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2003 MAY 14 PM 1:06

Rules and Directives
Branch

D. R. Woodlan, Chairman
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P.O. Box 1002, Glen Rose, Texas 76043

Ref: DG-1107

STARS-03013

May 7, 2003

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

3/19/03
08 FR 13338
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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON DRAFT REGULATORY GUIDE DG-1107,
WATER SOURCES FOR LONG-TERM RECIRCULATION COOLING
FOLLOWING A LOSS-OF COOLANT ACCIDENT
(67 FR 13338)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants are endorsing comments submitted by the Nuclear Energy Institute (NEI) on draft Regulatory Guide DG-1107, "Water sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident." Attached are additional comments developed by STARS.

Other specific comments identified by the STARS reviewers have been provided to NEI and are included in their comments provided under separate cover.

The STARS plants appreciate the opportunity to comment on the draft Regulatory Guide. If there are any questions regarding endorsing NEI comments, please contact me at 254-897-6887 or email me at dwoodla1@txu.com.

Sincerely,

D.R. Woodlan

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

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.

F-RIDS = ADM-03

Template = ADM-013

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**Comments to
Draft Regulatory Guide DG-1107
(Proposed Revision 3 to Regulatory Guide 1.82)**

1. Page 3, First Paragraph
NEI provided a comment on the consideration of transient activities. Licensees perform additional activities prior to refueling outages. The potential for an individual blocking the sump is an insignificant contributor, therefore they need not be considered. STARS proposes to add to the examples in the NEI comment: pre-outage preparation..
2. Page 9, Regulatory Position C.1.1.1.2
This paragraph should be clarified to indicate that the redundant sumps should be physically separated from high-energy piping systems whose resulting pipe breaks have the potential of damaging components of the sumps 'and' where the recirculation sumps are required to be operable to mitigate the consequences of these specific high-energy piping systems.
3. Page 13, Regulatory Position C.1.3.2.3
This paragraph should include the pressurizer surge line as one of the minimum lines where break locations should be considered.
4. Page 22, Section D.
Implementation, specifically states that the guide will serve as guidance for reviews under 10 CFR 50.59 dealing with modifications to the primary coolant system that might affect the availability of water sources. It is understood that this section would be used by licensees when performing 10 CFR 50.59 reviews. Conformance to the regulatory guide would lead to a conclusion that changes were acceptable because they implement a methodology approved by the NRC. However, the generic concept should be identified without giving specific reference to the regulation. One of the issues of concern during the revision of 10 CFR 50.59 was guidance on the regulation scattered throughout regulatory documents that could become outdated or inaccurate. This reference could be viewed as another of the same. Therefore, STARS recommends this section be clarified as follows:

The regulatory guide will also serve as guidance for the conduct of reviews by licensees that deal with plant modifications installed on primary coolant system piping and components when such modifications may affect the availability of water sources for long-term recirculation (e.g., altering potential sources of debris). Conformance to this guidance is a methodology acceptable to the NRC.