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2004 MAR 16 AM 8:54
D. R. Woodlan, Chairman
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Rules and Directives
Branch
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STARS-04002

January 30, 2003

Chief, Rules and Directives Branch
Division of Administrative Services
Office of Administration
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

11/26/03

68 FR 66501

425

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON
DRAFT MANUAL ACTIONS INTERIM ACCEPTANCE CRITERIA
(68 FR 66501 AND 68 FR 69730)**

Sir:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants are hereby endorsing comments submitted by the Nuclear Energy Institute (NEI) on Draft Manual Actions Interim Acceptance Criteria.

In general, STARS believes that manual actions provide a safe and effective element of the defense-in-depth approach inherent in the current regulations. The requirement for detection and suppression in the area where the fire occurs in order to rely on operator manual actions should be deleted.

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

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.

FRIDS = ADM-03

Template = ADM-013

Call = D. DICC (DTD)

The STARS plants appreciate the opportunity to comment on the draft interim acceptance criteria. If there are any questions regarding endorsing NEI comments, please contact me at 254-897-6887 or email me at dwoodl1@txu.com.

Sincerely,

A handwritten signature in black ink, appearing to read "D. R. Woodlan". The signature is written in a cursive style with a large, stylized initial "D".

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