

Response to Stakeholder Comments on Fee Matrix

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March 27, 2018

Agenda

- In December 2017, we conducted a public meeting introducing 3 possible approaches to calculating annual fees.
- We will discuss the comments received on each approach.
- We will introduce 2 additional approaches that grew out of the comments received.
- We will discuss next steps.

Comments on Possible Approaches

- Status Quo – Feedback was mixed.
- Uniform Approach – Feedback was mixed.
- Combination Approach – Feedback was mostly negative.
 - 85% uniform distribution
 - 15% proportional distribution based on billing data for direct services

Expanded Set of Possible Approaches

- Status Quo (No change at all)
- Uniform Approach
- Combination Approach (85/15 method)
- (NEW) Current matrix with revisions
- (NEW) Matrix based on regulated areas

Current Matrix with Revisions

- In response to the comment that factor of 10 difference between high and low is unreasonable, we changed the definitions of high, medium and low from 10-5-1 to 3-2-1.
- In response to the comment that Solid UF6 effort for an Enrichment facility should be consistent with the effort for a Category III Fuel Fabrication facility, we lowered the score from high to medium.
- In response to the comment that there should be a column for physical security, we added a column.

NRC FUEL CYCLE FACILITIES
ANNUAL FEES - EFFORT FACTOR MATRIX



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Impact of the Revised Approach

Fee Category	Licensee	Percent Based on Current Matrix With Revisions		Total Annual Fee Amount for FY17	New Annual Fee for FY17	Actual Annual Fee for FY17
Fuel Fab (HEU)	BWXT 07000027	22.6	20.8	\$27,365,000	\$5,691,920	\$7,255,000
	NFS 07000143	19.0		\$27,365,000	\$5,691,920	\$7,255,000
Fuel Fab (LEU)	GNFA 07001113	14.9	13.3	\$27,365,000	\$3,639,545	\$2,629,000
	Framatome 07001257	12.5		\$27,365,000	\$3,639,545	\$2,629,000
	Westinghouse 07001151	12.5		\$27,365,000	\$3,639,545	\$2,629,000
Enrichment	LES 07003103	11.3	11.3	\$27,365,000	\$3,092,245	\$3,470,000
Conversion	Honeywell 04003392	7.1	7.1	\$27,365,000	\$1,942,915	\$1,498,000

Matrix Based on Areas Regulated

- There was a comment that the matrix should include areas that are not technically a licensed process (sensitive information and physical security).
- What if we based the whole matrix on areas regulated by NRC (instead of processes)?

Matrix Based on Areas Regulated

[illegible]

Impact of New Matrix

Fee Category	Licensee	Percent Based on Matrix of Regulated Areas		Total Annual Fee Amount for FY17	New Annual Fee for FY17	Actual Annual Fee for FY17
Fuel Fab (HEU)	BWXT 07000027	16.1	16.1	\$27,365,000	\$4,405,765	\$7,255,000
	NFS 07000143	16.1		\$27,365,000	\$4,405,765	\$7,255,000
Fuel Fab (LEU)	GNFA 07001113	14.6	13.9	\$27,365,000	\$3,803,735	\$2,629,000
	Framatome 07001257	13.5		\$27,365,000	\$3,803,735	\$2,629,000
	Westinghouse 07001151	13.5		\$27,365,000	\$3,803,735	\$2,629,000
Enrichment	LES 07003103	14.1	14.1	\$27,365,000	\$3,858,465	\$3,470,000
Conversion	Honeywell 04003392	12.0	12.0	\$27,365,000	\$3,283,800	\$1,498,000

Questions on Approaches

- Are there any comments on the revisions included in the first new possible approach?
- Are there other revisions we should make?
- Is the matrix of regulated areas a better approach?
- Should the effort factors assigned to regulated areas be different? If so, why?
- Are there other approaches we should consider?

Next Steps

- Request comments in connection with this public meeting by April 27, 2018.
- After evaluating the comments, the NRC staff plans to prepare any recommendations on this issue to be included in the Commission paper for the FY19 Proposed Fee Rule.