



DOCKET NUMBER PR 170
PROPOSED RULE

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(54FR49763)

GE Nuclear Energy

DOCKETED
USNRC

Nuclear Fuel & Components Manufacturing
General Electric Company
P.O. Box 780, Wilmington, NC 28402
919-675-5000

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

January 22, 1990

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Docketing Service Branch

Reference: Federal Register, Vol. 54, No. 230, 12/1/89

Subject: Comments on Proposed Rule

Dear Sir:

GE's Nuclear Fuel and Components Manufacturing (NF&CM) has reviewed the referenced proposed rule and submits the following comments for your consideration:

1. Section 170.31, The Schedule of Materials Fees, requires in many categories that an initial \$150 fee must accompany each application. This amount is then applied to actual cost when the billing is submitted to the licensee.

The initial fee does not appear to serve any useful purpose and adds an unnecessary administrative cost for initiating, processing, and tracking to both the NRC and the licensee. Licensees are required to pay invoices within a specified time frame with specifically stated penalties for those who do not comply. Also, unnecessary refunding costs may be created for the NRC when the actual cost is less than the minimum application fee or a fee was not required. The initial fee serves no useful purpose and, in today's economy, the \$150 is an insignificant amount even when multiplied by the numerous applications.

We request that application fees in the less than \$500 range be eliminated since this fee does not serve a useful purpose and adds unnecessary cost to both the NRC and licensees.

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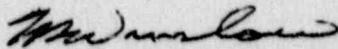
2. In Section 170.31, 1.A, the fourth and fifth line read "...350 grams or (m)ore of contained U²³⁵ in unsealed form..." It is suggested the word "contained" be deleted because it is confusing to state that the material is "contained" in an "unsealed form".

We appreciate the opportunity to participate in the development process of NRC rules and regulations and hope that our comments are constructive and useful.

If you have any questions or would like to discuss the matter further, please contact me on (919) 675-5461.

Sincerely,

GE NUCLEAR ENERGY



T. Preston Winslow, Manager
Licensing & Nuclear Materials Management

/sbm

cc: TPW-90-009