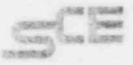


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Southern California Edison Company



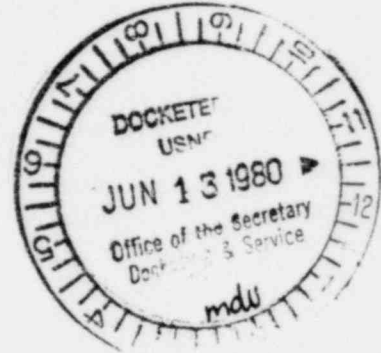
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May 30, 1980

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DOCKET NUMBER
PROPOSED RULE PR- Misc Notice
Reg Guide



Secretary of the Commission
Attention: Docketing and Service Branch
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gentlemen:

Subject: Comments on Proposed Revision 1 to Regulatory Guide 1.131, "Qualification Tests of Electric Cables and Field Splices for Light-Water-Cooled Nuclear Power Plants"

Enclosed for your consideration are Southern California Edison's comments on the proposed revision to Regulatory Guide 1.131. If you have any questions concerning these comments, please let me know.

Sincerely,

KP Baskin

Acknowledged by card. 6/13/80..mdv..

*IRP-11
Comments*

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Comments on Proposed Revision-1
to Regulatory Guide 1.131
"Qualification Tests of Electric Cables
and Field Splices for Light-Water-
Cooled Nuclear Power Plants"

1. Position C.2 and C.3: Both of these Sections state that type tests shall be performed to qualify cables and field splices to the service conditions in which they will be installed. The Regulatory Position makes no allowance for techniques such as Arrhenius relationships to qualify cables and splices to environmental conditions which differ from type test conditions.

Also, the cost impact of requiring tests for each unique application can be very substantial, and has not been evaluated in the Value/Impact Statement.

2. Position C.5: In the implementation of "Ongoing Qualification" Programs, it is important that the environmental conditions of cables that will be used for subsequent tests be monitored and documented. It is suggested that the Regulatory Guide call attention to these monitoring requirements.