

August 1, 2008

Dennis Tauber, Quality Assurance Director
Tioga Pipe Supply Company, Inc.
Philadelphia Regional Center
2450 Wheatsheaf Lane
Philadelphia, PA 19137

SUBJECT: TIOGA PIPE SUPPLY COMPANY, INC. RESPONSE TO U.S. NUCLEAR
REGULATORY COMMISSION (NRC) INSPECTION REPORT
99900879/2008201, NOTICE OF VIOLATION, AND NOTICES OF
NONCONFORMANCE

Dear Mr. Tauber:

Thank you for your June 6, 2008, letter in response to the Notice of Violation (NOV) and the Notices of Nonconformance (NONs) that were discussed in the subject NRC Inspection Report. Please consider this letter as a follow-up to the telephone call with my staff on July 2, 2008.

We have reviewed your letter and found that your replies to the NONs and the NOV are generally responsive to our concern. However, certain aspects of your responses need to be addressed in further detail. Your response to NON 99900879/2008-201-02, regarding the use of unanalyzed, recycled water for conducting hydrostatic test activities on piping, was found to be inadequate. Your decision to 1) cease using such water for future testing, 2) analyze the water for halogens, sulfur, and other elemental content, and 3) use potable water for future hydrostatic testing, is commendable. However, you did not fully describe any analysis of your proposed potable water sources. Please provide the staff with a response that describes such an analysis and what methodology Tioga intends to use for the future analysis of your hydrostatic test water. Please also specify the periodicity of such an analysis.

Your response to NON 99900879/2008-201-04 was also found to be inadequate. Even though you describe how your current corrective action procedure will be "revised or supplemented with a separate condition reporting system procedure," you did not fully describe what methodology Tioga intends to use or put into place for the initiation of both Tioga's nonconformance and corrective action programs, should a similar scenario - such as the one described in the report - arise in the future. Please provide the staff with a response that fully describes what methodology you intend to use to initiate Tioga's nonconformance and corrective action programs and, if determined to be necessary by your staff, the subsequent initiation of your 10 CFR Part 21 notification program.

Finally, your response to NON 99900879/2008-201-05 was also found to be inadequate because it does not fully describe nor specify which option you intend to use for future storage and preservation of QA records, i.e., the use of "electronic storage," the use of "2-hour fire-rated cabinets," or the use of a combination of both "electronic storage" and "2-hour fire-rated cabinets." Please provide the staff with a full description of which option Tioga intends to use for the future storage and preservation of Tioga's QA records.

The staff may review the implementation of your corrective actions during a future NRC staff inspection to determine that full compliance has been achieved and will be maintained.

Please provide a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Chief, Quality and Vendor Branch 2, Division of Construction Inspection and Operational Programs, Office of New Reactors, within 30 days of the date of this letter. This reply should be clearly marked as a "Reply to a Notice of Violation and Notice of Nonconformance" and should include: (1) additional explanation to address the violation or noncompliance, or if contested, the basis for disputing the violation or noncompliance; (2) the corrective steps that have been taken and the results achieved; and (3) the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

If you or your staff has any questions regarding this matter, we will be pleased to discuss them with you.

Sincerely,

/RA/

John A. Nakoski, Chief
Quality and Vendor Branch 2
Division of Construction Inspection
& Operational Programs
Office of New Reactors

The staff may review the implementation of your corrective actions during a future NRC staff inspection to determine that full compliance has been achieved and will be maintained.

Please provide a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Chief, Quality and Vendor Branch 2, Division of Construction Inspection and Operational Programs, Office of New Reactors, within 30 days of the date of this letter. This reply should be clearly marked as a "Reply to a Notice of Violation and Notice of Nonconformance" and should include: (1) additional explanation to address the violation or noncompliance, or if contested, the basis for disputing the violation or noncompliance; (2) the corrective steps that have been taken and the results achieved; and (3) the date when your corrective action will be completed. Where good cause is shown, consideration will be given to extending the response time.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

If you or your staff has any questions regarding this matter, we will be pleased to discuss them with you.

Sincerely,

/RA/

John A. Nakoski, Chief
Quality and Vendor Branch 2
Division of Construction Inspection
& Operational Programs
Office of New Reactors

Docket No. 99900879

DISTRIBUTION: NRO/REF GTracy JTappert PHiland
 JNakoski JFuller FTalbot SCleavenger

☒ Publicly Available ☐ Non-Publicly Available ☐ Sensitive ☒ Non-Sensitive

ADAMS Accession No.: **ML082110316**

OFFICE	NRO/DCIP/CQVB	NRO/DCIP/CQVB/BC
NAME	MMorgan	JNakoski
DATE	8/01/2008	8/01/2008

OFFICIAL RECORD COPY