



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

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October 31, 2008

Rulemaking, Directives and Editing Branch,
Office of Administration
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
Comments on Proposed Draft Regulatory Guide (DG)-5026,
"Fatigue Management for Nuclear Power Plant Personnel".**

Reference: 1) Proposed Draft Regulatory Guide (DG)-5026, "Fatigue Management
for Nuclear Power Plant Personnel.", dated September, 2008
(ML081960515)

Dear Sir or Madam,

The Strategic Teaming and Resource Sharing (STARS) alliance submits the following comments in response to the Nuclear Regulatory Commission's request for comments on DG-5026, "Fatigue Management for Nuclear Power Plant Personnel". STARS appreciates the Staff's effort to communicate the proposed regulatory guide through the public meeting held with the industry and other stakeholders.

STARS endorses the comments submitted by the Nuclear Energy Institute (NEI) in their letter dated October 31, 2008. Like NEI, STARS believes the rule is best implemented by the endorsement of NEI 06-11, Rev. 1. NEI 06-11 provides an effective methodology to implement a very complicated and involved rule.

Thank you for your consideration of these comments. 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,
Ted A. Moser

T. Moser, Chairman
STARS Integrated Regulatory Affairs Group

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

SONSI Review Complete
Template - ADM-013

E-REDS = ADM-03
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