

SOUTH CAROLINA ELECTRIC & GAS COMPANY

POST OFFICE 764

COLUMBIA, SOUTH CAROLINA 29218

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1/13/83

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O. W. DIXON, JR.
VICE PRESIDENT
NUCLEAR OPERATIONS

January 10, 1983

DOCKETING & SERVICE
BRANCH

Mr. Samuel J. Chilk
Secretary of the Commission
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

56

DOCKET NUMBER
PROPOSED RULE PR-170

(47 FR 52454)

Attention: Docketing and Service Branch

Subject: Virgil C. Summer Nuclear Station
Proposed Revision to Part 170
(License Fees)

Dear Mr. Chilk:

South Carolina Electric and Gas Company (SCE&G) has reviewed the proposed revision to 10CFR170, and hereby submits the following comments:

The current method of payment on a "fixed cost" basis puts control of NRC activities (the review process or inspections) in the hands of the NRC. Utilities believe an adequate review or inspection in this case takes place for the specific fee paid. The proposed method basically gives the NRC a "blank check" for all work. The utility pays while the NRC is allowed to do work with no controls. This proposed method is unacceptable unless changes are made to provide feedback of schedule and ongoing costs to the utilities to ensure that the NRC is doing their work efficiently and to provide utility input back into the NRC for cost control.

Under this new method, utilities' budgeting processes will become very difficult. Without having the ability to know in advance a proposed scope, cost and schedule of a review or inspection, and assurance that a review or inspection stays on schedule and within the original scope and cost, no utility can adequately develop an annual budget.

DSIO
add: A. Miller AR-2015
A. Cabell AR-2015

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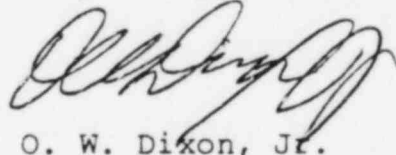
Acknowledged by encl. 1/14/83 emp

Samuel J. Chilk
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As an alternative, SCE&G suggests that either the original method of fee payments be maintained and the NRC revise the specific amounts to meet its financial needs, or that they establish maximum amounts for each activity under the new method.

If you have any questions, please let us know.

Very truly yours,



O. W. Dixon, Jr.

RBC:OWD/fjc

cc: V. C. Summer
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