



**Pennsylvania Power & Light Company**

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(58 FR 21662)

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MAY 24 1993

Mr. Samuel J. Chilk, Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attn.: Docketing and Service Branch

**SUSQUEHANNA STEAM ELECTRIC STATION  
COMMENTS TO PROPOSED RULEMAKING  
100% FEE RECOVERY, FY 1993  
PLA-3979 FILES R41-2/A17-11**

Docket Nos. 50-387  
and 50-388

Dear Mr. Secretary:

Pennsylvania Power and Light Company (PP&L) is submitting the following comments to the NRC proposed rulemaking titled "FY 1991 and 1992 Proposed Rule Implementing the US Court of Appeals Decision and Revision of Fee Schedules; 100% Fee Recovery, FY 1993" (58FR21662).

- The approximate 7% increase to the professional hour rate (\$123/hr. to \$132/hr.) appears excessive when compared to the current inflation rate. PP&L recognizes that a portion of this increase results from NRC's review pursuant to the Chief Financial Officers Act of 1990 (CFO Act) which resulted in additional professional hours being needed to accomplish some specific tasks. However, we do not believe that it is necessary to increase the total number of FTE's in response to the CFO Act review, but rather utilize alternative personnel management strategies (ie: reduce inspection hours by use of SALP, combining NRC Regions, reducing Research since it's NRC's intent to have industry perform more of this type activity).
- With regard to the cost passthrough concept, PP&L agrees that the ability to passthrough costs should not be a criteria for setting annual fees. The studies required to justify exempting or reducing Licensee annual fees cannot be done accurately or cost efficiently. Also, the burden of paying the fees which are exempted would fall on power reactors which in most cases because of their Public Utility Commission Regulations cannot passthrough these costs.

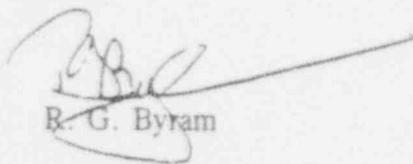
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- With regard to the continued exemption of annual fees for non-profit educational institutions, PP&L supports the Commission's continued exemption for non-profit educational institutions. We feel that the benefit for education outweighs the cost placed on power reactors.
- With regard to LLW, PP&L supports either Alternatives 1 and 2. We agree that alternatives 3 or 4 are not acceptable because of the problems associated with the equitable distribution of the fee to all applicable licensees.

PP&L appreciates the opportunity to comment on this proposed rulemaking.

Very truly yours,



R. G. Byram

cc: NRC Region I  
Mr. R. J. Clark, NRC Sr. Project Manager (OWFN) (w/o)  
Mr. G. S. Barber, NRC Sr. Resident Inspector (SSES) (w/o)