



INDIANA & MICHIGAN ELECTRIC COMPANY

DONALD C. COOK NUCLEAR PLANT
P.O. Box 458, Bridgman, Michigan 49106
(616) 465-5901

July 30, 1985

AEP:NRC:0935B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Number 05000315 and 05000316
License Numbers DPR-58 and DPR-74
LER 50-315/82-016

Mr. J. G. Keppler
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear. Mr. Keppler:

Attached is a revised LER which rescinds, with supporting rationale, our commitment to initiate a Condition Report anytime we enter an Action Statement "For any reason other than for preventive maintenance or surveillance testing."

Because of the event identified in I.E. Report 50-315/78-27; 50-316/78-31, we began the practice of initiating a Condition Report when a piece of Technical Specification equipment was out of service for whatever reason. We formalized this process in LER 316/82-016 (attached) where an LER again was not initiated. At that time, the reporting requirements of NUREG-0161 and Technical Specification 6.9.1.12 and 6.9.1.13 specified that an LER be submitted.

Subsequently, 10 CFR 50.73 revised the reporting criteria, specifically not requiring an LER on Technical Specification equipment outages so long as the Technical Specification Action Statement(s) were met. The Condition Report is our method of ensuring all events adverse to quality are reported to upper management for resolution and reportability.

Since January, 1984, we have continued this practice of initiating a Condition Report whenever a piece of Technical Specification equipment is removed from service regardless of the reason. In 1984 alone, over 700 Condition Reports of this type were generated. In light of the new reporting requirements, these are viewed as unnecessary and as adding more paperwork to an already overburdened system.

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As pointed out in I.L. inspection Report 315/316-85/007 and by several internal audits, we are struggling to manage a significantly increased Condition Report burden. One way to improve our timely closeout of Condition Reports is to eliminate those which are unnecessary, into which category fall those Condition Reports committed to in LER 315/82-016.

We are proposing to effect this change in order to eliminate the generation of unnecessary Condition Reports together with the time involved in investigating and reviewing the reports. We feel that by eliminating this category of unnecessary Condition Reports, we will be able to place the appropriate level of management review on legitimate safety related and adverse to quality issues.

The proposed effective date for this rescission of the commitment is August 31, 1985. The intervening time is to allow for you or members of your staff to review the matter and express any question you have on the proposed action.


W. G. Smith, Jr.
Plant Manager

DFK/ss

cc: J. E. Dolan
M. P. Alexich
NRC Region III Resident Inspectors at D. C. Cook
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File