

### Questions on NRC Review Fees

The 1Q07 review fee amount for TSTF-487, "Relocate DNB Parameters to the COLR," of \$37,975 (roughly 150 person-hours) seems very high. The total review fees for TSTF-487 were over \$55,000 for a change to relocate parameters to the COLR.

The review fees do not seem to be commensurate with the complexity of the change.

- TSTF-491, "Removal of Main Steam and Main Feedwater Valve Isolation Times From Technical Specifications," was a simple change to relocate a value from the TS. \$26,996 in review fees was assessed.
- TSTF-490, "Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec," was a large, complex change that replaced the use of E-bar in the TS with a new parameter, Dose Equivalent Xenon. Specification 3.4.16, RCS Specific Activity, was substantially rewritten and the analysis basis was changed. The NRC review fees were \$32,725.

The BWROG Travelers do not appear to be receiving equivalent review fees.

- TSTF-475, "Control Rod Notch Testing Frequency and SRM Insert Control Rod Action," which was resubmitted in 4Q06, and received an RAI in 3/07 and a response was provided in 5/07, has received no review fees in 2006 or 2007.
- TSTF-476, "Improved BPWS Control Rod Insertion Process (NEDO-33091)," which was submitted in 2004 and 2005, and was approved in early 2007, received \$1,178 in review fees in 2004 and 2005 and no review fees in 2006 and 2007.
- TSTF-477, "Add Action for Two Inoperable Control Room AC Subsystems," had three revisions submitted in 2006 and was approved in early 2007. There were no review fees assessed.
- TSTF-478, "BWR Technical Specification Changes that Implement the Revised Rule for Combustible Gas Control," which has submitted in 2005 and 2007, and has been the subject of numerous meetings and RAIs, has received no review fees.
- TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities," was submitted in 2005 and approved at the end of 2006. There were no review fees assessed.
- TSTF-495, "Bases Change to Address GE Part 21 SC05-03," was submitted in 7/06. An RAI was received in 1/07 and the response was submitted in 4/07. There have been no review fees assessed.

## NRC Review Fee Report

<b>TSTF Number</b>	<b>Applicability</b>	<b>Description</b>	<b>Submittal Date</b>	<b>Review Status</b>	<b>Approval Date</b>
TSTF-412-A, Rev. 3	PWRs	Provide Actions for One Steam Supply to Turbine Driven AFW/EFW Pump Inoperable	1/8/2007	NRC Approves	7/17/2007
	Fee Data				
	2005 Q1	\$1,099.00			
	2005 Q1	\$1,025.00			
	2005 Q2	\$4,505.90			
	2005 Q4	\$102.50			
	2006 Q1	\$1,025.00			
	2006 Q2	\$20,562.00			
	2006 Q3	\$8,571.00			
	2006 Q4	\$3,971.00			
	2007 Q1	\$8,463.00			
	<b>Total:</b>	\$49,324.40			
TSTF-421-A, Rev. 0	W	Revision to RCP Flywheel Inspection Program (WCAP-15666)	11/30/2001	NRC Approves	10/22/2003
	Fee Data				
	2003 Q3	\$156.00			
	2003 Q4	\$702.00			
	<b>Total:</b>	\$858.00			
TSTF-454-A, Rev. 1	BWRs	Extend PCIV Completion Times (NEDC-33046)	9/21/2005	NRC Approves	12/13/2005
	Fee Data				
	2003 Q4	\$4,134.00			
	2004 Q1	\$468.00			
	<b>Total:</b>	\$4,602.00			
TSTF-459, Rev. 1	BWRs	Provide an Exception to the Requirement to Have One RHR Shutdown Cooling System in Operation	2/13/2006	TSTF Withdrew	11/3/2006
	Fee Data				
	2003 Q4	\$1,950.00			
	2004 Q1	\$3,385.00			
	2004 Q2	\$312.00			
	2004 Q4	\$1,950.00			
	<b>Total:</b>	\$7,597.00			
TSTF-460-A, Rev. 0	BWRs	Control Rod Scram Time Testing Frequency	9/7/2003	NRC Approves	5/27/2004
	Fee Data				
	2003 Q4	\$156.00			
	2004 Q1	\$1,092.00			
	2004 Q2	\$3,744.00			
	2004 Q3	\$707.00			
	<b>Total:</b>	\$5,699.00			

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TSTF-465, Rev. 0	BWRs	Addition of time performance Surveillance Requirement (SR) note to Source Range Monitor (SRM) SRs	9/18/2003	TSTF Withdrew	4/14/2006
	Fee Data				
	2003 Q4	\$624.00			
	2004 Q1	\$1,498.00			
	2004 Q2	\$608.00			
	2004 Q3	\$2,355.00			
	2004 Q4	\$3,438.00			
	2005 Q1	\$550.00			
	<b>Total:</b>	\$9,073.00			
TSTF-475, Rev. 1	All	Control Rod Notch Testing Frequency and SRM Insert Control Rod Action	5/22/2007	Under NRC Consideration	
	Fee Data				
	2004 Q4	\$6,437.00			
	<b>Total:</b>	\$6,437.00			
TSTF-476-A, Rev. 1	BWRs	Improved BPWS Control Rod Insertion Process (NEDO-33091)	1/9/2007	NRC Approves	5/23/2007
	Fee Data				
	2004 Q4	\$1,099.00			
	2005 Q1	\$79.00			
	<b>Total:</b>	\$1,178.00			
TSTF-486, Rev. 2	CE	Revise MTC Surveillance for Startup Test Activity Reduction (STAR) Program (WCAP-16011)	5/10/2007	Under NRC Consideration	
	Fee Data				
	2006 Q1	\$0.00			
	2006 Q2	\$0.00			
	2006 Q3	\$325.00			
	2006 Q4	\$5,968.00			
	2007 Q1	\$2,105.00			
	<b>Total:</b>	\$8,398.00			
TSTF-487-A, Rev. 1	CE	Relocate DNB Parameters to the COLR	5/4/2007	NRC Approves	6/5/2007
	Fee Data				
	2006 Q1	\$554.00			
	2006 Q2	\$2,255.00			
	2006 Q3	\$325.00			
	2006 Q4	\$13,997.00			
	2007 Q1	\$37,975.00			
	<b>Total:</b>	\$55,106.00			

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TSTF-490-A, Rev. 0	PWRs	Deletion of E Bar Definition and Revision to RCS Specific Activity Tech Spec	9/13/2005	NRC Approves	3/15/2007
	Fee Data				
	2006 Q2	\$1,743.00			
	2006 Q3	\$7,307.00			
	2006 Q4	\$10,221.00			
	2007 Q1	\$13,454.00			
	<b>Total:</b>	\$32,725.00			
TSTF-491-A, Rev. 2	PWRs	Removal of Main Steam and Main Feedwater Valve Isolation Times From Technical Specifications	5/18/2006	NRC Approves	12/29/2006
	Fee Data				
	2006 Q2	\$6,216.00			
	2006 Q3	\$12,859.00			
	2006 Q4	\$7,921.00			
	<b>Total:</b>	\$26,996.00			
TSTF-492-T, Rev. 0	W	Modify RHR - High Water Level Bases to Address Decay Heat Removal with Upper Internals Installed		Approved for Use	
	Fee Data				
	2006 Q1	\$205.00			
	2006 Q2	\$1,640.00			
	2006 Q3	\$205.00			
	2006 Q4	\$13,851.00			
	<b>Total:</b>	\$15,901.00			
TSTF-498, Rev. 0	B&W	Risk-Informed Containment Isolation Valve Completion Times (BAW-2461)	12/22/2006	Under NRC Consideration	
	Fee Data				
	2007 Q1	\$977.00			
	<b>Total:</b>	\$977.00			