

DOCKET NUMBER DR 170
PROPOSED RULE FR
(54 FR 49763)

DOCKETED
USNRC

COMBUSTION ENGINEERING

January 25, 1990
LD-90-007

90 FEB -5 P3:32

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
The Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Docketing and Service Branch
Washington, D.C. 20555

Subject: Proposed Rule 10 CFR 170 "Fees for Facilities and Materials Licenses and Other Regulatory Services, Under the Atomic Energy Act of 1954, as Amended" (54FR49763)

Dear Mr. Chilk:

The purpose of this letter is to provide to the Nuclear Regulatory Commission (NRC), Combustion Engineering's position on the proposed revisions to 10 CFR 170 on license fees.

Combustion Engineering has taken the position in the past, and continues to believe, that there is benefit to the public and the NRC in avoiding unnecessary repetitive, plant-specific reviews whenever possible. Combustion Engineering, therefore, favors the proposed ceiling for Topical Report review fees and recommends its adoption.

We also note that Footnote (4) to the Fee Schedule in 170.21 has not been revised to indicate a deferral period of 15 years for a certified design, consistent with the final version of 10 CFR 52. The proposed revisions to 10 CFR 170 provide an opportunity to correct the current inconsistency.

Thank you for the opportunity to provide comment. If the Staff should have any questions, please do not hesitate to contact me or Mr. S. A. Toelle of my staff at (203) 285-5213.

Very truly yours,

COMBUSTION ENGINEERING, INC.



A. E. Scherer
Director
Nuclear Licensing

9002080253 900125
PDR PR
170 54FR49763 PDR

AES:jeb

DS10