



Strategic Teaming and Resource Sharing

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

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October 1, 2008

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

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
Comments on Proposed Draft Regulatory Guide (DG)-1200, "An Approach
for Determining the Technical Adequacy of Probabilistic Risk Assessment
Results for Risk-Informed Activities"**

Reference: 1) Federal Register Notice (73 FR 35170), Proposed Draft Regulatory Guide (DG)-1200,
"An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment
Results for Risk-Informed Activities.", dated June 20, 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 request for comments on DG-1200, "An Approach for Determining the Technical Adequacy of Probabilistic Risk-Informed Activities". STARS appreciates the Staff's effort to communicate the proposed regulatory guide and providing an extension to the due date for public comment.

STARS endorses the comments submitted by the Nuclear Energy Institute (NEI) in their letter dated August 20, 2008. Like NEI, STARS is very concerned with the expansion of the Scope of Applicability in the Draft Regulatory Guide. Changing the applicability from "Risk-informed Application" to "Risk-Informed Activity" is a significant change in the purpose and impact of the Regulatory Guide. The word "Activities" connotes a much broader scope than the original intention of the Regulatory Guide to provide PRA technical adequacy guidance in support of voluntary risk-informed license applications. Further, the standards being endorsed were written in the context of licensing applications. Using the concept of "Activities" would include risk-informed decision-making in support of the reactor oversight significance determination process, maintenance rule, use of PRA for developing operator training scenarios, use of PRA for procedure change reviews or design change reviews, use of PRA in support of 10 CFR 50.59 reviews, and potentially many other uses. The expansion of applicability into non-voluntary uses of PRA, such

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as the significance determination process would create many other problems, in that it will be many years before plants PRAs (or NRC's SPAR models) meet the technical adequacy expectations of the regulatory guide, and in the interim these non-voluntary processes have to remain viable. The regulatory guide should be clearly stated to apply only to voluntary risk-informed initiatives. In the absence of these applications, there remains no regulatory requirement for PRA for plants licensed under Part 50.

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 Ted Koser at 361-972-8963, or tkoser@stpegs.com.

Sincerely,



T. Moser, Chairman
STARS Integrated Regulatory Affairs Group