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(67FR 51783)

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

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STARS-02017

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October 24, 2002

November 6, 2002 (11:18AM)

Secretary,
U. S. Nuclear Regulatory Commission
Washington, DC 20555
ATTN: Rulemaking and Adjudications Staff

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PETITION FOR RULEMAKING REGARDING
EMERGENCY CORE COOLING SYSTEM (ECCS)
EVALUATION MODELS AND ASSOCIATED GUIDANCE
(67 FR 51783)**

Gentlemen:

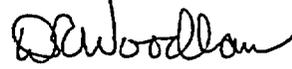
The following comments are submitted on behalf of the Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants on the petition for rulemaking regarding ECCS evaluation models and associated guidance (see 67 FR 51783).

STARS opposes the petition and believes that the proposed changes are unnecessary. STARS has concluded that, within the range of the test parameters which are applicable to commercial power reactors licensed per 10 CFR Part 50, the requirements of 10 CFR 50 Appendix K and associated guidance (NRC Regulatory Guide 1.157) are valid and conservative. Much of the test information referenced in the petition was available to the NRC and industry when the regulations and guidance were created or was assessed later when the test information became available. The apparent technical deficiencies discussed in the petition result from examining test results individually and not the net results when all the applicable testing results and available analyses are considered. STARS has not developed specific responses to each of the specifics provided in the petition based on the belief that others (e.g., NSSS vendors and fuel suppliers) are likely to do so.

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.

The STARS plants appreciate the opportunity to comment on this petition for rulemaking. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodl1@txu.com.

Sincerely,



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