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7/22/02
67 FR 47870
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Ref: DG-1099

STARS-02022

October 25, 2002

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

October 25, 2002
11:12 AM
10/25/02

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON DG-1099, "ANCHORING COMPONENTS AND
STRUCTURAL SUPPORTS IN CONCRETE"**

Gentlemen:

This letter provides comments from the Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants on draft Regulatory Guide DG-1099.

Because the design methodologies and acceptance criteria for anchoring components covered in this draft Regulatory Guide are significantly different than the current accepted design bases for the STARS plants, it is not anticipated that the Regulatory Guide will be adopted by many of the member plants. DG-1099 Section A, "Introduction," states that "implementation of this guidance by licensees will be on a strictly voluntary basis." It is recommended that Section D, "Implementation," include wording similar to that contained in Section A with regard to the voluntary adoption of DG-1099, such as:

Organizations holding a current operating license or construction permit may choose to continue to follow their current licensing basis or may select to follow the guidance of the regulatory guide to achieve compliance with the applicable regulatory requirements. No backfitting is intended or approved in connection with the issuance of this guide.

¹ STARS is an alliance of six plants (eleven nuclear units) operated by TXU Energy, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

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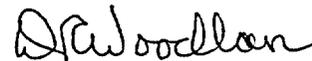
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In addition, a section entitled "Backfit Analysis" should be provided with wording such as:

The regulatory guide does not require a backfit analysis as described in 10 CFR 50.109(c) because it does not impose a new or amended provision in the Commission's rules or a regulatory staff position interpreting the Commission's rules that is either new or different from a previous applicable staff position. In addition, this regulatory guide does not require the modification or addition to systems, structures, components, or design of a facility or the procedures or organization required to design, construct, or operate a facility. Rather, a licensee or applicant can select a preferred method for achieving compliance with a license or the rules or the orders of the Commission as described in 10 CFR 50.109(a)(7). This regulatory guide provides an opportunity to use industry-developed standards, if that is a licensee's or applicant's preferred method.

The STARS plants appreciate the opportunity to comment on this draft Regulatory Guide. If there are any questions regarding the above comments, please contact me at 254-897-6887 or email me at dwoodl1@txu.com.

Sincerely,



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