

October 28, 2024

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission (NRC)
Washington, D.C. 20555-0001
Fax: (301) 816-5151

Subject: RSCC Wire & Cable LLC – interim update to Part 21 Retraction of Final Notification

Dear Sir or Madam,

This letter to the Nuclear Regulatory Commission (NRC) is an update to a prior written notification to the NRC of shipments of a non-compliant material in accordance with 10 CFR 21.21(d)(4).

On July 23, 2024, RSCC Wire and Cable LLC (RSCC) discovered a reel of insulated conductor which had been segregated due to an off standard report (OSR) had shipped to customers noted in Attachment 1 to this memorandum. The reel was determined to be non-compliant due to failure of insulation tensile and elongation at break (EAB) test following air oven aging. The extent of condition is limited to a single production work order and a single part number. All non-compliant insulated conductor has been accounted for. On July 25, 2024, RSCC submitted a written notification to the NRC of a shipment of non-compliant material in accordance with 10 CFR 21.21(d)(4), and on August 23, 2023, RSCC submitted a letter to the NRC of what it believed would be its Final Notification to the NRC about this matter in accordance with 10 CFR 21.21(d)(4).

However, during the subsequent course of RSCC's review and implementation of corrective actions, RSCC learned that an additional non-compliant shipment was identified with the same condition, and on September 6, 2024, RSCC notified the NRC of this development and requested the redaction of the August 23, 2024 submission based on this new information. On September 6, 2024, a retraction of Final Notification was requested for additional containment actions. While implementing corrective actions, an additional non-compliant shipment was identified (with same condition) and RSCC notified this customer. Root cause was traced to the application of laboratory sampling and testing frequencies, and the scope of containment actions was expanded. Attachment 1 to the September 6 update identified the impacted customers and product limited to the work orders listed.

On September 17, 2024, RSCC submitted an interim update letter to the NRC on this matter, identifying an additional customer that received non-conforming product.

On September 26, 2024, RSCC provided an update to the NRC on the status of its evaluation of the extent of condition and resulting corrective actions where RSCC estimated that its evaluation and any additional necessary corrective actions would be identified by October 4, 2024. Among other reasons for the time delay is that the testing process for potentially impacted material includes a 14-day aging test. At the time, RSCC believe it would have a final updated report ready for the NRC by October 7, 2024, which would include the results of the extent of condition, including all impacted customers, and corrective actions, along with the results of a third party audit verification of RSCC's implemented corrective actions.

Given that RSCC's evaluation has shown that the shipment of non-conforming product is more widespread than originally anticipated, RSCC has decided to expand the scope and breath of our review to ensure that RSCC has identified and corrected for the full extent of this matter. As a result, RSCC is looking back over all shipments over the past 18 months to ensure all non-conforming product has been accounted for. We are performing this review as expeditiously as possible, but due to the extent of the potentially impacted sites, the need to coordinate with multiple customers, and the time to undertake the necessary testing requirements of the product, the letter will serve as an interim update as we complete the more comprehensive review. Attachment 1 provides the list of impacted customers to date, and we have indicated therein at which point each set of customers have been identified. Attachment 2 provides the information required under 10 CFR 21.21(d)(4) as known at this time, and updates the previous submission of this information to the NRC in RSCC's September 6 letter. Notably, it updates Section V (for the expanded scope of shipped non-compliant product), Section VII (to reflect additional corrective action and the completion date for certain actions).

At this point, RSCC has notified all customers that we have identified received non-compliant material, and RSCC requested return of the non-compliant material. With respect to the known issues, root cause(s) and corrective action(s) have been identified, taken, and implemented to address the non-compliant escapes. Furthermore, as previously noted, RSCC has engaged a third party auditor to evaluate the implementation of the corrective actions. This review has been completed, and demonstrates all identified corrective actions for known shipments have been implemented.

If you have any questions related to this issue, the evaluation, and/or corrective action(s), please contact me at the number listed below my name. We will also reach out to your office to brief you on these developments.

Sincerely,



Phillip Sargenski
Quality Assurance Manager
Direct: 860-653-8376
Phillip.sargenski@marmoniei.com

Cc: Aaron Folkening – President RSCC Wire and Cable LLC (d.b.a MarmonIEI)

Attachment 1: Customer Exhibit

As identified in July 25, 2024 report to the NRC:

RSCC (Manufacture) Part Number FS01014-002 (A820146)
Description: 1C 14 AWG 7/.0242" TC XLPE Firewall SIS Grey 600V
Work Order: 727472

RSCC Sales Order Number	Customer	Plant	Customer PO Number	Part Number	Shipment Date	Quantity (FT)
139572	Wolf Creek	Wolf Creek	WCNOC-8000002251	WSR81301304	3/19/2024	1178
139531	Constellation	Dresden	1451762	0000001374 1	3/18/2024	2200
139530	Constellation	LaSalle	1451264	0000001374 1	3/18/2024	2750
136622	Constellation	Limerick	1405573	0012509502 1	9/28/2023	2000
136475	Constellation	Peach Bottom	1404513	0012509502 1	9/25/2023	1100
138627	Entergy	Arkansas Nuclear One	61231961	991790024	1/31/2024	550
136393	Entergy	Waterford 3	61094275	143-B846163	9/28/2023	700
136346	Talen	Susquehanna	708635	91210017	9/29/2023	6000
135564	Entergy Harbor	Davis Besse	45686968	00001 12273006	9/28/2023	3000

As identified in September 6, 2024 update to the NRC:

RSCC (Manufacture) Part Number FN12014-000 (C530120)
Description: 12C 14 AWG 7/.0242 TC XLPE Firewall III, Nuclear M1K1 Blk CSPE 600V
Work Order 917765

RSCC Sales Order	Customer	Plant	Customer PO Number	Part Number	Ship Date	Quantity - FT
138425	Constellation	Calvert Cliffs	1418988	0001470251 1	3/26/2024	3178

As identified in September 17, 2024 update to the NRC:

RSCC (Manufacture) Part Number FN07014-000 (C530070)
Description: 7C 14 AWG 7/.0242 TC XLPE Firewall III M1K1 Blk CSPE 600V
Work Order 994687

RSCC Sales Order	Customer	Plant	Customer PO Number	Part Number	Ship Date	Quantity - FT
139430	Curtiss - Wright Nuclear Division	Middleburg Heights, OH	3220543	C530070	3/29/2024	100

Attachment 2: Transfer of information per 10 CFR 21.21(d)(4)

i) Name and address of the individual or individuals informing the Commission.

Phillip Sargenski, Quality Assurance Manager
RSCC Wire & Cable LLC, 20 Bradley Park Rd, East Granby, CT 06026

ii) Identification of the facility, the activity, or the basic component supplied for such facility or such activity within the United States which fails to comply or contains a defect.

RSCC Wire & Cable LLC shipped safety-related product to customers listed in Attachment 1.

(iii) Identification of the firm constructing the facility or supplying the basic component which fails to comply or contains a defect.

RSCC Wire & Cable LLC manufactured the insulated conductor.

(iv) Nature of the defect or failure to comply and the safety hazard which is created or could be created by such defect or failure to comply.

Insulated conductor is non-compliant due to failure of insulation tensile and elongation at break (EAB) test following air oven aging.

(v) The date on which the information of such defect or failure to comply was obtained.

Initial discovery occurred on July 23, 2024, with additional identification of non-compliant product subsequently, as listed in Attachment 1 to NRC letters dated September 6, 2024 and September 17.

(vi) In the case of a basic component which contains a defect or fails to comply, the number and location of these components in use at, supplied for, being supplied for, or may be supplied for, manufactured, or being manufactured for one or more facilities or activities subject to the regulations in this part.

Customers that received non-compliant safety-related products from RSCC Wire and Cable are identified in Attachment 1.

(vii) The corrective action which has been, is being, or will be taken; the name of the individual or organization responsible for the action; and the length of time that has been or will be taken to complete the action.

- 1- Implement electronic HOLD process in ERP system for work orders with applied nonconformance(s) until completion of disposition, released by Quality Engineer. Quality Engineer, Completed 8/22/2024
- 2- Add confirmation process at final QC Inspection / Test that all applicable nonconformance(s) have been resolved with verification of conforming data associated with inspection and testing. QC Manager, Completed 9/13/2024
- 3- Add independent verification at final document review that all applicable nonconformance(s) have been resolved. QA Manager, Completed 8/27/2024
- 4- Updated criteria for laboratory sampling and testing frequencies to include every work order. Completed 9/13/2024
- 5- Audit completed by 3rd Party NQA-1 Lead Auditor for verification of effective implementation. Completed 10/1/2024

(viii) Any advice related to the defect or failure to comply about the facility, activity, or basic component that has been, is being, or will be given to purchasers or licensees.

The non-compliant insulated conductor may not be relied upon to perform its safety-function.