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D. F. Woodlan, Chairman
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DOCKET NUMBER
PROPOSED RULE **PR 50**
(67 FR 66578)

Ref: 10 CFR 50
67 FR 66578

DOCKETED
USNRC

STARS-03005

January 17, 2003

January 23, 2003 (12:19PM)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**Strategic Teaming and Resource Sharing (STARS)
Comments on Notice of Proposed Rulemaking for 10 CFR 50,
“Voluntary Fire Protection Requirements for Light Water Reactors; Adoption
of NFPA 805 as a Risk-Informed, Performance-Based Alternative,”
(Ref. 67 FR 66578-66588, dated November 1, 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 fire protection requirements for nuclear power reactor licensees.

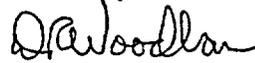
The STARS plants support the proposed rule which would permit reactor licensees to voluntarily adopt a set of fire protection requirements contained in the National Fire Protection Association (NFPA) Standard 805, “Performance-Based Standard for Fire Protection for Light Water Reactor Electric Generating Plants, 2001 Edition.” The proposed rule would provide existing nuclear power plant licensees with an alternative set of risk-informed, performance-based fire protection requirements.

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 hereby endorse the NEI comments.

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 proposed rule for 10 CFR 50. 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, Chairman
Integrated Regulatory Affairs Group
STARS