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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Appeal Board

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

Public Service Company of )  
New Hampshire, et al. )

(Seabrook Station, Units 1 & 2) )

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

ONSITE EMERGENCY  
PLANNING & TECHNICAL  
ISSUES

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S  
REPLY TO APPLICANTS' RESPONSE REGARDING  
ENVIRONMENTAL QUALIFICATION OF RG-58 COAXIAL CABLE

On December 2, 1987, the Appeal Board sua sponte issued an order granting the Coalition permission to reply to Applicants' November 25, 1987 Response Regarding Environmental Qualification of RG-58 Coaxial Cable. Applicants' Response states, at p. 3:

The RG-58 coaxial cable supplied by ITT Surprenant to Seabrook is color coded in accordance with Specification No. 9763-006-113-19, and is black with a red trace (Reference 1 at A1; Reference 7 at 2). Based on this color coding, acceptable performance of the RG-58 cable when exposed to harsh environmental conditions is measured only by the cable's ability to remain intact such that its insulation system will not catastrophically fail and result in a short to ground (Reference 6). Therefore, the basis for installed (i.e. RG-58) to tested (i.e. RG-59) cable similarity only relates to the overall strength of the insulation system and its resistance to catastrophic failure with respect to environmental effects.

ARGUMENT

As a threshold matter, it bears re-emphasizing that the issue on this appeal is whether there is adequate basis in the

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record for the Licensing Board's conclusion that RG-58 cable is environmentally qualified. Rather than support the Licensing Board's conclusion that there is an adequate basis for finding that the RG-58 cable is qualified, Applicants here appear to be arguing--for the first time--that because of its color coding, RG-58 cable does not need to be fully environmentally qualified.

In support of this novel proposition, Applicants offer only Reference 6 of Environmental Qualification File (EQF) No. 113-19-01, New England Coalition Exhibit 4. That document is denominated "Record of Conversation between Chuck Greiman (UE&C) and Mr. N. Woodward (Impell), dated 10/8/85."<sup>1</sup>

To begin with, a memorandum of a telephone conversation between two contractors is hardly probative authority for establishing the environmental qualification requirements for ten

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1 The memo states, in its entirety:

Chuck and I discussed how Impell can identify which of the different cables in P.O. 113-18 and the other cable specifications are connected to equipment which must perform a safety function subsequent to accident events.

The color coding of the outer jacket as defined in UE&C separation documents enables this determination. Specifically, outer jackets with the single solid color of red, white, blue, or yellow designates cables for which performance requirements such as I.R. and accuracy must be met during environmental qualification. Cable of other colors or color schemes must only remain intact (e.g. no shorting to ground). However, all Class 1E cables as defined by the Specification must be environmentally qualified.

Chuck will forward a copy of the UE&C separation document which defines these color schemes so that it may be included in the EQFs.

miles of cable inside this plant. The memo purports to describe how cables important to safety can be identified based on their color coding, but it does not explain the authority or basis for the unsubstantiated statement that multi-colored cables such as RG-58 "must only remain intact", rather than satisfy the more rigorous environmental qualification requirements. Nor does it contain any other indicia of reliability.

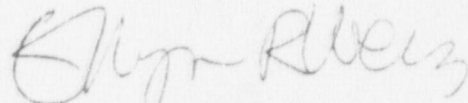
It is not even clear that the memorandum in question applies to the cables of instant interest, as it refers to "P.O. 113-18 and the other cable specifications", whereas the cables in question here were part of P.O. 113-19. We are apparently expected to infer, in the complete absence of any evidence on the point, that "the other cable specifications" applies to the one in question. Moreover, there is absolutely nothing in the record which establishes the qualifications or authority of either of the parties to the conversation to make pronouncements on the subject of environmental qualification requirements.

In sum, this telephone memo--Applicants' only authority for their new argument that RG-58 cable need only satisfy some lower environmental qualification standard--is the worst kind of unsubstantiated, non-probative multiple hearsay. It provides no objective evidentiary basis for finding either that RG-58 is sufficiently similar to RG-59 to justify a conclusion that it is qualified (the original finding of The Licensing Board) or to find that the cable need not be fully qualified, which appears to be the new substitute rationale.



At this point, it could not be more clear that the record does not support the Licensing Board's finding that the ten miles of RG-58 cable is environmentally qualified. This is an issue as to which the Applicant has the burden of proof and has not met it. Its latest filing only underscores the need for a hearing on this issue.

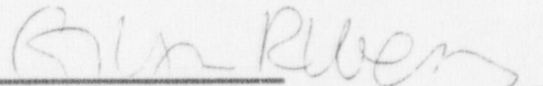
Respectfully submitted,



Dean R. Tousley  
Ellyn R. Weiss  
HARMON & WEISS  
2001 S Street, N.W.  
Suite 430  
Washington, D.C. 20009  
(202) 328-3500

December 10, 1987

I certify that on December 10, 1987, copies of the foregoing pleading were served by first class mail, on the attached service list.



Dean R. Tousley  
Ellyn R. Weiss

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SEABROOK SERVICE LIST -- ONSITE LICENSING BOARD

Sheldon J. Wolfe, Chairman  
Atomic Safety and Licensing  
Board  
U.S. NRC  
Washington, D.C. 20555

Dr. Jerry Harbour  
Atomic Safety and Licensing  
Board  
U.S. NRC  
Washington, D.C. 20555

Dr. Emmeth A. Luebke  
5500 Friendship Blvd.  
Apartment 1923N  
Chevy Chase, MD 20815

Atomic Safety and Licensing  
Board Panel  
U.S. NRC  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board Panel  
U.S. NRC  
Washington, D.C. 20555

Docketing and Service  
U.S. NRC  
Washington, D.C. 20555

Mrs. Anne E. Goodman  
Board of Selectmen  
13-15 New Market Road  
Durham, NH 03842

William S. Lord, Selectman  
Town Hall -- Friend Street  
Amesbury, MA 01913

Jane Doughty  
SAPL  
5 Market Street  
Portsmouth, NH 03801

Carol S. Sneider, Esquire  
Assistant Attorney General  
1 Ashburton Place, 19th Floor  
Boston, MA 02108

Stanley W. Knowles  
Board of Selectmen  
P.O. Box 710

North Hampton, NH 03826  
J.P. Nadeau  
Town of Rye  
155 Washington Road  
Rye, New Hampshire 03870

Richard E. Sullivan, Mayor  
City Hall  
Newburyport, MA 01950

Alfred V. Sargent, Chairman  
Board of Selectmen  
Town of Salisbury, MA 01950

Senator Gordon J. Humphrey  
U.S. Senate  
Washington, D.C. 20510  
(Attn. Tom Burack)

Selectmen of Northampton  
Northampton, New Hamp-  
shire 03826

Senator Gordon J. Humphrey  
1 Eagle Square, Ste 507  
Concord, NH 03301

Michael Santosuosso,  
Chairman  
Board of Selectmen  
Jewell Street, RFD # 2  
South Hampton, NH 03842

Judith H. Mizner, Esq.  
Silverglate, Gertner, et al.  
88 Broad Street  
Boston, MA 02110

Rep. Roberta C. Pevear  
Drinkwater Road  
Hampton, Falls, NH 03844

Phillip Ahrens, Esq.  
Assistant Attorney General  
State House, Station # 6  
Augusta, ME 04333

Thomas G. Dignan, Esq.  
R.K. Gad II, Esq.  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110

Robert A. Backus, Esq.  
Backus, Meyer & Solomon

111 Lowell Street  
Manchester, NH 03105  
Sherwin E. Turk, Esq.  
Office of General Counsel  
U.S. NRC  
Washington, D.C. 20555

Mr. Angie Machiros,  
Chairman  
Town of Newbury  
Town Hall, 25 High Road  
Newbury, MA 01951

George Dana Bisbee, Esq.  
Geoffrey M. Huntington, Esq.  
Office of the Attorney General  
State House Annex  
Concord, NH 03301

Allen Lampert  
Civil Defense Director  
Town of Brentwood  
Exeter, NH 03833

Richard A. Hampe, Esq.  
Hampe and McNicholas  
35 Pleasant Street  
Concord, NH 03301

Gary W. Holmes, Esq.  
Holmes & Ellis  
47 Winnacunnent Road  
Hampton, NH 03842

William Armstrong  
Civil Defense Director  
10 Front Street  
Exeter, NH 03833

Calvin A. Canney  
City Manager  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

Matthew T. Hock, Esq.  
Shaines & McEachern  
P.O. Box 369  
Maplewood Ave.  
Portsmouth, NH 03801

Sandra Gavutis  
RFD 1 Box 1154  
East Kensington, NH 03827

87 DEC 11 82:42  
Charles P. Graham, Esq.  
McKay, Murphy and Graham  
100 Main Street  
Amesbury, MA 01913  
OFFICE  
DOCKETING SERVICE  
BRANCH