

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8710300047 DOC. DATE: 87/10/26 NOTARIZED: NO DOCKET #
 FACIL: STN-50-528 Palo Verde Nuclear Station, Unit 1, Arizona Publi 05000528
 STN-50-529 Palo Verde Nuclear Station, Unit 2, Arizona Publi 05000529
 STN-50-530 Palo Verde Nuclear Station, Unit 3, Arizona Publi 05000530
 AUTH. NAME AUTHOR AFFILIATION
 VAN BRUNT, E. E. Arizona Nuclear Power Project (formerly Arizona Public Serv
 RECIP. NAME RECIPIENT AFFILIATION
 NRC - No Detailed Affiliation Given

SUBJECT: Forwards, under protest, payment of first quarterly
 installment of FY88 annual fee, per 10CFR171. Fee exceeds
 amount authorized by Congress due to inclusion of costs for
 research rulemaking & is unconstitutional.

DISTRIBUTION CODE: MO08D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: License Fees

NOTES: Standardized plant. 05000528
 Standardized plant. 05000529
 Standardized plant. 05000530

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1	PD5 PD	1
	LICITRA, E	1	DAVIS, M	1
INTERNAL:	ARM/DAF/LFMB	1	REG FILE 01	1
EXTERNAL:	LPDR	1	NRC PDR	1
NOTES:		1		

TOTAL NUMBER OF COPIES REQUIRED: LTTR 9 ENCL 0

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud.

2. The second part of the document outlines the specific procedures for recording transactions. It details the steps involved in the accounting process, from the initial entry of data into the system to the final review and approval of the records.

3. The third part of the document addresses the challenges associated with maintaining accurate records. It identifies common sources of error and provides strategies for minimizing these errors, such as implementing strict controls and regular audits.

4. The fourth part of the document discusses the role of technology in improving record-keeping. It highlights the benefits of using automated systems to process transactions and generate reports, and provides examples of how these systems can be implemented effectively.

5. The fifth part of the document concludes by emphasizing the importance of ongoing training and education for all personnel involved in the record-keeping process. It stresses that continuous learning is necessary to stay up-to-date on the latest best practices and technological advancements.

6. The sixth part of the document provides a detailed overview of the various types of records that must be maintained. It lists the different categories of transactions and the specific information that must be recorded for each category, ensuring that all necessary data is captured and stored accurately.

7. The seventh part of the document discusses the importance of data security and the measures that must be taken to protect the integrity of the records. It outlines the various threats to data security and provides a comprehensive set of guidelines for implementing robust security protocols.

8. The eighth part of the document addresses the issue of data retention and the policies that must be in place to ensure that records are kept for the appropriate length of time. It discusses the legal requirements for record retention and provides guidance on how to develop and enforce effective retention policies.

9. The ninth part of the document discusses the importance of regular audits and the role of internal controls in ensuring the accuracy of the records. It outlines the steps involved in conducting an audit and provides examples of the types of controls that should be implemented to prevent errors and fraud.

10. The tenth part of the document concludes by summarizing the key points discussed throughout the document and emphasizing the overall importance of maintaining accurate records for the success of the organization.

cc: Leak - File

Holloway

Rebo

10-27-87



Arizona Nuclear Power Project

P.O. BOX 52034 • PHOENIX, ARIZONA 85072-2034

U.S. Nuclear Regulatory Commission
Office of Resource Management
Division of Accounting and Finance
Washington, D.C. 20555

October 26, 1987
161-00610-EEVB/GS

Reference: Payment Under Protest of First Quarterly Installment of Fiscal Year 1988 Annual Fee, Assessed Pursuant to 10 CFR Part 171 for the Palo Verde Nuclear Generating Station, Unit Nos. 1, 2 and 3 Docket Nos. 50-528, 50-529 and 50-530, License Nos. NPF-41, NPF-51 and NPF-65

Gentlemen:

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2 and 3
Payment Under Protest of 10 CFR.171 Licensing Fees

The Arizona Nuclear Power Project, is paying, under protest, to the U.S. Nuclear Regulatory Commission (the "NRC") by electronic transfer of funds, in accordance with the NRC's procedures, the first quarterly installment of the Fiscal Year 1988 annual fee, assessed by the NRC pursuant to 10 CFR Part 171, for Palo Verde Nuclear Generating Station, Unit Nos. 1, 2 and 3. The amount so assessed and paid under protest was \$234,000.00 for Palo Verde Unit No. 1 (Docket No. 50-528, License No. NPF-41), \$234,000.00 for Palo Verde Unit No. 2 (Docket No. 50-529, License No. NPF-51) and \$234,000.00 for Palo Verde Unit No. 3 (Docket No. 50-530, License No. NPF-65).

Because the basis used by the NRC to compute the 10 CFR Part 171 annual fee includes cost budgeted by the NRC for research activities, including costs for research rulemaking, the fee exceeds that which Congress authorized the NRC to impose in the Consolidated Omnibus Budget Reconciliation Act of 1985 and is, therefore, invalid. Moreover, the assessment of a "fee" that not only charges for the benefits provided to the recipients of NRC services but also seeks to recover for generic research and rulemaking activities constitutes the unconstitutional imposition of tax. Therefore, the Arizona Nuclear Power Project is paying these installments under protest and reserves its right to a refund of all amounts which the NRC has illegally assessed.

Very truly yours,

E. E. Van Brunt

E. Van Brunt, Jr.
Executive Vice President
Project Director

187
11-28
P10:34
M. DRAM H

8710300047 871026
PDR ADDCK 05000528
PDR

EEVB/GS/rw

cc: U.S. NRC Executive Director of Operations
A. C. Gehr
E. A. Licitra
J. R. Ball

MOOS
1/0

RECEIVED
DIV OF ACCTG & FIN
'87 OCT 27 P 3:14
U.S. NUCLEAR REG
COMMISSION