

PUBLIC SUBMISSION

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Docket: NRC-2015-0223

Revision of Fee Schedules; Fee Recovery for FY 2016

Comment On: NRC-2015-0223-0001

Revision of Fee Schedules; Fee Recovery for Fiscal Year 2016

Document: NRC-2015-0223-DRAFT-0004

Comment on FR Doc # 2016-06284

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General Comment

See attached file(s)

Attachments

NL-16-0542



April 22, 2015

NL-16-0542

Annette Vietti-Cook
Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555-0001
ATTN: Rulemakings and Adjudications Staff

Comments on Proposed Rulemaking: "Revision of Fee Schedules; Fee Recovery for
Fiscal Year 2016," Docket ID NRC-2015-0223

Dear Ms. Vietti-Cook:

Southern Nuclear Operating Company (SNC) hereby submits comments for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, SNC is providing comments on proposed rulemaking as noticed in the Federal Register (*Federal Register* Vol. 81, No. 56, 15457, dated March 23, 2016; Docket ID NRC-2015-0223). The proposed rulemaking is entitled "Revision of Fee Schedules; Fee recovery for Fiscal Year 2016."

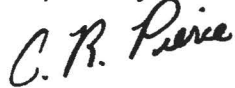
Representatives from SNC are working closely with the Nuclear Energy Institute (NEI) to address this very important proposed rule change. SNC endorses the comments provided to the NRC by NEI letter "10 CFR Parts 170 and 171, Revision of Fee Schedules...." This letter provides additional SNC comments on the proposed rulemaking:

1. SNC encourages the NRC to aggressively pursue the recommendations contained in SECY-16-0009, "Recommendations Resulting from the Integrated Prioritization and Re-baselining of Agency Activities," dated January 31, 2016. Making the changes recommended in SECY-16-0009 will result in reduced NRC fees in future budget years.
2. Part 170 and 171 rulemaking activity does not occur in a timely manner to support the budgeting processes used by SNC. The final budget for SNC and its sites is established well before the NRC fee rulemaking activities are available for public scrutiny, let alone finalized. By the time the NRC fee rule is published as final, the SNC fiscal year is nearly over and cost accruals must be reconciled with the final NRC fee structure, which causes last minute changes in financial prioritization of safety and production expenditures. In future years, SNC encourages the NRC to work to issue the final regulations earlier in the year.

SNC appreciates the opportunity to provide comments and encourages future public meetings to discuss resolution of the industry comments so that the final rule serves in the best interest of safety in a cost effective manner.

If you have any questions, please contact Mr. Justin Wheat at (205) 992-5998.

Respectfully submitted,

A handwritten signature in black ink that reads "C. R. Pierce". The signature is written in a cursive, slightly slanted style.

C. R. Pierce
Regulatory Affairs Director

CRP/DAN/lac

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. M. D. Meier, Vice President – Regulatory Affairs
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