

# STARS Alliance

www.starsalliance.com  
1626 N. Litchfield Rd., Suite 230  
Goodyear, AZ 85395  
T : 623-209-7549

Alliance Members:  
Callaway Energy Center  
Diablo Canyon Power Plant  
Palo Verde Nuclear Generating Station  
Wolf Creek Generating Station

STARS-15004

April 20, 2015

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

Subject: STARS Alliance LLC Comments on Petition for Rulemaking, "Improved Identification Techniques Against Alkali-Silica Reaction (ASR) Concrete Degradation at Nuclear Power Plants," (Docket ID No. PRM-50-109; NRC-2014-0257)

References: 1. Federal Register Notice Volume 80, No. 7 (80FR1476), dated January 12, 2015, Docket ID No. PRM-50-109; NRC-2014-0257  
2. Letter from Nuclear Energy Institute (NEI) to Ms. Annette Vietti-Cook, U.S. Nuclear Regulatory Commission, Rulemakings and Adjudications Staff, "Comments on Petition for Rulemaking: Improved Identification Techniques Against Alkali-Silica Reaction (ASR) Concrete Degradation at Nuclear Power Plants (Docket No. PRM-50-109; NRC-2014-0257)," dated March 25, 2015

Dear Ms. Vietti-Cook:

As noted in Reference 1, the Nuclear Regulatory Commission (NRC) issued for public comment a Petition for Rulemaking, "Improved Identification Techniques Against Alkali-Silica Reaction (ASR) Concrete Degradation at Nuclear Power Plants," Docket ID No. PRM-50-109; NRC-2014-0257." STARS Alliance LLC appreciates the opportunity to comment on this proposed rulemaking.

STARS endorses the comments submitted by the Nuclear Energy Institute (NEI) in their letter written on behalf of the nuclear energy industry, dated March 25, 2015 (Reference 2). STARS also believes that rulemaking is not necessary to resolve the issues related to inspecting concrete because (1) the mechanisms that contribute to ASR susceptibility have been identified and the industry is already taking appropriate actions and; (2) there are ample existing regulatory requirements to ensure that appropriate attention is given to potentially degraded concrete. The NEI Letter dated March 25, 2015, provides additional technical detail supporting this position. STARS license renewal staff provided input to the NEI letter.

Both the NRC and the industry continue to strive to reduce the cumulative impacts of regulatory actions and process changes. Efforts in this area are driven by the need to ensure that attention and resources remain focused on safe, reliable facility operation and that any changes to requirements and guidance are warranted for those purposes. Against this background, we ask the NRC to consider if there is a compelling need for rulemaking in this instance.

If you have any questions, please contact me at 623-239-4359 or [scott.bauer@starsalliance.com](mailto:scott.bauer@starsalliance.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Scott A. Bauer". The signature is written in a cursive style with a horizontal line at the end.

Scott A. Bauer

Regulatory Affairs Functional Area Manager, STARS LLC