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Docket Nos.: 50-315  
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U. S. Nuclear Regulatory Commission  
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Donald C. Cook Nuclear Plant Units 1 and 2  
CHANGE TO SAFETY EVALUATION COMMITMENT

References:

- 1) I&M to NRC Letter AEP:NRC:1260G4, "Confirmatory Action Letter (CAL) Supplemental Response", dated December 24, 1997.
- 2) NRC to I&M Inspection Report 315/97-201, "Donald C. Cook, Units 1 & 2 Design Inspection", dated December 10, 1997.
- 3) Letter from D. M. Crutchfield, NRC, to J. F. Colvin, NEI, "NEI's 'Guideline for Managing NRC Commitments,' Revision 2, December 19, 1995," dated January 24, 1996.

This letter provides notification of a change to a commitment made in Reference 1 to require a 10 CFR 50.59 safety screening review of senior reactor operator (SRO) change sheets prior to making the changes effective. The commitment was made because of concerns originally raised in Unresolved Item 315/97-201-023, Reference 2, regarding implementation of changes to system operating or controlling parameters under the SRO change sheet process, without performance of a safety screening. Since that time, the 10 CFR 50.59 program has undergone extensive changes and personnel have been trained and requalified to the new program, as documented in Restart Action Plan #004, Safety Evaluations. Therefore, the commitment made in Reference 1 is being changed to reflect the implementation of a new On-the-Spot-Change (OTSC) process for non-intent procedure changes.

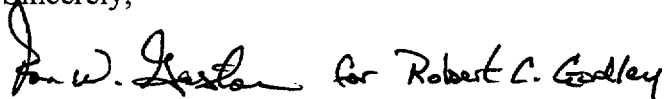
Using the OTSC process, a streamlined short form screening of proposed non-intent procedure changes will be performed to determine if the proposed activity impacts the Technical Specification (T/S) or T/S Bases, the Operating License, UFSAR, NRC Commitments, or potentially impacts plant programs. This process will be used when an immediate procedure change is required to continue in-process work. The short form screening will help facilitate this while still requiring a thorough review for 10 CFR 50.59 applicability. Although requiring the same level of screening as the current form, the amount of documentation required to be provided with the screening is reduced. In addition, the OTSC process requires that a qualified technical reviewer review the proposed change and the screening for approval prior to SRO review.

If the proposed change is determined to have no impact, it may be implemented under the OTSC process. The short form screening will be followed up with a fully documented safety screening and requires review by Donald C. Cook Nuclear Plant's (CNP) in-line review organization within 14 days of implementation.

This commitment change was evaluated against the Nuclear Energy Institute guidance in Reference 3 and it was determined that it could be made without prior NRC approval or notification to the NRC. However, due to the inclusion of CNP's Safety Evaluation Program on the NRC 0350 Case Specific Checklist, it was decided that a voluntary notification would be made.

Should you have any questions, please contact Mr. Robert C. Godley, Director of Regulatory Affairs, at (616) 466-2698.

Sincerely,



Robert C. Godley  
Regulatory Affairs Director

/jen

c: J. E. Dyer  
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NRC Resident Inspector  
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