



D. R. Woodlan, Chairman
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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON DRAFT REGULATORY GUIDE DG-1129 REGARDING
PHYSICAL INDEPENDENCE OF ELECTRIC SYSTEMS**

Gentlemen:

Herein are comments from the Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants regarding draft regulatory guide DG-1129 concerning physical independence of electric systems.

The significant difference between IEEE Std 384-1974 and IEEE Std 384-1992, "Standard Criteria for Independence of Class 1E Equipment and Circuits," is that the most recent version (1) relaxes the separation distance criteria for certain configurations and (2) adds separation distance criteria for configurations not previously addressed. The new configurations include cable trays and conduits, cable trays and cable in free air, and conduits and cable in free air.

Because the STARS plants are operating nuclear power plants and Section D, *Implementation*, states that no backfit is intended or approved, there will be no impact on the STARS plants. Section D, *Implementation*, notes that the NRC will use the new regulatory guide to review "submittals from operating reactor licensees who voluntarily propose to initiate system modifications if there is a clear nexus between the proposed modifications and this guidance with respect to the physical independence requirements of the circuits and electrical equipment that compose or are associated with safety systems." Although the NRC may choose to use this version of the regulatory guide to perform a review, the provisions of the regulatory guide which are not part of the current licensing basis of the plant may not be imposed without meeting the requirements of 10 CFR 50.109, the backfitting rule. Overall, STARS supports the NRC

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.

E-REDS = ADM-03

Template = ADM-013

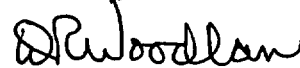
Adm = S. Aggarwal (SKA)

issuance of this regulatory guide and its endorsement of the later version of IEEE Std 384 for use by new construction applicants.

Additionally, STARS has examined a draft version of the Nuclear Power Engineering Committee's comments on DG-1129 and hereby endorses them.

The STARS plants appreciate the opportunity to comment on DG-1129. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodla1@txu.com.

Sincerely,

A handwritten signature in black ink, appearing to read "D. R. Woodlan".

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