

October 4, 2002

U. S. Nuclear Regulatory Commission  
Operations Center  
1 White Flint North  
11555 Rockville Pike  
Bethesda, MD 20852

**Subject: Written Notification of 10CFR Part 21 Defect/Failure to Comply**

Dear Sir or Madam:

This letter shall serve as the written notification by Rockbestos-Surprenant Cable Corp. that a basic component supplied for use in nuclear power plants may contain a defect or fail to comply, which is reportable under the requirements of 10 CFR 21 as previously indicated in our initial response dated August 9, 2002.

The following information is supplied in accordance with the requirements of 10 CFR 21.

**I. Name and address of individual informing the Commission:**

Richard C. Brown – Quality Assurance Manager  
The Rockbestos-Surprenant Cable Corp.  
20 Bradley Park Road  
East Granby, CT 06026

**II. Identification of the basic component supplied which fails to comply or contains a defect:**

The cable identified below failed to comply with the vertical tray flame test when subjected to the requirements as described in IEEE-383-1974 section 2.5.4:

2/C 14 AWG 600V Firewall SR (Silicone Rubber) with overall Rockhide braid  
Sales Order: 52727  
Shop Order: 220557  
Item: C643385  
Reel No.: 02F0693G

This cable was subsequently placed in an MRB location and issued a nonconformance report on 7/24/02.

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**III. Identification of the firm supplying the basic component which fails to comply or contains a defect:**

The Rockbestos-Surprenant Cable Corp., East Granby, CT facility

**IV. Nature of the defect or failure to comply and the safety hazard which is created:**

Nature of Defect: Incorrect lacquer material applied to overall Rockhide braid.

Potential Hazard: The lacquer material applied to the overall Rockhide braid may contribute to the propagation of flame, resulting in a burn of the entire length of the tray as described in IEEE-383-1974 section 2.5.4.

**V. The date on which the information of such defect or failure to comply was obtained:**

On the basis of our testing and evaluation it was determined on 7/24/02 that a defect or failure to comply as defined by 10 CFR 21 existed.

**VI. The number and location of all basic components which contain a defect or fails to comply:**

Our investigation has determined that the following quantities of cables were supplied with the incorrect lacquer material:

Tennessee Valley Authority (Sequoyah)	1902 ft (1 reel)
Exelon (LaSalle)	2750 ft (2 reels)
Nebraska Pub. Power Dist (Cooper Nuc. Station)	1100 ft (1 reel)
Entergy Nuclear (Indian Point 3)	5490 ft (3 reels)
Public Service Electric & Gas	1100 ft (1 reel)
Imaging & Sensing Technologies	2521 ft (3 reels)
First Energy (Perry Nuclear)	2200 ft (1 reel)

**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:**

**Corrective Action Taken:**

Letters of notification describing the failure to comply were sent to the purchasers listed above on August 12 -13, 2002 for the affected cables. Remedy and disposition inquiries are being directed to James Morganelli, Sr. Quality Engineer. A return

goods authorization has been issued for the entire cable quantities purchased by Nebraska Public Power District and Entergy Nuclear.

Rockbestos-Surprenant has conducted further flame resistance testing in accordance with IEEE-383-1974 sect 2.5.4 and has determined that the failure mode utilizing the incorrect lacquer is related to the ratio of combustibles to noncombustibles within a cable. Conforming results were obtained on a 1/C 4/0 AWG FWL SR (Silicone Rubber) with overall Rockhide braid and a 9/C 14 AWG FWL SR (Silicone Rubber) with overall Rockhide braid. Testing conducted by an independent test lab on September 19, 2002 for the 9/C 14 AWG confirmed the results as reported by Rockbestos-Surprenant.

**Corrective Action Taken:**

A Rockbestos-Surprenant Purchasing Specification was issued on September 19, 2002 for W400 lacquer which will be used on Firewall SR products with overall Rockhide braid. All manufacturing process documents for in process orders for Firewall SR (Silicone Rubber) with overall Rockhide braid have been revised to indicate W400 lacquer only. References to other lacquers have been removed.

**Corrective Action Being Taken:**

Processing documents for new orders of Firewall SR (Silicone Rubber) utilizing the overall Rockhide braid will be revised prior to order release for production.

**Corrective Action to be Taken by: Ongoing**

**Responsible Individual/Organization: Applications/Specifications Engineering**

Current procedures requiring evaluation of changes to manufacturing process documents for all basic components will be reviewed for adequacy.

**Corrective Action to be Taken by: October 25, 2002**

**Responsible Individual/Organization: Applications Engineering**

Reviews of previous evaluations of changes to manufacturing process documents for basic components will be repeated on a sampling basis to determine the extent to which the evaluation process may have had a contributing effect.

**Action to be Taken by: November 9, 2002**

**Responsible Individual/Organization: Applications Engineering**

**VIII. Any advice related to the defect or failure to comply about the basic component that has been, is being, or will be given to purchasers:**

As previously indicated, purchasers of Firewall SR (Silicone Rubber) products that were manufactured with the overall Rockhide braid and lacquer from 1999 through July 2002 were notified of the failure mode described above by letter on August 12

and 13, 2002. Purchasers have been requested to direct any inquiries regarding remedy and disposition of affected cables to James Morganelli, Sr. Quality Engineer.

Sincerely,



Richard Brown  
Quality Assurance Manager  
(860) 653-8322

cc: R. Konnik  
M. Mennone  
J. Morganelli  
J. Notarfrancesco  
F. Schwelm