

BWR OWNERS' GROUP

Kevin P. Donovan, Chairman

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BWROG-97036
February 18, 1997
NRC Project No. 691

License Fee and Debt Collection Branch
Office of the Controller
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: NRC REVIEW FEE FOR ECCS SUCTION STRAINER
UTILITY RESOLUTION GUIDANCE DOCUMENT
NRC Project 691

Attachment: Copy of Invoice No. RL0319-97, dated 1/20/97, \$64,402.00

GE Nuclear Energy is in receipt of an invoice for NRC review of BWR Owners' Group (BWROG) Report NEDO-32686, "Utility Resolution Guidance for ECCS Suction Strainer Blockage". The attached invoice summarizes initial charges for this review, which the BWR Owners' Group believes are inappropriate.

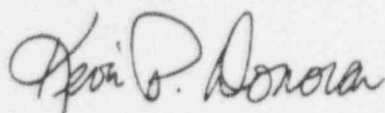
In April 1994, NRC management told the BWROG in a presentation to the BWROG Executive Oversight Committee that the BWROG will be exempted from NRC review fees when the BWROG submittals satisfy the following three criteria:

1. The NRC Staff requested the BWROG to address the issue,
2. The submittal represents a BWR "generic" position, and
3. The submittal addresses an industry issue, which if not proactively addressed by the BWROG, would ultimately have to be addressed by the Staff.

On November 20, 1996, the BWROG transmitted to the NRC NEDO-32686, "Utility Resolution Guidance for ECCS Suction Strainer Blockage", dated November 1996. This BWROG submittal clearly meets the above three criteria and should, therefore, be exempted from NRC review fees.

The BWR Owners' Group requests that the NRC reevaluate the appropriateness of this invoice, given the above discussion. If you have any questions regarding this subject, please contact the undersigned.

Sincerely,



Kevin P. Donovan, Chairman
BWR Owners' Group

nrc/eccs.c/prl

cc: R. Sgarro, Chairman ECCS Suction Strainer Committee
C. Terry, Chairman BWROG Executive Oversight Committee
T. Rausch, BWROG Vice Chairman
R. Elliott, NRC Project Manager
J. Wilson, NRC
K. Sedney, Acting GE BWROG Projects Manager
T. Green, GE Project Manager, ECCS Suction Strainer Committee
P. Lung, BWROG Financial Administrator, GE

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