

# PUBLIC SUBMISSION

<b>As of:</b> 2/25/19 2:58 PM <b>Received:</b> February 25, 2019 <b>Status:</b> Pending_Post <b>Tracking No.</b> 1k3-98gh-ffe1 <b>Comments Due:</b> March 04, 2019 <b>Submission Type:</b> Web
---

**Docket:** NRC-2017-0032

Revision of Fee Schedules: Fee Recovery for FY 2019

**Comment On:** NRC-2017-0032-0001

Revision of Fee Schedules: Fee Recovery for Fiscal Year 2019

**Document:** NRC-2017-0032-DRAFT-0003

Comment on FR Doc # 2019-00219

---

## Submitter Information

**Name:** Roger Wink

**Address:**

8315 Country Road 459  
Steedman, MO, 65077

**Email:** RWink@ameren.com

---

## General Comment

Comments on the FY 2019 NRC fee structure is provided in the attachment.

---

## Attachments

Response to 2019 fiscal year budget proposal

February 25, 2019

Ms. Annette Vietti-Cook  
Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
ATTN: Rulemaking and Adjudications Staff

Comments on Fiscal Year 2019 Proposed Fee Rule (NRC Docket ID NRC-2017-0032)

Dear Ms. Vietti-Cook:

The purpose of this letter is to provide feedback on the NRC Fiscal Year (FY) 2019 Proposed Fee Rule.

The NRC budget for FY 2019 remains essentially flat from FY2018 with only a proposed 1.2% decrease. In reviewing the proposed fee rule, it remains a challenge to identify the basis upon which the NRC justifies an essentially stagnant budget. This is during a period in which the nuclear industry is performing at unprecedented levels of safety and reliability, while under significant economic stress, with reduced budgets and plant closures. A review of the documents supporting the NRC budget provides little insight into the basis for maintaining a budget at this level, while examination of external measures (e.g., number of licensees, number of licensing submittals, etc.) would seem to support a larger reduction in budget. I respectfully request the NRC to supplement the future fee rules with additional detail on budgeted work activities and how this plan compares with the prior year. Such detail would enable my corporation to share that information with the state public service commission, our customers and allow our station to more accurately predict NRC fees in coming years for budgeting purposes.

The Operating Reactor budget for FY 2017 and FY 2018 was \$670 million. Similarly, the Operating Reactor budget for FY 2019 is \$670 million. During this period, fee for service collections for Operating Reactors (Part 170) have decreased by 26%. The unchanged Operating Reactor budget, combined with the rapid loss of service fees, has apparently required NRC to increase annual fee collections for operating plants by 7.3% in FY 2019. With the closure of Oyster Creek in 2018, the annual fee collection is distributed among fewer plants and results in an 8.4% increase in the per reactor annual fee.

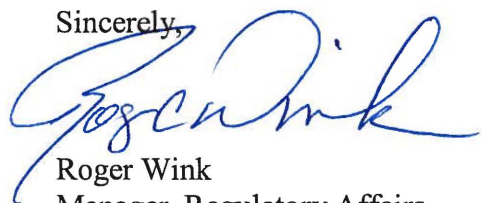
The percentage of the Operating Plant budget that is derived from annual fees (currently at 68.7%) continues to increase and is up from 64.0% in FY 2018. Without additional information on the indirect services covered under Part 171 fees, we are unable to determine if the increase in annual fees is a

reflection of an increase in required generic services, the consequence of overstaffing, or something else.

Twelve plants have announced closures between now and 2025. The loss of these licensees and the expected continued decrease in Part 170 service fees require NRC to take action to reduce the operating plant budget and stop the trend of increasing annual fees for the remaining operating plants. Given that the cap on annual fees for operating reactors under NEIMA goes into effect in FY 2021, it is important that the NRC begin establishing a means to more quickly adjust to anticipated reductions in reactor licensees and the associated workload.

I thank you for the opportunity to comment on this matter.

Sincerely,



Roger Wink  
Manager, Regulatory Affairs  
Ameren Missouri/Callaway Plant