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April 15, 2022

Mr. Scott Flanders
Deputy Chief Information Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NRC's Controlled Unclassified Information Program Implementation

Dear Mr. Flanders:

STARS Alliance LLC, on behalf of its member stations, submits this letter in response to the U.S. Nuclear Regulatory Commission's (NRC) proposed plan to implement its Controlled Unclassified Information (CUI) program. We appreciate the need to control sensitive information and are committed to working with the NRC and other federal agencies on this effort in an effective and timely manner.

We fully support the comments provided by the Nuclear Energy Institute in its letter that was submitted to you on April 1, 2022. Specifically, the expectation for stakeholders to implement an information system consistent with National Institute of Standards and Technology (NIST) Special Publication (SP) 800-171, "Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations," is not justified for external stakeholders that do not wish to receive and download CUI electronically from the NRC. The current approach to CUI program implementation for external stakeholders is unduly burdensome, and we request that the NRC delay its implementation while alternative approaches are explored.

We appreciated the opportunity to engage on this topic at the March 28, 2022, public meeting and look forward to continuing the dialogue. Please contact me at (805)459-5966, or hossein.hamzehee@starsalliance.com, if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hossein Hamzehee".

Hossein Hamzehee
Regulatory Affairs Functional Area Manager, STARS Alliance LLC

