

AMERICAN ELECTRIC POWER Service Corporation



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February 25, 1983

AEP:NRC:0631B

Donald C. Cook Nuclear Plant Unit Nos. 1 and 2
Docket Nos. 50-315 and 50-316
License Nos. DPR-58 and DPR-74
NUREG-0737, ITEM II.F.1.6 TECHNICAL SPECIFICATION
FEES PURSUANT TO 10 CFR 170

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

In our letter No. AEP:NRC:0631A, dated September 29, 1982, we submitted proposed Appendix A Technical Specification (T/S) changes required for placing the new Post-Accident Containment Hydrogen Monitoring System (PACHMS) into service to satisfy the requirements of NUREG-0737, Item II.F.1.6. Our letter included a statement to the effect that the payment for these changes would be made as part of the fee to be levied for the issuance of the T/S changes required by NUREG-0737. However, by way of his February 3, 1983, letter to Mr. John E. Dolan, Mr. William O. Miller requested the remittance of \$4,400 to cover the NRC review expenses.

We wish to bring to your attention that on February 15, 1983, we received Generic Letter 82-16 which requests the submittal of thirteen NUREG-0737-required T/S consolidated into one submittal. Furthermore, a draft Generic Letter transmitted by Mr. Darrell G. Eisenhut to Mr. Carl Walske of the Atomic Industrial Forum, dated January 28, 1983, requests submittal of the T/S required for the implementation of eighteen NUREG-0737 items, one of which is item II.F.1.6. Mr. Eisenhut's letter again requests that the T/S changes be consolidated into one submittal.

The early implementation of Item II.F.1.6 at the Cook Plant, reflects I&MECo's concern for the safe operation of the plant and the safety of the public. By requesting payment for this T/S change separately, the NRC is financially penalizing us for the early implementation of required safety equipment. Consequently, we request that the payment for the NUREG-0737, Item II.F.1.6 T/S be made part of the single fee to be levied for the issuance of the T/S changes required by NUREG-0737.

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This document has been prepared following Corporate Procedures which incorporate a reasonable set of controls to ensure its accuracy and completeness prior to signature by the undersigned.

Very truly yours,



Milton P. Alexich
Assistant Vice President
Nuclear Engineering

MPA/md

cc: John E. Dolan - Columbus
R. S. Hunter
R. W. Jurgensen
W. G. Smith, Jr. - Bridgman
R. C. Callen
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W. O. Miller - NRC
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