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STARS

Strategic Teaming and Resource Sharing

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Chief, Rules and Directives Branch  
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Washington, DC 20555-0001

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
RESPONSE TO REQUEST FOR COMMENTS ON NRC'S  
LOW LEVEL RADIOACTIVE WASTE PROGRAM  
(71 FR 38675 DATED JULY 7, 2006)**

Gentlemen:

Attached are comments from the Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants on the Nuclear Regulatory Commission's (NRC's) Low Level Radioactive Waste (LLRW) Program. The request for comments was posted in the Federal Register on July 7, 2006 (71 FR 38675).

The STARS stations fully support NRC's efforts to strategically assess the existing LLRW regulatory guidance. We believe that it is essential for the NRC to devote resources to this initiative, not only with respect to existing plants but also in support of pending new plant construction. STARS stations have been and will remain active participants in industry efforts regarding LLRW, including the development of the Nuclear Energy Institute (NEI) comment letter dated September 9, 2006. We fully endorse the comments submitted by NEI and would like to take this opportunity to provide our thoughts on certain proposed enhancements.

The NEI letter provides both near and long-term considerations for the staff. The STARS stations believe that these recommended enhancements, if implemented, will also have the positive effect of mitigating impacts associated with the extended storage of Class B and C LLRW by eliminating certain conditions that may contribute to larger volumes of Greater than Class C (GTCC) wastes being generated and stored in the future.

<sup>1</sup> 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.

*SUNSI Review Complete*

*E-RIDS = ADM-03  
Add = J. Kennedy (SEK 1)  
A. White (ARW 2)*

Callaway • Comanche Peak • Diablo Canyon • Palo Verde • South Texas Project • Wolf Creek

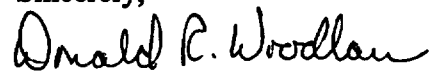
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We believe three specific issues can provide substantial near-term benefits: NRC working with states to achieve uniformity in regulatory criteria and guidance for waste classification; changes to the NRC guidance document , “Concentration Averaging and Encapsulation” in the factor of 10 limits [recommended by the Advisory Committee on Nuclear Waste (ACNW)] and incorporating encapsulation of filters in large containers [approved in NRC Topical Report subsequent to the BTP]; and changes to the dated guidance for tracking and reporting LLRW disposal working in concert with the Department of Energy to reduce the burdens and improve the transparency of this communication with stakeholders.

We also fully support the initiation of rulemaking to incorporate regulatory experience and risk-insights from approved (and disapproved) exemptions and alternatives in regard to disposal regulations, thereby providing an opportunity to update performance objectives and other standards to reflect contemporary scientific concepts and methodology in the area of radiation protection.

The STARS plants appreciate the opportunity to comment on priorities relative to the NRC’s LLRW Program. If there are any questions regarding these comments, please contact me at 254-897-6887 or [dwoodla1@txu.com](mailto:dwoodla1@txu.com).

Sincerely,



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