

DOCKET NUMBER PR 170
PROPOSED RULE (54 FR 49763)

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BWR OWNERS' GROUP

DOCKETED
USNRC
Stephen D. Floyd, Chairman
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BWROG-9007

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Services Branch

SUBJECT: COMMENTS ON PROPOSED REVISION TO FEE SCHEDULE

The BWR Owners' Group (BWROG) welcomes the opportunity to comment on the NRC's proposal to amend its regulations governing licensing fees.

The BWROG endorses the proposed change that would establish a ceiling of \$50,000 for topical report reviews. The BWROG is involved with numerous activities that require NRC review and approval. While some of these activities are undertaken in response to regulatory requirements, many others are voluntarily originated by the BWROG in order to improve plant safety and performance. Establishing a ceiling on the cost of the NRC review will encourage the BWROG to continue initiating activities with plant safety benefits. The proposed ceiling places a reasonable limit on the cost of reviewing these activities, and knowing the cost in advance enables the BWROG to more effectively plan allocation of its resources.

The BWROG has no comments on the other proposed changes.

Stephen D. Floyd, Chairman
BWR Owners' Group

- cc: G. J. Beck, BWROG Vice Chairman
- D. N. Grace, RRG Chairman
- BWROG Executive Oversight Committee
- BWROG Primary Representatives
- L. S. Gifford, GE
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