

**PRM-51-12
(72FR27068)**

(2)

From: <Duane.Kanitz@aps.com>
To: <SECY@nrc.gov>
Date: Thu, Aug 2, 2007 10:43 AM
Subject: Comments on Petition for Rulemaking to Amend 10 CFR Part 51- Docket Number PRM-51-12

The Strategic Teaming and Resource Sharing (STARS) alliance would like to take advantage of this opportunity to comment on a petition for rulemaking dated March 16, 2007, filed by Edmund G. Brown, Jr., Attorney General for the State of California. (assigned Docket No. PRM-51-12 and published in 72 FR 27068 on May 14, 2007). The STARS alliance has reviewed this petition and does not believe the petitioner provides sufficient reason for pursuing rulemaking. The current regulatory requirements and experience with on-site storage of spent fuel in fuel pools have shown the environmental impact is small. The STARS alliance does not agree with the petitioner's assertion that the NRC's regulations and past licensing decisions should be revoked and that all future NRC licensing decisions regarding high density spent fuel storage require an environmental impact statement.

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The STARS alliance submitted similar comments on a similar petition in STARS letter number 07001 dated January 17, 2007 (re: accession number ML070260411).

The STARS alliance appreciates the opportunity to comment on this petition for rulemaking. If there are any questions regarding these comments, please contact Tod Moser at 573-676-4775, or tmoser@ameren.com, or Duane Kanitz at 623-393-5427, or duane.kanitz@aps.com.

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

Thank you
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