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 50-315 Donald C. Cook Nuclear Power Plant, Unit 1, Indiana & 05000315  
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 AUTH. NAME: ALEXICH, M. P. AUTHOR AFFILIATION: Indiana & Michigan Electric Co.  
 RECIP. NAME: DENTON, H. R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Submits formal Tech Spec upgrade program based on listed activities, including meetings w/NRC, performance of 10CFR50.59 type review of interpretation & safety significance & generation of draft vocabulary list.

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# INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631  
COLUMBUS, OHIO 43216

April 10, 1986  
AEP:NRG:0983

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2  
Docket Nos. 50-315 and 50-316  
License Nos. DPR-58 and DPR-74  
TECHNICAL SPECIFICATION UPGRADE PROGRAM

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

Pursuant to discussions with your staff, we are submitting to you our formal Technical Specification (T/S) Upgrade Program. We have adopted this program because of the following:

1. There has recently been an increased emphasis on the T/Ss as a stand-alone document in enforcement-related activities.
2. The D. C. Cook Nuclear Plant was licensed with the early version of the Standard T/Ss. We therefore have been unable to obtain full benefit from later and more concise versions of this document.
3. A large administrative burden (both for our staff and for the Commission) has been created by T/S interpretations and a succession of emergency T/S changes necessary to allow "literal compliance."

The Cook Plant T/S Upgrade Program is based on the following activities:

1. Regularly scheduled meetings with your staff to discuss required T/S changes. At these meetings we will discuss the difficulties we are having in matching the literal words of a specific T/S with plant equipment and operability requirements. We have had two of these meetings since November 1985, and we find them a valuable tool in processing our various T/S submittals.
2. Performance of T/S interpretations by the following method:

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- a) Perform a 10 CFR 50.59 type review of the T/S interpretation to ascertain that it does not have any safety significance and meets the intent of the T/S.
  - b) Obtain concurrence by the Plant Nuclear Safety Review Committee (PNSRC) of a T/S interpretation and safety review.
  - c) Advise the NRC Resident Inspector of the T/S interpretation.
  - d) Maintain administrative records of the T/S interpretations and safety reviews.
  - e) Apply for a formal T/S change associated with a specific T/S interpretation as soon as conveniently possible.
3. Generate a draft vocabulary list that would allow further clarification of the T/Ss and licensing documentation upon which they exist. We anticipate submitting a draft vocabulary list for your comments by July 1, 1986.

The T/S interpretation method will be implemented upon your approval. This T/S interpretation method will be restricted to those areas in which literal compliance would cause deviations from the intent of the T/S. We will not interpret T/Ss so as to deviate from the plant licensing bases.

In addition to the above, it should be noted that we are a member of the Westinghouse Owners Group (WOG) effort to clarify and simplify the T/Ss. We will continue our WOG-related activities along with the activities discussed in this letter.

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. P. Alexich 9/85  
Vice President 4/9/86

cm

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