



Carl B. Corbin, Chairman
STARS Integrated Regulatory Affairs Group
P.O. Box 1002, Glen Rose, Texas 76043

STARS-11001

January 5, 2011

DOCKETED
USNRC

Cindy K. Bladey, Chief,
Rules, Announcements and Directives Branch,
Office of Administration,
Mail Stop: TWB-05-B01M,
U.S. Nuclear Regulatory Commission,
Washington, DC 20555-0001

January 6, 2011 (3:35 pm)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON NEI's PETITION FOR RULEMAKING
DATED SEPTEMBER 3, 2010 , DOCKET ID NRC-2010-0304**

Reference: (1) 75 FR 65249, Notice of Receipt of Petition for Rulemaking from the Nuclear Energy Institute.

Dear Ms. Bladey,

The Strategic Teaming and Resource Sharing (STARS)¹ endorses the actions requested by the Nuclear Energy Institute (NEI) in their petition for rulemaking published for comment in the Federal Register, (Reference 1).

Like NEI, STARS believes the complexity of the rule has resulted in unintended consequences that have diminished the safety benefit the rule was intended to achieve. The unintended consequences include adverse impacts to safety beneficial practices that have become core elements of our safety infrastructure, adverse impacts on quality of life issues for workers, and, conflicts with bargaining unit agreements. The industry's petition for rulemaking submitted on September 3, 2010, delineated a number of these impacts.

The rule does not need to have the inordinate level of complexity and rigidity that currently exists in order to achieve its objectives. After a year of working with the rule in its current state and trying to resolve the complexities through software and procedure changes, the industry believes the best approach to relieving some of the burden of the rule and the unintended consequences is to simplify the rule while retaining the intended objectives of the rule.

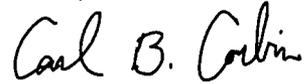
¹ STARS consists of thirteen plants at seven stations operated by Luminant Power, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company, Arizona Public Service Company, and Southern California Edison.

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Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact me at 254-897-0121, or carl.corbin@luminant.com, or Ted Koser at tckoser@stpegs.com, or 361-972-8963.

Sincerely,

A handwritten signature in black ink that reads "Carl B. Corbin". The signature is written in a cursive style with a large, prominent "C" at the beginning.

Carl B. Corbin, Chairman
STARS Integrated Regulatory Affairs Group

Rulemaking Comments

From: Mendiola, Doris
Sent: Thursday, January 06, 2011 10:35 AM
To: Rulemaking Comments
Subject: FW: EIE E110106t010001 from carl.corbin@luminant.com (ADM Doc.)
Attachments: E110106t010001_STARS-11001 Comments on Petition for Rulemaking - Work Hour Rule.pdf; E110106t010001.xfd

FYI...

From: Buan, Angelina
Sent: Thursday, January 06, 2011 10:06 AM
To: Bladey, Cindy; Mendiola, Doris
Cc: Collins, Michael; Khamphoui, Orada; King, Mike; Neely, Mary; Nguyen, Kenny; Repetto, John; Rieta, Melissa; Tennille, Eric
Subject: EIE E110106t010001 from carl.corbin@luminant.com (ADM Doc.)

Cindy/Doris,

This document received via EIE is being forwarded directly to you because DPC does not normally intercept **Office of Administration** mail.

Thanks,
Angelina

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(148.184.100.43) with Microsoft SMTP Server id 8.2.247.2; Thu, 6 Jan 2011
01:27:21 -0500

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X-SBRS: 5.3

X-MID: 29179235

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X-IronPort-Anti-Spam-Result:

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d="scan'208,217";a="29179235"

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1xh9wh1.142850501; Thu, 06 Jan 2011 00:27:18 -0600

Received: from CCCMSCON01.energy.power.corp ([130.197.106.20]) by
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Jan 2011 00:27:16 -0600

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Jan 2011 00:27:17 -0600

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Date: Thu, 6 Jan 2011 00:27:16 -0600

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X-MS-TNEF-Correlator:

Thread-Topic: NRC-2010-0304

thread-index: AcutasMvaUmltimjRiOtiUQNJVLTUw==

From: <robb.caputo@exeloncorp.com>

To: <Rulemaking.Comments@nrc.gov>

CC: <sabah.shams@exeloncorp.com>

Return-Path: robb.caputo@exeloncorp.com

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