

February 13, 2003

U. S. Nuclear Regulatory Commission  
Operations Center  
1 White Flint North  
11555 Rockville Pike  
Bethesda, MD 20852

**Subject: Written Notification of 10CFR Part 21 Defect/Failure to Comply**

Dear Sir or Madam:

This letter shall serve as the written notification by Rockbestos-Surprenant Cable Corp. that a basic component supplied for use in nuclear power plants may contain a defect or fail to comply, which is reportable under the requirements of 10 CFR 21 as previously indicated in our initial notification dated January 14, 2003.

The following information is supplied in accordance with the requirements of 10 CFR 21.

**I. Name and address of individual informing the Commission:**

Richard C. Brown – Quality Assurance Manager  
The Rockbestos-Surprenant Cable Corp.  
20 Bradley Park Road  
East Granby, CT 06026

**II. Identification of the basic component supplied which fails to comply or contains a defect:**

The KXL 760D insulation system (chemically crosslinked only) provided in some of the Firewall III cables manufactured from January 1992 thru June 1995 may include an alternate resin that was not part of the baseline qualification testing.

**III. Identification of the firm supplying the basic component which fails to comply or contains a defect:**

The Rockbestos-Surprenant Cable Corp., East Granby, CT facility

IE19

**IV. Nature of the defect or failure to comply and the safety hazard which is created:**

Nature of Defect: An alternate resin material may have been substituted in the insulation system for Firewall III cables (chemically crosslinked cables only)

Potential Hazard: The chemically cured insulation system utilizing KXL 760D for cables manufactured from January 1992 thru June 1995 may not be enveloped by qualification report QR5804.

**V. The date on which the information of such defect or failure to comply was obtained:**

On the basis of our evaluation it was determined on January 14, 2003 that a defect or failure to comply as defined by 10 CFR 21 existed.

**VI. The number and location of all basic components which contain a defect or fails to comply:**

The number and location of all basic components which may contain a defect or fail to comply is yet to be determined.

**VII. The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action:**

Rockbestos-Surprenant has implemented a two step process to evaluate the potential effect on baseline qualification arising from use of the alternate resin.

**Step 1:**

Because the two resins are so similar, locating finished cable for testing was not immediately feasible. In order to completely explore this avenue, samples containing both the qualified and alternate resins were sent by Rockbestos-Surprenant to both resin manufacturers to use whatever methods available to differentiate their resin in the finished material. If an analytical method could be found to identify the resin used, Rockbestos-Surprenant would look to the utilities to find inventory containing the alternate resin. Based on the cable available, an appropriate test program could be established to document qualification. Both suppliers have indicated, however, that they were not able to identify their resin in the sample provided.

**Step 2**

Based on the limited availability of the alternate resin (discontinued in 1995) a similarity analysis program has been established by Rockbestos-Surprenant which is running in parallel with Step 1 that will compare the two resins. The program has been designed to address electrical performance, dielectric strength, physical properties, heat aging to end of life condition, irradiation with 200 Mrad exposure, and moisture absorption. FTIR scans will be generated for both finished samples

including the starting resins for comparison. Testing is scheduled to be completed by March 14, 2003. Preliminary test results indicate that the two resins are indistinguishable. A full report will be available upon completion of the test comparison program.

Additionally, third party testing consideration is being given regarding a proposed test program designed for analysis and identification of the resins. The submitted test program is currently being evaluated by Rockbestos-Surprenant.

**VIII. Any advice related to the defect or failure to comply about the basic component that has been, is being, or will be given to purchasers:**

Purchasers are being advised not to install Firewall III cables that employ the chemically cured insulation material that was manufactured from January 1992 thru June 1995 until the results of the test comparison program are known. Further advice will be provided at that time.

The following personnel may be contacted regarding the preceding notification:

James Morganelli  
Senior Quality Engineer  
(860) 653-8319

Richard Brown  
Quality Assurance Manager  
(860) 653-8322

Robert Konnik  
Director of Applications Engineering  
(860) 653-8340

Sincerely,



Richard Brown  
Quality Assurance Manager

cc: R. Konnik  
M. Mennone  
J. Morganelli  
J. Notarfrancesco  
F. Schwelm