



ARKANSAS POWER & LIGHT COMPANY
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April 30, 1981

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Director, Office of Administration
ATTN: Mr. William O. Miller, Chief
License Fee Management Branch
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Fees for OPERABLE Technical Specification
(File: 1510, 2-1510)

Gentlemen:

After reviewing your letter of February 20, 1981, we found your reasoning for requesting a fee of \$4,000 for the review of the ANO-1 OPERABLE Technical Specification to be inconsistent with your determination of the fee requirement for ANO-2's OPERABLE Technical Specification. Both the ANO-1 and 2 OPERABLE Technical Specifications were submitted in response to NRC's generic letter of April 10, 1980. In this letter, AP&L was requested by the NRC to modify both ANO-1 and 2 Technical Specifications to incorporate the NRC's Model Technical Specification definition of OPERABLE. It is our contention that these changes (the same change for both units) had no effect on the overall operation of the units and that these changes were made merely to comply to an NRC request. If any fees are required for these changes, we believe that the maximum fee should be a Class II fee for both units. Therefore, AP&L requests that of the \$4,000 fee already submitted for ANO-2, that \$1,200 be applied to the ANO-1 change, that an additional \$1,200 be applied to the ANO-2 change, and the remaining \$1,600 be refunded to AP&L.

Very truly yours,

David C. Trimble

David C. Trimble
Manager, Licensing

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