



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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**Strategic Teaming and Resource Sharing (STARS)
Comments on RIN 3150-AI01, Alternate Fracture Toughness Requirements for
Protection against Pressurized Thermal Shock Events
72 FR 56275 (October 3, 2007)**

The Strategic Teaming and Resource Sharing (STARS)¹ alliance would like to take advantage of this opportunity to comment on the subject proposed rulemaking.

The proposed voluntary rule, 10 CFR 50.61a, will provide licensees with an alternative to the requirements of 10 CFR 50.61, using an updated technical basis that is more realistic. This is an important rule that will reduce regulatory burden for licensees approaching the current 10 CFR 50.61 screening criteria. In addition to the regulatory burden reduction, the voluntary rule has the potential to promote operational and radiological safety over the remaining life of the plants. Operational safety is promoted through the avoidance of the unnecessarily restrictive operating limits. Radiological safety is promoted through potential elimination or reduction in the likelihood that utilities would accumulate significant radiological exposure performing unneeded vessel inspections or more drastic reactor vessel annealing or replacement. The STARS alliance endorses the addition of 10 CFR 50.61a to the existing regulations.

The STARS alliance appreciates the opportunity to comment on the proposed rule. If there are any questions regarding these comments, please contact me at 573-676-4775, or tmoser@ameren.com, or Michael Richardson at 805-545-4557, or mjrm@pge.com.

Sincerely,

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group

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