

Indiana Michigan
Power Company
500 Circle Drive
Buchanan, MI 49107 1395



August 5, 1998

AEP:NRC:1260GC

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Stop O-P1-17
Washington, D.C. 20555-0001

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
SUPPLEMENTAL RESPONSE TO 2.206 PETITION
PROPRIETARY CALCULATIONS

This letter is provided as a supplement to our submittal AEP:NRC:1260G7, dated July 31, 1998, to support our request to consider the calculations enclosed in response to question 4d of the submittal as proprietary information in accordance with 10 CFR 2.790.

The calculations listed in AEP:NRC:1260G7, attachment 2, table 1, contain proprietary information and should be withheld from public disclosure. Attached is the affidavit for withholding proprietary information from public disclosure in accordance with 10 CFR 2.790.

Sincerely,

A handwritten signature in black ink, appearing to be 'John R. Sampson', written over a circular stamp.

John R. Sampson
Site Vice President

/vlb

Attachment

C: J. A. Abramson
J. L. Caldwell
MDEQ - DW & RPD
NRC Resident Inspector
R. P. Powers

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ATTACHMENT TO AEP:NRC:1260GC

SUPPLEMENTAL RESPONSE TO 2.206 PETITION
PROPRIETARY CALCULATIONS

AFFIDAVIT OF D. E. COOPER

1. I am the plant manager for Cook Nuclear Plant, Indiana Michigan Power Company (I&M), and as such, have the responsibility of reviewing the proprietary information sought to be withheld from public disclosure in connection with our submittal AEP:NRC:1260G7, and am authorized to apply for its withholding on behalf of I&M.
2. I am making this affidavit in conformance with the provisions of 10 CFR 2.790 of the regulations of the Nuclear Regulatory Commission (NRC) and in conjunction with I&M's application for withholding, which accompanies this affidavit.
3. I have knowledge of the criteria used by I&M in designating information as proprietary or confidential.
4. Pursuant to the provision of 10 CFR 2.790(b)(4), the following is being furnished for consideration by the NRC in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned by I&M and has been held in confidence by its consultants.
 - (ii) The information is of a type that would customarily be held in confidence by I&M. The information consists of analysis methodology details, analysis results, supporting data, and aspects of development programs, relative to a method of analysis that provides a competitive advantage to I&M.
 - (iii) The information was transmitted to the NRC in confidence, and under the provision of 10 CFR 2.790 it is to be received in confidence by the NRC.
 - (iv) The information sought to be protected is not available in public to the best of our knowledge and belief.
 - (v) The proprietary information sought to be withheld in this submittal is contained in our submittal AEP:NRC:1260G7, dated July 31, 1998, attachment 2, table 1, titled "List of NPSH Calculations".

This information enables I & M to:


- (a) Support Cook Nuclear Plant with system performance, evaluation, and analysis information.
- (b) Develop strategies to provide cost effective plant operation.
- (c) Perform and support Cook Nuclear Plant safety reviews per 10 CFR 50.59.

The proprietary information sought to be withheld from public disclosure has commercial value to I&M.

The subject information could only be duplicated by other companies at a similar expense to that incurred by I&M.

5. Public disclosure of this information is likely to cause harm to I&M because it would allow other companies in the nuclear industry to benefit from the results of a significant development program without requiring commensurate expense, or allowing I&M to recoup a portion of its expenditures, or benefit from the sale of the information.

D. E. Cooper, being duly sworn, on his oath deposes and says that he is the person who subscribed his name to the foregoing statement, and that the matters and facts set forth in the statement are true.


D. E. Cooper, Plant Manager

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 5th DAY OF August, 1998



Notary Public

My commission expires 09-05-2002

