28

DOCKET NUMBER
PROPOSED RULE PR 170+171
(68FR 16374)

DOCKETED
USNRC
May 14, 2003 (2:30PM)
OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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

Ref: 68 FR 16374

STARS-03014

May 7, 2003

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555
ATTN: Rulemakings and Adjudications Staff

STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PROPOSED RULE; REVISIONS OF FEE SCHEDULES;
FEE RECOVERY FOR FY2003
(68 FR 16374)

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)[1] nuclear power plants are endorsing comments submitted by the Nuclear Energy Institute (NEI) on proposed rule; "Revision of Fee Schedules; Fee Recovery for FY 2003."

STARS understands the concept and regulation for NRC cost recovery through licensee fee allocation. However, STARS believes that there should be some specific accountability and reasonableness in that allocation. Therefore, the inclusion of security issues into the fee base when some of the financial responsibility lies within other governmental jurisdictions is unacceptable. In the same manner, many of the efficiencies gained from the current regulatory environment should also be reflected. STARS also believes, as noted in the NEI letter, that better cost explanations for evaluation by licensees and stakeholders should be provided. Therefore, STARS encourages the NRC to consider NEI's comments and recommendations.

The STARS plants appreciate the opportunity to comment on the proposed rule. 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

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

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

Template=SECY-067

SECY-02

cc: Ameren-UE

Senator Christopher Bond (MO)
274 Russell Senate Office Building
Washington, DC 20510

Senator James Talent (MO)
493 Russell Senate Office Building
Washington, DC 20510

Arizona Public Service Company

Senator Pete Domenici (NM),
328 Hart Senate Office Building
Washington, DC 20510-3101

Senator Jon Kyl (AZ)
730 Hart Senate Office Building
Washington DC 20510

Senator John McCain (AZ)
241 Russell Senate Office Building
Washington DC 20510

STP Nuclear Operating Company

Senator John Cornyn (TX)
United States Senate
SR-C5 Russell Senate Office Building
Washington DC 20510

Senator Kay Bailey Hutchison (TX)
284 Russell Senate Office Building
Washington DC 20510

Wolf Creek Nuclear Operating Corporation

Senator Sam Brownback (KS)
303 Hart Senate Office Bldg.
Washington, D.C. 20510

Senator Pat Roberts (KS)
109 Hart Senate Office Building
Washington, D.C. 20510