



COMBUSTION ENGINEERING OWNERS GROUP

Arizona Public Service Co.
Palo Verde 1, 2, 3
Baltimore Gas & Electric
Calvert Cliffs 1, 2

Consumers Power Co.
Palisades
Florida Power & Light Co.
St. Lucie 1, 2

Entergy Operations Inc.
ANO 2
WSES Unit 3

Maine Yankee Atomic Power Co.
Maine Yankee
Northeast Utilities Service Co.
Milestone 2

Omaha Public Power District
Fl. Calhoun
Southern California Edison Co.
SONGS 2, 3

November 1, 1996
CEOG-96-451

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington D.C. 20555

Subject: Request for Non-Assessment of Fees

References (1) D. F. Pilmer to USNRC, "C-E Owners Group Submittal of Joint Application Reports", letter CEOG-95-344, July 10, 1995.

Reference (1) provided the first in a set of reports that the CE Owners Group (CEOG) will be submitting for review and approval by the NRC. These reports contain the results of risk-informed applications for the improvement of Technical Specification Allowable Outage Times (AOTs). The reports known as Joint Application Reports are unique in that they document deterministic and probabilistic evaluations and the associated plant specific results for the CEOG plants. The results have been cross compared to understand the reasons for differences and to understand the insights gained from the PRA and deterministic evaluations. Importantly, the reports have illustrated a process for performing risk-informed applications. The CEOG has worked closely with the NRC Technical Specification and PRA branches during the project and believe the processes and results documented in the reports assist the NRC in formulating PRA policy statements, regulatory guides, and standard review plans currently under development for risk-informed applications.

The CEOG has reviewed footnote 4 to the Schedule for Facility Fees of 10 CFR 170.21. The footnote is associated with the Special Projects section and clarifies the definition of "Special Project". The footnote clarifies that fees will not be assessed for assisting the NRC.

This letter requests non-assessment of fees that could be and have been assessed to the CEOG based upon NRC review and approval of the Joint Application Reports and associated license amendments. This request is based upon 10 CFR 170.21 Note 4 item 2 and 3 which state "fees will not be assessed for requests/reports submitted to the NRC... to assist the NRC in developing a

9611050343 961101
PDR TOPRP EMVC-E
C PDR

RD-8-2 Combustion
Engineering

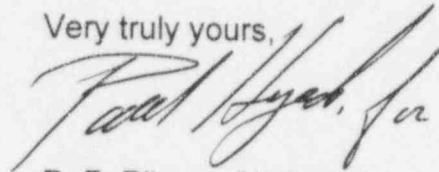
10
B42

November 1, 1996
CEOG-96-451

rule, regulatory guide, policy statement, generic letter or bulletin; or ... for the purpose of supporting generic regulatory improvements or efforts." Therefore the CEOG requests that fees not be assessed for the NRC review of those portions of Reference (1) that the NRC will use to develop regulatory guidance and improvements.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "D. F. Pilmer, Jr.", written in a cursive style.

D. F. Pilmer, Chairman
C-E Owners Group

cc: G. C. Bischoff, ABB
P. J. Hijeck, ABB
CEOG representatives
PSAWG members
S. Magruder, NRC
N. Gillis, NRC