



RSCC Wire & Cable LLC
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December 5, 2014

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

Subject: Reply to Notice of Nonconformance
NRC Inspection Report No. 99901443/2014-202
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 XVI, "Corrective Action," of Appendix B to Title 10 of the Code of Federal Regulations (10 CFR) Part 50 states, in part that, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR Part 50 states in part that, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings."

Contrary to the above, as of October 06, 2014, RSCC failed to ensure that technical changes to safety-related design specifications were provided to customers in accordance with RSCC's Quality Manual. Specifically, product specification drawing TD-005418 for a 1/C 2 American Wire Gauge (AWG) power cable was revised as part of a completed corrective action. A previous review of the calculation basis for the product specification drawing indicated, that the actual cable outside diameter including jacket was incorrect, the minimum bend radius should be higher than what was listed on the product specification drawing, and the maximum pulling tension values were also incorrect which resulted in NRC Notice of Nonconformance 99901443/2014-201-02. This product specification drawing is utilized by customers for installation of cables and determining cable tray fill and for other engineering and design-related activities; however, customers were not made aware of the changed requirements per the requirements of the RSCC Wire & Cable LLC Quality Manual.

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The reasons for the noncompliance:

RSCC did not have a procedure for submission of customer drawing revisions for stock cable items.

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

Drawing TD-005418 rev 4 was submitted to all customers on 11/03/2014 that had purchased the applicable stock cable item.

The corrective steps that have been taken to avoid noncompliances:

RSCC procedure 041DI111 "Engineering Drawings and Calculations" was revised to include controls for drawing revisions to stock cable items. Training was performed with RSCC Engineering on the revision of the procedure and noncompliance.

The date when the corrective action will be achieved:

The corrective actions were completed on 12/4/2014.

Regards,

A handwritten signature in black ink, appearing to read "David A. Murphy". The signature is fluid and cursive, written over a white background.

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