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Subject: Discussion points for low voltage cable AMP

Rani, here are some discussion points from the staff guidance documents to consider WRT the low voltage calibration program:

GALL AMP XI.E2 is a performance monitoring program. The program description states that:

"operating experience has shown that a significant number of cable failures are identified through routine calibration testing."

Therefore, GALL AMP XI.E2 detects failures of the cable insulation after such failures occur and not before they occur..

SRP Section A.1.2.3.4 - Detection of Aging Effects states that "Detection of aging effects should occur before there is a loss of the structure and component function... A program based solely on detecting structure and component failure should not be considered as an effective aging management program for license renewal." GALL AMP XI.E2 does not seem to meet the expectations for aging management programs expressed in the SRP-LR nor the overall philosophy of license renewal which is to detect aging effects before failures occur.

In contrast, look at the operating experience for GALL AMP XI.E1, which is a condition monitoring program:

"Operating experience has shown that adverse localized environments caused by heat or radiation for electrical cables and connections may exist next to or above (within three feet of) steam generators, pressurizers or hot process pipes, such as feedwater lines. These adverse localized environments have been found to cause degradation of the insulation materials on electrical cables and connections that is visually observable, such as color changes or surface cracking. These visual indications can be used as indicators of degradation."

Clearly this AMP meets the expectations of SRP Section A.1.2.3.4 and the overall license renewal philosophy whereas GALL AMP XI.E2 does not.

I do not understand how the staff can advocate a position that requires the use of GALL AMP XI.E2 when the program fails to meet its own guidance documents with respect detection of aging effects before the component function is lost.

Bob

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