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D. R. Woodlan, Chairman
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P.O. Box 1002, Glen Rose, Texas 76043

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STARS-04006

March 8, 2004

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

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

STRATEGIC TEAMING AND RESOURCE SHARING (STARS) COMMENTS ON PROPOSED RULE: REVISION OF FEE SCHEDULES; FEE RECOVERY FOR FY 2004 (69 FR 4865) (RIN 3150-AH37)

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 2004."

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 inappropriate. In the same manner, many of the efficiencies gained from the current regulatory environment should 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,

DRWoodlan

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.

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SECY-02

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