



**INDIANA
MICHIGAN
POWER**

A unit of American Electric Power

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

October 18, 2006

AEP:NRC:2073-39
10 CFR 2.202
10 CFR 50.4

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
**IMPLEMENTATION RESPONSE TO NUCLEAR REGULATORY COMMISSION
ORDER EA-06-137 REQUIRING COMPLIANCE WITH
KEY RADIOLOGICAL PROTECTION MITIGATION STRATEGIES**

- Reference:
1. Nuclear Regulatory Commission (NRC) letter EA-06-137, Issuance of Order Requiring Compliance with Key Radiological Protection Mitigation Strategies, dated June 20, 2006.
 2. NRC letter EA-06-137, Order Requiring Compliance with Key Radiological Protection Mitigation Strategies, dated August 28, 2006.

Pursuant to Section III.C of reference 1 (Order), Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant Units 1 and 2, is submitting this letter confirming that the requirements as specified in the Order are fully implemented as modified by Reference 2.

The NRC issued the Order, effective immediately, to licensees specified in Attachment 1 of the Order. The Order requires addressees to provide reasonable assurance that public health and safety and common defense and security continue to be adequately protected for a scenario resulting from a large fire or explosion. The Order also requires that the key radiological protection mitigation strategies that are identified in Attachment 2 to the Order be incorporated into I&M's security plan, safeguards contingency plan, guard training and qualification plan, and emergency plan, as appropriate, within 120 days of the date of the Order. By reference 2, the NRC modified the requirements of the Order to allow licensees the option to agree to a license condition to implement the required strategies of the Order instead of incorporating the required strategies into the security plan, safeguards contingency plan, guard training and qualification plan, and emergency plan.

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I&M agrees to allow the NRC to amend Facility Operating Licenses DPR-58 and DPR-74 to satisfy the requirements of the Order as modified by reference 2 with the following license condition:

Indiana Michigan Power Company shall implement and maintain all Actions required by Attachment 2 to NRC Order EA-06-137, issued June 20, 2006, except the last action that requires incorporation of the strategies into the site security plan, contingency plan, emergency plan, and/or guard training and qualification plan, as appropriate.

I&M requests a 30-day period following issuance of the license condition to allow for administrative processing to update controlled documents.

No previous submittals affect the license pages that are affected by this license amendment. If any future submittals affect these pages, I&M will coordinate the changes to the pages with the NRC Project Manager to ensure proper page control when the associated license amendments are issued.

This letter contains no new commitments.

Should you have any questions, please contact Ms. Susan D. Simpson, Regulatory Affairs Manager, at (269) 466-2428.

Sincerely,



Mark A. Peifer
Site Vice President

HLE/jen

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