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**Florida
Power**
CORPORATION

Crystal River Unit 3
Docket No. 50-302

May 24, 1991
3F0591-09

Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Revision to Fee Schedule
56 Fed. Reg. 14870
Request for Comments

Dear Sir:

Florida Power Corporation (FPC) provided input to the comments provided by NUMARC. We endorse those comments as providing a very thorough constructive criticism of the proposed new fee schedule. The NRC Staff is obligated by public law to recover approximately 100% of its budget authority from those who receive benefits from its services. However, it is clear that many services for which nuclear utilities receive little benefit are being funded by nuclear utilities. Further, as noted in the detailed comments provided by NUMARC, this level of budget recovery obligates the NRC to a higher level of accountability with regard to the hours charged to individual utilities, the amount of contractor dependence, level of administrative and general support and the usefulness of research programs.

One specific point of concern is the incorporation of several categories of overhead costs in the calculated hourly rate for Part 170 costs. These overhead costs are not directly attributable to plant-specific activities. Since the total man-hours per unit is significantly higher for single unit utilities, the burden of the overhead costs is not being equitably distributed. These overhead costs could be included in the Part 171 annual fee which would then be equally shared between each licensed reactor.

Finally, the timing from a budget perspective, is burdensome. Back-charging for services rendered in a single lump-sum in the current budget year is having a deleterious impact on our ability to plan for the orderly and appropriately prioritized expenditure of limited O&M funds.

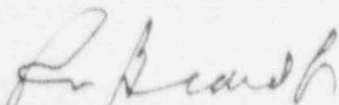
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FPC encourages your careful consideration of the industry's comments. The NRC staff should also recognize that the approach taken, after any judicial review that may be forthcoming, will be precedent-setting in the area of 100% fee recovery by large federal agencies. In consideration of this fact, we strongly recommend that your ultimate decision be as fair as possible.

Sincerely,



P. M. Beard, Jr.
Senior Vice President
Nuclear Operations

PMB:KRW

xc: Regional Administrator, Region II
NRR Project Manager
Senior Resident Inspector