



PR 19, 20 and 50
(71FR55382)

D. Hooper, Acting Chairman
STARS Integrated Regulatory Affairs Group
P.O. Box 411, Burlington, Kansas 66839

Ref: RIN 3150-AH40

STARS-06022

DOCKETED
USNRC

December 28, 2006

January 17, 2007 (3:45pm)

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

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PROPOSED RULE
Occupational Dose Records, Labeling Containers, and the Total
Effective Dose Equivalent**

- References:
1. 71 FR 55382 Proposed Rule: 10 CFR Parts 19, 20 and 50 (RIN 3150-AH40)
 2. Nuclear Energy Institute (NEI) letter dated July 2, 2001, entitled "Workshop on Reducing Unnecessary Regulatory Burden" (ADAMS No. ML01187432)
 3. STARS-04008 letter dated April 8, 2004, entitled "Comments on Draft Rule Language for 10 CFR parts 19, 20 and 50 Regarding Collection, Reporting, or Posting of Information"

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants appreciate the opportunity to comment on the Proposed Rule: Occupational Dose Records, Labeling Containers, and the Total Effective Dose Equivalent.

The STARS plants appreciate the staff's commitment to the NRC Strategic Plan, which includes in part, a performance goal for reducing unnecessary regulatory burden. This proposed rule change represents the culmination of efforts initiated at a public workshop in early 2001. Comments were provided by NEI in July 2001 under the Radiation Protection category, including proposed changes to 10 CFR 19.13, "Notifications and reports to individuals," 10 CFR

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.

20.1904, "Labeling containers," and 10 CFR 20.2104, Determination of prior occupational dose" (reference 2).

The STARS plants agree the proposed changes to the regulations would result in a reduction in administrative and reporting burdens on licensees, while retaining the necessary requirements to maintain the level of protection to either the health and safety of workers and the public or environment. The STARS plants also recognize the staff's consideration of comments previously provided (reference 3).

The STARS plants appreciate the opportunity to comment on the proposed rule language for 10 CFR Parts 19, 20 and 50. If there are any questions regarding these comments, please contact me at (364) 620-4041 or dihooper@wcnoc.com.

Sincerely,

Diane M. Hooper

D. Hooper, Acting Chairman
STARS Integrated Regulatory Affairs Group