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December 28, 2005

AEP:NRC:5048
10 CFR 50.48(c)

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
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Mail Stop O-P1-17
Washington, DC 20555-0001

Donald C. Cook Nuclear Plant Units 1 and 2
LETTER OF INTENT TO ADOPT NFPA 805, "PERFORMANCE-BASED
STANDARD FOR FIRE PROTECTION FOR LIGHT WATER REACTOR
GENERATING PLANTS, 2001 EDITION"

This letter serves to inform you of Indiana Michigan Power Company's (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP), intent to adopt National Fire Protection Association (NFPA) Standard 805, "Performance-Based Standard for Fire Protection for Light Water Reactor Generating Plants, 2001 Edition," in accordance with 10 CFR 50.48(c) at CNP.

The transition to the performance-based standard for fire protection is expected to commence in January of 2006 and will take approximately 24 months to fully implement. The schedule is subject to change depending on the extent to which I&M determines the need to make either physical modifications or changes to the fire protection program to comply with NFPA 805. An updated schedule will accompany the License Amendment Request required under 10 CFR 50.48(c)(3)(i).

The NFPA transition process will proceed in three phases:

Phase I – Preliminary Assessment of the Fire Protection Program

- Technical and regulatory assessments performed to determine the feasibility and practicality of performing the transition.

Phase II – Reviews and Engineering Analysis

- Completion of Fire PRA
- Fundamental Fire Protection Program and Design Elements Review
- Nuclear Safety Performance Criteria Transition Review
- Non-Power Operational Mode Transition Review
- Radiological Release Transition Review

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- Change Evaluations
- License Amendment Request

Phase III – Implementation

- Program Documentation
- Configuration Control
- Monitoring

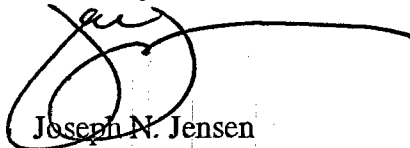
The process will be considered complete upon receipt of the License Amendment(s) authorizing the transition to NFPA 805.

The Nuclear Regulatory Commission interim Enforcement Policy (69 FR 33684, June 16, 2004) provides guidelines for enforcement discretion for identified non-compliances. Those non-compliances must be entered into the licensee's corrective action program, must not be associated with findings that the Reactor Oversight Process Significance Determination Process would evaluate as Red, or would not be categorized at Severity Level 1, and appropriate compensatory measures have been taken (non-safety significant).

I&M understands that this letter of intent will initiate a period of enforcement discretion for CNP during which no enforcement actions will be taken for non-safety significant non-compliances discovered as a result of evaluations performed during the transition process.

This letter contains no regulatory commitments. Should you have any questions, please contact Mr. Michael K. Scarpello, Regulatory Affairs Supervisor, at (269) 466-2649.

Sincerely,



Joseph N. Jensen
Site Vice President

RAJ/rdw

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