



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

November 5, 1982

Reba M. Diggs
 Facilities Program Coordinator
 License Fee Management Branch
 Office of Administration
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Applicant	Commonwealth Ed.
Check No.	153987
Amount	\$1,200
Date of Check	11/4/82
Date Check Rec'd	11/10/82
Received By	RMF

Subject: LaSalle County Station Unit 1
 License Change Request
 NPF-11/82-9, Fee
NRC Docket No. 50-373

- References (a): Inspection Report 50-373/82-35
 Covering the period May 25-July 11, 1982.
- (b): A. Schwencer letter to L. O. DelGeorge
 dated July 15, 1982.
- (c): C. W. Schroeder letter to A. Schwencer
 dated July 14, 1982.
- (d): C. W. Schroeder letter to A. Schwencer
 dated July 15, 1982.
- (e): Reba M. Diggs letter to L. O. DelGeorge
 dated October 19, 1982.

Dear Ms. Diggs:

Region III of the NRC conducted an intensive investigation of allegations at LaSalle County Station. As stated in their inspection report (Reference (a)), Commonwealth Edison Company, at the request of the NRC, had committed to take certain actions. That portion of the commitment which was to be completed prior to exceeding 5% power was done. Still remaining was a portion to be completed, per our commitment, prior to January 15, 1983. It is noted that this commitment was made in response to a finding in an ongoing inspection by Region III.

As part of the licensing process, NRR had close contact with Region III. In order to provide additional documentation of this commitment, NRR requested by telecon (July 14, 1982) and by letter (Reference (b)) that Commonwealth Edison submit immediately a new condition for license NPF-11. This was accomplished by Reference (c). Reference (d) explained that this change was submitted for the convenience of the Commission, and therefore no fee is required.

MOB

November 5, 1982

Commonwealth Edison Company still strongly believes that fees should not be imposed when, at the request of NRR, documentation of a commitment to Region III is added to our license. Because the costs involved in pursuing a reversal of your position as stated in Reference (e) would be greater than the \$1,200 fee involved, enclosed please find a remittance for \$1,200.00.

Commonwealth Edison Company's policy has always been to cooperate with the NRC in every reasonable request. In the future, however, Commonwealth Edison will not request license changes which simply confirm commitments that have been made and formally documented. Instead, it is our judgment that, if the staff feels additional actions are necessary to assure compliance with documented commitments, the staff should proceed with the more involved actions of:

- a) Confirmatory Action Letters
- b) Confirmatory Orders
- c) Imposed modification of license

Commonwealth Edison regrets that the NRC staff has forced us to take this position, but, under the circumstances we must take actions to reduce unnecessary expenditures on our part that translate into costs to our ratepayers.

If there are any questions in this matter, please contact this office.

Enclosed please find one (1) signed original and thirty-nine (39) copies of this letter.

Very truly yours,

CW Schroeder 10/8/82

C. W. Schroeder
Nuclear Licensing Administrator

lm

cc: Mr. T. M. Novak
Mr. A. Schwencer
Dr. A. Bournia
Mr. J. G. Keppler
NRC Resident Inspector - LSCS
Mr. P. Steptoe, IL&B

5365N

November 10, 1982

NOTE TO: Jeff Bartlett, Document Control Desk (Room 016)
FROM: Reba Diggs, License Fee Management Branch, ADM
SUBJECT: PROCESSING LETTERS WITH CHECKS RECEIVED DIRECTLY BY THE
LICENSE FEE MANAGEMENT BRANCH

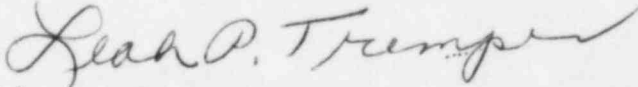
Please process the enclosed letter under the applicable docket and give the following distribution under code M008:

Original of ltr to Regulatory Docket File
Action Cy w/check to W. O. Miller, LFMB (L-233)
3 cys to applicable Branch of DOR or DPM
1 to LPDR
1 to PDR

I am retaining the check and the following information is for your records.

Check No.: 153987
Amount: \$1,200
Date: 11/4/82
Ltr. Date: 11/5/82
Applicant: Commonwealth Edison Company
Docket No: 50-373
Plant: LaSalle

Thanks!


Leah P. Trumper
License Fee Management Branch
Office of Administration