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D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
P.O. Box 1002, Glen Rose, Texas 76043

Ref: PRM-50-73A

STARS-02004

March 28, 2002

Secretary of the Commission
Attention: Rulemakings and Adjudications Staff
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

STRATEGIC TEAMING AND RESOURCE SHARING (STARS) COMMENTS ON ROBERT H. LEYSE SUPPLEMENTAL PETITION FOR RULEMAKING REGARDING SEVERE DEPOSITS OF CRUD ON FUEL BUNDLES
(67 FR 4214)

Docket Number: PRM-50-73A

Reference: NEI letter from Alex Marion to U.S. Nuclear Regulatory Commission dated December 18, 2001, titled "Industry Comments on Petition for Rulemaking, PRM-50-73 (Federal Register of October 12, 2001, 66 FR 52065)"

Gentlemen:

This letter presents comments from the Strategic Teaming and Resource Sharing (STARS)[1] nuclear power plants on the subject supplemental petition for rulemaking filed with the U. S. Nuclear Regulatory Commission (NRC) by Robert H. Leyse. The subject supplemental petition for rulemaking was docketed on November 5, 2001, per the above referenced Federal Register notice.

The petitioner requests in this supplemental petition that the NRC amend elements in Appendix K to part 50 and 10 CFR 50.46, *ECCS Evaluation Models,* (and perhaps other regulations) to include the impact of severe crud deposits on core coolability during normal operation. Industry comments were provided on the original petition via the referenced NEI letter. STARS supports

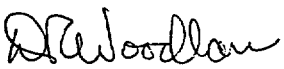
[1] STARS consists of six plants operated by TXU Generation Company LP, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

the comments in that letter and offers the following additional comments on the supplemental petition.

The STARS nuclear power plants do not support the subject petition. Chemistry controls and core design constraints are in place to reduce susceptibility to heavy crud deposition. During operation, chemistry indicators and core power distribution measurements are evaluated to look for evidence of heavy crud deposition or crud movement. Visual inspections of fuel assemblies during refueling outages have shown no evidence of heavy crud deposition. Therefore, nuclear safety will not be enhanced by adopting the subject supplemental petition for rulemaking.

The STARS plants appreciate the opportunity to comment on the petition for rulemaking. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodla1@txu.com.

Sincerely,



D. R. Woodlan, Chairman
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STARS