



**INDIANA  
MICHIGAN  
POWER**

*A unit of American Electric Power*

**Indiana Michigan Power**  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
AEP.com

September 15, 2006

**AEP-NRC:6170  
10 CFR 170.11**

Docket Nos.: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
ATTN: Jesse L. Funches, Chief Financial Officer  
11555 Rockville Pike  
Rockville, Maryland 20852

**Donald C. Cook Nuclear Plant Units 1 and 2  
REQUEST FOR EXEMPTION FROM FEE REQUIREMENTS ASSOCIATED WITH  
IMPLEMENTATION OF CONTAINMENT SPRAY MODIFICATIONS FOR POST-LOCA  
WATER MANAGEMENT**

- References:
1. Nuclear Regulatory Commission (NRC) Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," dated September 13, 2004 (ML042360586).
  2. Slides, "Post Loss of Coolant Water Management Strategies to Optimize Long Term Core Cooling Availability," presented by B. Lutz and L. Smith, Pressurized Water Reactor Owners Group, at NRC meeting with industry regarding water management post-loss-of-coolant-accident, held May 11, 2006 (ML061460378).
  3. Slides, "Post-LOCA Water Management," presented by T. Martin, NRC Director - Division of Safety Systems, at NRC meeting with industry regarding water management post-loss-of-coolant-accident, held May 11, 2006 (ML061460383).

This letter informs the Nuclear Regulatory Commission (NRC) that Indiana Michigan Power Company (I&M) is volunteering the Donald C. Cook Nuclear Plant (CNP) as a pilot plant for elimination of automatic containment spray actuation.

NRC Generic Letter 2004-02 (Reference 1) documents concerns regarding the effects of post-loss-of-coolant-accident debris on emergency core cooling system and containment spray system functions at pressurized water reactors (PWRs). At a meeting held May 11, 2006 (References 2 and 3), representatives of the PWR Owners Group and the NRC discussed water management strategies to optimize long term cooling availability following a loss-of-coolant accident. The elimination of automatic containment spray actuation was identified as a strategy that would reduce debris

generation and transport, and extend the time available to establish a reliable recirculation path and/or implement other remedial or compensatory actions. The meeting included discussion of regulatory impediments to such a strategy, and the need for allowance to use more realistic analytical models and assumptions in calculating post accident containment pressures and in calculating control room and offsite doses. In a June 23, 2006, telephone conference, members of CNP management and the NRC staff discussed the potential use of CNP as a pilot plant for elimination of automatic containment spray actuation. I&M has elected to volunteer CNP as a pilot plant for implementation of this water management strategy, and intends to initiate action within the next 30 days pursuant to that end. I&M also intends to initiate discussions with the NRC staff regarding potential reduction in the scope of recirculation sump modifications based on the resultant reduced debris generation and transport, and relaxation of regulatory guidance regarding assumptions and models used in containment pressure analyses and control room and offsite dose analyses.

The provisions of 10 CFR 170.11(a)(1)(ii) and (iii) state that no application fees, license fees, renewal fees, inspection fees, or special project fees shall be required to assist the NRC in developing a rule, regulatory guide, policy statement, generic letter, or bulletin; or as a means of exchanging information between industry organizations and the NRC for the specific purpose of supporting the NRC's generic regulatory improvements or efforts. In that, the I&M development and NRC review of licensing actions needed to implement elimination of automatic containment spray actuation would satisfy these provisions with respect to the regulatory concerns identified in NRC Generic Letter 2004-02, I&M requests a waiver of the associated NRC fees. I&M anticipates submittal of the associated licensing requests by the end of the fourth quarter 2007. It is I&M's understanding that the fee waiver would be applicable to the complete NRC review of the CNP license amendment request.

This letter contains no new regulatory commitments. Should you have any questions, please contact Ms. Susan D. Simpson, Regulatory Affairs Manager, at (269) 466-2428.

Sincerely,



Joseph N. Jensen  
Support Services Vice President

JRW/jen

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