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PETITION FILED PRM 50-74
(66FR 51884)

D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
P.O. Box 1002, Glen Rose, Texas 76043

STARS-02001

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February 1, 2002

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Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Attention: Rulemakings and Adjudications Staff

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PETITION FOR RULEMAKING
REGARDING AMENDMENT OF APPENDIX K TO
10 CFR 50 ECCS EVALUATIONS MODELS
(66 FR 51884)**

Docket Number: PRM-50-74

Gentlemen:

This letter presents endorsement from the Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants on the subject petition for rulemaking filed with the U. S. Nuclear Regulatory Commission (NRC) by the Nuclear Energy Institute (NEI). The subject petition for rulemaking was docketed on December 11, 2001, per the above referenced Federal Register notice.

The petitioner requests that the NRC amend Appendix K to 10 CFR 50, *ECCS Evaluation Models*, to allow licensees to voluntarily adopt the latest industry consensus standard on decay heat rates, ANS/ANSI-5.1-1994. The petitioner further requests that licensees be given the option to adopt, without further rulemaking, any subsequent revision to this standard that the NRC endorses.

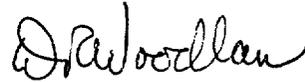
The STARS nuclear power plants fully support the subject petition and recommend that the Commission codify the latest consensus standard on decay heat as a direct final rule. Use of the latest standard is preferred because it is a contemporary consensus standard that incorporates results from most recent data measurements and calculations.

¹ The STARS group consists of six plants operated by TXU Generation Company LP, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

Nuclear safety will be enhanced because decay heat curves and uncertainties are based on up-to-date data measurements for specific fuel isotopes, allowing more accurate decisions involving relative risk. Employment of the latest consensus standard will allow licensees greater operational flexibility without impacting safety.

The STARS utilities appreciate the opportunity to comment on the petition for rulemaking. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodla1@txu.com.

Sincerely,

A handwritten signature in cursive script that reads "D. R. Woodlan".

D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
STARS