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PRM-50-83  
(72FR14713)

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

DOCKETED  
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Ref: PR 50

STARS-07005

June 19, 2007 (3:50pm)

June 13, 2007

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Ms. Annette L. Vietti-Cook  
Secretary, U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemakings and Adjudications Staff

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON PETITION FOR RULE MAKING SUBMITTED  
BY THE PROJECT ON GOVERNMENT OVERSIGHT AND  
UNION OF CONCERNED SCIENTISTS  
(72 FR 14713)**

Dear Ms. Cook,

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants would like to take advantage of this opportunity to comment on the subject proposed rulemaking. STARS has reviewed the letter submitted by NEI on behalf of the nuclear industry via NEI's letter dated June 12, 2007 and strongly endorses the comments.

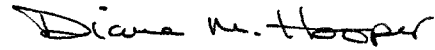
STARS concurs that the responsibility and authority for oversight and coordination of local, state and federal entities for all terrorist threats, including those above the Design Basis Threat, rests with the Department of Homeland Security (DHS). As such, it is not appropriate to amend 10 CFR 50 in this manner.

For the reason stated above and those in the NEI letter, we believe the petition for rulemaking should be denied.

<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.

The STARS plants appreciate the opportunity to comment on the proposed rule. If there are any questions regarding these comments, please contact me at 620-364-4041, or [dihoope@wcnoc.com](mailto:dihoope@wcnoc.com), or Ted Koser at 361-972-8963, or [tkkoser@stpegs.com](mailto:tkkoser@stpegs.com).

Sincerely,

A handwritten signature in black ink that reads "Diane M. Hooper". The signature is written in a cursive style with a large initial "D" and a stylized "H".

D. Hooper, Acting Chairman  
STARS Integrated Regulatory Affairs Group