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P.O Box 1002, Glen Rose, Texas 76043

Ref: 10 CFR 50.44
DG-1117

STARS-02021

October 16, 2002

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PROPOSED RULE PR 50-52
(67FR50374)

Secretary, U. S. Nuclear Regulatory Commission
Attn: Rulemakings and Adjudications Staff
Washington, DC 20555-0001

Strategic Teaming and Resource Sharing (STARS)
Comments on Notice of Proposed Rulemaking for
10 CFR 50.44, "Combustible Gas Control in Containment,"
(and 10 CFR 52.47, "Contents of Applications") with Supporting Documents
(Ref. 67 FR 50374, dated August 2, 2002)

Gentlemen:

Herein are comments from the Strategic Teaming and Resource Sharing (STARS)[1] nuclear power plants regarding the subject notice of proposed rulemaking for revising regulatory requirements pertaining to combustible gas control systems for power reactors.

In short, the STARS plants support the proposed rule and concur with the risk-informed approach taken to revise the rule, which reflects an improved understanding of the behavior of accidents involving severe core damage and the understanding that combustible gas generated from design-basis accidents is not risk significant for our containment designs.

It should be noted that the Nuclear Energy Institute (NEI) is also submitting a letter which provides comments in response to the subject proposed rulemaking, on behalf of the nuclear industry in general. The STARS plants support that response, including, in particular: the comment regarding the language of Section B of Draft Regulatory Guide DG-1117 where the term "risk-significant" is used in describing systems and provisions required by 10 CFR 50.44 for mitigating the risk associated with beyond-design-basis accidents; the comment about the Statements of Consideration regarding the safety categorization of hydrogen mixing systems for

[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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containment designs employing the use of containment fan cooler units; and the comment recommending improved wording for Section IIIF of the Statements of Consideration regarding the functional description of reactor coolant system high point vents.

The STARS plants appreciate the opportunity to comment on this proposed rule for 10 CFR 50.44. For any questions regarding the STARS response provided via this letter, please contact me by telephone at 254-897-6887 or via E-mail at dwoodla1@txu.com.

Sincerely,

D R Woodlan

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