

**Detroit Edison**



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PROPOSED RULES 170+171  
(70 FR 08678)

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USNRC

March 24, 2005 (4:14pm)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

March 22, 2005  
NRC-05-0028

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D C 20555-0001  
Attention: Rulemakings and Adjudications Staff

Reference: Federal Register Notice (70FR8678) dated February 22, 2005

Subject: Detroit Edison Comments on "Revision of Fee Schedules; Fee Recovery for FY 2005; Proposed Rule" - RIN 3150-AH61

Detroit Edison, owner and operator of Fermi 2 Nuclear Power Plant, endorses the specific comments provided by the Nuclear Energy Institute (NEI) and the associated recommendations on the proposed rule discussed in the referenced Federal Register notice.

In addition to the industry comments provided by NEI, Detroit Edison is concerned about the large increase in NRC hourly rates associated with the proposed changes to 10 CFR 170.20. Detroit Edison believes the change disproportionately shifts NRC management and overhead costs to single unit licensees, and these overhead costs should more appropriately be included in 10 CFR Part 171 fees. The proposed changes unfairly allocate these costs such that single unit sites with a Project Manager and two Resident Inspectors assigned pay a disproportionately larger per unit share of the NRC overhead and management costs than multiple unit sites, which typically share Project Manager and Resident Inspector resources.

Should you any questions or require additional information, please contact me at (734) 586-4258.

Sincerely,

Norman K. Peterson  
Manager - Nuclear Licensing

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