

PR 50  
(73FR19443)

T. Moser, Chairman  
STARS Integrated Regulatory Affairs Group  
P.O. Box 620, Fulton, Missouri 65251

STARS-08010

May 20, 2008

Ms Annette L. Vietti-Cook  
Secretary,  
U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001

DOCKETED  
USNRC

May 27, 2008 (3:00pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

**STRATEGIC TEAMING AND RESOURCE SHARING (STARS)  
COMMENTS ON SUPPLEMENTAL PROPOSED RULE, "POWER  
REACTOR SECURITY REQUIREMENTS "  
(73 FR 19443)**

Dear Ms. Vietti-Cook,

The Strategic Teaming and Resource Sharing (STARS) alliance would like to take advantage of this opportunity to comment on the subject proposed rulemaking by submitting the following remarks:

The proposed wording of Section 50.54(hh)(1) (ii) states, "Maintenance of continuous communication with applicable entities." This requirement is unreasonable and too broad to be workable and effective during an event. During an actual event the licensee will need the latitude to communicate as necessary to monitor and mitigate the event. The proposed wording could lead to requiring the licensee to maintain an open phone line to three or more entities at the same time. This would be an inefficient use of limited and important station resources. The STARS alliance suggests the following wording: Maintenance of communications with applicable entities as necessary and as resources allow.

The STARS members appreciate the opportunity to comment on the proposed rulemaking. If there are any questions regarding these comments, please contact me at 573-676-4775, or [TMoser@ameren.com](mailto:TMoser@ameren.com), or Ted Koser at 361-972-8963, or [tckoser@stpegs.com](mailto:tckoser@stpegs.com).

Sincerely,



Tod Moser, Chairman  
STARS Integrated Regulatory Affairs Group