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October 26, 2012

AEP-NRC-2012-84
10 CFR 50.54(f)

Docket No.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2
Initial Status Report in Response to March 12, 2012, Commission Order Modifying Licenses with
Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events
(Order Number EA-12-049)

References:

1. Letter from E. J. Leeds and M. R. Johnson, U. S. Nuclear Regulatory Commission (NRC) to All Power Reactor Licensees and Holders of Construction Permits in Active or Deferred Status, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012, ML12059A736.
2. NRC Interim Staff Guidance JLD-ISG-2012-01, Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events, Revision 0, dated August 29, 2012, ML 12229A174.
3. Letter, A. R. Pietrangelo, Nuclear Energy Institute (NEI) to G. B. Jaczko, US Nuclear Regulatory Commission (NRC), "Industry Initiative on Procurement of Equipment for the Diverse and Flexible Coping Strategy (FLEX)," dated February 24, 2012, ML 12061A023.
4. NEI 12-06, Diverse and Flexible Coping Strategies (FLEX) Implementation Guide, Revision 0, dated August 2012, ML 12242A378.

On March 12, 2012, the NRC issued an order (Reference 1) to Indiana Michigan Power Company (I&M), the licensee for the Donald C. Cook Nuclear Plant Units 1 and 2 (CNP). Reference 1 was immediately effective and directed I&M to develop, implement, and maintain guidance and strategies to restore or maintain core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements were outlined in Attachment 2 of the enclosure of Reference 1.

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Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance. The final interim staff guidance (Reference 2) was issued August 29, 2012. The purpose of this letter is to provide the initial status report pursuant to Section IV, Condition C.2, of Reference 1 within 60 days following issuance of Reference 2.

This report confirms I&M has received Reference 2 and is in the process of evaluating the guidance for the purpose of establishing mitigation strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event as described in the enclosure of Reference 1.

Major activities completed during this reporting period:

- Additional portable equipment was ordered prior to the issuance of Reference 2, as described in an NEI letter to the NRC (Reference 3).
- A site-specific evaluation is in progress to establish the coping capabilities as defined in NEI 12-06 (Reference 4).
- Resources have been identified and project plans initiated, including development of milestones, to assure compliance with Reference 1.

Planned activities for the next six months:

- Development and submittal of the overall integrated plan.

Technical difficulties encountered that could affect the ability to provide the licensee's February 28, 2013, submittal:

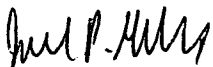
- None at this time.

Project milestone schedule through completion of installation and testing:

- A project milestone schedule will be provided with the overall integrated plan.
- Implementation of the order will be completed for CNP Unit 1 prior to startup from Refueling Outage (RFO) 26 (Fall 2014).
- Implementation of the order will be completed for CNP Unit 2 prior to startup from RFO 22 (Spring 2015).

The enclosure provides an affirmation. This letter contains no new or revised regulatory commitments. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,



Joel P. Gebbie
Site Vice President

MCS/kmh

Enclosure:
Affirmation

c: E. E. Bowman, NRR/DPR/PGCB, NRC
C. A. Casto, NRC Region III
J. T. King, MPSC
J. A. Kratchman, NRR/JLD/PMB, NRC
S. M. Krawec, AEP Ft. Wayne, w/o enclosure
E. J. Leeds, NRR, NRC
MDEQ – RMD/RPS
NRC Resident Inspector
T. J. Wengert, NRC Washington DC

AFFIRMATION

AFFIRMATION

I, Joel P. Gebbie, being duly sworn, state that I am Site Vice President of Indiana Michigan Power Company (I&M), that I am authorized to sign and file this request with the Nuclear Regulatory Commission on behalf of I&M, and that the statements made and the matters set forth herein pertaining to I&M are true and correct to the best of my knowledge, information, and belief.

Indiana Michigan Power Company



Joel P. Gebbie
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 26th DAY OF October, 2012

Regan D. Wendt
Notary Public

My Commission Expires 1-21-18