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April 27, 2001
GDP 01-0084

Secretary
U. S. Nuclear Regulatory Commission
Attention: Rulemakings and Adjudications Staff
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Paducah Gaseous Diffusion Plant (PGDP)
Portsmouth Gaseous Diffusion Plant (PORTS)
Docket Nos. 70-7001 & 70-7002
USEC Comments on NRC Proposed Rule, "Revision of Fee Schedules; Fee Recovery for FY 2001," (66 FR 16982)

The United States Enrichment Corporation (USEC) appreciates the opportunity to provide comments on the NRC Proposed Rule, "Revision of Fee Schedules; Fee Recovery for FY 2001." The annual fees for the fuel facility class of licensees have substantially increased despite recent changes to the Omnibus Budget Reconciliation Act of 1990 (OBRA-90) reducing the fee recovery rate from 100 percent to 98 percent for FY 2001. The NRC's description of the proposed action does not reveal the rationale behind why the FY 2001 budgeted costs to be recovered in fuel facility annual fees has increased over 6% while budgeted costs for almost all other classes of licensees have decreased. Without a clear understanding of the basis of these increased budget allocations, it is difficult to ascertain whether they are fair and equitable.

During the past year, USEC has undertaken major actions to reduce operating costs. These actions have included significant workforce reductions at our production facilities and headquarters and the commencement of enrichment cessation at the Portsmouth Gaseous Diffusion Plant. The NRC's proposed fee increase imposes a financial burden that counteracts our own cost control efforts. USEC is disappointed that the NRC continues to escalate fuel facility fees at a time when fuel facility licensees and certificate holders are implementing major cost control and reduction efforts in order to effectively compete in world markets.

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If you have any questions please contact Lisamarie L. Jarriel at (301) 564-3247.

Sincerely,

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