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July 1, 2011

AEP-NRC-2011-1
10 CFR 50.90

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Donald C. Cook Nuclear Plant Unit 1 and Unit 2
Docket Nos. 50-315 and 50-316
Request for License Amendment to Adopt National Fire Protection Association
(NFPA) 805 Performance-Based Standard for Fire Protection for Light Water Reactor
Generating Plants (2001 Edition)

References: 1) U.S. Nuclear Regulatory Commission (NRC) Regulatory Guide 1.205, "Risk-Informed, Performance-Based Fire Protection for Existing Light-Water Nuclear Power Plants," Revision 1, dated December 2009 (ADAMS Accession Number ML092730314).

2) Nuclear Energy Institute (NEI) document NEI 04-02, "Guidance for Implementing a Risk- Informed, Performance-Based Fire Protection Program Under 10 CFR 50.48(c)," Revision 2, dated April 2008 (ADAMS Accession Number ML081130188).

3) NRC Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis," Revision 1, dated November 2002. (ADAMS Accession Number ML023240437).

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Indiana Michigan Power Company (I&M), the licensee for Donald C. Cook Nuclear Plant (CNP) Unit 1 and Unit 2, proposes to amend Facility Operating Licenses DPR 58 and DPR-74. I&M proposes to adopt a new fire protection licensing basis which complies with the requirements in 10 CFR 50.48(a) and (c) and the guidance in Revision 1 of Regulatory Guide 1.205 (Reference 1). Regulatory Guide 1.205 endorses, with exceptions and clarifications, NEI 04-02, Revision 2 (Reference 2).

In accordance with the guidance in Regulatory Position C.2.2.4.2 of Regulatory Guide 1.205, the total risk change associated with pre-transition fire protection program variances meeting the NFPA 805 performance-based approach (via the change evaluation process) was evaluated. The evaluation determined that, upon completion of the plant modifications as referenced in Section 4.8.2 of the Transition Report, the total change in risk associated with the CNP transition to NFPA 805 will be consistent with the acceptance guidelines in Regulatory Guide 1.174 (Reference 3).

Security-Related Information – Withhold From Public Disclosure Under 10 CFR 2.390.
Attachments C, E G, I and W of Enclosure 2 to this letter contain security-related information.
Upon removal of Attachments C, E G, I, and W of Enclosure 2, this letter is uncontrolled.

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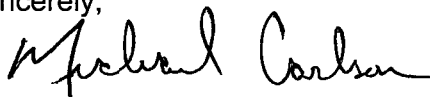
Enclosure 1 to this letter provides an affirmation statement. Enclosure 2 to this letter provides a CNP Transition Report documenting information associated with the CNP transition to National Fire Protection Association Standard 805 (NFPA 805), including the technical and regulatory justifications. Consistent with the industry template for NFPA 805 transition requests, the major topics in the Transition Report are presented as Attachments A through W to Enclosure 2. I&M requests that Attachments C, E, G, I, and W to Enclosure 2, which contain sensitive security related information, be withheld from public disclosure in accordance with 10 CFR 2.390.

I&M requests approval of the proposed license amendment in accordance with the normal NRC schedule for review of such amendments. Section 5.4 of the Transition Report provides I&M's proposed implementation schedule for transitioning CNP to the new fire protection licensing basis following NRC approval. Consistent with Section 5.4 of the Transition Report, I&M requests an implementation period of 180 days following NRC approval.

Copies of this letter and its attachment are being transmitted to the Michigan Public Service Commission and Michigan Department of Environmental Quality, in accordance with the requirements of 10 CFR 50.91.

This letter contains no new or modified regulatory commitments. Should you have any questions regarding this proposed amendment, please contact Mr. Michael K. Scarpello, Regulatory Affairs Manager, at (269) 466-2649.

Sincerely,



Michael H. Carlson
Vice President, Site Support Services

JRW/jmr

Enclosures:

1. Affirmation
2. Transition Report with Attachments A through W

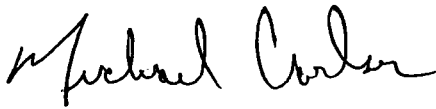
c: J. T. King, MPSC – Enclosure 2 on CD
S. M. Krawec, AEP Ft. Wayne, w/o enclosures
MDEQ – WHMD/RPS – Enclosure 2 on CD
NRC Resident Inspector – Enclosure 2 on CD
M. A. Satorius, NRC Region III – Enclosure 2 on CD
P. S. Tam – NRC Washington DC – Enclosure 2 on CD

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Upon removal of Attachments C, E G, I, and W of Enclosure 2, this letter is uncontrolled.

AFFIRMATION

I, Michael H. Carlson, being duly sworn, state that I am Vice President, Site Support Services, 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.

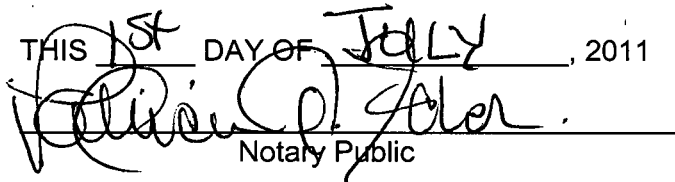
Indiana Michigan Power Company



Michael H. Carlson
Vice President, Site Support Services

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 1st DAY OF JULY, 2011


Notary Public

My Commission Expires 11-5-2011