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May 19, 1988

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

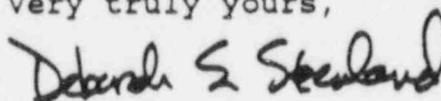
Re: Public Service Company of New Hampshire, et al.  
Docket Nos. 50-443-OL-1 & 50-444-OL-1

Dear Sir or Madam:

Pursuant to the Commission's Rules and Regulations, there is enclosed herewith for filing in the above-entitled matter one signed and two conformed copies of the following documents with Certificate of Service attached.

1. Applicants' Suggestion of Mootness;
2. Affidavit of Richard Bergeron;
3. Affidavit of Gerald A. Kotkowski;
4. Affidavit of Ted C. Feigenbaum; and
5. Applicants' Response to Board Order of May 9, 1988.

Very truly yours,



Deborah S. Steenland

DSS/ml  
Enclosures

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PDR ADOCK 05000443  
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May 19, 1988

UNITED STATES OF AMERICA  
UNITED STATES NUCLEAR REGULATORY COMMISSION

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 this 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)
17	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*

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

Counsel for Applicants

UNITED STATES OF AMERICA  
UNITED STATES NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

\_\_\_\_\_  
In the Matter of )

PUBLIC SERVICE COMPANY )  
NEW HAMPSHIRE, et al. )

(Seabrook Station, Units 1 )  
and 2) )

Docket Nos. 50-443-OL-1  
50-444-OL-1

(On-site Emergency  
Planning Issues)

AFFIDAVIT OF RICHARD BERGERON

I, RICHARD BERGERON, being on oath, depose and say as follows:

1. I am the Instrumentation and Controls Engineering Supervisor for New Hampshire Yankee. A statement of my professional qualifications is attached and marked "A".
2. The purpose of my affidavit is to describe the means used to identify and locate all Seabrook Station RG-58 coaxial cable applications; the means used to identify those RG-58 cables which could be subjected to a harsh environment within the nuclear island (see FSAR Figure 8.3-58); the rationale why only cables located in harsh environments within the nuclear island need be replaced; and to conclude that the RG-59 coaxial cable replacement evaluated in the Affidavit of Gerald A. Kotkowski is environmentally qualified for the RG-58 coaxial cable applications located in harsh environments.

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3. Specification 9763-006-113-19 establishes the requirements for all of the specialty cable supplied to Seabrook Station by ITT Surprenant. It includes RG-11 coaxial, RG-11 triaxial, RG-58 coaxial and RG-59 coaxial cables supplied under Purchase Order 113-19. The specification assigns Cable Code TA6Y to the RG-58 cable.
4. Cable codes are used to identify plant cables and are described in the Computerized Conduit and Cable Schedule Programs (CASP) Design Guide. In the Design Guide, Cable Code TA6Y denotes that RG-58 is a coaxial, single conductor cable, and is colored black with a red tracer to signify that it is non-vital, associated with Train A. This color coding of cables is also described in FSAR Section 8.3.1.3. In addition, FSAR Section 8.3.1.4 defines non-vital cables as being Non-Class 1E (i.e. nonsafety-related).
5. CASP is a computer based system for maintaining the design configuration of both safety related and nonsafety-related installed plant cables such as the RG-58 coaxial cable. The CASP system provides the controls to identify and maintain cable routes and termination locations for each uniquely identified plant cable.
6. A sort was made of CASP to generate a list of all installed cables with the Cable Code TA6Y used to denote the ITT Surprenant RG-58 coaxial cable. This sort identified 126 nonsafety-related RG-58 coaxial cable runs.

7. The route of each cable identified was traced by means of Seabrook Station cable raceway drawings. In addition to tracing the route of the identified RG-58 cable, a review was performed to determine if the other cables routed along with the RG-58 cable(s) were Class 1E (i.e., safety-related) or Non-Class 1E (i.e. nonsafety-related).

8. After each route was established, the environmental zones through which each cable traveled were determined using the Service Environment Chart Design Basis Calculations. The environmental parameters of each environmental zone were then reviewed using the Service Environment Charts.

9. The information obtained from the above review was evaluated to identify common groupings of cables. This evaluation categorized the 126 RG-58 coaxial cables into the following:

<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
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

10. This evaluation also concluded that none of the RG-58 coaxial cables are routed inside the Containment Building or in the Main Steam and Feedwater pipe chases.

11. An evaluation was made of the above five cable categories to determine which cables are required to comply with the environmental qualification requirements set forth in 10 CFR 50.49.

12. 10 CFR 50.49(c) provides in pertinent part "Requirements for... (3) environmental qualification of electric equipment important to safety located in mild environment are not included within the scope of this section [10 CFR 50.49]." Wherein a mild environment is described as "an environment that would at no time be significantly more severe than the environment that would occur during normal plant operation including anticipated operational occurrences." Therefore cables located in mild environments are not required to comply with the environmental qualification requirements set forth in 10 CFR 50.49. Environmental qualification for cables in mild environments is demonstrated through the specifying and purchasing of cables in accordance with recognized and acceptable industry standards and by invoking the general quality and surveillance requirements applicable to electric cables as a result of Commission regulations other than 10 CFR 50.49 (e.g., 10 CFR 50, Appendix B). Since all cable in Purchase Order No. 113-19 were purchased as if

it were intended for safety-related applications (i.e., purchased as safety-related regardless of its actual or intended end use), the RG-58 cable meets or exceeds the requirements necessary to demonstrate its acceptability for mild environment applications. The requirements for mild environment qualification of electrical equipment were articulated in the statements of consideration to the published final rule of 10 CFR 50.49 (Ref. 48 FR 2729, Comment No. 3 at 2731).

13. 10 CFR 50.49(b) provides in pertinent part "Electric equipment important to safety covered by this section [10 CFR 50.49] is:...(2) Nonsafety-related equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions...by the safety related equipment." Therefore RG-58 coaxial cables which are routed with other nonsafety-related cables outside the nuclear island need not comply with the requirements set forth in 10 CFR 50.49. In this regard, it should be noted that the RG-58 coaxial cable outside the nuclear island was specified and procured in accordance with the same requirements for the RG-58 coaxial cable located within the nuclear island as described in paragraph 12 above.

14. Spare cables are not functioning or energized and therefore would not pose any threat to other cables in the same raceway. In order to use a spare cable, a design change

has to be initiated prior to its incorporation into the plant design. One of the considerations in any design change is the need to comply with the requirements of 10 CFR 50.49. Therefore, a cable which is not qualified for a given application would not be used. This necessarily restricts the use of the spare cables. Therefore spare cables need not comply with the environmental qualification requirements set forth in 10 CFR 50.49 until the cable has been designated for a use in the plant design and all applicable NRC regulations have been met.

15. Based on the foregoing the only cables which need comply with the environmental qualification requirements 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 [10 CFR 50.49(b)(2)]. These cables are: FM3-JW5; FM3-JW5/1; FM6-JW5; FM6-JW5/1; FM4-JX1; FM4-JX1/1; FM7-JX1; FM7-JX1/1; GU4-Y59/2; GU4-Y59/3; GU4-Y59/4; and GU4-Y59/5.

16. An independent review was performed and verified that all RG-58 cable had been identified and more specifically that the twelve (12) nonsafety-related RG-58 coaxial cables identified above were the only nonsafety-related cables which were routed at least partially through a harsh environment within the nuclear island. The review was performed by different individuals and essentially replicated the review

described above, using the same information sources. The review included an evaluation of Seabrook Station electrical schematic drawings for RG-58 applications. This provides further assurances that all RG-58 applications have been identified.

17. A review of the applicable drawings and related documentation was performed. It verified that the raceway drawings used in the above described evaluations reflected the as-built installed raceway configuration.

18. As provided in the Affidavit of Gerald A. Kotkowski, ¶¶3-8 the twelve RG-58 cables located in harsh environments can be replaced with the RG-59 cable supplied by ITT Surprenant.

19. The environmental qualification of the RG-59 cable for the postulated accident conditions inside the containment at Seabrook Station is contained in EQ File No. 113-19-01 (NECNP Exhibit No. 4). As provided therein, this qualification was established by means of testing. The RG-58 coaxial cable is only used outside the containment which experiences less severe environmental condition than those inside the

containment. Therefore the RG-59 coaxial cable is environmentally qualified for the harsh environment RG-58 cable applications.

  
Richard Bergeron

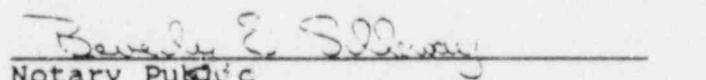
STATE OF NEW HAMPSHIRE

Rockingham, ss.

May 19, 1988

The above-subscribed Richard Bergeron appeared before me and made oath that he had read the foregoing affidavit and that the statement set forth therein are true to the best of his knowledge.

Before me,

  
Notary Public  
My Commission Expires: March 6 1990

"A"

RICHARD BERGERON

Instrumentation & Controls Engineering Supervisor

Education

BS Marine Engineering, Maine Maritime Academy, May 1969

Mr. Bergeron joined Public Service Company of New Hampshire in May 1982 as Senior I&C Engineer in the Engineering Services Department. His areas of responsibility include coordination of I&C Engineering activities for the Station Staff, Construction and Startup interface activities, as well as, various special projects. Mr. Bergeron was recently appointed to the position of Instrumentation & Control Supervisor in the Engineering Department. For the past six years Mr. Bergeron has also been assigned as the Station Staff Representative on the Equipment Qualification Task Force. He has been responsible for the coordination and review of the Equipment Qualification Program, as well as, coordinating the implementation of the Station Equipment Qualification Program.

Mr. Bergeron came to Public Service Company of New Hampshire from Stone & Webster Engineering Corporation where he was employed from 1972-1982. He held the position of Principle Instrument Application Engineer responsible, for

specifying, purchasing and design review of electron and pneumatic instrumentation control systems. Mr. Bergeron is also experienced in the scheduling and preparation of Logic Diagrams and System Descriptions which define the functional control concepts. He was also assigned as a task member to assist in the development and preparation of the 79-01B equipment qualification submittal for Duquesne Light Company.

Between 1969 and 1972 was employed by Gulf Oil Corporation as an engineer in their Marine Engineering Division. There he was responsible for the operation and maintenance of Marine Power Plants.



3. A review was performed to determine the applications of these twelve (12) RG-58 cables. As a result of the review, these applications can be categorized into two nonsafety-related/non-essential groupings. The first application grouping is cables connected between intelligent remote termination units (IRTU) and the main plant computer system Host CPU. The second application grouping is cables connected between ultrasonic level sensors and electrical control units for certain level measuring instruments. In both cases the intended function of the cable is to transmit high frequency electrical signals.

4. In determining the acceptability of RG-59 coaxial cable in these twelve applications an evaluation was made to assess the degradation of signal due to insertion loss (attenuation) and variation in response time due to the change in the velocity of propagation.

5. The velocity of propagation is the velocity of an electric wave governed solely by the properties of the dielectric medium and the permeability of the conductor through which it is transmitted. In a coaxial cable the velocity of propagation is the ratio of the speed of electromagnetic energy flow compared to the speed of light and is generally referred to herein as a percentage (%). The actual measured velocity of propagation provided in the typical factory cable test reports is 61.24% for RG-59 and

63.5% for RG-58. The minor decrease in the velocity of propagation (approximately 2.26%) will not noticeably affect the rate of signal transmission. This is due to the fact that the actual field cable lengths for these twelve applications are much less (approximately 1/4) than the maximum allowable cable lengths for the applicable operating frequency as recommended by the equipment vendors.

6. A review of factory test results for both RG-58 and RG-59 coaxial cables showed that the attenuation (i.e., db/100 ft.) for the RG-59 cable is less than that for the RG-58 cable. Thus the RG-59 cable will have less insertion losses and will retain equal or better signal quality than the RG-58 cable for these twelve (12) applications.

7. In addition the compatibility of an RG-59 cable with the connecting device/instrument was evaluated. In both application groupings the characteristic impedance of the RG-59 is compatible with the requirements of the connecting device/instrument. In addition, the respective equipment vendors were contacted and they confirmed that the use of RG-59 was acceptable.

8. Based on the foregoing, I have concluded that an RG-59 coaxial cable would be an acceptable substitute for the twelve (12) nonsafety-related RG-58 cables located in harsh environments and within the nuclear island.

Gerald A. Kotkowski  
Gerald A. Kotkowski

STATE OF NEW HAMPSHIRE

Rockingham, ss.

May 19, 1988

The above-subscribed Gerald A. Kotkowski appeared before me and made oath that he had read the foregoing affidavit and that the statement set forth therein are true to the best of his knowledge.

Before me,

Beverly E. Sullivan  
Notary Public  
My Commission Expires: March 6, 1990

"A"

GERALD A. KOTKOWSKI

ELECTRICAL ENGINEERING SUPERVISOR

EDUCATION

BS Electrical Engineering, Northeastern University, June 1974. Mr. Kotkowski joined PSNH in June 1982 as a Senior Electrical Engineer in the Engineering Services Department. He was assigned to the Startup and Test Department as the System Test Engineer for the 13.8 KV, 4160 Volt, 125 Volt DC and Diesel Generator Electrical Systems and as the Lead Electrical Distribution Test Engineer. Specific accomplishments include the preparation and performance of the pre-operational acceptance tests for the DC Distribution and Diesel Generator Systems. Specific responsibilities included the review and approval of all design changes to the Distribution Systems and the subsequent implementation and testing of these changes.

WORK EXPERIENCE

In June 1986, Mr. Kotkowski was appointed to the position of Electrical Engineering Supervisor in the Engineering Department. His current responsibilities include the supervision of Electrical Engineering and Design activities and technical support of field/construction activities. He has overall responsibility for ensuring that

the electrical design of the plant complies with the codes and regulations specified in the Seabrook FSAR.

Mr. Kotkowski came to PSNH from Power Technical Services where he was employed from June 1981 - April 1982 and was assigned as a Project Engineer to Boston Edison Company. While in this position he had the overall responsibility for implementing an Emergency Response Facility program for the Pilgrim 1 Nuclear Station. This program was designed to ensure technical adequacy and licensing compliance to current regulatory requirements including NUREG-0696, NUREG-0700 and Regulatory Guide 1.97, Revision 2.

Between March 1978 and May 1981, Mr. Kotkowski was employed by Stone & Webster Engineering as an engineer in the Electrical Control Group. While at Stone & Webster Headquarters in Boston he was assigned to the Electrical Control Group on the Shoreham Nuclear Power Station Project as the engineer responsible for providing post accident instrumentation to meet the requirements of Regulatory Guide 1.97, Revision 2. He also was designated as the cognizant engineer responsible for all controls associated with the Nuclear Steam Supply Systems as well as several other major modifications to Balance of Plant Systems.

While on a field assignment he was the only site representative for the controls Division at the Shoreham Nuclear Power Station. He assumed complete responsibility

for the resolution of construction and startup problems on all instrumentation and controls associated with an 850 MW Boiling Water Reactor. Specific responsibilities included: medium and low voltage switchgear, motor control centers, protective relaying, control and relay panels, electronic analog instrumentation, pneumatic control loops and instrumentation tubing. Also designated as the Interface Engineer between Nuclear Steam Supplier and the Architect Engineer.

Between December 1974 and February 1978, he was employed by General Atomic Engineering company. While on a field assignment he participated in the rise to power program at the Fort St. Vrain Nuclear Power Station. Specific accomplishments include: tuning the major plant controllers, modifying the Plant Protective System and Overall Plant Control System as required to pass Reactor Scram and Turbine Trip testing, coordinating a task force to resolve the Nuclear Regulatory Commission's concerns on cable segregation, and eliminating spurious control room alarms.

While at General Atomic Headquarters in San Diego he was assigned to the Control and Electrical Department. He was responsible for the design of instrumentation and controls for systems associated with the operation of a nuclear power plant. He prepared control and instrumentation diagrams,

schematic diagrams, cable tabulations, and instrument specifications.

Between December 1970 and October 1974 he was employed by Stone & Webster on a student co-operative basis where he received various assignments in the Electrical Control Department.

In summary, Mr. Kotkowski has fourteen (14) years experience in the electrical design and testing of nuclear power plants.

UNITED STATES OF AMERICA  
UNITED STATES OF NUCLEAR REGULATORY COMMISSION

before the

ATOMIC SAFETY AND LICENSING BOARD

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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)
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AFFIDAVIT OF TED C. FEIGENBAUM

I, TED C. FEIGENBAUM, being on oath, depose and say as follows:

1. I am the Vice-President of Engineering, Licensing, and Quality Programs for New Hampshire Yankee. A statement of my professional qualifications is attached and marked "A".
2. I directed New Hampshire Yankee Engineering to perform such reviews and evaluations as necessary to identify all RG-58 coaxial cable applications, both safety and nonsafety; to identify and quantify all RG-58 coaxial cable applications required to be environmentally qualified per 10 CFR 50.49 and to identify an acceptable substitute for those RG-58 cable applications requiring qualification per 10 CFR 50.49.

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3. The Affidavits of Richard Bergeron and Gerald A. Kotkowski provide the details and pertinent results of these reviews and evaluations.

4. As provided in the Affidavit of Richard Bergeron, paragraph 15, only twelve (12) nonsafety-related RG-58 coaxial cable applications are required by 10 CFR 50.49 to be environmentally qualified for postulated accident conditions.

5. Based on the Affidavit of Richard Bergeron, paragraph 19, and the Affidavit of Gerald A. Kotkowski, paragraph 8, an RG-59 coaxial cable supplied by ITT Surprenant is a technically acceptable replacement for these twelve (12) nonsafety-related RG-58 coaxial cable applications.

6. Although I believe that further litigation of this issue would demonstrate that the RG-58 coaxial cable was and still is qualified for its intended service, I have concluded that given the small quantity of cable involved, the licensing process would be better served by replacing the RG-58 cable in these twelve (12) applications versus continuing the expenditure of resources and time of the NRC, New Hampshire Yankee and others by further litigating this issue.

7. I have directed that for these twelve (12) RG-58 coaxial cable applications the existing RG-58 coaxial cable shall be replaced by RG-59 cable supplied ITT Surprenant.

8. New Hampshire Yankee will complete the replacement of the RG-58 coaxial cable, as described above, prior to issuance of an operating license authorizing power operations up to and including 5% power.

Ted C. Feigenbaum  
Ted C. Feigenbaum

STATE OF NEW HAMPSHIRE

Rockingham, ss.

May 19, 1988

The above-subscribed Ted C. Feigenbaum appeared before me and made oath that he had read the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Before me,

Beverly E. Silboway  
Notary Public  
My Commission Expires: March 6, 1990

"A"

TED C. FEIGENBAUM

Vice President, Engineering, Licensing and Quality Programs

Education

The City College of the City University of New York  
Bachelor of Engineering (Mechanical) - 1972

Mr. Feigenbaum joined Public Service Company of New Hampshire in 1986 as Executive Assistant to the Senior Vice President. Subsequently in 1987, Mr. Feigenbaum became the Vice President, Engineering, Licensing, and Quality Programs. His areas of responsibility are the corporate officer responsible for all aspects of design, engineering, licensing, quality assurance and quality control. He is responsible for the conduct and operation of Plant Engineering, Configuration Management Group, Reliability and Safety Engineering, Licensing, Quality Inspections, Audit and Surveillance Groups, Independent Safety Engineering Group, Independent Review Team, and Employee Allegation Resolution Program. He directs the efforts of 175 professional staff and contract personnel and is plant spokesman for Emergency Planning drills and graded exercises. Mr. Feigenbaum has been responsible in assisting the Senior Vice President in accomplishing Company goals and objectives by developing and implementing programs to assure safe and reliable plant operation. He performed independent reviews of Company

operations on a regular basis and appraised the effectiveness, efficiency, economy, and conformance of activities to established standards of performance. He advised senior management regarding realistic, practical and comprehensive actions to effect improvement or correct deficiencies.

Mr. Feigenbaum came to Public Service Company of New Hampshire from Ebasco Services, Inc., where he was employed from 1978 to 1985. He held the position of Independent Review Team Leader for the Seabrook Station, Public Service of New Hampshire supervising engineers who conducted detailed evaluations of construction and engineering activities. He provided oral and written reports and recommendations to senior project management and Joint Owners relating to schedule, budget and technical adequacy of Project activities.

Mr. Feigenbaum was a Project Engineer for the St. Lucie Nuclear Power Plant, Units 1 & 2 of Florida Power & Light Company responsible for design and retrofit engineering. He supervised the activities of eighty multi-disciplined engineering and design personnel and was responsible for technical quality, planning, and scheduled adherence and cost control. He also supervised home office engineering personnel, liaison with site engineering staff and construction support, licensing activities and coordination

of all major regulatory related tasks. This Project experience included lead mechanical engineer responsible for all phases of mechanical, nuclear, water treatment and radwaste systems engineering.

Mr. Feigenbaum was Lead Piping Engineer for Shearon Harris Nuclear Power Plant of Carolina Power & Light Company responsible for engineering, design, and procurement of all piping and support systems.

Between 1972 and 1978, Mr. Feigenbaum was employed by Stone & Webster Engineering Corporation as a Lead Systems Engineer, Turbine Engineer and Engineer. As a Turbine Engineer on NYSPA Greene County Plant he was responsible for administration of the turbine-generator contract and as a Lead Systems Engineer on Virginia Electric and Power Company Surry Nuclear Power Station, Units 3 & 4 he was responsible for engineering, design and equipment procurement for all BOP systems.

May 19, 1988

UNITED STATES OF AMERICA  
UNITED STATES NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

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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' RESPONSE TO BOARD ORDER OF MAY 9, 1988

The Licensing Board issued an Order on May 9, 1988 directing the parties "to provide their views as to how this Board should proceed with the remanded issue regarding the environmental qualification of RG-58 coaxial cable." May 9 Order at 1.

Based on the information provided in "Applicants' Suggestion of Mootness" (May 19, 1988), Applicants believe that the issue is now moot. In the event that the Licensing

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Board does not find that the issue is moot, Applicants support the position presented by NRC Staff. "NRC Staff Response to Board Order of April 26, 1988" (May 6, 1988).

Respectfully submitted,

*Deborah S. Steerland*

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

Counsel for Applicants