



U.S. NUCLEAR REGULATORY COMMISSION

Washington, DC 20555

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(2)

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON DRAFT REGULATORY GUIDE DG-3022  
(PROPOSED REVISION 1 of REGULATORY GUIDE 3.69)  
TOPICAL GUIDELINES FOR THE LICENSING SUPPORT NETWORK  
(67 FR 127)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> plants have reviewed the subject draft regulatory guide and offer the comments below. We appreciate the opportunity to provide input on this guidance.

The regulatory guide addresses the capture of information that is not dissimilar to the information that the nuclear industry collected for power operation licenses (i.e., FSAR, docketed correspondence, quality assurance records). The regulatory guide appears to establish a well-defined records management system titled the Licensing Support Network (LSN). Application of Section C of the regulatory guide, *Topical Guidelines*, appears prudent and appropriate, but only when used in combination with Appendix A, *Types of Documents to be Included* and Appendix B, *Excluded and Privileged Information*. Application of the Regulatory Guide should be reasonable and items such as daily office emails not used to establish a licensing bases should not be required for capture. Therefore, it is of utmost importance that the regulatory guide be executed as a whole and not dissected and put into practice through its parts.

<sup>1</sup> STARS 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.

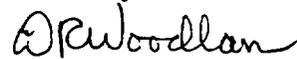
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Another important aspect associated with the implementation of the LSN is the collection and indexing of the records delineated by this Regulatory Guide. This process should not be allowed to become critical path or negatively impact the Yucca Mountain licensing schedule. As stakeholders, the nuclear industry has a vested interest in the expeditious operation of the Yucca Mountain site for spent fuel storage. Therefore, unnecessary administrative burden should be avoided.

The STARS plants appreciate the opportunity to comment on the Draft Regulatory Guide DG-3022. If there are any questions regarding these comments, please contact me at 254-897-6887 or [dwoodl1@txu.com](mailto:dwoodl1@txu.com).

Sincerely,



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