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DOCKET NUMBER
PROPOSED RULE 170-171
(70 FR 08678)

March 28, 2005

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

SOUTHERN
COMPANY

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NL-05-0588

Southern Nuclear Operating Company
Comments on Proposed Rule:
Revision of Fee Schedules; Fee Recovery for FY 2005
(70 Federal Register 8678 dated February 22, 2005)

Ladies and Gentlemen:

Southern Nuclear Operating Company (SNC), the licensed operator for the Joseph M. Farley Nuclear Plant, the Edwin I. Hatch Nuclear Plant and the Vogtle Electric Generating Plant, has reviewed the notice of proposed rulemaking for 10 CFR 50.170 and 171, "Revision of Fee Schedules; Fee Recovery for FY 2005," published in the Federal Register on February 22, 2005. SNC endorses the comments which have been provided by the Nuclear Energy Institute. SNC would like to specifically emphasize the following comments:

- NRC Fees should not include charges for Homeland Security activities. Homeland Security issues related to nuclear power plants are part of the United States government's responsibility to protect the nation's critical infrastructure.
- The NRC should reallocate resources dedicated for the inspection of areas of the plants that have little or no safety significance to areas such as risk-informing regulatory requirements, reviewing license renewal applications and licensing new reactor designs. This reallocation would reflect efficiency in the agency and reduce costs.
- The NRC should provide an estimate of fees to licensees in advance of the proposed rulemaking to allow licensees to better predict regulatory expenses during the normal budget cycle.

Sincerely,



Don E. Grissette

DEG/JMG/sdl

cc: Southern Nuclear Operating Company
Mr. L. M. Stinson, Vice President, Plant Farley
Mr. H. L. Sumner, Jr., Vice President, Plant Hatch
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