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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
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 RECIP. NAME: DENTON, H.R. RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation, Director

SUBJECT: Forwards "Implementation Plan of Reg Guide 1.97, Rev 3 for DC Cook Nuclear Plant Units 1 & 2," status rept, per 840612 licensing order. Rept includes schedule for planned instrument upgrades. Next rept will be issued by Sept 1985.

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INDIANA & MICHIGAN ELECTRIC COMPANY

P.O. BOX 16631
COLUMBUS, OHIO 43216

February 28, 1985

AEP:NRC:0773J

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
June 12, 1984 CONFIRMATORY ORDER - STATUS
REPORT ON REGULATORY GUIDE 1.97 COMPLIANCE

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

Dear Mr. Denton:

This letter is submitted in compliance with your June 12, 1984 Licensing Order to the Donald C. Cook Nuclear Plant Unit Nos. 1 and 2. The Order required us to submit a status report on the Donald C. Cook Nuclear Plant's compliance with Regulatory Guide 1.97 by February 28, 1985.

In our letter to you (AEP:NRC:0773D) dated January 30, 1984, AEPSC committed to submit a status report on how we meet the requirements of Type A, B, C, D, and E variables as described in Regulatory Guide 1.97, Revision 2, for the Donald C. Cook Nuclear Plant Units 1 and 2. The enclosure to this letter contains this report including a schedule for planned instrumentation upgrades.

AEPSC has decided to upgrade the D.C. Cook Nuclear Plant to the requirements of Regulatory Guide 1.97, Revision 3, in order to stay as current as possible with regulatory positions regarding accident and post-accident monitoring. It is believed that this change in commitment is not significant in terms of plant safety due to the small number of differences in actual requirements between Revision 2 and Revision 3.

The current schedule for the D.C. Cook modifications associated with post-accident monitoring is described in the enclosure. We recognize that equipment delivery delays, test difficulties, or other problems may cause delays in this schedule. If these problems should result in a significant change in our overall target date, we will notify you accordingly.

AEPSC has engaged an engineering consulting firm to perform the engineering study to determine Donald C. Cook Nuclear Plant's compliance with Regulatory Guide 1.97. This consultant has not yet issued the final report; therefore, some items in the enclosure may be added, deleted, or otherwise revised. In addition, revisions to the schedular commitments made herein may be required due to the impact of the Emergency Operating Procedure and DCRDR integration process.

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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures that the financial statements are reliable and can be audited without issue.

Furthermore, it is noted that the accounting system should be designed to be user-friendly and efficient. This allows staff to enter data quickly and accurately, reducing the risk of errors. Regular training and updates are essential to keep the system current and effective.

In addition, the document highlights the need for a strong internal control system. This includes separating duties, such as having different people responsible for entering data, approving transactions, and reconciling accounts. This helps to prevent fraud and misappropriation of assets.

The document also mentions the importance of data security. All financial information should be stored securely, both physically and electronically. Access should be restricted to authorized personnel only, and regular backups should be performed to prevent data loss.

Finally, the document stresses the importance of transparency and communication. Management should provide regular reports to the board and stakeholders, explaining the company's financial performance and the actions being taken to improve it. This builds trust and ensures that everyone is on the same page.


Overall, the document provides a comprehensive overview of the key principles and practices of good financial management. By following these guidelines, a company can ensure that its financial records are accurate, secure, and useful for decision-making.

The document concludes by stating that financial management is an ongoing process. As the company grows and its needs change, the accounting system and internal controls must be reviewed and updated regularly. This ensures that the company remains financially sound and compliant with all applicable laws and regulations.

A final report from the consultant is expected by June, 1985. We will issue an updated status report no later than September, 1985. Please note that the final schedule for several items has yet to be determined, pending the outcome of the consultant's report. These items are designated as such in the enclosure to this report.

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
Vice President
RJK
2/28/85

MPA/tc

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

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