



Scott A. Bauer, Chairman
STARS Regulatory Affairs
1776 I St, NW, Suite 400
Washington, DC 20006-3708

11/29/2011

Te FR 73738

STARS-12001

January 16, 2012

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

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**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON IMPLEMENTATION OF THE
REACTOR OVERSIGHT PROCESS
DOCKET ID NRC-2011-0270**

Reference: NRC Press Release No. 11-217, "NRC Seeks Public Comment on Implementation of Reactor Oversight Process, dated November 29, 2011"

Dear Cindy Bladey,

The Strategic Teaming and Resource Sharing (STARS)¹ Alliance is submitting comments in response to the referenced Press Release and associated Federal Register notice soliciting comments on Implementation of Reactor Oversight Process (ROP). We appreciate the NRC providing this opportunity to comment on the ROP. We have been working with Nuclear Energy Institute (NEI) and Region IV Regional Utility Group (RUG IV) in the development of industry comments. The STARS Alliance endorses the comments submitted by NEI and RUG IV.

The STARS Alliance recognizes the NRC's efforts to continuously improve the ROP by way of the routine ROP public meetings and the periodic solicitation of public feedback. These interactions have assisted the ROP in effectively meeting the intended objectives, i.e., to provide tools for inspecting and assessing licensee performance in a manner that is more risk-informed, objective, predictable, and transparent. We support initiatives that continue to move the ROP to be more risk-informed and would oppose changes that would erode the risk-informed principles that the ROP was originally built upon.

¹ STARS consists of thirteen plants at seven stations operated by Luminant Power, Ameren Missouri, 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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The structured Frequently Asked Question (FAQ) and FAQ appeal process continues to improve consistency in application of performance indicator guidance and capture the rationale for the decisions made in a durable way. The STARS Alliance supports and looks forward to assisting in the continuing efforts to further develop and improve the ROP.

Thank you for your consideration of these comments. If there are any questions regarding these comments, please contact me at 202-739-8058 or sab@nei.org, or Larry Parker at 805-545-3386 or larry.parker@starsalliance.com.

Sincerely,

A handwritten signature in black ink that reads "Scott A. Bauer". The signature is written in a cursive style with a long horizontal flourish at the end.

Scott A. Bauer, Chairman
STARS Regulatory Affairs