



PR 50
(72FR16731)

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group
P.O. Box 620, Fulton, Missouri 65251

Ref: 10 CFR 50, RIN 3150-AH76

STARS-07004

June 19, 2007

Ms. Annette L. Vietti-Cook
Secretary, U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

DOCKETED
USNRC

June 20, 2007 (10:15am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PROPOSED AMENDMENT OF INDUSTRY
CODES AND STANDARDS, 10 CFR 50, RIN 3150-AH76**

Dear Ms. Cook,

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants would like to take advantage of this opportunity to comment on the subject proposed rulemaking. STARS has reviewed the letter being submitted by the American Society of Mechanical Engineers (ASME) on the proposed rulemaking and STARS strongly endorses the comments provided by ASME.

While STARS believes all of the comments are important, one merits specific mention in this letter based on its significance.

The proposed change to ASME Section XI, item 8, 10 CFR 50.55a(g)(6)(ii)(D) – Augmented Inspection of PWR Reactor Vessel Heads Endorsement of Code Case N-729-1. The NRC requested the ASME to develop a Code Case to cover this issue. ASME spent several years of its volunteer resources to complete this effort as a top priority task. During this time ASME met several times with the staff to address concerns related to cracking in Alloy 600 materials. This proposed rulemaking with the added conditions will make Code Case N-729-1 equivalent to the existing NRC Order EA-03-09, rendering all of the ASME work worthless. We are disappointed that the NRC has taken this position given that Code Case N-729-1 was developed and approved using the latest available technical information under an ANSI-approved consensus process. We request the NRC address and resolve this concern as a top priority issue as part of this proposed rulemaking.

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.

We encourage the Commission to permit the industry and ASME to work with the staff to resolve the comments and develop a rule that will be beneficial to all parties.

The STARS plants appreciate the opportunity to comment on the proposed rule. If there are any questions regarding this comment, please contact me at 573-676-4775, or tmoser@ameren.com, or Ted Koser at 361-972-8963, or tkoser@stpegs.com.

Sincerely,

A handwritten signature in black ink, appearing to read "T. Moser", with a stylized flourish at the end.

T. Moser, Chairman

STARS Integrated Regulatory Affairs Group

From: <ccorbin1@txu.com>
To: <SECY@nrc.gov>
Date: Tue, Jun 19, 2007 11:39 PM
Subject: STARS Letter on Proposed Rulemaking

See attached letter. Letter is also sent via mail.

Thanks,

Carl Corbin

STARS Regulatory Affairs

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972-775-8418 -- cell 972-841-8872

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STARS 07004 5055a.pdf	31932	
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Expiration Date: None
Priority: Standard
ReplyRequested: No
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