

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



December 17, 2003

AEP:NRC:3049  
10 CFR 50.4

Docket No.: 50-315

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

Donald C. Cook Nuclear Plant, Unit 1  
DEPARTMENT OF TRANSPORTATION EXEMPTION REQUEST

The attached request for exemption from the requirements of 49 CFR 173.403 and 49 CFR 173.427(b)(1) is being forwarded for the Nuclear Regulatory Commission's information. The exemption request is being transmitted to the Department of Transportation to support the disposal of the Donald C. Cook Nuclear Plant Unit 1 steam generators. The steam generators were removed from service in 1997. The exemption request will allow the steam generators to be shipped unpackaged as it can be demonstrated that the disposal item itself can provide equivalent packaging.

This letter contains no new commitments. Should you have any questions, please contact Mr. Brian D. Mann, Acting Director of Regulatory Affairs, at (269) 697-5806.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Zwolinski".

John A. Zwolinski  
Director of Design Engineering and Regulatory Affairs

RV/rdw

Attachment

A001

c: J. L. Caldwell, NRC Region III  
K. D. Curry, Ft. Wayne AEP, w/o attachment  
J. T. King, MPSC, w/o attachment  
MDEQ – WHMD/HWRPS, w/o attachment  
NRC Resident Inspector  
J. F. Stang, Jr., NRC Washington, DC

**Attachment to AEP:NRC:3049**

**Department of Transportation  
Exemption Request**

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



December 17, 2003

Associate Administrator for Hazardous Materials Safety  
Research and Special Programs Administration  
U. S. Department of Transportation  
400 7th St., S.W.  
Washington, DC 20590-0001

Attention: Exemptions, DHM-31

Donald C. Cook Nuclear Plant Units 1 and 2  
EXEMPTION REQUEST FROM THE SURFACE CONTAMINATED  
OBJECT DEMONSTRATION REQUIREMENTS OF 49 CFR 173.403 AND  
THE PACKAGING REQUIREMENTS OF 49 CFR 173.427(b)(1) FOR THE  
SHIPMENT OF FOUR STEAM GENERATOR LOWER ASSEMBLIES  
FROM DONALD C. COOK NUCLEAR PLANT

Indiana Michigan Power Company (I&M) hereby requests exemption from the subject regulations for the shipment of four steam generator lower assemblies (SGLAs) from the Donald C. Cook Nuclear Plant (CNP) to the Chem-Nuclear Systems (CNS) low-level radioactive waste management facility in Barnwell, South Carolina. This will be a one-time shipment, and will be performed in a controlled manner as described in the information provided as attachments to this letter. The transportation of the steam generator lower assemblies is expected to begin on or after May 1, 2004, and be completed within one year. This Application for Exemption is being prepared in accordance with the requirements of 49 CFR Part 107<sup>(1)</sup> and the guidance provided in the Nuclear Regulatory Commission (NRC) Generic Letter 96-07<sup>(2)</sup>. A similar set of four SGLAs from Unit 2 was shipped from CNP to the CNS facility in 1999 under DOT E-12190.

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(1) Hazardous Material Program Procedures, Part 107, Title 49, United States Code of Federal Regulations, October 1, 1999.

(2) NRC Generic Letter 96-07: Interim Guidance on Transportation of Steam Generators, United States Nuclear Regulatory Commission, December 5, 1996.

Accompanying this letter is a series of attachments that provide supporting information for this exemption request. The attachments include the compliance matrix that addresses the requirements of 49 CFR 107 for an exemption request, detailed engineering analyses, drawings, and operational plans and procedures supporting the SGLA transportation effort. None of the attached information is proprietary.

Consistent with the guidance of the NRC Generic Letter, I&M requests that the Department of Transportation grant the following exemptions from the surface contaminated object (SCO) shipping and classification requirements:

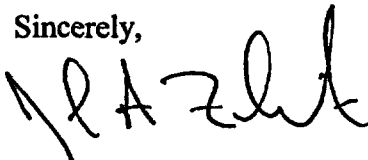
- An exemption from the packaging requirements of 49 CFR 173.427(b)(1) for SCO material, and
- An exemption from the demonstration of contamination levels for SCO materials of 49 CFR 173.403.

As described fully in Attachment 1, justification for I&M's request is based on the relatively low total activity levels, integrity of each SGLA outer shell, and comprehensive transportation system controls.

In all other aspects, the shipment of the four CNP SGLAs will meet the requirements of 49 CFR Part 173 and NRC Generic Letter 96-07. Both the compliance matrix and the transportation system controls demonstrate the transport of the SGLAs can be performed safely. Additional supporting information is provided in the attached documents.

If you have any questions concerning this request, please contact Mr. Brian D. Mann, Acting Manager of Regulatory Affairs at (269) 697-5806.

Sincerely,



John A. Zwolinski  
Director of Design Engineering and Regulatory Affairs

**Attachments:**

- 1. Compliance Matrix**
- 2. Structural Package Evaluation**
- 3. SGLA General Arrangement and Closure Drawings**
- 4. Transportation System General Arrangements Drawings**
- 5. SGLA Characterization**
- 6. Transportation and Emergency Response Plan**
- 7. Evaluation of Residual Water in Plugged Tubes**