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STARS 13005

July 31, 2013

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: STARS Alliance LLC Comments on Proposed Revisions to the Petition for Rulemaking Process

References:

1. Federal Register Vol. 78, No. 86, May 3, 2013, pp. 25886-25898
2. Letter from E. C. Ginsberg, Nuclear Energy Institute, to A. Vietti-Cook, USNRC, "Comments on Proposed Revisions to the Petition for Rulemaking Process," dated July 17, 2013
3. Revisions to the Petition for Rulemaking Process, NRC Docket ID: NRC-2009-0044, RIN number: 3150-AI30

Dear Sir,

STARS Alliance LLC (STARS) submits the following comments in response to the Federal Register notice (Reference 1) soliciting comments on the proposed revisions to the Petition for Rulemaking (PRM) process. STARS appreciates the opportunity to comment on the proposed revisions to the PRM process.

STARS endorses the comments submitted by the Nuclear Energy Institute (Reference 2) on the proposed revisions. STARS would like to emphasize the following points listed below.

- The proposed provision that would explicitly permit rulemaking petitioners to submit requests to suspend licensing proceedings in situations where the petitioners are not participants in such proceedings would be detrimental to the adjudicatory process. Allowing non-participants to file suspension petitions in licensing proceedings is unnecessary and would not improve the Commission's ability to meaningfully consider suspension petitions.
- The NRC's proposed two-part process for reaching final determinations on PRMs is overly complex and may blur, rather than clarify, the agency's process for resolving rulemaking petitions.



If you have any question on these comments, please contact me at 623-239-4359, or Steve Meyer at 314-225-1483, or steve.meyer@starsalliance.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Bauer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott Bauer
STARS Regulatory Affairs Manager
scott.bauer@starsalliance.com

SJM

