



**GPU Nuclear**  
 100 Interpace Parkway  
 Parsippany, New Jersey 07054  
 201 263-6500  
 TELEX 136-482  
 Writer's Direct Dial Number:

June 1, 1981  
 EAJK-81-157



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

Dear Sir:

Please excuse our delay in providing the fee (\$12,300) requested by your March 18, 1981 letter. Enclosed is a check for \$12,300, however we still feel the fee is unwarranted. Our feelings are based upon the fact that the nature of the submittal was such that it should be classified as a Class III Amendment in accordance with 10 CFR 170.22 and since it was issued for the convenience of the Commission no fee is required. Secondly, regardless of the Classification of the amendment, the amount of NRC staff review cannot justify the \$12,300 fee since these Lessons Learned Technical Specifications are a generic topic.

Based on our assessment, we hope you will reconsider the fee charged.

Very truly yours,

*James Knubel*  
 James Knubel  
 Manager, BWR Licensing

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*Moos  
 5/10  
 w/check  
 \$12,300.00*