

RulemakingComments Resource

From: Scott Bauer [scott.bauer@starsalliance.com]
Sent: Thursday, March 21, 2013 11:12 AM
To: RulemakingComments Resource
Subject: NRC-2012-0031
Attachments: Final- comments NTTF Rec 8 Stars .pdf

STARS comments on the Draft Regulatory Basis are attached.

Respectfully,

Scott Bauer
STARS Regulatory Affairs Functional Area Manager

**DOCKETED
USNRC**

March 22, 2013 (12:00 p.m.)

OFFICE OF THE SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF



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South Texas Project
Wolf Creek Generating Station

STARS 13002

March 21, 2013

Ms. Annette L. Vietti-Cook
Secretary
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

Attn: Rulemakings and Adjudications Staff

Subject: Docket ID NRC-2012-031; 10 CFR Part 50 and 52, Onsite Emergency Response Capabilities; Draft Regulatory Analysis (78 *Fed. Reg.* 1154)

Dear Ms. Vietti-Cook:

STARS Alliance LLC (STARS)¹ is submitting comments in response to the subject Federal Register notice soliciting comments on the Draft Regulatory Analysis regarding proposed NRC rulemaking addressing onsite emergency response capabilities, NRC Fukushima Near Term Task Force (NTTF) Recommendation 8. STARS appreciates the opportunity to comment on this regulatory analysis.

STARS supports the Industry comments submitted by the Nuclear Energy Institute (NEI). In particular, STARS agrees that the rulemaking would be better pursued following the implementation of the post-Fukushima activities currently underway.

STARS would reiterate the point made by NEI that we do not believe there is a "lack of a comprehensive strategy to address events as they progress beyond design basis assumptions." The U. S. plants have developed comprehensive strategies in this regard and have robust command and control structures through our well-trained Emergency Response Organizations (ERO). As new capabilities are developed they are appropriately integrated with the existing capabilities. For example, the FLEX Support Guidelines (FSGs) are currently in development and that process includes integration with the Emergency

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.



STARS 13002

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Operating Procedures (EOPs) such that there is a clear progression from the EOPs to the FSGs.

STARS would also reiterate the NEI comment that the training/qualification and drill requirements need to be carefully considered in light of the low probability of the events in question. It is important that operator training for design basis events not be diminished.

If you have any questions on these comments, please contact me or Dennis Buschbaum at (254)-897-5851 or dennis.buschbaum@luminant.com.

Sincerely,



Scott A. Bauer
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