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May 2, 2001

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

Re: Okonite Bonded Jacket Cable Loss-Of-Coolant Accident Test Failures

Dear Mr. Collins:

Please reference our previous letters to you of June 14, 2000 and July 14, 2000. In those letters, and in discussions with the NRC, two possibilities were raised in order to address the Wyle Laboratories test results on Okonite's 1/C #12 AWG Okonite Okolon cables.

The possibilities were either that Okonite would undertake requalification of these cables; or, would submit an analysis of all the available data. Okonite believes that either approach, based on realistic operating conditions, would demonstrate that these cables will perform satisfactorily in a LOCA at any time during their 40-year service life.

Okonite has elected to undertake a requalification program. In doing so, Okonite does not in any way change its position that this cable will perform satisfactorily in a LOCA during its service life. Similarly, Okonite stands by the analysis in NQRN-1A that the most realistic method of gauging the cable's aging rate is by comparison to the accelerated and natural aging of previous generations of insulation material, and not by the Arrhenius technique. Okonite adheres to its belief that the Arrhenius technique gives rise to overly conservative results.

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Nevertheless, we believe that the most expeditious resolution of the question raised by the Wyle Laboratories results, would be a testing program leading to requalification of 1/C #12 AWG composite Okonite Okolon including data for extrapolating the accelerated aging to the 40-year condition. Therefore in a spirit of cooperation with the NRC, Okonite will undertake a test program as indicated above.

We intend to test a number of samples with aging conditions ranging from mild to severe and to overly severe. The aging parameters will encompass the results of the NEI survey, and will go beyond them.

The testing will be done by an outside facility, and will be conducted in accordance with the requirements of IEEE 383-1974, and The Okonite Company Quality Assurance Program.

We have already had discussions with Wyle Laboratories about performing these tests, and are reviewing the qualifications of other outside testing laboratories. We propose to finalize our arrangements with a testing laboratory by the end of May. When we have done so we will advise you of which facility we have chosen. We intend that the testing program will begin on an immediate basis.

When it is completed, we will present the results of the qualification program, along with appropriate data supporting satisfactory performance in temperatures in excess of the plant conditions reported in the NEI survey.

A successful requalification of 1/C #12 AWG composite Okonite Okolon will resolve the question raised by the BNL testing programs.

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We will communicate to the NRC the exact schedule for this program as soon as it is available, and look forward to working with the Commission in bringing this project to an early conclusion.

Very truly yours,

THE OKONITE COMPANY, INC.

Arthur V. Pack, Jr.
Vice President - Engineering

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