

# Babcock & Wilcox

a McDermott company

Nuclear Power Division

May 29, 1985

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Mr. William O. Miller, Chief  
License Fee Management Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Topical Report Review Fees

Dear Mr. Miller:

B&W's experience with the revised 10CFR170 regulation for fees has indicated a problem in the area of topical report review fees. We find the \$150.00 [10CFR170.12(A)] application fee particularly objectionable. The processing of payment for this fee generally costs more than the fee itself, particularly when such costs must be recovered from the B&W Owners Group. Secondly, processing payment for a fee for which no bill has been rendered leaves a poorly auditable record which is contrary to B&W standard practices.

One method of dealing with this latter concern is for B&W to wait for a dunning notice from your office for the \$150.00 fee and use that in lieu of a bill. This approach costs your office additional processing time and does not resolve B&W's concern with the ratio of bill size to costs for processing payment.

We would like to suggest that in the letter for submittal of a report for NRC review that B&W recognize our obligation to pay a minimum unreturnable fee of \$150.00 for report review and our guarantee to pay that fee along with review costs above that amount at our next six months billing interval for topical reports. You would, therefore, be guaranteed, in writing, the minimum \$150.00 fee and B&W would be able to process payment in response to a bill of a size more consistent with processing costs.

We would be interested in your response to this suggestion or any alternate suggestion you might have for resolution of this concern.

Very truly yours,

*J. H. Taylor /bcc*

J. H. Taylor, Manager  
Licensing Services

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PDR TOPR EMVBW  
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JHT/bcc

cc: R. B. Borsum  
D. Moran (NRC)  
J. R. Bohart

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