



April 22, 2015

NL-15-0757

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

Comments on Proposed Rulemaking: "Revision of Fee Schedule; Fee Recovery for Fiscal Year 2015," Docket ID NRC-2014-0200

Dear Ms. Vietti-Cook:

Southern Nuclear Operating Company (SNC) hereby submits comments for consideration by the U.S. Nuclear Regulatory Commission (NRC) staff. Specifically, SNC is providing comments on proposed rulemaking as noticed in the Federal Register (*Federal Register* Vol. 80, No. 55, 15476, dated March 23, 2015; Docket ID NRC-2014-0200). The proposed rulemaking is entitled "Revision of Fee Schedule; Fee recovery for Fiscal Year 2015."

Representatives from Southern Nuclear Company (SNC) are working closely with the Nuclear Energy Institute (NEI) to address this very important proposed rule change. SNC endorses the comments provided to the NRC by NEI letter "10 CFR Parts 170 and 171, Revision of Fee Schedules..." This letter provides additional SNC comments on the proposed rulemaking.

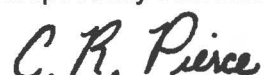
1. The Part 170 and 171 Rulemaking activity does not occur in a timely manner to support the budgeting processes used by SNC. The final budget for SNC and our sites is established well before the NRC fee rulemaking activities are available for public scrutiny, let alone finalized. By the time the NRC fee rule is published as final, the SNC fiscal year is nearly over and cost accruals must be reconciled with the final NRC fee structure which causes last minute changes in financial prioritization of safety and production expenditures. In future years, SNC encourages the NRC to work to issue the final regulations earlier in the year.
2. The Part 171 fees for operating plants appear to include a disproportionate percentage attributable to new and advanced reactors. The NRC work papers imply that up to \$1 million/reactor (20%) of the Part 171 fees could be supporting NRC work on new and advanced reactors. The NRC should justify in a transparent manner how much of the annual fees support this new reactor

business line, and how this portion of the annual fee directly supports operating plant regulatory activities.

SNC appreciates the opportunity to provide comments and encourages future public meetings to discuss resolution of the industry comments so that the final rule serves in the best interest of safety in a cost effective manner.

If you have any questions, please contact Mr. Doug McKinney at (205) 992-5982.

Respectfully submitted,



C. R. Pierce
Regulatory Affairs Director

CRP/DAN/lac

cc: Southern Nuclear Operating Company
Mr. S. E. Kuczynski, Chairman, President & CEO
Mr. D. G. Bost, Executive Vice President & Chief Nuclear Officer
Mr. M. D. Meier, Vice President – Regulatory Affairs
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