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UNITED STATES OF AMERICA
UNITED STATES NUCLEAR REGULATORY COMMISSION
DOCKETING & SERVICE
BRANCH
before the

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PUBLIC SERVICE COMPANY)	Docket Nos. 50-443-OL-1
NEW HAMPSHIRE, et al.)	50-444-OL-1
)	
(Seabrook Station, Units 1)	(On-site Emergency
and 2))	Planning Issues)
)	

APPLICANTS' SUGGESTION OF MOOTNESS

On the basis of the Affidavits of Richard Bergeron, Gerald A. Kotkowski and Ted C. Feigenbaum and for the reasons set forth below, Applicants move the Licensing Board to enter an order that the issue regarding the environmental qualification of RG-58 coaxial cable pending before the Licensing Board is moot.

As is established by the Affidavit of Richard Bergeron, the RG-58 cable is a coaxial, single conductor cable which is non-vital, or nonsafety-related. Bergeron Affidavit at ¶¶ 3-4. A computer run was made to generate a list of all installed RG-58 coaxial cables at Seabrook Station and 126 nonsafety-related cables were identified. Id. at ¶¶ 3-6.

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The route of each cable identified was traced by means of Seabrook Station cable raceway drawings. Id. at ¶ 7. In addition to tracing the route of the identified RG-58 coaxial cable, a review was performed to determine if the other cables routed along with the RG-58 cable(s) were safety-related or nonsafety-related. Id.

Information regarding the RG-58 cable routes, the physical interactions with other cables (i.e. other cables routed with RG-58 cables) and environmental zones and parameters of the routes was evaluated to identify common groupings of cables. Id. at ¶¶ 7-9. The 126 nonsafety-related RG-58 cables were placed into the following categories:

<u>No. of Cables</u>	<u>Category</u>
18	Spare RG-58 cables
12	RG-58 cables routed at least partially through a harsh environment within the nuclear island (see FSAR Figure 8.3-58)
77	RG-58 cables located in mild environments within the nuclear island
10	RG-58 cables routed with other nonsafety-related cables outside the nuclear island
9	RG-58 cables routed in mild environments within the nuclear island and routed with nonsafety-related cables outside the nuclear island

Id. at ¶ 9.

It should be noted that none of the RG-58 cables are routed inside the Containment Building or in the main steam and feedwater pipe chases. Id. at ¶ 10.

The only RG-58 coaxial cables which must meet the environmental qualification set forth in 10 CFR 50.49 are the twelve (12) nonsafety-related RG-58 coaxial cables which are routed at least partially through a harsh environment within the nuclear island. The RG-58 cables located in mild environments are not required to be qualified under 10 CFR 50.49 as 10 CFR 50.49(c) provides that "environmental qualification of electric equipment important to safety located in a mild environment [is] not included within the scope of this section." Furthermore, the nonsafety-related RG-58 cables which are routed with other nonsafety-related cables outside the nuclear island are not required to comply with the requirements set forth in 10 CFR 50.49 as 10 CFR 50.49(b)(2) provides that the electric equipment covered by the regulations includes "nonsafety-related equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions...by the safety-related equipment." Finally, the spare cables are not required to meet the requirements of 10 CFR 50.49 as the spare cables are not functioning or energized and therefore do not pose any threat to other cables in the same raceway. Id. at ¶ 14. See also id. at ¶¶ 12-15.

An independent review was performed and verified that: (1) all RG-58 cables were identified; and (2) there were only twelve nonsafety-related RG-58 cables which were routed at least partially through a harsh environment within the nuclear island. Id. at ¶ 16. An additional review was performed and verified that the raceway drawing used reflected the as-built installed raceway configuration. Id. at ¶ 17.

As is established by the Affidavit of Gerald A. Kotkowski, the RG-59 coaxial cable is an acceptable substitute for the twelve RG-58 cables located in a harsh environment within the nuclear island. A review was performed to determine the applications of the twelve RG-58 cables which are located in harsh environments within the nuclear island. Kotkowski Affidavit at ¶ 3. It was determined that the applications of the RG-58 cable fall into two groups which are nonsafety-related/non-essential. Id. In both cases the intended function of the cable is to transmit high frequency electrical signals. Id. A review of factory test results for both the RG-58 cable and the RG-59 cable demonstrated that the RG-59 cables will retain equal or better signal quality than the RG-58 cable for these twelve applications. Id. at ¶¶ 4-6. In addition, the RG-59 cable was found to be compatible with the requirements of the connecting device/instrument used by the RG-58 cable. Id. at

¶ 7. It was therefore determined that the RG-59 coaxial cable was an acceptable substitute for the twelve RG-58 cables located in a harsh environment within the nuclear island. Id. ¶ 8.

The environmental qualification of the RG-59 cable for the postulated accident conditions inside the containment at Seabrook Station was established by means of testing and is contained in Environmental Qualification File No. 113-19-01. Bergeron Affidavit at ¶ 19. Therefore, the RG-59 coaxial cable is qualified for the harsh environment RG-58 cable applications. Id.

Finally, as is established by the Affidavit of Ted C. Feigenbaum, the management of Seabrook Station has determined that given the small quantity of cable involved, the licensing process would be better served by replacing the RG-58 cables in the twelve applications where the cable needs to meet the requirements of 10 CFR 50.49, rather than to continue to litigate the issue of the environmental qualification of the RG-58 cable. Feigenbaum Affidavit at ¶¶ 2-5.

New Hampshire Yankee, therefore, has directed that for the twelve RG-58 coaxial cable applications, the RG-58 coaxial cable will be replaced by RG-59 coaxial cable. Id.

at ¶ 7. The replacement of the cable will be completed prior to the issuance of an operating license authorizing power operations up to and including 5% power. Id. at 8.

CONCLUSION

An order should enter finding that the issue regarding the environmental qualification of RG-58 coaxial cable pending before this Licensing Board is moot.

Respectfully submitted,

Deborah S. Steenland

Thomas G. Dignan, Jr.
Deborah S. Steenland
Ropes & Gray
225 Franklin Street
Boston, Massachusetts 02110
(617) 423-6100

Counsel for Applicants