PRM-50-84
(72FR28902)

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

(11)

Ref: PRM-50-84

STARS-07011

August 15, 2007

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

STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON MARK EDWARD LEYSE PETITION FOR RULEMAKING REGARDING CRUD AND OXIDE LAYERS ON FUEL BUNDLES
(72 FR 28902)

Docket Number: PRM-50-84

Reference: NEI letter from James H. Riley to U.S. Nuclear Regulatory Commission dated August 3, 2007, titled "Leyse Petition for Rulemaking: PRM-50-84"

Dear Ms. Viette-Cook,

The Strategic Teaming and Resource Sharing (STARS)[1] alliance provides the following comments on the subject petition for rulemaking filed with the U. S. Nuclear Regulatory Commission (NRC) by Mark Edward Leyse.

The petitioner requests that the NRC amend the regulations (Appendix K to part 50 and 10 CFR 50.46, *ECCS Evaluation Models*) to address the effects that crud and oxide layers on fuel cladding and hydrogen content in cladding have on core coolability during normal operation and the loss of coolant accident. Industry comments were provided on the petition via the referenced NEI letter. STARS supports the comments in that letter and offers the following additional comments on the petition.

[1] STARS consists of six plants operated by Luminant 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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The STARS alliance does not support the subject petition. The industry has funded extensive research that has resulted in chemistry controls, core design constraints, and operational guidance that reduce susceptibility to heavy crud deposition. Chemistry indicators and core power distribution measurements can be evaluated to look for evidence of heavy crud deposition or crud movement. Visual inspections of fuel assemblies during refueling outages may also provide evidence of heavy crud deposition. Many PWRs, especially those most susceptible to heavy crud deposition, make extensive use of this industry guidance.

The requested rulemaking would not make a significant contribution to maintaining safety because current regulations and regulatory guidance already address consideration of crud-related parameters for core cooling.

The proposed revisions would decrease efficiency and effectiveness because licensees would be required to generate additional information as part of the development of their ECCS evaluation models and the NRC staff would need to evaluate the licensee's data and analysis. The resources expended to promulgate the rule and supporting regulatory guidance would be significant with little return of value.

The existing regulatory requirements and guidance already require a nuclear power plant applicant/licensee to address the impacts of the core geometry change on cooling in ECCS analyses and transient analyses. Therefore, nuclear safety will not be enhanced by adopting the subject petition for rulemaking.

The STARS alliance appreciates the opportunity to comment on this issue. If there are any questions regarding these comments, please contact me at 573-676-4775, or tmoser@ameren.com, or Carl Corbin at 254-897-0121, or carl.corbin@luminant.com.

Sincerely,

Ted A. Moser

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group