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September 4, 2007

**Subject: Westinghouse Comments on U. S. NRC Draft Regulatory Guide DG-1132,  
"Qualification of Safety-Related Cables and Field Splices for Nuclear Power Plants"**

Westinghouse appreciates the opportunity to provide comments to the NRC regarding Draft Regulatory Guide DG-1132 in accordance with the Federal Register Volume 72, No. 135, July 16, 2007. Our comments are attached to this letter and include recommendations to delete selected statements in the Draft Regulatory Guide. These comments endeavor to ensure that the final Regulatory Guide is a document that the industry can effectively implement, without incurring costs that are not commensurate with the safety significance. These comments are consistent with Westinghouse's understanding of the NRC's current position that the regulatory process should not be so prescriptive and burdensome that it becomes a needless impediment to improving plant safety.

If you have any questions or require additional information, please contact either me or James Parello at (724) 722-5545.

Very truly yours,

J. A. Gresham, Manager  
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SUNSI Review Complete  
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**Westinghouse Comments on U.S. NRC Draft Regulatory Guide DG-1132**  
**“Qualification of Safety-Related Cables and Field Splices for Nuclear Power Plants,”**  
**dated June 2007**

1. Section B (DG-1132 Page 2, fourth paragraph) states that power and instrumentation and control (I&C) cables for which failures could disable risk-significant equipment should have condition monitoring programs to demonstrate that the cables can perform their safety function when needed. A condition monitoring program does not demonstrate that the cables can perform their safety-related function; that is the purpose of qualification testing. Condition monitoring programs are used to assess the physical and operating condition of the cabling. The qualification program demonstrates that the cables will perform their required safety-related function at the end of qualified life under design basis accident (DBA) conditions.

Conditioning monitoring can be used to support aging assessments in conjunction with monitoring temperature and radiation. Condition monitoring can be used to determine if qualified equipment is suitable for further service based on its installed conditions. Usually when condition monitoring is applied one or more condition indicators are monitored to determine whether equipment remains in a qualified condition. As the qualified equipment approaches the end of its demonstrated qualified life, condition monitoring results may be used to determine if an extension of qualified life is possible. When condition monitoring technologies become proven and commercially available then they can become part of the plant maintenance/surveillance program implemented by the utility. Conditioning monitoring should not be required as part of the EQ program, rather it should be part of the plant maintenance/surveillance program.

Westinghouse recommends deleting the last sentence of the fourth paragraph or revise it to clarify the purpose of a condition monitoring program. Also, Regulatory Position C(2)(c) should be deleted or clarified.

2. Regulatory Positions C(2)(a) and C(2)(b) request supplements to Clause 4 of IEEE Std 383-2003. These positions are already included in IEEE Std 383-2003, Clause 4. These exceptions should be deleted.
3. Regulatory Position C(10) should be deleted. Condition monitoring does not demonstrate that the cables can perform their safety-related function. See Item 1 above.