



T. Moser, Chairman
STARS Integrated Regulatory Affairs Group
P.O. Box 620, Fulton, Missouri 65251

PRM-73-13
(72FR17440)

Ref: 10 CFR 73

STARS-07006

June 25, 2007

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

DOCKETED
USNRC



July 2, 2007 (3:35pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PETITION FOR RULEMAKING (PRM-73-13)
(72 FR 17440)**

Dear Ms. Cook,

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants would like to take advantage of this opportunity to comment on the subject proposed rulemaking. STARS worked closely with the Nuclear Energy Institute (NEI) Security Rulemaking Task Force to review and comment on the proposed rule. Based on our review, STARS strongly endorses the comments submitted by NEI on behalf of the nuclear industry via NEI's letter dated June 22, 2007.

STARS believes rulemaking to prevent an individual from gaining access to the protected area of a nuclear plant, whether escorted or not, when information becomes known to the licensee that would prevent the individual from gaining unescorted access to the protected area is appropriate.

However, requiring the use of armed security officers as escorts for visitors is completely unwarranted. In the last several years with the increased emphasis on security, only people with a work-related need for entry are typically allowed access as visitors. The petitioner has not cited a single instance demonstrating the inadequacy of the current process. For these reasons, STARS believes this request should be denied.

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.

The STARS plants appreciate the opportunity to comment on the proposed rulemaking. If there are any questions regarding these comments, please contact me at 573-676-4775, or tmoser@ameren.com, or Ted Koser at 361-972-8963, or tckoser@stpegs.com.

Sincerely,

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group

By: *Carl B. Corbin*
Carl B. Corbin
STARS Licensing Consultant