



Westinghouse
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Energy Systems

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June 2, 1994

NTD-NSRLA-SSL-94-025

Andrew J. Kugler, Acting Chief
Generic Communications Branch
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, DC 20555

Comments on Proposed IN 91-45 Supplement 1

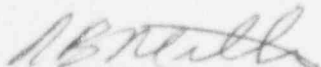
Reference: Letter Kugler to Miller dated May 26, 1994

Dear Mr. Kugler:

Westinghouse has the following general comments on the Proposed IN 91-45 Supplement 1 "Possible Malfunction of Westinghouse ARD, BFD and NBFD Relays, and A200 DC and DPC 250 Magnetic Contactors".

1. The heat-and-probe test and two surveillance cycle acceptance criteria was established in 1991 as a means of detecting most of the potential failures due to deficient potting compound. It was not intended to detect potential failures due to the Mylar insulation placement issue which is implied by the last sentence in the first paragraph on Page 4. Westinghouse does not believe that our criteria is inadequate for its intended purpose.
2. The failures at Prairie Island in 1993 were most likely the result of a combination of poor insulation placement and localized deficient potting compound, a condition that would not be and was not intended to be detected by the recommended tests for deficient potting compound alone. Relays in service that have been cycled many times should not be subject to failure from poor insulation placement alone. The number of anticipated failures due to combination of both issues would be low. This should be reflected in the Information Notice.

Thank you for the opportunity to comment.


R. B. Miller
Safety Systems Licensing

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