



D. R. Woodlan, Chairman
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Washington, DC 20555-0001

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON THE PROPOSED GENERIC COMMUNICATION:
POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY
RECIRCULATION DURING DESIGN BASIS ACCIDENTS AT
PRESSURIZED WATER REACTORS**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants are hereby endorsing the comments on the proposed generic communication, "Potential Impact of Debris Blockage Emergency Recirculation During Design Basis Accidents at Pressurized Water Reactors," prepared by the Nuclear Energy Institute (NEI). STARS plants contributed to the comments developed by NEI. The STARS plants also support comments submitted by the Nuclear Utility Backfitting and Reform Group (NUBARG). The STARS plants understand the significance of the issues associated with containment sumps. However, in order to ensure the issues are addressed appropriately, it is imperative that events required to address those issues are sequenced correctly and with a suitable amount of time allotted. In addition, the STARS plants believe that the generic letter must allow for the incorporation of identified changes to the licensing bases when applying the new guidance while not affecting current operability.

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

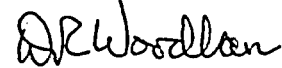
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Auth = C. Petrone (CJP)

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

Sincerely,

A handwritten signature in dark ink, appearing to read "D.R. Woodlan". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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