

EcoTech/RAM-Q Nuclear Safety Related Parts and Service
Industries

6702 Bergenline Avenue West New York, NJ 07093 (201-662-0003)

October 9, 1989
FR89.10.9.1

U S Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

**Subject: Findings and Potential Concerns
Based on the EcoTech/RAM-Q Source
Verification and Performance Based Audit
Of The Rockbestos Company**

Gentlemen:

This letter is provided in confirmation of previous telephone correspondence between L. Gradin of EcoTech/RAM-Q and Mr. S. Alexander of the USNRC Division of Nuclear Reactor Regulators, in Washington D.C.

EcoTech/RAM-Q has performed a Source Verification and Performance Based Audit at the offices of the Rockbestos Company. As a result of this audit, several items of concern were discovered. At least two findings deal with the lack of support for Arrhenius based activation energy, and unsupported incomplete ampacity data for Firezone R cable. These items may be of significant concern on a generic basis. The following items summarize the concerns which resulted from the audit:

- 1) There is a lack of supporting qualification data for Rockbestos Firewall SR based cable. Rockbestos has been certifying SR insulated cable for more than 10 years. As a result of the EcoTech/RAM-Q audit, it has been found that aging and LOCA capability related to these cables have been based on unsupported, or technically incorrect, or incomplete data.
- 2) There is a possible QA control breakdown. Engineering and design verification inadequacies appear to exist at Rockbestos. These inadequacies especially relate to data for Firezone R cable. Incomplete or unsupported ampacity data for this cable, some five years after it has been made available as a fully qualified cable to the nuclear industry, may be of generic concern.
- 3) The Rockbestos response to the findings in the EcoTech/RAM-Q Performance Based Audit is insufficient to resolve the concerns for every nuclear unit. The state of the QA related findings appears to reflect at least some of the concerns raised in IE Information Notice 84-44, "Environmental Qualification Testing of Rockbestos Cable", dated June 8, 1984.

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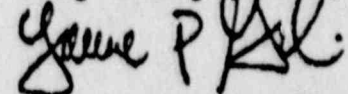
It appears that use of the Rockbestos data at the limits of published ratings, or Rockbestos stated qualification levels (e.g. aging and LOCA/HELB extrapolation), is not supportable by written objective evidence.

A specific user may be applying Rockbestos Silicone Rubber, or Firezone R cable in a derated manner, which may actually provide substantial margin. An evaluation to this effect for specific applications can only be undertaken by the specific utility.

Please note that a report to the NRC by EcoTech/RAM-Q regarding this matter is not required, in accordance with 10CFR21. However, we feel honor bound to advise you of the situation.

The staff of EcoTech/RAM-Q are available to provide any information or assistance which you may require in relation to this matter. Please feel free to call our Mr. Tom Farina or myself with any questions or comments which you may have.

Very truly yours,



Lawrence P Gradin
President

cc: C. Szeglin
S. Alexander
db w/att
Project File 2106

cf: 2106LTR.012