRECTIVE ACTION REPORT**
Vendor Name: Tioga Pipe Supply Co IncCAR # 281, Rev. 1Location: Easton, PADate: 8/28/08**Requirement:**

Criterion XV, Nonconforming Materials, Parts, or Components, of Appendix B to 10 CFR Part 50, states that measures shall be established to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. Criterion XVI, Corrective Actions, of Appendix B to 10 CFR Part 50, states that measures shall be established to assure that conditions adverse to quality, such as non-conformances, are promptly identified and corrected.
 (see Supplemental Sheet)

Finding:

Contrary to the stated requirements:

1. Tioga did not adhere to the requirements of Step 4.5 of QSP-17, "Nonconformance Procedure," Revision 7; on March 5, 2008, in that, when notified of a nonconforming condition by a customer, Tioga's QA department failed to initiate a notice of nonconformance report and an associated corrective action report.

Reported by: NRC Inspection Issue Dept. NA Date 3/6/08Corrective Action Responsibility Steve DiMauro Requested Reply Date 9/8/08**Probable Cause and Corrective Action:**

- 1., 3. The QA Manager determined that the non-conforming item was already being controlled to prevent its inadvertent use under the utility's corrective action program. Tioga Pipe understands the identified concerns and will take the action specified below.
 (see Supplemental Sheet)

Date Corrective Action

To Be Completed 10/30/08Signature Steven T. DiMauro**Verification of Corrective Action**

Comments:

By _____ Dept. _____ Date _____

Requirement (cont'd):

Tioga QSM, Section 15, "Control of Non-conformances," Revision 15, dated October 10, 2003, states that "non-conformances are processed in accordance with an established written procedure covering the identification, documentation, segregation, and disposition."

Tioga QSM Section 16, "Corrective Action," Revision 16, dated October 10, 2003, requires that a request for corrective action be generated when conditions adverse to quality exist that reflect a possible programmatic failure, such as repetitive non-conformances, deviation from Tioga Pipe's Quality program, or a significant nonconforming condition.

Tioga QSP-17, "Non-Conformance Procedure," Revision 7, dated December 12, 2006, Step 4.5 requires that "if material has shipped to a customer and later found to be or suspected to be non-conforming, the QA Department shall notify the customer by issuing and sending a Nonconformance Report for their review and disposition." QSP-17 Step 4.6 requires that "during the evaluation for required corrective action, the QA manager will evaluate and document on the Nonconformance Report whether a determination for reportability under 10CFR21 must be performed."

Tioga QSP-26, "Corrective Action Procedure," Revision 8, dated October 10, 2008, references a corrective action report form used to track corrective actions for identified non-conformances.

Finding (cont'd):

2. Even though Tioga had identified numerous, repetitive non-conformances over a three-year period by two different sub-suppliers, a corrective action report form was not initiated as required by Tioga QSP-26, "Corrective Action Procedure," Revision 8.
3. On March 6, 2008, the NRC inspectors found that upon receiving a rejected "butt-welded elbow fitting" from a customer, Tioga personnel failed to follow steps 4.5 and 4.6 of QSP-17, "Nonconformance Procedure," Revision 7. Steps 4.5 and 4.6 required an issuance of a nonconformance report and initiation of a corrective action report.

These issues have been identified as Nonconformance 99900061/2007-201-04.

Probable Cause and Corrective Action (cont'd):

2. The QA Manager determined that the issues in question were unrelated isolated incidents which occurred over a three year period and did not meet the threshold for generating corrective action reports.

Corrective Action – Items 1, 2, 3

Although the Corrective Action System at Tioga Pipe Supply Co. is in compliance with applicable regulations, Tioga will enhance the program to encourage the identification of issues by all employees at a low threshold in the spirit of continuous improvement.

The current program had no entry except through the QA Manager. QSP-26, Corrective Action Procedure will be revised or supplemented with a separate procedure (e.g. a condition reporting

system) by **10/30/08** to encourage the identification of issues or concerns at any employee level.

The following enhancements will be included in the proposed revision to QSP-26.

- *The program will change to a Condition Reporting System for the identification of any issue by any Tioga Pipe Supply Co., Inc. employee.*
- *A Management Review Group (MRG) will be used to determine significance levels, and Part 21 applicability*
- *The MRG will determine if nonconformance reports should be generated as a result of the identified condition. The Tioga Nonconformance procedure will continue to drive issuance of a CR (with appropriate significance level) when the applicable determination is made.*

Vendor
 Internal

TIOGA PIPE SUPPLY CO INC.
CORRECTIVE ACTION REPORT

Vendor Name: Tioga Pipe Supply Co Inc.

Car # 280, Rev. 1

Location: Easton, PA

Date: 8/29/08

Requirement:

Criterion XVII, "Quality Assurance Records," of Appendix B to 10 CFR Part 50 requires records to be identifiable and retrievable and states, "requirements shall be established concerning record retention, such as duration and location." Basic Requirement 17 of NQA-1-1989 requires records to be protected against damage, deterioration, or loss.

Further, Section 4 of NQA-1-1989 supplement 17S-1 states that records "shall be stored in facilities constructed and maintained in a manner which minimizes the risk of damage or destruction from the following: natural disasters such as winds, floods, or fires."

Finding:

Contrary to the above, Tioga's QSM Section 17.0, "Quality Assurance Records," and QSP-16, Records Maintenance Procedure, Revision 10 dated October 10, 2003, did not specify requirements for the storage and preservation of QA records. Additionally, some single copy QA records were stored in one-hour fire-rated cabinets while others were only stored in standard, non-fire rated metal file cabinets at Tioga's facilities in Easton, PA and Philadelphia, PA.

This issue has been identified as Nonconformance 99900061/2007-201-05.

Reported by NRC Inspection Issue Dept. NA Date 3/6/08

Corrective Action Responsibility Steve DiMauro Requested Reply Date 9/8/08

Probable Cause and Corrective Action:

Tioga Pipe Supply Co Inc is not committed to NQA-1 supplement 17S-1 and consequently controls quality records in accordance with our ASME/NUPIC audited Quality Program. *To address the NRC's concerns, Tioga has purchased a 2-hour fire rated file cabinet for use by the Forks facility. An additional 2-hour fire rated file cabinet will be obtained for the Philadelphia facility and all quality records will be stored in same by 12/31/08.*

Date Corrective Action To Be Completed 12/31/08 Signature Steve T. DiMauro

Verification of Corrective Action
Comments:

By _____ Dept. _____ Date _____