



D. R. Woodlan, Chairman
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P.O. Box 1002
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Ref: 71 FR 12716
Dated March 13, 2006

STARS-06008

May 15, 2006

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

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71 FR 12716

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
Comments on Proposed Generic Communication;
Endorsement of Nuclear Energy Institute Guidance
“Enhancements to Emergency Preparedness Programs for Hostile Actions”
(71 FR 12716)**

Dear Sir or Madam:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants appreciate the opportunity to comment on the proposed generic communication NRC Regulatory Issue Summary 2006-XX, Endorsement of Nuclear Energy Institute Guidance “Enhancements to Emergency Preparedness Programs for Hostile Action,” as described in Federal Register Notice 71 FR 12716, dated March 13, 2006.

Following the terrorist attacks of September 11, 2001, the NRC evaluated the emergency preparedness planning basis, issued orders requiring compensatory measures for nuclear security and safety, and observed licensee performance during security-based EP drills and exercises and security force-on-force exercise evaluations. Additionally, the staff reviewed current public radiological protective action guidance. The staff also discussed security-based EP issues with various stakeholders, including licensees and Federal, State and local government officials. These efforts culminated in part, with the issuance of NRC Bulletin 2005-02 “Emergency Preparedness and Response Actions for Security-Based Events,” dated July 18, 2005.

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.

STSP Review Complete

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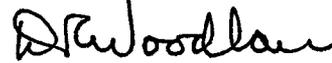
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add = M.B. Morris (mbm)
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The subject NEI White Paper provides guidance to licensees that clarify the various options available to them as they implement the enhancements identified in the Bulletin. STARS believes that NRC endorsement of this White Paper will provide the industry and the NRC with a consistent approach to implementing these enhancements in licensee's existing emergency preparedness programs.

STARS endorses NEI's comments regarding this matter. In addition, STARS appreciates the efforts of the NRC staff in reviewing and endorsing this document.

The STARS plants appreciate the opportunity to comment on the proposed generic communication. If there are any questions regarding these comments, please contact me at 254-897-6887 or dwoodla1@txu.com or Rodney Wilferd at 623-393-5744, or rwilferd@apsc.com.

Sincerely,



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