



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

STARS-08011

5/1/08
73 FR 24094

July 14, 2008

(4)

Chief, Rulemaking, Directives and Editing Branch,
Division of Administrative Services,
Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

RECEIVED

2008 JUL 21 PM 3:46

RULES AND DIRECTIVES
BRANCH
USNRC

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
Comments on Proposed Generic Communication;
Fatigue Analysis of Nuclear Power Plant Components**

Reference: 1) Federal Register Notice (73 FR 24094), Proposed Generic
Communication – Fatigue Analysis of Nuclear Power Plant
Components, dated May 1, 2008

Dear Sir or Madam,

The Strategic Teaming and Resource Sharing (STARS) alliance submits the following comments
in response to the Federal Register Notice of the Nuclear Regulatory Commission's proposed
issuance of a regulatory issue summary (RIS) addressing a potential nonconservatism in the
method used to perform fatigue analysis calculations for nuclear power plant components
(73 FR 24094). STARS appreciates the Staff's effort to communicate the proposed generic
communication and provide the opportunity for public comment.

STARS endorses the comments submitted by the Nuclear Energy Institute (NEI) suggesting that
the proposed RIS be withdrawn. Should the proposed RIS be issued, STARS encourages the
Staff to specifically identify the analysis issues leading to the issuance of the RIS and to include
specific guidance and recommendations in the issued RIS.

Thank you for your consideration of these comments. If there are any questions regarding these
comments, please contact me at 573-676-4775, or tmoser@ameren.com, or Don Rickard at 573-
676-8802, or drickard@ameren.com.

Sincerely,

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group
E-RTDS = ADM-03
Cell = J.R. FAIR (JRF)

SUNSI Review Complete
Template = ADM-013