



RSCC Wire & Cable LLC
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July 21, 2014

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Subject: Reply to Notice of Nonconformance
NRC Inspection Report No. 99901443/2014-201
Nonconformance 99901443/2014-201-01

Dear Sir/Madam,

In accordance with the instructions in the notice of nonconformance, please find RSCC Wire & Cable LLC's response.

Nonconformance 99901443/2014-201-01 is stated as follows:

Criterion III of Appendix B to Title 10 of the Code of Federal (10CFR) Part 50 states in part that, "Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems, and components."

Contrary to the above, as of May 23, 2014, RSCC failed to review suitability of all material used during original qualification of cable. Specifically, L4 oil is used on the KXL-760D insulation as part of the manufacturing process for Class 1E nuclear cables. The effect on the qualification in accordance with Qualification Test Report #QR-5804 was indeterminate since RSCC's initial review did not find documentation that the oil was used on the sample that was qualified and there are also no controls on the oil to ensure that there were no changes to the composition/quality of the oil or screening for possible contaminants that may affect the original qualification assumptions.

The reasons for the noncompliance:

- 1) L4 oil is used as a manufacturing aid to prevent the insulation from sticking to the conductor during the CV process and was not considered a subcomponent of the cable and therefore was not identified specifically in Qualification Test Report #QR-5804.
- 2) The L4 oil is purchased as a manufacturing aid using the part number alone and was not considered a critical component.

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The corrective steps that have been taken and the results achieved:

1) Production records were located on 5/23/14 that document that L4 was used during production of the EQ samples for Qualification Test Report #QR-5804.

The corrective steps that will be taken to avoid noncompliances:

An RSCC Purchasing Specification (RPS) for the L4 oil will be created to establish the requirements and the receipt inspection criteria for the oil to ensure consistency.

The date when the corrective action will be achieved:

The RPS will be created by 8/29/14.

Regards,

A handwritten signature in black ink, appearing to read "DA Murphy", is written over the typed name.

David A Murphy
Director of Quality Assurance
RSCC Wire & Cable LLC

Cc: Steve Bonnell, Group President, Marmon Specialty Wire & Cable Group
Mike Mennone, Vice President and GM, RSCC Utility Group
Chief, Construction Electrical Vendor Branch, Division of Construction Inspection and Operational Programs, Office of New Reactors