

June 16, 2006

Mr. Mano K. Nazar
Senior Vice President and
Chief Nuclear Officer
Indiana Michigan Power Company
Nuclear Generation Group
One Cook Place
Bridgman, MI 49106

SUBJECT: DONALD C. COOK NUCLEAR PLANT, UNIT 1 - QUICK TURNAROUND TIME
FOR REVIEW OF A PROPOSED AMENDMENT (TAC NO. MD2106)

The purpose of this letter is to share our observation with you regarding the need for better planning of licensing submittals by the Indiana Michigan Power Company (I&M) that require Nuclear Regulatory Commission (NRC) approval.

By letter dated May 31, 2006, you submitted an application for license amendment to replace the existing resistance temperature detector (RTD) bypass loop piping with a fast response thermowell-mounted RTDs located in the reactor coolant piping. You requested our approval of the amendment by September 8, 2006, allowing approximately 3 months for the NRC staff to complete its review. The NRC has established performance goals for licensing actions: complete 96 percent in less than 1 year, and 100 percent in less than 2 years. I&M should anticipate that our review of most licensing actions can be accomplished in a range of 8 to 12 months. Thus, we find your proposed target date for completion of the review to be aggressive. We will endeavor to complete the review as expeditiously as possible. However, I&M should take appropriate contingency measures if our action is not completed before I&M's requested schedule.

We have previously discussed with I&M the need to exercise prior planning of I&M submittals to ensure adequate time for NRC review consistent with NRC's performance goals. For example, in a public meeting held on February 12, 2004, relating to a proposed license amendment regarding nuclear fuel supplier transition, we had stressed the need for adequate review time. More recently, while reviewing certain relief requests with short lead times, we again informed you on the need for planning your submittals.

NRC faces significant challenges in balancing its work load, available resources, budget constraints, and performance goals. Licensing actions that involve short turnaround times tend to abruptly divert NRC resources dedicated to other already scheduled tasks, thus, risking timely completion of previously scheduled tasks and hampering NRC's ability to respond to unforeseen circumstances. We request that I&M take appropriate corrective actions to ensure

Mr. M. Nazar

- 2 -

that future licensing submittals are planned with sufficient lead time to effectively conduct all required internal and external reviews. If you would like to discuss this matter further, please call me at 301-415-2429.

Sincerely,

/RA/

L. Raghavan, Chief
Plant Licensing Branch III-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-315 and 50-316

cc: See next page

Mr. M. Nazar

- 2 -

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