



RDB Received
10/13/04

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

Ref: GL-91-018
69FR46599

STARS-04019

October 5, 2004

Chief, Rules and Directives Branch
Division of Administrative Services, Office of Administration
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

8/3/04
69FR 46599
(10)

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON DRAFT REVISION TO NRC INSPECTION MANUAL
CHAPTER 9900, "TECHNICAL GUIDANCE," OPERABILITY
DETERMINATIONS AND RESOLUTION OF NONCONFORMANCES OF
STRUCTURES, SYSTEMS, AND COMPONENTS
("REGULATORY ISSUE SUMMARY 2004-XX")
(MC2262)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants are endorsing the September 30, 2004, comments submitted by the Nuclear Energy Institute (NEI) on the draft revision to NRC Inspection Manual Chapter 9900, "Technical Guidance," Operability Determinations and Resolution of Nonconformances of Structures, Systems, and Components ("Regulatory Issue Summary 2004-XX"). (See 69FR46599 dated August 3, 2004.)

The STARS plants recognize the effort that went into creating this draft document. We support the project and feel that significant progress has been made. Because of the importance of operability determinations and the resolution of nonconforming conditions, this draft document has received many comments from the industry. The STARS plants have been working through NEI to present our comments to the NRC. We strongly encourage the NRC to continue the dialogue with NEI and other stake holders to resolve these comments and to produce a document that serves the industry and the NRC while avoiding any unintended consequences.


¹ STARS is an alliance of six plants (eleven nuclear units) operated by TXU Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

Template = ADM-013

F-RIDS = ADM-03
Call = K. Kavanagh (kak)
C. Petrone (CCP)

The STARS plants appreciate the opportunity to comment on this draft revision to the NRC Inspection Manual. If there are any questions regarding this endorsement of NEI comments, please contact me at 254-897-6887 or email me at dwoodla1@txu.com.

Sincerely,



D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
STARS