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Comment On: NRC-2012-0211-0001
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Comment on FR Doc # 2013-05172

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Submitter Information

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General Comment

RE: NRC fee structure. This really should be converted to a tax on nuclear operations to fund the NRC or another less direct funding structure. The current structure creates problems of impartiality where dependence for budget is based on having more operating nuclear plants to fund the NRC.

If the current fee structure is far too low. Hourly work rates are below those many lawyers and similar professionals charge. Considering the wide scope of overhead and other work that comes with inspection work a higher rate would be in order. Another route would be to drastically increase the rate for any hourly charged work that is part of a failure or non-compliance by an operator. IE: routine re licensing work at the current rate but NRC hourly work when it is the result of the operator failing to comply with existing NRC mandates the rate should be much higher, acting as a penalty. Both San Onofre and Ft. Calhoun are good examples of this. The NRC is spending considerable amounts of manpower dealing with the result of poor operator conduct.

SECY-067

DS10

RulemakingComments Resource

From: Gallagher, Carol
Sent: Friday, March 15, 2013 11:27 AM
To: RulemakingComments Resource
Subject: Comment on Revision of Fee Schedules; Fee Recovery for FY 2013
Attachments: NRC-2012-0211-DRAFT-0004.pdf

Attached for docketing is a comment from Nancy Foust on the above noted proposed rule that I received via the regulations.gov website on March 14, 2013.

Thanks,
Carol