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 AUTH. NAME      AUTHOR AFFILIATION  
 FITZPATRICK, E.      Indiana Michigan Power Co. (formerly Indiana & Michigan Ele  
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SUBJECT: Requests extension of comment period expiration date from 970619 to 970719.

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June 10, 1997

AEP:NRC:1249C

Docket Nos.: 50-315  
50-316

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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Gentlemen:

DONALD C. COOK NUCLEAR PLANT UNITS 1 AND 2  
LICENSE NOS. DPR-58 AND DPR-74  
PROPOSED NRC BULLETIN 96-01 SUPPLEMENT 1  
NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT  
REQUEST FOR EXTENSION OF COMMENT PERIOD

This letter requests an extension of the comment period expiration date from June 19, 1997, to July 19, 1997. Given the limited notice of the changes in the NRC's proposed supplement, an extension is necessary to provide an opportunity to evaluate and develop a response commensurate with the overall impact of the proposed supplement.

Proposed NRC bulletin 96-01, supplement 1, contains dramatic differences from what was previously identified in NRC presentations and discussions. Specifically, the proposed burnup limits for 12 ft. cores with  $T_{\text{out}} < 610^{\circ}\text{F}$  have changed from 45,000MWD/MTU to 35,000MWD/MTU for fuel assemblies without intermediate flow mixing grids (IFMs), and from 50,000MWD/MTU to 40,000MWD/MTU for fuel assemblies with IFMs.

Based upon the expectation that the burnup limits as previously identified in NRC presentations and discussions would be imposed, core designs and fuel procurement strategies for unit 1 cycle 16 and unit 2 cycle 12 have been developed to meet the higher burnup limits expected for units that operate with  $T_{\text{out}} < 610^{\circ}\text{F}$ . In addition, preliminary analyses have been performed to show sufficient shutdown margin exists at end-of-cycle for unit 2 cycle 11. These analyses have been performed with both the single control rod located above an assembly with a burnup in excess of 50,000MWD/MTU and the most reactive rod at that condition fully withdrawn.

Based on the differences identified above, we will require additional time to fully assess the impact of these more restrictive limits. An extension of the comment period expiration date will permit sufficient time to assess the technical and economic impact of the proposed NRC bulletin 96-01, supplement 1.

Sincerely,

A handwritten signature in cursive script, appearing to read 'E. E. Fitzpatrick'.

E. E. Fitzpatrick  
Vice President

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cc: A. A. Blind  
A. B. Beach  
MDEQ - DW & RPD  
NRC Resident Inspector  
J. R. Padgett