

Notes on Pebble Bed Meeting

7/9/01

Met with RES (Tom King, Stuart Rubin, Charles Ader, Gina Thompson, NP Kadambi, John Flack); NRR (Amy Cubbage); and OCFO (Jim Turdici, Ellen Poteat, Tony Rossi, Glenda Jackson, Joel Dorfman).

Discussed two issues: charging time for MOX and for Pebble Bed (PBMR)

MOX

Jim Turdici explained the Commission's policy on charging RES work on the MOX licensing as Part 170 fee billable rather than the normal Part 171 (annual fees). The approach for MOX will be unique due to an April 2001 Commission decision. Jesse Funches has written to letters to Duke Energy and the consortium regarding this.

Jim T. explained that there is big "R" research and little "r" research:

- Big "R": RES work associated with responding to requests from NRR or NMSS (Part 170 fee billable)
- Little "r": confirmatory or participatory research with the DOE labs (or commercial contractors) (normally recovered in Part 171 annual fees)

The Commission decision was to charge the MOX licensee for small "r" confirmatory research (rather than through annual fees). Rational was to make DOE pay for cost of MOX. Small "r" research for PBMR should be charged to annual fees (unless DOE reimbursable funds are available.)

PBMR

Jim T. defined "pre-application" work as starting with the 1st meeting. He viewed the first meeting to get acquainted and establishing communication channels as non-billable. After that, meetings could be billable.

Tom King: PBMR project had a January, 2001, get acquainted meeting - not billable. April and June meetings to discuss issues are billable to Exelon.

Big "R" in this case has RES as the lead (Part 170 fees)

Little "r" is chargeable to the DOE reimbursable agreement, unless the DOE money is inadequate. If DOE money is inadequate, anything else would be charged as Part 171.

RES noted that they are responding to NEI questions which are similar to Exelon questions. Observed that there is no one to charge these costs to.

Joel D pointed out that the DOE funds are a limitation on RES's AAFP. Turdici and Joel commented that NRR and NMSS should report any billable hours to RES for consolidation. RES has the lead to report all hours. Staff costs are on RES's AAFP.

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Question arose regarding what is chargeable to DOE. Joel D. commented that the SOW to the agreement is important guidance. Jim T. noted that RES has to make some decisions. NP Kadambi is responsible for managing contractual support funds for the work. He was curious regarding whether DOE or regular NRC funds would be used. I referred him to the SOW and noted that the financial codes will distinguish the money.

Joel D. brought up travel job codes. Tom King commented that a trip to Germany is upcoming. Joel noted that foreign travel should be on a different job code than domestic and that foreign travel is billable to DOE. Joel questioned whether NRR's travel is reimbursable or should be funded directly. Joel will look into what job code NRR should use for travel and advise NRR and RES.

Stuart Rubin, RES, is responsible for monitoring hours worked, both billable to DOE or to Exelon. RES advised Exelon that they should expect to be billed \$200K in the first year.

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