

NMSS' comments on FY 2005 final Proposed License Fee Rule

- o Pg. 4, end of first paragraph under I. Background, add, After accounting for carryover and billing adjustments, the net amount to be recovered through fees is approximately \$538 million. (this is the same sentence as stated at the end of the first paragraph on page 1)
- o Pg. 6, second paragraph, starting with The FY 2005 fee recovery amount is reduced by a \$2.2 million... add the following after sentence mentioned, taken from third paragraph to better align narrative with Table I discussed on pg. 7, For FY 2005, the NRC also estimates a net adjustment of approximately \$0.5 million for FY 2005 invoices that the NRC estimates will not be paid during the fiscal year, and for payments received in FY 2005 for FY 2004 invoices. This leaves approximately \$538.5 \$538.0 million to be recovered in FY 2005 through part 170 licensing and inspection fees, and part 171 annual fees, and other offsetting receipts.
- o Pg. 6, third paragraph, delete sentence moved to second paragraph above.
- o Pg. 12, fifth line,estimate of hours per FTE that reflects direct time; (delete comma)
- o Pg. 22, top of page, after sentence ...annual fee while the remainder would have increased annual fees. Add the following sentence, The largest materials fee category, the industrial users of nuclear material in Category 3P, which includes nearly 1,700 of NRC's 4,500 materials licensees, would experience no fee change. [Note: Perhaps a similar statement could be added near the front of the fee rule package as a summary statement also to provide more context with respect to Part 171 changes. The reason NMSS feel the insert is needed is to demonstrate the impact with respect to the number of licensees affected. A simple count of fee categories that go up or down does not provide this to the reader.]
- o Pg. 23, top of page, ...the final FY 2004 final rule published...
- o Pg. 27, a. Fuel Facilities, add the following sentence where applicable under this section, Upon issuance of the Construction Authorization, the staff is proposing to charge an annual fee for the Mixed Oxide Fuel Fabrication Facility (MFFF) in 2005. This fee would be charged to recover generic and other regulatory costs not otherwise recovered in 10 CFR Part 170 fees.