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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. 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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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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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

RBK 2/28/85

MPA/tc

cc: John E. Dolan
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