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STARS-03011

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON REVIEW STANDARD FOR  
EXTENDED POWER UPRATES  
(67 FR 79950)**

Sir:

Below are comments from the Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants on RS-001, "Review Standard for Extended Power Uprates." The STARS plants also endorse the comments submitted by the Nuclear Energy Institute (NEI).

STARS believes the development of a comprehensive review document such as this is an excellent concept that should be encouraged. By developing documents such as this to guide the review process it both promotes consistency and discourages digression into irrelevant areas. Part of the concept behind development of a document such as this is to reduce review costs and the need to request additional information (RAI). STARS believes this concept to be sound. However, STARS also believes that the document and its use should be revisited and evaluated to determine if there is indeed a savings in review costs and RAIs issued.

STARS has one primary concern with the document. The document provides a draft Safety Evaluation (SE) for both boiling water reactors and pressurized water reactors. Section 1.3 of both SEs state, "The licensee's application for the proposed EPU follows the guidance in the Office of Nuclear Reactor Regulation's (NRR's) Review Standard (RS)-001, 'Review Standard

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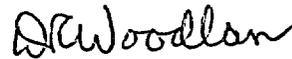
<sup>1</sup> STARS is an alliance of six plants (eleven nuclear units) operated by TXU Energy, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

for Extended Power Uprates,' to the extent that the review standard is consistent with the licensing basis of the plant." This statement invokes the review standard as guidance for the licensee. From a content perspective this is not an issue. However, conceptually this establishes the review standard as a document similar to a Regulatory Guide or NUREG. The Review Standard does not have the same review, comment and publication requirements and controls. Where the current development and review has been extensive and comprehensive, there does not appear to be a requirement for future revisions to be as rigorous. Therefore, STARS recommends either striking that statement from the SE or formalizing the review and approval process to require public notification and comment.

STARS is also concerned as to the issue of backfit. There is the potential that some of the criteria established by this review standard may pose issues of backfit on some licensees. The document includes provisions for criteria that do not apply to a licensee's licensing bases. It does not provide guidance on the issue criteria that could be considered backfit. STARS recommends some discussion on this topic be included.

The STARS plants appreciate the opportunity to comment on the Review Standard for Extended Power Uprates. If there are any questions regarding these comments, please contact me at 254-897-6887 or email me at [dwoodla1@txu.com](mailto:dwoodla1@txu.com).

Sincerely,



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