



**INDIANA  
MICHIGAN  
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*A unit of American Electric Power*

**Indiana Michigan Power**  
Cook Nuclear Plant  
One Cook Place  
Bridgman, MI 49106  
AEP.com

April 15, 2005

AEP:NRC:5901-01  
10 CFR 50.90

Docket Nos. 50-315  
50-316

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

Donald C. Cook Nuclear Plant, Units 1 and 2  
COMMENTS ON DONALD C. COOK NUCLEAR PLANT  
DRAFT SAFETY EVALUATION FOR THE CONVERSION TO  
IMPROVED TECHNICAL SPECIFICATIONS  
(TAC NOS. MC2629 AND MC2630)

- References:
1. Letter from J. Donohew, Nuclear Regulatory Commission, to M. K. Nazar, Indiana Michigan Power Company, "Donald C. Cook Nuclear Plant, Units 1 and 2 - Draft Safety Evaluation for the Conversion to Improved Technical Specifications (TAC Nos. MC2629 and MC2630)," dated October 1, 2004.
  2. Letter from J. Donohew, Nuclear Regulatory Commission, to M. K. Nazar, Indiana Michigan Power Company, "Donald C. Cook Nuclear Plant, Units 1 and 2 - Draft Final Safety Evaluation for the Conversion to Improved Technical Specifications (TAC Nos. MC2629 and MC2630)," dated March 31, 2005.
  3. Letter from J. N. Jensen, Indiana Michigan Power Company, to Nuclear Regulatory Commission Document Control Desk, "Donald C. Cook Nuclear Plant Units 1 and 2, Supplement to License Amendment Request - Conversion of Current Technical Specifications (CTS) to Improved Technical Specifications (ITS), (TAC Nos. MC2629 and MC2630)," AEP:NRC:5901, dated April 15, 2005.

Dear Sir or Madam:

By References 1 and 2, the U. S. Nuclear Regulatory Commission (NRC) issued a draft and draft final Safety Evaluation (SE) for the conversion of the Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2 current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) consistent with Improved Standard Technical Specifications as described in NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 2, and certain generic changes to the NUREG.

Abol

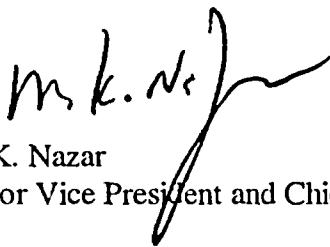
Following issuance of the draft SE in Reference 1, Indiana Michigan Power Company (I&M) provided informal comments based upon the status of NRC review of the original License Amendment Request for the conversion to the ITS at that time. These comments have been incorporated by the NRC in the draft final SE provided in Reference 2 to the satisfaction of I&M. Based upon the completion of the NRC review of the original License Amendment Request, I&M provided a supplement to the original License Amendment Request in Reference 3. The purpose of this letter is to provide the final comments on the draft SE in Reference 1 and the draft amendments in Reference 2 to be consistent with Reference 3.

Attachment 1 is a copy of the draft SE and draft SE Attachment 1 with changes proposed by I&M shown using red, strikethrough text for deleted text and bold, blue text for added text. These changes are consistent with the supplement to the original License Amendment Request in Reference 3. Attachments 2 through 6 are copies of the final SE tables to replace Attachments 2 through 6 of the draft SE, with changes incorporated that are consistent with the Discussion of Changes provided in Reference 3. Enclosure 2 provides comments on the draft amendments in Reference 2 to ensure consistency with the supplement to the original License Amendment Request in Reference 3. As of the date of this letter, there are no outstanding open items that are anticipated to require any change to the documents provided.

Enclosure 1, "Affirmation," provides an oath and affirmation affidavit regarding the statements made and matters set forth in this submittal.

This letter contains no commitments. If you have any questions or require additional information, please contact Mr. Richard J. Grumbir, Project Manager, ITS, at (269) 697-5141.

Sincerely,

A handwritten signature in black ink, appearing to read "M. K. Nazar", with a stylized flourish extending from the end.

M. K. Nazar  
Senior Vice President and Chief Nuclear Officer

GW/rdw

Enclosure:

1. Affirmation
2. Comments on the Draft Amendments for the Conversion to Improved Technical Specifications

Attachments:

1. Markup of Draft Safety Evaluation for the Conversion to Improved Technical Specifications, Including Attachment 1
2. Replacement Pages for Draft Safety Evaluation Attachment 2, Table A - Administrative Changes
3. Replacement Pages for Draft Safety Evaluation Attachment 3, Table M - More Restrictive Changes
4. Replacement Pages for Draft Safety Evaluation Attachment 4, Table L - Less Restrictive Changes
5. Replacement Pages for Draft Safety Evaluation Attachment 5, Table LA - Removed Details
6. Replacement Pages for Draft Safety Evaluation Attachment 6, Table R - Relocated Specifications

NOTE

A single copy of this cover letter, enclosure, and attachments is being submitted to the NRC Document Control Desk. In addition, a single CD-ROM suitable for use for entry of this complete submittal into the NRC Agencywide Documents Access and Management System (ADAMS) is being provided. The single copy of the submittal and CD-ROM provided meet the applicable requirements of Regulatory Issue Summary (RIS) 2001-05, "Guidance on Submitting Documents to the NRC by Electronic Information Exchange or on CD-ROM." Additional CD-ROMs are provided for the persons designated below.

- c: T. H. Boyce, NRC Washington, DC, w/o attachments, with CD-ROM  
J. L. Caldwell, NRC Region III, w/o attachments, with CD-ROM  
K. D. Curry, Ft. Wayne AEP, w/o enclosure/attachments  
J. N. Donohew, NRC Washington, DC, w/o attachments, with CD-ROM  
P. C. Hearn, NRC Washington, DC, w/o attachments, with CD-ROM  
J. T. King, MPSC, w/o enclosure/attachments  
C. F. Lyon – NRC Washington DC, w/o attachments, with CD-ROM  
MDEQ – WHMD/HWRPS, w/o enclosure/attachments  
NRC Resident Inspector, w/o attachments, with CD-ROM

**AFFIRMATION**

I, Mano K. Nazar, being duly sworn, state that I am Senior Vice President and Chief Nuclear Officer of American Electric Power Service Corporation and 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.

American Electric Power Service Corporation



M. K. Nazar  
Senior Vice President and Chief Nuclear Officer

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 15<sup>th</sup> DAY OF April, 2005

  
Notary Public

My Commission Expires 6/10/2007

