



Carl B. Corbin, Chairman
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STARS-10007

August 19, 2010

Ms. Cindy Bladey, Chief
Rules, Announcements, and Directives Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

6/15/2010
75 FR 33853

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
Comments On Draft Regulatory Guide,
DG-1240, "Condition Monitoring Program for Electric
Cables Used in Nuclear Power Plants."
Docket ID NRC-2010-0202**

- Reference:
1. 75 FR 33853, Draft Regulatory Guide: Issuance, Availability, Notice of Issuance and Availability of Draft Regulatory Guide, DG-1240, "Condition Monitoring Program for Electric Cables Used in Nuclear Power Plants."
 2. Draft Regulatory Guide DG-1240 (Proposed new regulatory guide) Condition Monitoring Program For Electric Cables Used In Nuclear Power Plants, dated June 2010.
 3. Letter from John C. Butler (NEI) to Ms. Cindy Bladey (USNRC), Dated August 13, 2010, Subject: Comments on Draft Regulatory Guide, DG-1240, "Condition Monitoring Program for Electric Cables Used in Nuclear Power Plants." (Federal Register of June 10, 2010, 75 FR 33853) Docket ID NRC-2010-0202

Dear Ms. Bladey,

The Strategic Teaming and Resource Sharing (STARS)¹ alliance is submitting comments in response to the referenced Federal Register notice soliciting comments on draft Regulatory Guide, DG-1240, "Condition Monitoring Program for Electric Cables Used in Nuclear Power Plants." STARS appreciates the NRC request for comments on the draft Regulatory Guide.

STARS endorses the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the nuclear industry (Reference 3) and supports the recommendation that DG-1240 be withdrawn. STARS concurs with the NEI position that DG-1240 establishes a new position relative to

¹ STARS consists of thirteen plants at seven stations operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, Arizona Public Service Company, and Southern California Edison.

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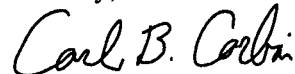
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condition monitoring for electric cables, and as such, is inconsistent with previously endorsed guidance for the implementation of the Maintenance Rule and requires a backfit analysis.

The most significant concern, however, is the absence of an analysis demonstrating a positive effect on nuclear safety through the cable monitoring program described in DG-1240. The monitoring techniques described in DG-1240 can actually reduce cable insulation life or cause the catastrophic failure of a fully operable safety-related cable (Direct Current High-Potential Test). Additionally, the potential for equipment damage through repeated cable de-termination and re-termination of hundreds of safety-related cables needs to be evaluated and addressed prior to issuing this Regulatory Guide.

Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact me at 254-897-0121, or carl.corbin@luminant.com, or Jacques Vandebroek at 760-484-7556, or jacques.vandebroek@sce.com.

Sincerely,

A handwritten signature in cursive script that reads "Carl B. Corbin".

Carl B. Corbin, Chairman
STARS Integrated Regulatory Affairs Group