



**INDIANA  
MICHIGAN  
POWER**

*A unit of American Electric Power*

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

August 4, 2005

AEP:NRC:2073-28  
10 CFR 2.202

Docket Nos. 50-315  
50-316

U. S. Nuclear Regulatory Commission  
Attn: Rulemakings and Adjudications Staff  
Mail Stop O-P1-17  
Washington, DC 20555-0001

**SUBJECT:** Response to Issuance of Order for Additional Security Measures on the Transportation of Radioactive Material Quantities of Concern, Dated July 19, 2005

Under cover of a letter dated July 19, 2005, the Nuclear Regulatory Commission ("NRC" or "Commission") transmitted an immediately effective order entitled: "Issuance of Order for Additional Security Measures on the Transportation of Radioactive Material Quantities of Concern" EA-05-007, ("Order"), to Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Units 1 and 2, Facility Operating Licenses DPR-58 and DPR-74. The Order states that, as a result of its initial consideration of current safeguards and security requirements, as well as a review of information provided by the intelligence community, the Commission has determined "that certain security measures are required to be implemented by Licensees as prudent, interim measures to address the current threat environment in a consistent manner," Order, Page 2. The Order requires compliance with specific additional security measures (ASMs) as set forth in Attachment B of the Order, which supplement existing regulatory requirements, by all licensees identified in Attachment A of the Order to enhance the security for transporting radioactive material quantities of concern. These ASMs are to remain in effect until the Commission determines otherwise. The Commission recognizes that licensees may have already initiated many of the measures set forth in Attachment B to the Order in response to previously issued Safeguards and Threat Advisories on their own.

Although it found that the security measures implemented by licensees in response to the Safeguards and Threat Advisories have been adequate to provide reasonable assurance of adequate protection of common defense and security, in light of the continuing threat environment, the Commission concluded the security measures must be embodied in an order, consistent with the established regulatory framework. In addition, pursuant to 10 CFR 2.202, in light of the common defense and security matters identified above, the Commission concluded that the public health and safety required that the Order be immediately effective.

SOOL

Pursuant to 10 CFR 2.202(d), I&M consents to the order and is not requesting a hearing on the caption docket. I&M will complete implementation of the requirement in Attachment B to the order by January 17, 2006, or before the next shipment of radioactive material quantities of concern thereafter. I&M will notify the NRC upon completing implementation of the requirements in Attachment B to the order. I&M does not currently ship radioactive materials within quantities of concern. If in the future I&M identified a need to ship materials within the quantities of concern, I&M will notify the NRC no later than 90 days prior to the intended shipping date.

There are 3 commitments identified in this submittal and are listed in the attachment.

Should you have any questions, please contact Mr. John A. Zwolinski, Director of Safety Assurance, at (269) 466-2428.

Sincerely,



Joseph N. Jensen  
Site Vice President

Attachment

HE/rdw

c: Assistant General Counsel for Materials Litigation and Enforcement – NRC  
Washington DC  
J. L. Caldwell – NRC Region III  
K. D. Curry – AEP Ft. Wayne  
Document Control Desk – Washington DC  
J. T. King – MPSC  
C. F. Lyon – NRC Washington DC  
MDEQ – WHMD/RPMWS  
NRC Resident Inspector  
Office of Enforcement – NRC Washington DC  
Records Center - INPO

**AFFIRMATION**

I, Joseph N. Jensen, 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



Joseph N. Jensen  
Site Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 4 DAY OF August, 2005

  
Notary Public



My Commission Expires Apr. 4, 2008

ATTACHMENT TO AEP:NRC:2073-28

REGULATORY COMMITMENTS

The following table identifies those actions committed to by Indiana Michigan Power Company (I&M) in this document. Any other actions discussed in this submittal represent intended or planned actions by I&M. They are described to the Nuclear Regulatory Commission (NRC) for the NRC's information and are not regulatory commitments.

<b>Commitment</b>	<b>Date</b>
I&M will complete implementation of the requirement in Attachment B to the order by January 17, 2006, or before the next shipment of radioactive material quantities of concern thereafter.	Prior to the intended shipping date
I&M will notify the NRC upon completing implementation of the requirements in Attachment B to the order.	Prior to the intended shipping date
If in the future I&M identified a need to ship materials within the quantities of concern, I&M will notify the NRC no later than 90 days prior to the intended shipping date.	90 days prior to the intended shipping date