

March 19, 1984

SBN- 638  
T.F. B4.2.7

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Mr. R. W. Starostecki, Director  
Division of Project and Resident Programs

References: (a) Construction Permits CPPR-135 and CPPR-136, Docket  
Nos. 50-443 and 50-444  
(b) USNRC Letter, dated February 14, 1984, "Inspection  
No. 50-443/83-20", T. T. Martin to R. J. Harrison

Subject: Response to Inspection No. 50-443/83-20

Dear Sir:

In response to the violation which you reported in the subject inspection [Reference (b)], we offer the following:

NRC Notice of Violation (443/83-20-01):

10CFR50, Appendix B, Criterion X, requires a program for inspection... to verify conformance with the documented instructions, procedures, and drawings for accomplishing the activity. United Engineers & Constructors (UE&C) installation Drawing M-300230, Sheet 27, required that field wiring be securely clamped by connectors that were bolted to the equipment to support a seismic event.

Contrary to the above, as of December 22, 1984, the installation of field safety-related wiring harnesses were not being terminated in electrical equipment as required by Drawing M-300230, with bolted tie connectors but instead were tied to a glued type of connector for termination.

This is a Severity Level IV violation. (Supplement II).

Response

Corrective Action Taken and Results Achieved:

The licensee wishes to note that UE&C Drawing 9763-M-300230, Sheet 27, Note 2, deleted the requirement for bolted tie connectors and actually required the tie connectors to be epoxied to the cabinet surfaces. The

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inspector's concern with this epoxy connection, as described in the inspection report in Reference (b), was that a few epoxy connections came loose and that a non-safety-related detail was being used for safety-related applications.

The primary purpose for the cable-tie connectors is to provide a means to support internal wiring harnesses in a neat and workmanlike manner. After a wiring harness has been routed within a control panel, the wiring tends to conform naturally to the contour of its path and to be self-supporting. The deletion of the requirement for bolted tie connectors was the result of an engineering assessment that epoxied tie connectors, properly applied, can serve their intended purpose. Furthermore, we believe that random detachment of cable-tie connectors from panel surfaces does not affect the operation of the control panels during a seismic event since their proper functioning is not dependent on the unconditional support of the cable-tie connectors. This will be verified with the manufacturers.

For additional conservatism, we have decided to utilize screws for the installation of the field cable-tie connectors in containment due to the environment.

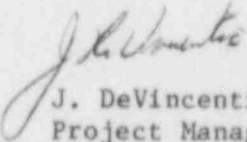
Drawing 9763-M-300230 will be revised to incorporate the following:

1. Epoxy applied cable-tie mounting bases shall be used in the installation of field wiring in both Class 1E and non-Class 1E equipment. This method shall be limited to equipment located outside of the containment area.
2. For equipment located inside the containment area, screws shall be used for installation of the cable-tie mounting bases.

Corrective action will be completed by April 30, 1984.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

  
J. DeVincentis  
Project Manager

cc: Atomic Safety and Licensing Board Service List

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