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DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Offers preliminary ideas in effort to clarify Tech Specs while maintaining some general format & writing in unambiguous & easily understood language.

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Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
SUGGESTED GUIDELINES FOR CLARIFYING
TECHNICAL SPECIFICATIONS

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

Dear Mr. Denton:

As a follow-up to discussions with your staff, we would like to offer some preliminary ideas on the effort to clarify the technical specifications for the Donald C. Cook Nuclear Plant. The purposes of this effort are as follows:

1) Clarify the technical specifications while maintaining the same general format.

2) Write the technical specifications in language that is unambiguous and easily understood.

3) Focus on the conditions required by the control room operator to control plant systems and ensure safe operation.

4) Maintain compliance with existing NRC regulations and ensure that all required systems function in a manner that ensures public health and safety.

5) Expand and clarify definitions to eliminate the possibility of multiple interpretations of the technical specifications.

6) Expand the Bases to address <u>why</u> the surveillance requirements are to be implemented. For each system, the Bases may address the attendant systems and components that are required to function in order to ensure safety if that is not clear from the specification itself. The Bases may also address alternative methods for demonstrating safety.

7) Where possible and justifiable, eliminate onerous surveillance requirements and expand surveillance intervals.

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8) For fire protection, change Action Statement from a requirement to shut down the plant to a less punitive measure. Change all standing fire watches to roving fire watches or remote surveillances as appropriate.

9) Delete redundant information where such deletion seems appropriate.

10) Combine the technical specifications that deal with a single system or component, i.e., consolidate them into one section for each system or component if possible.

11) Move equipment listings and details of surveillance requirements to the Bases section or separate documents if appropriate.

12) Direct the surveillance requirements toward what NRC inspectors will look for.

Our clarification effort will be focused mainly on three sections of the technical specifications document: Definitions, Surveillance Requirements, and Bases. As a corollary to item Nos. (3) and (11) above, we would consider moving to the Bases section those Surveillance Requirements that are not under the direct control of the control room operators. The Bases section might also be used to amplify and clarify other conditions and design details that are not directly related to the main functions of the control room operators.

In considering the Definitions section, we would focus attention on clarification of the words and phrases that could be the source of multiple interpretations. These would include, for example, words such as "surveillance," "shall be determined/demonstrated," "basis," "limits," "response time," "operating," "functional test," "procedures," "verify," "out of service," "inspect/inspection," "compliance," and "conformance."

We look forward to working with your staff to resolve this most important matter.

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

RBC
4/24/85

cm

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