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SUBJECT: Part 21 rept re current transformer encapsulant matl.

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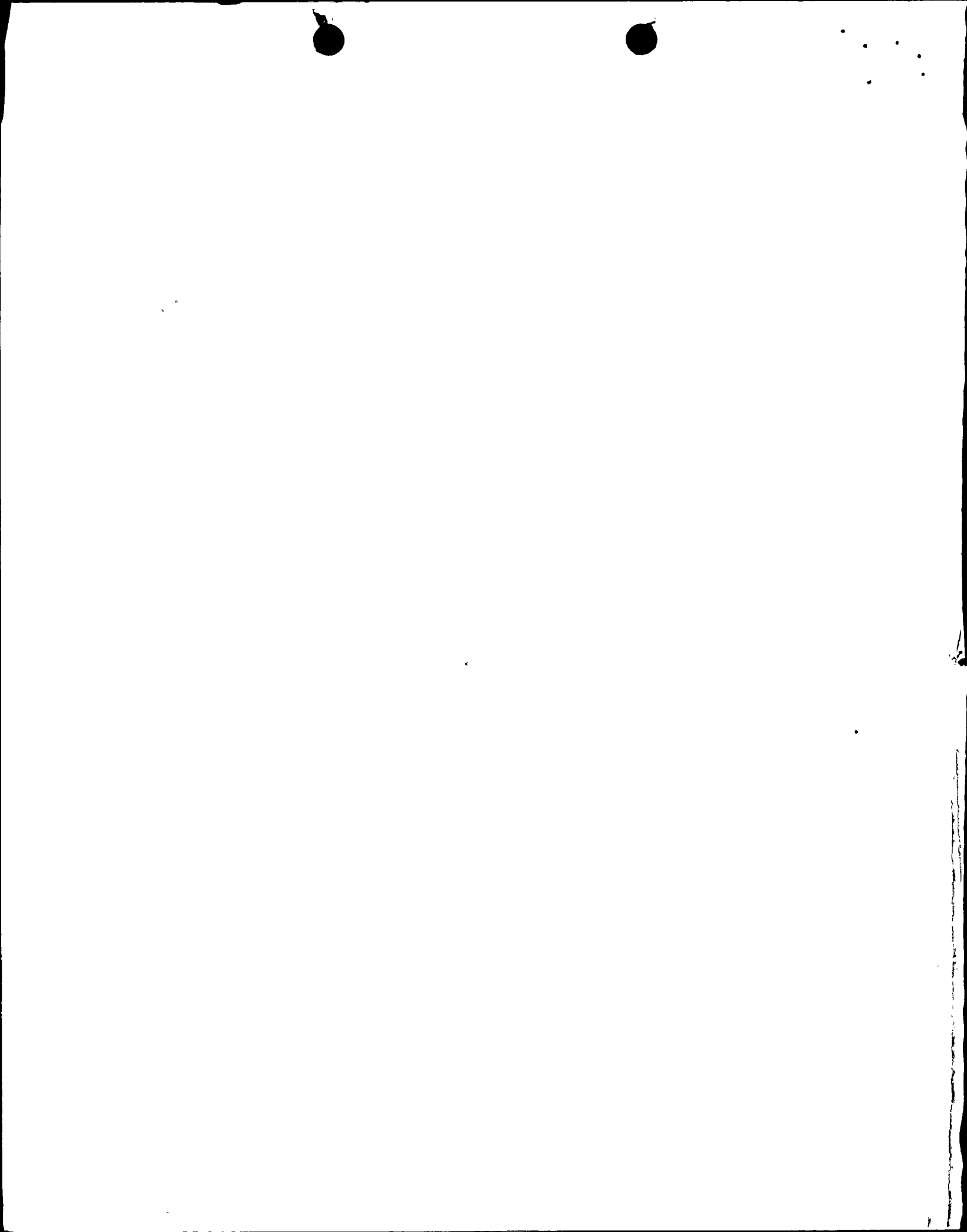
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April 17, 1989



Albert F. Kalser
President

Mr. Carl Berlinger, Branch Chief
Office of Generic Communications
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Part 21 Report
ABB Power Distribution, Inc.
Current Transformer (CT) Encapsulant Material

Gentlemen:

ABB switchgear equipment has for many years utilized current transformers and sensors encapsulated in an epoxy-anhydride compound. Epoxy-anhydride formulations are commonly used as encapsulants in a great many electrical components. Normally these materials form a durable protective casing with proper formulating and curing.

During the past few years a very small number of low voltage current transformers and ground sensors manufactured with this particular type of material have been found to be softening or reverting back to liquid.

In August 1988 some TKM CT's in two spare (deenergized) low voltage load centers at the St. Lucie Nuclear Plant of FP&L were found to be softening. This, as in a few previous cases, was attributed to a formulating or curing problem, however, a detailed evaluation was initiated to determine the cause of this material degradation.

This evaluation consisted primarily of a series of accelerated aging tests conducted at Piedmont Dielectrics Inc. and some special tests at Clemson University. A summary of these tests is included as Appendix "C" of this report.

It should be noted that these accelerated aging tests were unusual and very severe and are not considered a standard test for this material.

Summary of Evaluation

There are least 500,000 to 600,000 components made of this material in service today. The number of items that have shown signs of reversion are considerably less than .01% of those manufactured over the past 24 years.

Items which reverted to liquid after being in service for more than 10 years have been isolated cases. One CT was recovered from a commercial installation near Orlando, Florida; one CT from a factory in North Carolina; one ground sensor from a factory in Spartanburg, S.C. and one ground sensor from equipment installed in Taiwan.

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THE UNITED STATES OF AMERICA
DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

MEMORANDUM FOR THE DIRECTOR
FROM: SAC, [City]
SUBJECT: [Topic]

On [Date], [Name] advised that [Description of event or information received]. [Name] stated that [Additional details].

[Name] further stated that [Additional details]. [Name] also mentioned that [Additional details].

[Name] advised that [Additional details]. [Name] stated that [Additional details]. [Name] also mentioned that [Additional details].

[Name] advised that [Additional details]. [Name] stated that [Additional details]. [Name] also mentioned that [Additional details].

[Name] advised that [Additional details]. [Name] stated that [Additional details]. [Name] also mentioned that [Additional details].

Very truly yours,
[Signature]

[Name]
Special Agent in Charge

[Name]
[Title]

Mr. Carl Berlinger
April 17, 1989
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The common factors in the reverted materials environment appear to be elevated air temperatures at high relative humidity, with little or no mitigating circumstances such as air conditioning, space heaters, or self heating. The CT's at St. Lucie were not energized.

It has been found that the effects of humidity on DDSA used in the hardener is what causes the depolymerization or reversion. It is also known that decreasing the amount of DDSA in the hardener can improve the materials resistance to reversion, however, it cannot prevent it altogether.

The results of these tests confirm that the epoxy will revert back to liquid, however, the prediction of when this will happen is not readily apparent. Whether this will happen in 10 years, 30 years, or 100 years in a particular environment remains to be determined.

The small number of field occurrences and the scattering of data from tests makes it difficult to do more than generalize about the causes of reversion and the factors affecting the rate of reversion at this time.

It should be noted that the CT's at St. Lucie that were found to be reverting had been inspected 18 months earlier and were found to be normal at that time. Approximately 15 CT's were changed out in each of two load centers.

Recommended Inspection

It is recommended that items encapsulated with the epoxy be inspected at approximately 18 month intervals. With the equipment deenergized, the item can be examined by pressing a thumb nail into the material. This should leave a small indentation if the material is still acceptable for use. If the material is tacky it has started to revert. The reversion process is slow but irreversible. Once it has started it will continue until the material liquifies. The item should be replaced when the encapsulant becomes tacky.

If the item shows no sign of reversion, it can continue to be used indefinitely. Some few items failed at approximately 10 years. The CT's that reverted at St. Lucie were 17 years old, however, the other CT's at St. Lucie show no signs of reversion at this time. Many CT's have been in service for over 20 years with no signs of reversion.

Once the process of reversion is detected, there is adequate time to order and install replacement parts. The process of degradation is very gradual as was evident by the 18 month inspection cycle at St. Lucie and from the tests performed by Clemson.

An inspection of CT's at Turkey Point shows no signs of reversion. Turkey Point was built approximately two to three years earlier than St. Lucie.

The first part of the document discusses the importance of maintaining accurate records and the role of the auditor in ensuring the integrity of the financial statements.

In the second part, the auditor is required to perform a thorough examination of the company's internal controls and to report on their effectiveness.

The third part of the document outlines the specific procedures that the auditor must follow when conducting a field audit, including the selection of samples and the use of audit evidence.

Finally, the document concludes by emphasizing the auditor's responsibility to the public and the need for transparency and accountability in the audit process.

The auditor's report is a key document in the audit process, and it is essential that it be prepared in accordance with the relevant standards and regulations.

The auditor must also be aware of the potential risks and challenges associated with the audit process, and must take appropriate steps to mitigate these risks.

In conclusion, the auditor plays a vital role in ensuring the accuracy and reliability of the financial statements, and must therefore exercise the highest level of professional judgment and care.

The auditor's report is a key document in the audit process, and it is essential that it be prepared in accordance with the relevant standards and regulations.

The auditor must also be aware of the potential risks and challenges associated with the audit process, and must take appropriate steps to mitigate these risks.

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Determination of material hardness by means of a durometer as it is done in the factory is not a practical means of inspecting CT's in field service. In fact, it could be misleading. The durometer can only be used if the item being tested is on a smooth flat surface.

Equipment Affected

Reversion has occurred in TKM type CT's used in low voltage switchgear. It also occurred in ground sensors used in medium and low voltage switchgear. The same material is used in medium voltage CT's and other sensors, however, there have been no reports of reversion in these items.

Appendix "A" lists all components that are manufactured with the epoxy resin and require the inspection mentioned above.

The fact that there have been no reversions reported in the medium voltage CT's may be because the epoxy is poured into a hard reinforced cylindrical case and the epoxy potting compound is only exposed to humidity on the top. This effectively reduces the surface area of the epoxy exposed to humidity by a factor of ten. Tests are being performed to evaluate these components.

Corrective Action

Only components showing actual signs of reversion need to be replaced.

Replacement parts can be obtained by following existing procedures for ordering spare parts.

Copies of this report are being forwarded to all Nuclear Power Generating Stations that have ABB Power Distribution, Inc. equipment being utilized in Nuclear Safety Related applications.

Appendix "B" contains a list of Nuclear Power Generating Stations with ABB Power Distribution, Inc. low voltage and/or medium voltage switchgear in Nuclear Safety Related applications.

Further Considerations

Alternate designs for CT's are being evaluated.

Changing the encapsulant to a polyurethane material is being evaluated. No change can be implemented quickly due to materials testing and design testing that must be accomplished. Three alternative materials are currently under evaluation.

The first part of the report deals with the general situation in the country. It is noted that the economy is in a state of depression and that the government is unable to meet its obligations. The report also mentions that the population is suffering from widespread poverty and that the government is unable to provide for the basic needs of the people.

The second part of the report deals with the political situation. It is noted that the government is unable to carry out its policies and that the country is in a state of political instability. The report also mentions that the government is unable to maintain law and order and that the country is in a state of chaos.

The third part of the report deals with the social situation. It is noted that the population is suffering from widespread poverty and that the government is unable to provide for the basic needs of the people. The report also mentions that the government is unable to maintain law and order and that the country is in a state of chaos.

The fourth part of the report deals with the economic situation. It is noted that the economy is in a state of depression and that the government is unable to meet its obligations. The report also mentions that the population is suffering from widespread poverty and that the government is unable to provide for the basic needs of the people.

The fifth part of the report deals with the international situation. It is noted that the country is in a state of political instability and that the government is unable to carry out its policies. The report also mentions that the country is in a state of chaos and that the government is unable to maintain law and order.

The sixth part of the report deals with the future of the country. It is noted that the country is in a state of political instability and that the government is unable to carry out its policies. The report also mentions that the country is in a state of chaos and that the government is unable to maintain law and order.

The seventh part of the report deals with the conclusion. It is noted that the country is in a state of political instability and that the government is unable to carry out its policies. The report also mentions that the country is in a state of chaos and that the government is unable to maintain law and order.



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As can be seen from this evaluation, the probability of encountering this type problem is very low, and if it is detected there is adequate time to initiate corrective action. The material degradation is a very slow process.

This report is being issued to advise the users of the potential for this problem and to initiate inspections recommended above.

A. F. Kaiser

A. F. Kaiser, President
ABB Power Distribution, Inc.

EWR/jm

Attachments

10

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY
5708 SOUTH WOODLAND AVENUE
CHICAGO, ILLINOIS 60637
TEL: 773-936-3700

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APPENDIX A

Components Used in NSR Installations

<u>CATALOG NO.</u>	<u>C/T TYPE</u>	<u>WHERE USED</u>
*	TKM followed by Suffix 1, 2, 3, 4 K-Line Neutral Sensor	K-Line Low Voltage Switchgear K-Line Low Voltage Switchgear
*	GS-5 & GS-200 & GSM & RCSG Round & Rectangular Sensors	K-Line Low Voltage Switchgear HK Medium Voltage Switchgear
401619 & 401621	LKM followed by Suffix 1, 2	LK Low Voltage Switchgear
401658, 401665, 401781 & 401786	LKM Neutral Sensor	LK Low Voltage Switchgear
401636	LK Sensor	LK Circuit Breaker
401644	LK Sensor	LK Circuit Breaker
*	MC, MCS, MCB, MCR followed by Suffix 5, 15, 20, 21, 25	HK Medium Voltage Switchgear
401717	LK Sensor (2500 thru 4200)	LK Circuit Breaker

* ALL CATALOG NUMBERS APPLICABLE TO THIS CT TYPE ARE INCLUDED IN APPENDIX A, SHEET 2.

APPENDIX A

Component List in 22K Installation

Part No.	Description	Quantity
40151	LM followed by Switch 1	1
40152	LM Voltage Switch	1
40153	LM Voltage Switch	1
40154	LM Voltage Switch	1
40155	LM Voltage Switch	1
40156	LM Voltage Switch	1
40157	LM Voltage Switch	1
40158	LM Voltage Switch	1
40159	LM Voltage Switch	1
40160	LM Voltage Switch	1
40161	LM Voltage Switch	1
40162	LM Voltage Switch	1
40163	LM Voltage Switch	1
40164	LM Voltage Switch	1
40165	LM Voltage Switch	1
40166	LM Voltage Switch	1
40167	LM Voltage Switch	1
40168	LM Voltage Switch	1
40169	LM Voltage Switch	1
40170	LM Voltage Switch	1
40171	LM Voltage Switch	1
40172	LM Voltage Switch	1
40173	LM Voltage Switch	1
40174	LM Voltage Switch	1
40175	LM Voltage Switch	1
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40177	LM Voltage Switch	1
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40181	LM Voltage Switch	1
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40188	LM Voltage Switch	1
40189	LM Voltage Switch	1
40190	LM Voltage Switch	1
40191	LM Voltage Switch	1
40192	LM Voltage Switch	1
40193	LM Voltage Switch	1
40194	LM Voltage Switch	1
40195	LM Voltage Switch	1
40196	LM Voltage Switch	1
40197	LM Voltage Switch	1
40198	LM Voltage Switch	1
40199	LM Voltage Switch	1
40200	LM Voltage Switch	1

ALL PARTS LISTED IN THIS APPENDIX ARE IDENTIFIED IN SHEET 2.

APPENDIX A

CT & SENSOR CATALOG NUMBERS

<u>TYPE</u>	<u>CAT. NO.</u>	<u>TYPE</u>	<u>CAT.NO.</u>	<u>TYPE</u>	<u>CAT.NO.</u>
TKM	401181	MC-5	401437	MC-15	400977
TKM	401184	MC-5	400862		
TKM	401190			MC-15A	401026
TKM	401310	MC-5A	401309		
TKM	401344			MC-15A1	401160
TKM	401174	MC-5M	401043		
		MC-5M	401434	MC-15AS	401042
SENSORS					
GS	302L0721UL			MC-15A1S	401601
GS	302B0500UL	MC-5M1	401179	MC-15A1S	401314
GS	302B0800UL	MC-5A1	401343	MC-15A1S	401191
GS	302B1013UL			MC-15S	401197
GS	302B1017UL	MCB-5	401012	MC-15S	401086
GS	302B1024UL	MCB-5	401048	MC-15S	401018
GS	302L0725UL				
GS	302A0500	MCB-5A	401024		
GS	302A0800			MC-15M	401031
GS	401240	MCB-5AS	401048		
GS	401222			MC-15M1	401161
GS	401214	MCB-5M	401040		
GS	401215			MC-15M1S	401194
GS	401205	MCB-5MS	401744		
GS	401208	MCB-5MS	401040		
GS	401202			MCB-15	401012
		MCS-5	400990	MCB-15S	401036
GSM	401075			MCB-15A	401024
GSM	401259				
		MCS-5S	401056		
		MCS-5S	401339	MCB-15AS	401048
		MC-25A1	401574	MCB-15AS	401591
NEUTRAL	609301			MCB-15M	401040
		MC-25A1S	401683		
GS	614521	MC-25M	401577	MCR-15A	401480
GS	614605			MCR-15A1	401514
GS	614608	MCS-20	401034	MCR-15M	401479
GS	401257	MCS-21S	401193	MCR-15M1	401529
GS	401262	MCS-21S	401124		
GS	401263	MCS-21S	401338		
GS	401264	MCS-21	401153		
		MCS-21S	401538		
		MCS-25	401572		
		MCS-25S	401580		

TABLE 1

U.S. DEPARTMENT OF AGRICULTURE

TYPE	QTY.	TYPE	QTY.	TYPE	QTY.
MC-15A	401030	MC-15A	401030	MC-15A	401030
MC-15B	401030	MC-15B	401030	MC-15B	401030
MC-15C	401030	MC-15C	401030	MC-15C	401030
MC-15D	401030	MC-15D	401030	MC-15D	401030
MC-15E	401030	MC-15E	401030	MC-15E	401030
MC-15F	401030	MC-15F	401030	MC-15F	401030
MC-15G	401030	MC-15G	401030	MC-15G	401030
MC-15H	401030	MC-15H	401030	MC-15H	401030
MC-15I	401030	MC-15I	401030	MC-15I	401030
MC-15J	401030	MC-15J	401030	MC-15J	401030
MC-15K	401030	MC-15K	401030	MC-15K	401030
MC-15L	401030	MC-15L	401030	MC-15L	401030
MC-15M	401030	MC-15M	401030	MC-15M	401030
MC-15N	401030	MC-15N	401030	MC-15N	401030
MC-15O	401030	MC-15O	401030	MC-15O	401030
MC-15P	401030	MC-15P	401030	MC-15P	401030
MC-15Q	401030	MC-15Q	401030	MC-15Q	401030
MC-15R	401030	MC-15R	401030	MC-15R	401030
MC-15S	401030	MC-15S	401030	MC-15S	401030
MC-15T	401030	MC-15T	401030	MC-15T	401030
MC-15U	401030	MC-15U	401030	MC-15U	401030
MC-15V	401030	MC-15V	401030	MC-15V	401030
MC-15W	401030	MC-15W	401030	MC-15W	401030
MC-15X	401030	MC-15X	401030	MC-15X	401030
MC-15Y	401030	MC-15Y	401030	MC-15Y	401030
MC-15Z	401030	MC-15Z	401030	MC-15Z	401030

APPENDIX B

Epoxy Encapsulated Items in NSR Locations

Arizona Public Service	Palo Verde
Arkansas Power & Light	Arkansas Nuclear One
Baltimore Gas & Electric	Calvert Cliffs
Boston Edison (CT's Only)	Pilgrim
Carolina Power & Light	Brunswick
Carolina Power & Light	Shearon Harris
Cincinnati Gas & Electric	Zimmer
C.E.I.	Perry
Commonwealth Edison	Zion
Commonwealth Edison	LaSalle County
Connecticut Yankee	Connecticut Yankee
Consumers Power	Palisades
Consumers Power	Midland
Detroit Edison	Fermi
Duke Power	Oconee
Duke Power	McGuire
Duke Power	Catawba
Duquesne Light	Beaver Valley
Florida Power Corporation	Crystal River
Florida Power & Light	St. Lucie
Florida Power & Light	Turkey Point
Georgia Power	Vogtle
Gulf States Utilities	River Bend
Houston Lighting & Power	South Texas
Illinois Power	Clinton
Indiana & Michigan	Cook
Iowa Electric Light & Power	Arnold
Long Island Light	Shoreham
Systems Energy Resources (Formerly Mississippi Power & Light)	Grand Gulf
Niagara Mohawk	Nine Mile Point 2
Northeast Utilities	Millstone 3
Northern States Power	Prairie Island

APPENDIX B

Epoxy Encapsulated Items in NSR Locations

Pennsylvania Power & Light	Susquehanna
Philadelphia Electric Company	Peach Bottom
Philadelphia Electric Company	Limerick
Portland General Electric	Trojan
Public Service Colorado	Ft. St. Vrain
Public Service Indiana	Marble Hill
Public Service New Hampshire	Seabrook
Public Service Electric & Gas	Salem
Public Service Electric & Gas	Hope Creek
SMUD	Rancho Seco
South Carolina Electric & Gas	Summer
Southern California Edison	San Onofre
TVA	Sequoyah
TVA	Watts Bar
TVA	Bellefonte
TVA	Hartsville
TVA	Phipps-Bend
TVA	Yellow Creek
Texas Utilities	Comanche Peak
Union Electric (Non 1E)	Calloway
Virginia Electric Power Company	Surry
Virginia Electric Power Company	North Anna
WPPSS	WNP
CFE (Mexico)	Laguna Verde
Taiwan Power	Kuosheng

APPENDIX C

Epoxy Encapsulant Materials Testing

During the past three years a few incidents have been reported of low voltage current transformers and ground sensors reverting back to liquid. This condition wherein the thermoset epoxy resin encapsulant material depolymerizes has occurred in switchgear units that have been in service for ten or more years. These failures had been attributed to incorrect mixing or formulating of the encapsulant material and the units were replaced.

In August 1988 some TKM current transformers in two spare (deenergized) low voltage load centers at the St. Lucie Nuclear Plant of Florida Power and Light were found to be in the reverted condition. The CT's at St. Lucie with this condition were manufactured in October 1971. This again appeared to be a mixing or curing problem, however, a detailed evaluation was initiated to determine the cause of the degradation of the epoxy resin material.

Experimental Testing

Several samples of the material were subjected to 95% relative humidity at 90°C (194°F). These environmental conditions were adapted from a standard Navy avionics test for the reversion of polyurethanes.

It should be noted that this accelerated aging test is unusual and very severe and is not a standard test for this material.

Five of the seven samples, including the control sample, reverted in 6 to 10 days. The rate of reversion was different and dependent upon the makeup of the samples. Test results indicated that one of the hardeners (DDSA) used in the epoxy formulation is the most likely cause of failure known as chain scission. Two samples which did not revert (liquify) in the 6 to 10 day period had been modified to contain less hardener. Altering the environmental conditions also affects the rate of reversion. A standard sample tested at 95% relative humidity and 80°C (176°F) took 23 days for reversion to occur.

Two TKM transformers manufactured at an earlier date were placed in the humidity chamber at 95% R.H. and 90°C. Both of these units reverted (liquified). One unit, manufactured between 2/74 and 5/79, was very soft when received, with a durometer hardness of 20D which is half the normal hardness. This indicated that this transformer had already started to revert. After 23 hours, the epoxy was very tacky and after 144 hours, the epoxy had liquified. The other transformer, manufactured between 1965 and 1972, had a normal hardness and did not revert until 480 hours into the test.

Finally, a new TKM transformer manufactured at Piedmont Dielectrics Inc. was subjected to the humidity/temperature test 95% R.H./90°C. Although this unit had a very high initial hardness of 58D, the material reverted after 288 hours.

APPENDIX C

Accelerated Material Testing

During the last three years a few incidents have been reported of low voltage current transformers and ground sensors reverting back to input. This condition where the highest epoxy resin encapsulant material depositives has occurred in switch gear units that have been in service for ten or more years. These failures had been attributed to incorrect mixing or formulation of the encapsulant material and the units were replaced.

In August 1971 some 1200 current transformers in two spare (demeritized) low voltage load centers at the St. Lucie Nuclear Plant at Florida Power and Light were found to be in the reverted condition. The CT's at St. Lucie with this condition were manufactured in October 1971. This again appeared to be a mixing or curing problem, however, a detailed evaluation was initiated to determine the cause of the degradation of the epoxy resin material.

Experimental Testing

Several samples of the material were subjected to 95% relative humidity at 90°C (174°F). These environmental conditions were adopted from a standard Navy avionics test for the reversion of polyurethanes.

It should be noted that this accelerated aging test is unusual and very severe and is not a standard test for this material.

Five of the seven samples, including the control sample, reverted in 6 to 10 days. The rate of reversion was different and dependent upon the amount of the samples. Test results indicated that one of the hardeners (DDA) used in the epoxy formulation is the most likely cause of failure known as chain scission. Two samples which did not revert (divinity) in the 6 to 10 day period had been modified to contain less hardener. Altering the environmental conditions also affects the rate of reversion. A standard sample tested at 95% relative humidity and 80°C (176°F) took 23 days for reversion to occur.

Two 1200 current transformers manufactured at an earlier date were placed in the humidity chamber at 95% R.H. and 90°C. Both of these units reverted (divinized). One unit, tested between 2 1/2 and 5 1/2 hours, was very soft when received, with a durometer hardness of 20D which is half the normal hardness. This indicated that this transformer had already started to revert. After 2 1/2 hours the epoxy was very tacky and after 1 1/2 hours the epoxy had divinized. The other transformer, manufactured between 1965 and 1971, had a normal hardness and did not revert until 180 hours into the test.

Relative humidity was maintained at 95% and temperature test 90°C. Although the unit had a very high initial hardness of 52D, the material reverted after 23 days.

APPENDIX C
(Continued)

The Chemical Engineering Department at Clemson University was contacted about other types of testing that could be done on the epoxy resin. Their suggestion was to run second order glass transition temperature (T_g) determinations.

T_g numbers are an indication of cross linking density. However, T_g determinations were not feasible, though the modulus of elasticity was determined. This physical property is also a function of cross linking density. By obtaining these values for a controlled specimen and for specimens exposed for 2 and 5 days at 95% R.H., 90°C, it was thought that it may be possible to determine a more accurate rate of degradation.

The results of these tests confirm that the epoxy will revert back to liquid, however, the prediction of when this will happen is not readily apparent. Whether this will happen in 10 years, 30 years, or 100 years in a particular environment remains to be determined.

ALPHAVIRUS
(continued)

The first Engineering Department of Clemson University was contacted about
other type of testing that could be done on the epoxy resin. Their
suggestion was to run second order glass transition to determine the
deterioration.

It appears to be an indication of cross linking density. However, Tg
determination were not feasible through the coating of substrate was
deteriorated. This physical method is also a function of cross linking
density. In obtaining these values for a controlled specimen and for
specimens exposed for 1 and 2 days at 92° R.H., 90%. It was thought that it
was possible to determine a more accurate rate of degradation.

The results of these tests confirm that the epoxy will revert back to liquid
however, the prediction of when this will happen is not readily apparent.
Whether this will happen in 10 years, 30 years, or 100 years in a particular
environment remains to be determined.