

DEC 19 1980

DOCKET NOS. 50-266  
and 50-307

Wisconsin Electric Power Company  
ATTN: C. W. Fay, Director  
Nuclear Power Department  
231 W. Michigan  
P.O. Box 2046  
Milwaukee, Wisconsin 53201

Gentlemen:

Your letter dated November 14, 1980, expressed the opinion that the additional Class I duplicate amendment fee requested in our letter dated October 23, 1980, is not appropriate in that a single amendment will be issued for each of the Point Beach Units (1 & 2). You further stated that fees are charged for licensing services rendered and that once the review is completed for one unit, the licensing services rendered is no different than if the application had only involved one class.

The Class I duplicate amendment fee provision was included in 10 CFR 170.22 because it was recognized that although the technical review of a single application which covers more than one essentially identical unit is generally a single review, there is nonetheless additional administrative work for the second unit. Normally this would include issuance of the amendment as well as checking and issuing the accompanying Technical Specification page changes. Therefore, the licensing services are not totally complete until all of the Technical Specification pages for the requested changes for each unit are revised and incorporated in the amendment package. If there was no additional Technical Specifications change, there would be no additional administrative effort for the second unit and the one duplicate amendment fee would be all that is required.

Based on the above, we take the position that the additional duplicate amendment fee for your September 19, 1980 application is applicable and justified pursuant to 10 CFR 170.

Sincerely,

Original Signed by  
Wm. O. Miller

William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

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