

April 3, 2019

US Nuclear Regulatory Commission  
Washington, DC 20555-0001

**“Reply to a Notice of Nonconformance”**

Attn: Document Control Desk

Subject: Inspection Report No.: 99902072/2019-201  
Notice of Nonconformance dated March 14, 2019

Dear Ms. Kavanagh:

This letter is to provide our response to Nonconformance 99902072/2019-201-01 from the recent NRC Vendor Inspection performed at HydroAire Service Inc., Docket No. 99902072, and Report No. 2019-201.

**Nonconformance 99902072/2019-201-01**

To address this nonconformance, regarding the pressure gages for Hydro Test not being calibrated throughout the full range, HydroAire took the steps outlined below through internal CAR 19-07.

The cause of the nonconformance was lack of clear instructions in the Purchase Order to the calibration lab for a specified range resulting in the calibration being done to limited set points as per the OEM instructions.

A Part 21 evaluation was performed where it was determined not to be a reportable condition.

The corrective action steps that have been taken include:

All gages listed in the nonconformance were sent out to a HydroAire approved calibration lab for calibration throughout the entire range of the instrument.

An “extent of condition” was performed on Hydro Tests performed over the last 3 years. This resulted in the discovery that over that time only two gages and one master were used to perform the tests. Gages 1208422 and 1313113, and Master Gage 1313104.

The results of the calibrations were acceptable, gages were found in good working condition with no out of tolerances in the as-found reading, allowing us to have confidence previous test results were valid.

To prevent further noncompliance, HydroAire has subsequently revised its procedure, PCP 027 “Hydrostatic Pressure Testing” to include more detailed instructions on performing the calibration/verification of the test gage including use of the “Master Gauge Comparator”, a new record was created for accurate documentation of pre and post calibrations for each Hydro Test.

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PO attachments to Calibration Service suppliers have been revised to include very specific instructions for the range to be calibrated.

Calibration range for a 0-7000 PSI gage is defined at 100, 300, 500, 700, 1150, 2300, 3500, 4500, 5800, 7000 PSI. Similar range intervals are defined for 0-3000, 0-5000 and 0-10000 PSI gages.

This corrective action has been fully documented on HydroAire CAR 19-07 and has been implemented in full as of April 2, 2019.

We believe this response satisfactorily addresses the issues identified in this nonconformance. Please advise if any further action is required on our part.

Best Regards,

Scott Borland  
QA Manager  
HydroAire Service Inc.

CC: Kerri A Kavanagh, Chief, Quality Assurance Vendor Inspection Branches 1 and 2, Division of Construction and Operational Programs, Office of New Reactors