



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

November 10, 1981

11-10-81

A.M.
B.G.S.

MEMORANDUM FOR: William O. Miller, Chief
License Fee Management Branch
Office of Administration

FROM: Herbert N. Berkow, Chief
Management Analysis Branch
Planning and Program Analysis Staff

SUBJECT: CHANGE TO PROPOSED LICENSE FEE RULE REVISION

Several PPAS members and I met with Jim Holloway and Reba Diggs of your Branch on November 6 to discuss some implementation items associated with the proposed new Fees Rule (SECY-81-615). In discussing the provision for periodic billing and payment of fees (§ 170.12 on pages 34 and 35 of the paper) it became apparent that billing for each amendment, license review, topical report and other activity at six-month intervals from the filing dates would cause us an excessive accounting and tracking burden and probably place a greater than necessary burden on the licensees as well.

Since we have a very large number, probably thousands, of fee-bearing activities in process at any given time, we would have to develop a computerized tracking system keyed on filing date to identify for us all those activities which must be billed during an upcoming week, month or other suitable period. The process of gathering and reviewing data and their billing would be continuous. Licensees with multiple actions in process could receive billings every month.

We suggest as an alternative approach that bills be batched and sent quarterly rather than monthly. For example, half of all licensees would be billed every June 30 and December 31; the remaining half would be billed every March 31 and September 30. This would permit us to operate the system as a batch, rather than a continuous, process, which would save us considerable time and effort. Also, no licensee would get more than two bills per year. Each six-month bill would include all of the licensee's ongoing activities for the period, suitably itemized.

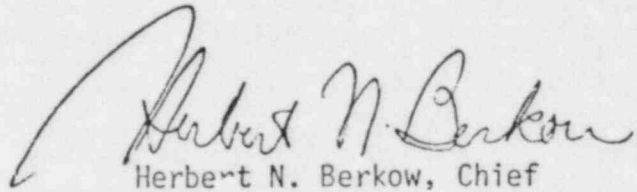
The current proposal in SECY-81-615, § 170.12 states that in addition to the billings at the end of each six-month period, the final installments will be due when the review is completed. This policy could be incorporated into the alternative approach described above or could be deleted, with the final installment made at the next scheduled six-month billing period.

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YA Copy Has Been Sent to PDR

We would appreciate your consideration and prompt response to this proposal. We are available to discuss it further with you if necessary.

A handwritten signature in cursive script, reading "Herbert N. Berkow". The signature is written in dark ink and is positioned above the typed name and title.

Herbert N. Berkow, Chief
Management Analysis Branch
Planning and Program Analysis Staff

cc: H. Thompson
J. Funches
J. Carter
B. Grenier
S. Stern
V. Wilson
J. Holloway
R. Diggs
D. Donoghue