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Rules and Directives
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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PROPOSED REGULATORY INFORMATION
SUMMARY; RISK-INFORMED INSPECTION GUIDANCE FOR
POST-FIRE SAFE-SHUTDOWN INSPECTIONS**

(68 FR 49529 dated August 18, 2003)

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants are endorsing comments provided by the Nuclear Energy Institute (NEI) on proposed Regulatory Information Summary (RIS); "Risk-Informed Inspection Guidance for Post-Fire Safe-Shutdown Inspections." STARS believes the RIS contains acceptable guidance. However, STARS has concerns that the RIS does not stress the importance and impact of the licensing bases on inspection activities. The guidance background states, "The extent to which these requirements or guidance are applicable to a specific NPP depends on the plant's age, commitments made by the licensee in establishing its fire protection plan, and license conditions regarding fire protection." However, the licensing bases may also contain statements or design conditions as well and these items may contradict the guidance. Therefore, STARS believes the application statement may be too limited. For example, a licensee's licensing basis may contain a statement that for certain fire areas and conditions, only one hot short is considered at a time. In this case, since the statement was reviewed and approved by the NRC and is still valid, it should take precedence over the RIS. This type of situation should be considered in the RIS.

The STARS plants appreciate the opportunity to comment on the proposed RIS. If there are any questions regarding these comments, please contact me at 254-897-6887 or 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.

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