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Rules and Directives

65 FR 55064
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November 20, 2000

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

Gentlemen:

ULNRC-04342



**NRC Request for Public Comments on Draft Regulatory Guide DG-1100,
Design Guidance for Radioactive Waste Management Systems, Structures,
and Components Installed in Light-Water-Cooled Nuclear Power Plants
(65 Fed. Reg. 55064)**

Reference: NEI Letter from David J. Modeen, dated November 20, 2000

AmerenUE concurs with the comments presented in the referenced NEI comment letter. Regulatory Guidance should reflect improved technical knowledge and reference revised or new consensus standards. We support the position that each licensee must determine the feasibility and value of applying updated regulatory guidance, and no requirement to defend a decision to not apply an updated regulatory guide to a system modification or license amendment in place of the current licensing basis.

These comments are being submitted by AmerenUE for Callaway Plant and as the spokesman for the other STARS plants. STARS is an industry consortium of five nuclear licensees who have entered a mutual agreement known as Strategic Teaming and Resource Sharing or STARS. The STARS group consists of the five plants operated by TXU Electric, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric, and STP Nuclear Operating Company.

Sincerely,

David Shafer
for Alan C. Passwater
Manager, Corporate Nuclear Services

DJW/jdg

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NEI File: E230.39

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