



DOCKET NUMBER  
PETITION/RULE PRM 20-25  
(68FR23618)

D. R. Woodlan, Chairman  
Integrated Regulatory Affairs Group  
P.O. Box 1002, Glen Rose, Texas 76043

Ref: 68 FR 23618  
Docket No. PRM-20-25  
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USNRC

STARS-030018

July 30, 2003

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

August 13, 2003 (10:08AM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON PETITION FOR RULEMAKING; TESTING AND  
ACCREDITATION REQUIREMENTS FOR ELECTRONIC DOSIMETRY  
PRM-20-25  
(68 FR 23618)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants are endorsing comments provided by the Nuclear Energy Institute (NEI) on the petition for rulemaking filed by the Technical Director of ICN Worldwide Dosimetry Service. The petition requests the NRC amend regulations to require any dosimeter used to report dose of record and demonstrate compliance with dose limits be processed and evaluated by a dosimetry process holding accreditation from the National Voluntary Laboratory Accreditation program. STARS does not believe the rule making to be beneficial or necessary at this time. Therefore, based on comments provided by NEI, STARS requests that the NRC deny the petition for rulemaking.

The STARS plants appreciate the opportunity to comment on the petition for rulemaking. 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](mailto:dwoodla1@txu.com).

Sincerely,

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

<sup>1</sup> 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.