



Mid-South Nuclear, Inc.

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

3/31/94

Reference: "Reply to a Notice of Nonconformance"

Docket No. 99901270, Report No. 94-01

Dear Sir:

Mid-South Nuclear hereby submits a written statement of "Reply to a Notice of Nonconformance".

Nonconformance A.

1. S.O. #3225, Bechtel P.O. 21042-T-0504Q, 5" Stainless Pipe

a. Steps taken to correct nonconformance:

Our customer has been advised of the testing methods used to dedicate this material. Subsequently, MSN has obtained a twelve inch long prolongation of the material. The prolongation was chemically and mechanically re-tested on February 28, 1994, to the requirements of ASME SA312 Type 304 with acceptable results. The documentation of the acceptable results have been forwarded to our customer.

b. Steps taken to prevent reoccurrence:

The MSN critical characteristic evaluation requirement for this product has been enhanced to include mechanical testing.

c. Dates for corrective action and preventive measures:

The date for corrective action for this nonconformance was February 28, 1994. The date for preventative measure completion will be March 17, 1994.

2. S.O. #3309, Bechtel P.O. 21042-T-0563Q, 4" x 3" Pipe Tee

a. Steps taken to correct nonconformance:

None required. Our customer has been advised and has accepted the testing methods used by MSN to dedicate this item.

b. Steps taken to prevent reoccurrence: None required.

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Nonconformance Response, Continued

- c. Dates for corrective action and preventive measures: None required.

Note Concerning NRC Inspection Report Error:

NRC Inspection Report 999001270/94-01, page 8, item 2, 4" x 3" A234 Reducing Tee, reported in error the way this material was dedicated by MSN. The report stated that MSN purchased two tee's, then destroyed one tee for chemical testing and supplied the other tee to the customer with no benefit of a MSN qualified traceability program to verify that the two tee's came from the same starting piece. This above information was verified to be in error with your Mr. Larry Campbell. In fact, MSN purchased only one tee. This single tee was successfully hardness tested and then was machined on the inside diameter to remove filings that were subjected to a successful chemical analysis by a qualified MSN laboratory. The testing was performed in accordance with the MSN dedication procedures.

MSN requests that NRC acknowledge this reporting error in their acceptance of this response to the reported nonconformances.

3. S.O. #3292, Bechtel P.O. 21042-SW-2012AQ, 16" Flanges

- a. Steps taken to correct nonconformance:
Our customer has been advised of the testing methods used by MSN to dedicate this item. MSN was been advised by our customer that this material was used in a non-safety related application.
- b. Steps taken to prevent reoccurrence:
The MSN critical characteristic evaluation requirement for this product has been enhanced to include chemical testing. Also, see hardness testing discussion in section 7 below.
- c. Dates for corrective action and preventive measures:
The date for corrective action for this nonconformance was February 28, 1994. The date for preventative measure completion was February 28, 1994.

MID-SOUTH NUCLEAR, INC.
Nonconformance Response, Continued

4. S.O. #3381, Bechtel P.O. 21042-C-0227Q, 2-1/2" OD A36 Bar
 - a. Steps taken to correct nonconformance:
Our customer has been advised of the testing methods used by MSN to dedicate this item. In addition, MSN has conducted extensive research on this item to verify that MSN has performance history records meeting the requirements of the MSN Procedure SOP-106 for the material manufacturer and product that was supplied. Our customer has also been forwarded this information.
 - b. Steps taken to prevent reoccurrence:
The MSN critical characteristic evaluation requirement for this product has been enhanced to include chemical testing. Also, see hardness testing discussion in section 7 below.
 - c. Dates for corrective action and preventive measures:
The date for corrective action for this nonconformance was February 28, 1994. The date for preventative measure completion was February 28, 1994.

5. S.O. #3428, TVA P.O. P-93PJX-36732H-1, A36 Structural Steel Plate, Angle, and Bar.
 - a. Steps taken to correct nonconformance:
Our customer has been advised of the testing methods used by MSN to dedicate this item. In addition, MSN has conducted extensive research on each line item supplied to verify that MSN has performance history records meeting the requirements of the MSN Procedure SOP-106 for the material manufacturer and product that was supplied. Our customer has also been forwarded this information.
 - b. Steps taken to prevent reoccurrence:
The MSN critical characteristic evaluation requirement for these products has been enhanced to include chemical testing. Also, see hardness testing discussion in section 7 below.
 - c. Dates for corrective action and preventive measures:
The date for corrective action for this nonconformance was February 28, 1994. The date for preventative measure completion was February 28, 1994.

MID-SOUTH NUCLEAR, INC.
Nonconformance Response, Continued

6. S.O. #3376 and #3376A, TVA P.O. P-93PGC-36737H, A36 Structural Steel Plates, Angle, Channel, and Bar.
 - a. Steps taken to correct nonconformance:
Our customer has been advised of the testing methods used by MSN to dedicate this item. In addition, MSN has conducted extensive research on each line item supplied to verify that MSN has performance history records meeting the requirements of the MSN Procedure SOP-106 for the material manufacturer and product that was supplied. Our customer has also been forwarded this information.
 - b. Steps taken to prevent reoccurrence:
The MSN critical characteristic evaluation requirement for these products has been enhanced to include chemical testing. Also, see hardness testing discussion in section 7 below.
 - c. Dates for corrective action and preventive measures:
The date for corrective action for this nonconformance was February 28, 1994. The date for preventative measure completion was February 28, 1994.

7. Hardness Testing Discussion:

The use of Mid-South Nuclear hardness testing as a verification of tensile strengths of carbon steel materials is justified by the following:

- a. ASME SA370 provides reference tables that correlate Rockwell Hardness values to approximate Tensile Strength.
- b. Mid-South Nuclear maintains hardness equipment that is calibrated to known hardness values prior to use.
- c. The MSN Hardness Test Procedure SOP-702 Revision 2, dated 3/17/94, now includes requirements for the maintenance of verification records that attest to the accuracy of MSN's equipment and procedures. These records include documentation of samples of carbon steel materials that have been portable hardness tested by MSN and have subsequently been bench hardness tested and mechanically tested for tensile strength by a MSN qualified mechanical testing laboratory. The reported values, which are verified in accordance with the ASME SA370 hardness/tensile strength tables, are maintained as documented evidence of the adequacy of our procedures.

MID-SOUTH NUCLEAR, INC.
Nonconformance Response, Continued

Nonconformance B.

1. S.O. #3528, Bechtel P.O. 21042-TS-990Q, 1/4" SS Tubing
 - a. Steps taken to correct nonconformance:
Our customer has been advised of the order processing methods used by MSN. MSN was given consent by our customer (an N-type certificate holder and owner) to use the provisions of NX2610. This consent was given through the customer's purchasing and procurement system which required conformance to our quality assurance program.
 - b. Steps taken to prevent reoccurrence:
MSN has held employee training sessions to review the requirements of "Certificate Holder consent" for processing orders for various customers under ASME Sec III Subsection NX2610.
 - c. Dates for corrective action and preventive measures:
Training sessions were completed 3/17/94.

Sincerely,

E.A. George, Jr.

E.A. George, Jr.
Quality Assurance Manager
Mid-South Nuclear, Inc.