



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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FEB 17 1984

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MEMORANDUM FOR: James G. Partlow, Acting Director
Division of Quality Assurance, Safeguards,
and Inspection Programs
Office of Inspection and Enforcement

FROM: Robert L. Baer, Chief
Engineering and Generic
Communications Branch
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement

SUBJECT: PROPOSED IE INFORMATION NOTICE ON ENVIRONMENTAL QUALIFICATION
TESTING OF ROCKBESTOS CABLE

Your memorandum of February 7, 1984 requests comments regarding the subject Information Notice (IN). It should be noted that I transmitted a note (enclosed) to you on January 23, 1984 expressing my concerns regarding the IN. I have reviewed the redraft version of the IN which resolves Comment No. 1 of my concerns. However, comments 2 through 4 do not appear to have been considered. Further review of the redrafted IN resulted in additional comments which follow:

1. The IN, as now drafted, is essentially unchanged from that proposed by RIV, except that the conclusion section has been added.
2. The statements in the conclusion section now effectively elevate the IN to a Bulletin status. If we decide to proceed with such strong statements of licensee corrective actions, we should call it a bulletin and process it accordingly.
3. Serious consideration should be given to Item 4 of my January 23 correspondence which states:

"If the consensus of the staff is that the cables are suitable for use in a potentially harsh environment, then the need for an IN should be reconsidered. It might be appropriate to limit action to the vendor. Perhaps a civil penalty would be justified." If we take enforcement action and still feel that an IN is required, we can shorten the technical part of the IN and state that we have taken enforcement action.

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4. The IN reads like a trip report from RIV (entirely too much detail). I believe that much of the specificity ought to be omitted. Also, I suggest that Rockbestos be given an opportunity to review this document before final issuance.
5. I suggest that prior to identifying deficiencies in testing of coaxial, triaxial, etc. type cable, EQB should identify safety-related applications of this type cable and determine if there is indeed a concern. If not, then these references in the IN should be omitted. If the IN is to include coaxial, triaxial, etc. then the IN should be expanded to identify and include information regarding the other cable in question (e.g., 7 conductors, 12 AWG Wire, and the like) to facilitate resolution of the problems by the end-users.

Robert L. Baer
Robert L. Baer, Chief
Engineering and Generic
Communications Branch
Division of Emergency Preparedness
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Enclosure: Note B. Baer to J. Partlow
dated January 23, 1984

cc: E. L. Jordan, IE
S. A. Schwartz, IE
V. D. Thomas, IE
W. B. Le, IE
J. A. Axelrad, IE
✓ V. S. Noonan, NRR