



February 6, 1997

Mr. Robert M. Gallo, Chief  
Special Inspection Branch  
Division of Inspection and  
Support Programs  
Office of Nuclear Reactor Regulations  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Clarification for AIT Responses to  
Nonconformance E and B.2 (99901292/96-01-01)

Reference: 1) NRC Inspection Report No. 99901229/96-01  
2) AIT Letter Dated 9/28/96

Dear Mr. Gallo:

I will attempt to clarify our previous Ref. 2 responses by chronological event.

- May 2, 1994, AIT surveyed Marmon/Keystone to determine if they maintain traceability of material and of the implementations of their QA program. The survey found M/K suitable for addition to the AIT Approved Vendor List.

- AIT issued P.O. to Marmon/Keystone on 5/5/94 for 36 pcs. of 0.5" O.D. x .049" Avg. Wall x 20' plus length of SA249, TP316. We further stipulated that the tubes must be from 1 lot.

- May 17, 1994 - AIT receipt inspected 1 lot of 36 tubes and assigned the AIT traceability number M-2627 per our QA Program.

- One test piece was cut from the lot and sent to Ramball Test Lab, Inc. for chemical and mechanical testing which was reported on 7/22/94 and accepted as satisfactory.

- On 7/15 and 20/94, AIT conducted Hydrostatic test of the 1 tube marked M-2627.

- On 8/1/94, AIT issued CMTR 442-1 for 0.5" x .049" tubes, HT No. 714652, M-2627.

*ID&R-13 Vendor Insp.*

9702120264 970206  
PDR QA999 E\*\*\*\*\*  
99901292 PDR

120008

*(99901292)*

*TE09*



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- P.O. 20726 Add. 3 was issued to Ramball Test Lab for Chemical test on 8/10/94 for sample coupons marked M-2627-1 through 35 as a result of discussions with our ANI Supervisor. It was his recommendation to perform these extra tests. Results were received on 8/18/94 and found acceptable.

- AIT performed hydrostatic testing of the 35 other tubes from the lot received from Marmon/Keystone now marked M-2627-1 through M-2627-35 in August '94; however, due to an oversight, the report was not prepared until 3/13/95 (the date it was signed). Clarification should have been added to expound on the test date/signature date.

- At this point the tubes had been satisfactorily upgraded to the requirements imposed by our customer, namely ASME B & PV Code Sec. III 1971 Ed.

- The AIT ANI signed Data Reports 8/23/94.

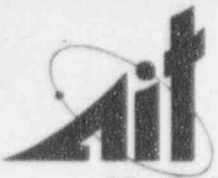
- Units were shipped in September '94.

- On 12/5-7/94, an ASME survey issued ASME Finding No. 7 which resulted in the AIT NCR 442-1 and required further mechanical test for all tubes of Lot M-2627. Although this was not consistent with the 1971 Ed. requirements, AIT felt "compelled" to do the additional testing even though AIT knew this was not necessary.

- P.O. 20824 was issued to Lab Testing, Inc. 4/95 for mechanical testing of sample coupons marked M-2627-1 through 35 which resulted in satisfactory test results.

In summary, the qualification of unqualified source material (tubes) was performed to ASME B & PV Code Section III 1971 Ed. which requires testing from 1 piece of tube since the tubing came from an approved supplier. Consequently, all other tests performed, while providing greater information of the physical and chemical properties of the remaining tubes, were unnecessary.

As you can see from the above test reports, the tubes were, if anything, over tested.



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Copies of the relevant documents are enclosed for your review. Should you have any further questions, please contact us at 302-652-3900.

Sincerely,

A.E. Amer, CEO  
Amer Industrial Technologies, Inc.

cc: USNRC File  
QA Chron