



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

Ref: Safety Culture

STARS-05011

September 28, 2005

Mr. Michael R. Johnson
Director, Office of Enforcement
U. S. Nuclear Regulatory Commission
Washington, DC 20555

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)
COMMENTS ON NRC'S PROPOSED SAFETY CULTURE INITIATIVE**

Gentlemen:

Below are comments from the Strategic Teaming and Resource Sharing (STARS)¹ nuclear power plants on the NRC's proposed safety culture initiative.

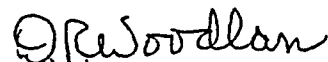
On August 4, 2005, the NRC issued a meeting notice for an August 17 meeting on the NRC's Safety Culture Initiatives. Along with the meeting notice, the NRC made available an NRC Safety Culture Attributes Table and an NRC Safety Culture Response Plan. The NRC offered to allow stakeholders to submit additional comments or ideas. The STARS plants have been working with NEI to generate our comments in the short time allowed.

The STARS plants are very concerned about the direction being taken by the NRC. We have reviewed the NEI comments provided to the NRC and support these comments. We strongly urge the NRC to move cautiously or we could easily end up with resource intensive processes with little value and significant unintended consequences.

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. R. Woodlan". The signature is written in a cursive, flowing style.

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