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 FACIL: 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315
 50-316 Donald C. Cook Nuclear Power Plant, Unit 2, Indiana & 05000316
 AUTH. NAME: ALEXICH, M.P. AUTHOR AFFILIATION: Indiana & Michigan Electric Co.
 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Responds to Generic Ltr 85-07 re implementation of integrated living schedules (ILS). ILS would imply unnecessary formalized schedule commitment w/ formal licensing action required to change scheduler commitment.

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Figure 1 shows a 2D hexagonal lattice of atoms. The atoms are represented by solid black circles. A central atom is labeled 'A'. To its right is an atom labeled 'B'. Above 'A' is an atom labeled 'C'. Below 'A' is an atom labeled 'D'. To the left of 'A' is an atom labeled 'E'. To the right of 'B' is an atom labeled 'F'. The lattice extends to the edges of the frame. The caption indicates that the lattice constant is 1.0 nm.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

June 28, 1985
AEP:NRC:0938

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
GENERIC LETTER 85-07-IMPLEMENTATION OF INTEGRATED
LIVING SCHEDULES FOR PLANT MODIFICATIONS

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 2055

Dear Mr. Denton:

This letter is in response to Generic Letter (GL) 85-07, dated May 2, 1985, on implementation of Integrated Living Schedules (ILS). On the GL 85-07 Response Format, Attachment 1 to this letter, we have marked item I.D.--"Plan to implement an informal ILS only."

Although we do maintain schedules to implement regulatory requirements, the concept of an integrated living schedule would imply a formalized schedule commitment with formal licensing action required to change the schedular commitment. We find this to be unnecessary, at this time and in fact will be an additional burden on our manpower and resources.

Our decision in this matter is predicated on the current excellent communications with your staff, and the fact that when schedular difficulties arise, we are able to discuss this issue and settle upon schedules which are satisfactory to both yourselves and us. We consider this current process to be what we refer to as "an informal Integrated Living Schedule," and is a process we would like to continue.

Our plant modification schedule currently extends to about two years. As we near completion of some of the major modifications caused by TMI, Salem ATWS, etc. we plan to further extend our plant modification schedule. After we are in the longer range modification scheduling arena we will certainly entertain the more formal ILS approach.

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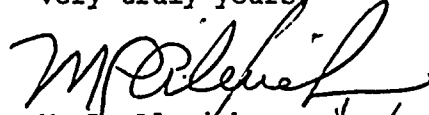
Mr. Harold R. Denton

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This document has been prepared following Corporate procedures which incorporate a reasonable set of controls to insure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,


M. H. Alexich
Vice President
RBC
6/28/85

MPA/rjn

cc: John E. Dolan
W. G. Smith, Jr. - Bridgman
R. C. Callen
G. Bruchmann
G. Charnoff
NRC Resident Inspector - Bridgman

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ATTACHMENT 1

RESPONSE FORMAT - GENERIC LETTER 85-07

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1952

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: D. C. Cook Nuclear Plant Units 1 & 2

UTILITY: American Electric Power / Indiana & Michigan Electric Power Co.

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS _____
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only X

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology:

_____ Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or-provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

LIST OF RECENTLY ISSUED GENERIC LETTERS

<u>GENERIC LETTER NO.</u>	<u>SUBJECT</u>	<u>DATE</u>
84-17	Annual Meeting to Discuss Recent Developments Regarding Operator Training, Qualifications and Examinations	7/3/84
84-18	Filing of Applications for Licenses and Amendments	7/6/84
84-19	Availability of Supplement 1 to NUREG-0933 "A Prioritization of Generic Safety Issues"	8/6/84
84-20	Scheduling Guidance for Licensee Submittals of Reloads that Involve Unreviewed Safety Questions	8/20/84
84-21	Long Term Low Power Operation in PWR's	10/16/84
84-22	Not used	
84-23	Reactor Vessel Water Level Instrumentation in BWRs	10/26/84
84-24	Clarification of Compliance to 10 CFR 50.49 Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants	12/27/84
85-01	Fire Protection Policy Steering Committee Report	1/9/85
85-02	Staff Recommended Actions Stemming From NRC Integrated Program for the Resolution of Unresolved Safety Issues Regarding Steam Generator Tube Integrity	4/15/85
85-03	Clarification of Equivalent Control Capacity For Standby Liquid Control Systems	1/28/85
85-04	Operator Licensing Examinations	1/29/85
85-05	Inadvertent Boron Dilution Events	1/31/85
85-06	Quality Assurance Guidance for ATWS Equipment that is not Safety-Related	4/16/85
85-07	Implementation of Integrated Schedules for Plant Modifications	5/02/85

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WASHINGTON, D.C. 20555

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