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May 18, 2000

Rules and Directives Branch  
Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

SUBJECT: COMMENTS ON DRAFT REGULATORY GUIDE DG-1075,  
PROPOSED REVISION 4 TO REGULATORY GUIDE 1.101,  
"EMERGENCY PLANNING AND PREPAREDNESS FOR  
NUCLEAR POWER REACTORS"

Gentlemen:

This letter presents comments on the subject Draft Regulatory Guide which was issued by the U. S. Nuclear Regulatory Commission in March, 2000. These comments are provided from the Strategic Teaming and Resource Sharing (STARS) nuclear power plants which are the Callaway Plant, Comanche Peak Steam Electric Station, Diablo Canyon Power Plant, South Texas Project Electric Generating Station, and Wolf Creek Generating Station.

Draft Regulatory Guide DG-1075 essentially broadens the Regulatory Position of the existing Regulatory Guide 1.101, Revision 3, to add NRC staff acceptance of an additional guidance document that was recently issued by the Nuclear Energy Institute (NEI). The statement being added to the Regulatory Position is: "In addition, the guidance contained in NEI 99-01 (Draft Final Revision 4, February 2000), "Methodology for Development of Emergency Action Levels," is acceptable to the NRC staff as an alternative method to that described in Appendix 1 to NUREG-0654/FEMA-REP-1 and NUMARC/NESP-007 for developing EALs required in Section IV of Appendix E to 10 CFR Part 50 and 10 CFR 50.47(b)(4)."

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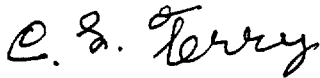
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The STARS plants concur that licensees could benefit from the guidance provided in NEI 99-01 without revising their entire EAL scheme, as long as the licensee's EAL scheme remains internally consistent (i.e., the EALs making up the scheme are integrated so as to cover the spectrum of conditions that may warrant classification in a logical manner). This is particularly so in regard to adopting guidance on EALs for cold shutdown and refueling modes of operations or for Independent Fuel Storage Facilities. Accordingly, on the basis that further benefits could be provided from the NEI 99-01 guidance, the STARS plants agree with the issuance of the proposed Revision 4 to Regulatory Guide 1.101.

Sincerely,



C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

CLW/clw

c - Mr. Alan Nelson, NEI