

DOCKET NUMBER

PROPOSED RULE: 170-171

(68 FR 16374)

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USNRC

May 14, 2003 (2:30PM)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFFD. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
P.O. Box 1002, Glen Rose, Texas 76043

Ref: 68 FR 16374

STARS-03014

May 7, 2003

Secretary

U. S. Nuclear Regulatory Commission

Washington, DC 20555

ATTN: Rulemakings and Adjudications Staff

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON PROPOSED RULE; REVISIONS OF FEE SCHEDULES;
FEE RECOVERY FOR FY2003
(68 FR 16374)**

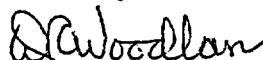
Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants are endorsing comments submitted by the Nuclear Energy Institute (NEI) on proposed rule; "Revision of Fee Schedules; Fee Recovery for FY 2003."

STARS understands the concept and regulation for NRC cost recovery through licensee fee allocation. However, STARS believes that there should be some specific accountability and reasonableness in that allocation. Therefore, the inclusion of security issues into the fee base when some of the financial responsibility lies within other governmental jurisdictions is unacceptable. In the same manner, many of the efficiencies gained from the current regulatory environment should also be reflected. STARS also believes, as noted in the NEI letter, that better cost explanations for evaluation by licensees and stakeholders should be provided. Therefore, STARS encourages the NRC to consider NEI's comments and recommendations.

The STARS plants appreciate the opportunity to comment on the proposed rule. If there are any questions regarding this endorsement of NEI comments, please contact me at 254-897-6887 or email me at dwoodla1@txu.com.

Sincerely,

D. R. Woodlan, Chairman
Integrated Regulatory Affairs Group
STARS

¹ STARS is an alliance of six plants (eleven nuclear units) operated by TXU Energy, AmerenUE, Wolf Creek Nuclear Operating Corporation, Pacific Gas and Electric Company, STP Nuclear Operating Company and Arizona Public Service Company.

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