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

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

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Operating Reactors Branch #1
Division of Licensing

Enclosures:
As stated

ORB#1:DL
CParrish
07/8/85

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DWigginton/ts
07/8/85

MEETING SUMMARY DISTRIBUTION
OPERATING REACTORS BRANCH NO. 1

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NSIC
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Plant Service List
C. Parrish
J. Partlow

NRC Participants (wo/enclosures)

D. Wigginton
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