



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 6, 1993

Docket No. 99901255

Mr. G. Gardner, Chief Executive Officer
Connex Pipe Systems, Inc.
1115 Gilman Street
Marietta, Ohio 45750

Dear Mr. Gardner:

SUBJECT: EVALUATION AND CONCLUSIONS REGARDING THE REPLY TO THE NOTICE OF
NONCONFORMANCE (NRC INSPECTION REPORT NO. 99901255/92-01)

I am responding to Connex Pipe Systems, Inc.'s (Connex's) November 25, 1992, reply to the Notice of Nonconformance which was issued by the U.S. Nuclear Regulatory Commission (NRC) on November 4, 1992, following an NRC inspection of Connex's facility in Marietta, Ohio. Also, addressed is our review of Connex's discussion of its practice for determining when welds are inaccessible for nondestructive examination (NDE).

The Notice of Nonconformance identified activities which failed to comply with the requirements of Appendix B to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR Part 50) and your Nuclear Quality Assurance Manual. Your corrective actions were determined to be adequate for all Nonconformances. However, your discussion on Connex's practice for determining when welds are inaccessible for NDE did not adequately identify controls for ensuring that required NDE is performed on accessible weld surfaces. On December 14, 1992, Mr. L. L. Campbell of this office discussed with Mr. K. A. Welch of Connex the need to incorporate additional requirements in Connex's work control process to ensure required NDE is performed. The accessibility of the internal weld surfaces of an 8 inch diameter x 6 inch long pipe welded to a 36 inch diameter pipe fabricated by Connex during the recent NRC inspection was discussed. If this welding had been to ASME Class 1 requirements Connex's current practice would have resulted in the required NDE not being performed on the weld's internal surface even though this surface was accessible for NDE at some point during the fabrication process. It was further discussed that Connex should review its practice of performing NDE at the final stage of the fabrication process and implement appropriate controls to ensure required NDE is performed.

We will review the implementation of your corrective actions and actions to prevent recurrence, as described in your reply to the Notice of Nonconformance, during a future inspection to ensure that full compliance to 10 CFR Part 50 has been achieved and will be maintained. At that time, we will also reassess the weld accessibility issue.

In accordance with Section 2.790 of 10 CFR, "Rules of Practice," a copy of this letter will be placed in the NRC's Public Document Room.

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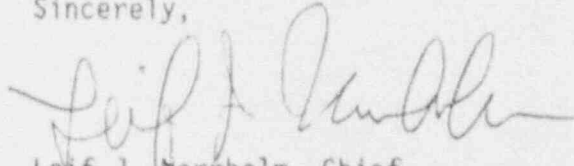
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Mr. G. Gardner

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If you have any questions concerning the inspection and this reply, we will be glad to discuss them with you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Leif J. Morrholm". The signature is fluid and cursive, with a long horizontal stroke at the end.

Leif J. Morrholm, Chief
Vendor Inspection Branch
Division of Reactor Inspection
and Licensee Performance
Office of Nuclear Reactor Regulation

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