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Submitter Information

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General Comment

"Eventually, power and control cables that are not designed to operate in a submerged state will experience early failures, often resulting in significant safety consequences."

- 1. Please review the GL2007-01 data to support the term "often resulting in significant safety consequences." I submit that there have been NO significant safety consequences from the reported cable failures. If there have, I submit that the failure have been "seldom." If no significant safety consequences HAVE resulted, please change the text to reflect this fact.
- 2. "Eventually," "will experience early failures." These two terms contradict each other.
- 3. The question is not "will a submerged cable fail sooner than a dry cable," but "will a submerged cable remain Operable throughout its [40 year] design life."
- 4. Please supply support for the contention that control cables (low voltage) will fail early when submerged. I believe that this is supposition rather than fact.

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