



January 12, 2000

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Operating License DPR-58
Docket No. 50-315

Document Control Manager:

In accordance with the criteria established by 10 CFR 50.73 entitled Licensee Event Report System, the following report is being submitted:

LER 315/1999-030-00, "Improper Use of Clarifications Results in Violation of Two Technical Specifications".

The following commitments were identified in this submittal:

- The thirteen TS clarifications that are still active will be cancelled by February 25, 2000.
- Upon resolution of the thirteen active clarifications, action will be taken to eliminate the clarification program and cancel the governing procedure. This will be completed by March 25, 2000.

This reportable condition was originally identified on October 13, 1999. At the time of its identification, it was erroneously concluded that since the investigation was part of the extent of condition from LER 315/99-004-01, that a supplement would be submitted when the extent of condition review was complete. This conclusion was called into question during the NRC Programmatic Readiness Inspection conducted the week of December 13, 1999, at DC Cook. On December 17, 1999, the NRC determined that the TS violations identified here should have been reported within 30 days of identification, and failure to do so represented a violation of 10CFR50.73. As such, this LER is submitted outside the 30 days allowed by 10CFR50.73. The failure to submit the LER in a timely manner will be resolved within the guidelines of the DC Cook Corrective Action Program.

If you have any questions, please contact Mr. Robert C. Godley, Director, Regulatory Affairs, at 616/465-5901, extension 2698.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. W. Rencheck'.

M. W. Rencheck
Vice President – Nuclear Engineering

/mbd
Attachment

IE22

c: J. E. Dyer, Region III
R. C. Godley
D. Hahn
W. J. Kropp
R. P. Powers
R. Whale
Records Center, INPO
NRC Resident Inspector