

**PRM-51-12
(72FR27068)**

(2)

From: <Duane.Kanitz@aps.com>
To: <SECY@nrc.gov>
Date: Thu, Aug 2, 2007 10:43 AM
Subject: Comments on Petition for Rulemaking to Amend 10 CFR Part 51- Docket Number PRM-51-12

The Strategic Teaming and Resource Sharing (STARS) alliance would like to take advantage of this opportunity to comment on a petition for rulemaking dated March 16, 2007, filed by Edmund G. Brown, Jr., Attorney General for the State of California. (assigned Docket No. PRM-51-12 and published in 72 FR 27068 on May 14, 2007). The STARS alliance has reviewed this petition and does not believe the petitioner provides sufficient reason for pursuing rulemaking. The current regulatory requirements and experience with on-site storage of spent fuel in fuel pools have shown the environmental impact is small. The STARS alliance does not agree with the petitioner's assertion that the NRC's regulations and past licensing decisions should be revoked and that all future NRC licensing decisions regarding high density spent fuel storage require an environmental impact statement.

DOCKETED
USNRC

August 2, 2007 (11:48am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

The STARS alliance submitted similar comments on a similar petition in STARS letter number 07001 dated January 17, 2007 (re: accession number ML070260411).

The STARS alliance appreciates the opportunity to comment on this petition for rulemaking. If there are any questions regarding these comments, please contact Tod Moser at 573-676-4775, or tmoser@ameren.com, or Duane Kanitz at 623-393-5427, or duane.kanitz@aps.com.

STARS is an alliance of six plants (eleven nuclear units) operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

Thank you
Duane Kanitz
STARS Regulatory Affairs
Office (623) 393-5427
Cell (602) 509-6237

Template = SECY-067

SECY-02

Mail Envelope Properties (46B1ED7F.8E1 : 18 : 43233)

Subject: Comments on Petition for Rulemaking to Amend 10 CFR Part 51-
Docket Number PRM-51-12
Creation Date Thu, Aug 2, 2007 10:40 AM
From: <Duane.Kanitz@aps.com>

Created By: Duane.Kanitz@aps.com

Recipients

nrc.gov
TWGWPO02.HQGWDO01
SECY (SECY)

Post Office

TWGWPO02.HQGWDO01

Route

nrc.gov

Files	Size	Date & Time
MESSAGE	1636	Thursday, August 2, 2007 10:40 AM
TEXT.htm	2708	
Mime.822	6865	

Options

Expiration Date: None
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

Junk Mail Handling Evaluation Results

Message is eligible for Junk Mail handling
This message was not classified as Junk Mail

Junk Mail settings when this message was delivered

Junk Mail handling disabled by User
Junk Mail handling disabled by Administrator
Junk List is not enabled
Junk Mail using personal address books is not enabled
Block List is not enabled