

ROP Budget Key Messages

The NRC is dedicated to improving transparency in its fee billing. In the staff requirements memorandum (SRM) to SECY 15-015 (ADAMS Accession No. ML15159A234), the Commission approved staff recommendations aimed at simplifying how the NRC calculates its fees, improving transparency in the fee billing process, and improving the timeliness of NRC's communications about fee changes. Since that time, the staff has been actively implementing those improvements.

- a) As part of the fee transformation initiative, the agency posted (per site) resource estimate summaries, which were based on historical inspection data, at <https://www.nrc.gov/docs/ML1727/ML17271A262>. These summaries include information related to direct inspection costs. The table also includes a line item for documentation, preparation, travel to and from the site, plant status, etc. Actual effort may vary based on regional needs and site-specific considerations.
- b) As noted on the NRC's website at <https://www.nrc.gov/about-nrc/regulatory/licensing/sample-invoice.pdf>, the bill to the licensee includes the names of the inspectors for the invoice period, the hours charged, the hourly rate, and total amount billed to the licensee in the invoice period. The bill also includes the cost activity code (CAC) that the inspectors charged to. The CAC distinguishes the inspection-related work from the inspection support-related work.
- c) Each inspection procedure includes the resource estimates, in hours, required to complete the inspection. In addition to these inspection procedures, there are critical support activities that are performed by inspectors to execute the inspection program. Because inspections can vary in complexity depending on the issue being evaluated, the associated hours may deviate from the estimates in the inspection procedure in some cases. As noted in the historical inspection data, on the public website (ADAMS Accession No. ML17271A262), time is spent preparing and documenting inspections and performing other activities to support the execution of inspections.
- d) The agency increased standardization of the financial charging system used by inspectors and all NRC personnel. The new structure allows the grouping of costs for a single inspection or other project so that costs are no longer commingled within the invoice for multiple projects, and consolidates all the charges under a given project for the invoice period.
- e) Consistent with 10 CFR § 170.12(c)(1), resident inspectors are using a new CAC to ensure that inspection fees will be assessed to “recover full cost for each resident inspector (including the senior resident inspector), assigned to a specific plant or facility.” As further noted by § 170.12(c)(1), inspection fees are “based on the number of hours that each inspector assigned to the plant or facility is in an official duty status (i.e., all time in a non-leave status), excluding time spent by a resident inspector in support of activities at another site.”

The agency continues to look for trends and biennially evaluates every baseline inspection procedure to determine if resource estimates need to be reallocated. The web site for billing of inspection activities and associated information can be found at <https://www.nrc.gov/about-nrc/regulatory/licensing/fees-transformation-accomplishments.html>.