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August 22, 2002
LIC-02-0095

Chief Financial Officer
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Reference: Docket No. 50-285

SUBJECT: Request for Waiver or Reduction of License Renewal Review Fees

The purpose of this letter is to request waiver or reduction of 10 CFR 170 review fees for the Fort Calhoun Station (FCS) license renewal application. This request is made pursuant to 10 CFR 170.11(b) for the reasons set forth below.

Omaha Public Power District (OPPD) has actively supported industry efforts through the Nuclear Energy Institute (NEI) to work with the Nuclear Regulatory Commission (NRC) to develop a stable and efficient license renewal process. On January 9, 2002, OPPD submitted the first license renewal application prepared in accordance with NUREG-1800, *Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants (SRP)*, and NUREG-1801, *Generic Aging Lessons Learned Report (GALL)*. Prior to that, OPPD actively participated in the extensive NRC/industry SRP demonstration project, providing the model format which was ultimately preferred by the NRC and subsequently used for the FCS application.

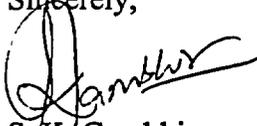
However, the NRC sufficiency review of the FCS application revealed significant "lessons learned" (e.g., the need to create linkage between Sections 2 and 3 of the application) which were not disclosed as necessary during the SRP demonstration project. As a result, OPPD spent additional and unplanned resources re-drafting portions of the FCS application, which delayed both the completion of the sufficiency review and docketing of the application.

OPPD believes that the public, the NRC, and the nuclear industry will benefit greatly from implementation of the SRP-based license renewal process. The revised FCS license renewal application is a first-of-a-kind model that will facilitate NRC review of it and future similar licensing actions. In addition, the FCS application will aid the NRC in its ongoing development of supplementary regulatory guidance, as well as revisions to NUREG-1800 and NUREG-1801. Accordingly, a waiver or reduction of review fees associated with the FCS license renewal application is justified, pursuant to 10 CFR 170.11(b). We are aware that new fee waiver criteria have been the subject of a recent final rule; however, this request is being made pursuant to Section 170.11(b), rather than Section 170.11(a)(1). This request is similar to the requests for non-assessment of fees submitted by Duke Power Company on February 2, 1996, and by Baltimore Gas & Electric on July 3, 1996. Both requests were granted by the NRC. Additionally, Southern Company received a partial fee waiver for the review of the Edwin J. Hatch license renewal application by letter dated December 5, 2001.

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Please contact me if you have any questions regarding this request.

Sincerely,



S. K. Gambhir
Division Manager
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TCM/tcm

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- W. F. Burton, NRC Project Manager
- T. J. Kenyon, NRC Project Manager
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