



**RSCC Wire & Cable LLC**

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September 11, 2014

U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk

Washington, DC 20555-0001

Subject: Response to NRC August 4, 2014 Request for Additional Information on RSCC Response to NRC Inspection Report Number 99901443/2014-201 and Notice of Nonconformance

Dear Sir/Madam,

Your letter of August 4th requested clarification regarding the following concerns:

"We have reviewed your letters and found that they are not fully responsive to both of the Notice of Nonconformances (NON) discussed in IR 99901443/2014-201. Specifically, your response to NON 99901443/2014-201-01 stated that the corrective step to avoid noncompliance with be to create a purchasing specification for the L4 oil and establish receipt inspection criteria for the oil to ensure consistency. This fails to examine: all cases where L4 oil is used; the original composition of L4 oil used during qualification; if there were any variations of the L4 oil composition between qualification and today; if any variations would affect the original qualification; if any applicable licensees/customers were notified of this deviation; and if a 10 CFR 21 evaluation was completed. Additionally, your response to NON 99901443/2014-201-02 stated that the corrective step taken was Drawing TD-005418 was revised to correct the diameter, bend radius, and pulling tension values. This fails to examine: if there was a review of other affected drawings or calculations; if applicable licensees/customers were notified of this deviation as the values in the drawings are used during installation of cables and other engineering and design-related activities; and if a 10 CFR 21 evaluation was completed."

In response, RSCC is providing the following clarifications:

With regards to NON 99901443/2014-201-01, RSCC performed 10 CFR 21 evaluations on May 22, 2014, June 2, 2014, and June 20, 2014. RSCC concluded that the original composition of L4 oil used during qualification and currently being used is chemically identical based on information gathered from each vendor. RSCC verified that the only safety related compound where L4 oil is used during cable manufacturing is KXL-760D. The L4 oil's purpose is as a manufacturing aid and prevents the insulation from sticking to conductor. L4 oil is not critical to the cable's safety function. Since the oils used are chemically identical and L4 oil is not critical to the cable's safety function, then RSCC concluded 10 CFR 21 notifications were not required and there is not an effect on qualification.

With regards to NON 99901443/2014-201-02, RSCC performed 10 CFR 21 evaluations on May 22, 2014. RSCC concluded that the root cause of the error was solely typographical and was not procedural in nature. Bend radii are conservatively calculated based on the overall diameter of the cable. Bend radii

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can be calculated based on the diameter of the insulation alone. The cable in question is a single insulated conductor with an overall jacket. The insulation is critical to the safety function of the cable. The jacket is not critical to the safety function of the cable and its purpose is to protect the cable's insulation during installation. Since the bend radius when calculated based on the overall diameter of the insulation is lower and more conservative than the value indicated on the drawing, then RSCC concluded 10 CFR 21 notifications were not required and there is not an effect on qualification. Additionally, since smaller diameters yield lower pulling tensions, then the maximum pulling tension noted on the drawing is conservative.

Regards,

David A Murphy

Director of Quality Assurance

RSCC Wire & Cable LLC

Cc: Steve Bonnell, Group President, Marmon Specialty Wire & Cable Group  
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