

July 8, 1985

LICENSEE: Indiana and Michigan Electric Company (IMEC)

FACILITY: Donald C. Cook Nuclear Plant, Unit No. 1 and 2

SUMMARY OF MEETING HELD ON JUNE 26, 1985 WITH IMEC TO DISCUSS "GUIDELINES FOR SIMPLIFICATION AND MODIFICATION OF THE TECHNICAL SPECIFICATIONS FOR THE DONALD C. COOK NUCLEAR PLANT UNIT NOS. 1 AND 2

On June 26, 1985, the staff met with representatives of the licensee at the Donald C. Cook Nuclear Plant site to discuss the draft guidelines proposed for upgrading the Technical Specifications for the facilities. A representative of the State of Michigan and the Chairman of the Westinghouse Owners Group were also present. The list of attendees is attached as Enclosure 1.

The licensee's presentation was made from the viewgraphs attached as Enclosure 2. The program consists of administrative and procedural changes to the existing Technical Specification which should facilitate a common understanding between NRR, the Regional Office and the licensee, a simplified Tech Spec for the operators to apply and follow, and a clearer purpose and more flexible operation of the plant in keeping with the purpose of the Tech Spec. Nothing in the licensee's proposal or program is intended to reduce the level of safety of the general public as a result of any eventual change to the current Technical Specifications.

The licensee's proposal can be viewed as consisting of three major parts. These are (1) a clarification effort by pre-defining requirements words and phrases to reduce interpretation latitude, (2) expanding the bases section to also include such things as tech spec interpretations, alternatives to surveillance requirements, lists of support systems necessary to assure overall operability, lists of equipment and instruments and non-critical setpoints, instrument ranges, etc. to specify acceptable performance, and (3) organizing the tech specs on the basis of equipment. The first item on "clarification" is in keeping with on-going efforts on the Emergency Operating Procedures which are aimed at reducing the implied or variations of interpretations on requirement statements. With the pre-defined words and phrases, the tech spec requirements statement can be more specific in understanding without the need for detailed qualifying statements in the tech spec.

The second part of the licensee's program will entail improving the bases section to more adequately compliment the tech specs. The improvements to the bases section, which requires NRR prior approval for any change, will more adequately define the implementation limits and acceptance criteria of the tech spec. The actual implementation details on how to carry out the requirements of the tech specs are contained in the plants' operating procedures. The third part of the licensee's program is proposed primarily for the benefit of the operator so that all tech spec requirements for any equipment item (currently in the tech spec) will appear with that item in the tech specs. Presently there are related requirements scattered throughout the tech specs leading to confusion and the potential for error for the operator.

See Rpts

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P PDR.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions and activities. It emphasizes the need for transparency and accountability in financial reporting.

2. The second part of the document outlines the various methods and techniques used to collect and analyze data. It highlights the importance of using reliable sources and ensuring the accuracy of the information gathered.

3. The third part of the document focuses on the interpretation and analysis of the collected data. It discusses the various statistical and analytical tools used to identify trends and patterns in the data.

4. The fourth part of the document discusses the importance of communication and reporting. It emphasizes the need for clear and concise communication of the findings and conclusions of the study to the relevant stakeholders.

5. The fifth part of the document discusses the importance of ethical considerations in research. It highlights the need for researchers to adhere to strict ethical guidelines and to ensure the privacy and confidentiality of the data collected.

6. The sixth part of the document discusses the importance of ongoing monitoring and evaluation. It emphasizes the need for researchers to regularly assess the progress of their work and to make adjustments as needed to ensure the quality and reliability of the results.

July 8, 1985

Several preliminary points were made to the licensee on the program. The proposed bases should be enforceable and the licensee should propose a tech spec mechanism which makes appropriate sections enforceable as they are used. The licensee has proposed safety categories but the repair times of one week, month, etc. do not appear to be adequately justified by the proposed guidelines above. Comments were made by the licensee that grouping the tech specs by equipment would probably cause the most impact on plant procedures revisions and would have the most benefit for the operator. The licensee has yet to propose a format for the grouping by equipment or for the proposed basis section which could include more information. The licensee will also re-review the writers guide to assure it and the proposed grouping by equipment are compatible.


The draft guidelines, Enclosure 3, was presented at the meeting but is expected to undergo further revision before formal submittal to the NRC.

/s/DLWigginton

David L. Wigginton, Project Manager
Operating Reactors Branch #1
Division of Licensing

Enclosures:
As stated

ORB#1:DL
CParrish
07/9/85


ORB#1:DL
DWigginton/ts
07/8/85

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for ensuring the integrity of the financial statements and for providing a clear audit trail. The text also mentions that proper record-keeping is essential for identifying trends and anomalies in the data.

2. The second part of the document focuses on the role of internal controls in preventing fraud and errors. It highlights that a strong internal control system is necessary to ensure that all transactions are properly authorized and recorded. The text also notes that internal controls should be designed to be effective and efficient, and should be regularly reviewed and updated.

3. The third part of the document discusses the importance of transparency and accountability in financial reporting. It states that organizations should provide clear and concise information about their financial performance and position. This includes disclosing all material information and providing a clear explanation of any significant changes or uncertainties. The text also emphasizes that transparency and accountability are essential for building trust and confidence among stakeholders.

4. The fourth part of the document discusses the importance of compliance with applicable laws and regulations. It states that organizations must ensure that their financial reporting practices are in full compliance with all relevant laws and regulations. This includes following the requirements of the accounting standards and the securities laws. The text also notes that compliance is essential for avoiding legal and financial penalties.

5. The fifth part of the document discusses the importance of communication and collaboration in financial reporting. It states that all employees involved in the financial reporting process should be clearly communicated the importance of their role and the need for accuracy and integrity. The text also emphasizes that collaboration and teamwork are essential for ensuring that the financial reporting process is efficient and effective.

6. The sixth part of the document discusses the importance of continuous improvement in financial reporting. It states that organizations should regularly review and evaluate their financial reporting processes to identify areas for improvement. This includes seeking feedback from stakeholders and implementing changes to enhance the quality and reliability of the financial reporting. The text also notes that continuous improvement is essential for staying current with the latest best practices and technologies.

MEETING SUMMARY DISTRIBUTION
OPERATING REACTORS BRANCH NO. 1

Docket or Central file

NRC PDR

Local PDR

ORB#1 RDG

J. Partlow (Emergency Preparedness only)

Steve Varga

Project Manager

OELD

E. Jordan

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ACRS (10)

NSIC

Gray file

Plant Service List

C. Parrish

J. Partlow

NRC Participants (wo/enclosures)

D. Wigginton

R. Emch

S. Wigginton

1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It is essential to ensure that all entries are supported by appropriate documentation and receipts.

3. Regular audits should be conducted to verify the accuracy of the records and to identify any discrepancies.

4. The second part of the document outlines the procedures for handling disputes and resolving conflicts.

5. It is important to establish clear communication channels and to resolve issues promptly and fairly.

6. The final part of the document provides a summary of the key points and offers recommendations for future actions.

7. It is hoped that these guidelines will help to improve the efficiency and effectiveness of the organization's operations.