



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

June 2, 1981

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

Subject: Dresden Station Unit 1
 Fees for Fire Protection
 Schedule Extension Request
NRC Docket No. 50-10

- References (a): R. M. Diggs letter to R. F. Janecek
 dated March 6, 1981
- (b): W. O. Miller letter to R. F. Janecek
 dated May 22, 1981
- (c): W. O. Miller letter to C. Reed
 dated July 12, 1979

Dear Mr. Miller:

References (a) and (b) requested a remittance in the amount of \$1,200.00 in support of our request to extend Fire Protection implementation dates for Dresden Unit 1.

Based on our review of 10 CFR 170.22 and the guidance provided by Reference (c), we do not believe that a fee is required. Since our request entailed only a schedule change, we agree that the request was only administrative in nature. However, our request did not include a change or amendment to our license of any kind. Therefore, we do not believe that it is properly classed as a Class II Amendment, since both 10 CFR 170.22 and Reference (c) define Class II Amendments as amendments (or changes) only. The definition of Class II does not include "exemptions" of "required approvals".

If you have any further questions in this regard, please contact this office.

Very truly yours,

J. S. Abel
 J. S. Abel
 Director of
 Nuclear Licensing



As of 5/10

21018

8106090377

F