



DSI-21

(18)

Westinghouse
Electric Corporation

Energy Systems

Box 355
Pittsburgh Pennsylvania 15230-0355

NSD-NRC-96-4892

November 25, 1996

Mr. John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001



Attention: Chief, Docketing and Service Branch

Subject: NRC Strategic Assessment and Rebaselining (61 Federal Register 195, October 7,
1996), Request for Comments

Dear Mr. Hoyle:

Westinghouse has reviewed the Direction Setting Issue (DSI) papers which form a part of the NRC Strategic Assessment and Rebaselining Initiative. We support and endorse the comments being provided by the Nuclear Energy Institute (NEI) on behalf of the nuclear power industry. In addition, we have provided additional comments, included as an attachment herein, to certain DSI papers of specific significance to Westinghouse.

We appreciate the opportunity to comment on these important issues. Additionally, Westinghouse is always willing to meet with the NRC to further discuss any facet of our comments. Should you wish to discuss our comments in greater detail, please contact Mr. H. A. Sepp, Manager, Regulatory and Licensing Initiatives at (412) 374-5282 at your convenience.

Very truly yours,

N. J. Liparulo, Manager
Regulatory and Engineering Networks

jas

Attachment

9611290182 961125
PDR NRCSA I
21 PDR

DSI3

Westinghouse Comments
on
Direction Setting Issue Papers
from
NRC Strategic Assessment and Rebaselining Initiative

DSI 21: FEES

Westinghouse Comments:

Westinghouse has reviewed DSI-21 focusing on the options presented to resolve this issue. These options have been developed within the context of the two primary types of activities that NRC performs. The first type includes program activities performed by the NRC in response to mandates (statutes, Executive Orders, treaties, etc.). The second type includes non-mandated activities that are not necessary for the NRC to meet its mandates, but the activities are performed as a "service" to another organization.

Westinghouse believes that the NRC should pursue Option No. 2, "No Consideration of Fees for Mandated Activities". This Option is consistent with Westinghouse views expressed in NTD-NRC-95-4447 in which Westinghouse provided comments to the NRC regarding revisions of the fee schedule. Specifically, Westinghouse stated, "Westinghouse supports the Commission's plans to increase the use of reimbursable agreements to avoid costs that do not benefit NRC licensees within the Commission's budget." Additionally, Westinghouse continues to encourage the NRC to seek legislative relief from the 100 percent fee recovery requirement as mandated by Congress.