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SUBJECT: Forwards LER 99-004-01, re failure to perform TS surveillance analyses of reactor coolant chemistry with fuel removed. Commitments made by util are listed.

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In accordance with the criteria established by 10CFR50.73(a)(2)(i)(B) the following supplemental report is being submitted:

LER 315/99-004-01, "Failure to Perform Technical Specification Surveillance Analyses of Reactor Coolant Chemistry with Fuel Removed."

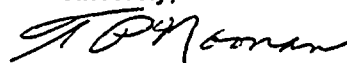
The following new commitments were identified in this submittal:

- A Technical Specification (TS) Amendment for TS 3.4.7 will be prepared and submitted to address the RCS sample requirements for times when there is a lack of sufficient coolant inventory.
- As a part of the restart effort, DC Cook is performing diverse programmatic and functional area assessments which will be used to address the improvement of performance. For example, the Chemistry self assessment program will be enhanced to place particular emphasis on sampling requirements and TS-related activities.
- A review of the Technical Specification Clarification (TSC) letters, both active and cancelled, will be performed to verify that no TSC provided an procedural interpretation to the TS such that the TSC was used to define an exemption or alternative to a technical specification. //

An existing commitment is being revised by this submittal as described below:

- In previous submittal AEP:NRC:1238F, dated March 12, 1997, AEP committed to develop an improved TS Clarification Program. However, as stated in the attached LER, Technical Specification Clarifications are being eliminated by incorporation into procedures, TS amendments or deletion, as appropriate. Te22

Sincerely,


for A. Christopher Bakken, III
Site Vice President

/lr/b

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Attachment

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