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PROPOSED RULE PR 50  
(68FR 43673)

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

Ref: RIN 3150-AH00

STARS-03025

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USNRC

October 2, 2003

October 10, 2003 (11:23AM)

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

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON PROPOSED RULE ON EMERGENCY PLANNING AND  
PREPAREDNESS FOR PRODUCTION AND UTILIZATION FACILITIES  
(RIN 3150-AH00, 68 FR 43673)**

Gentlemen:

The Strategic Teaming and Resource Sharing (STARS)<sup>1</sup> nuclear power plants are endorsing comments provided by the Nuclear Energy Institute on the proposed rule to amend 10 CFR Part 50 Appendix E.IV regarding NRC approval of licensee changes to Emergency Action Levels (EALs) and exercise requirements for co-located licensees. STARS believes that the proposed revision to better define the change process to EALs and allow the applicability of 10 CFR 50.54(q) to EAL changes is beneficial without reducing safety. STARS also believes that the changes made to the exercise requirements for co-located licensees will increase efficiency and allow the future development of new nuclear facilities to progress without undue burden. STARS believes this proposed rule should be implemented without delay.

The STARS plants appreciate the opportunity to comment on the proposed rule. If there are any questions regarding these comments, please contact me at 254-897-6887 or 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.