



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

APR 12 1985

MEMORANDUM FOR: Files

THRU: William O. Miller, Chief  
License Fee Management Branch, ADM

FROM: C. James Holloway, Jr., Assistant Chief  
License Fee Management Branch, ADM

SUBJECT: IE-HQ AND REGIONAL OFFICE PROFESSIONAL STAFF HOUR DATA

Part 170 of the Commission's regulations was revised effective June 20, 1984. Section 170.12(b) provides that for each application for which the review charges are based on full costs and the application has been pending with the Commission for six months or longer, the first bill for accumulated costs would be sent to the applicant after the rule became effective. For construction permit applications, the bill would include the professional staff hours and contractual costs expended from the date the application was filed through June 23, 1984. For operating license applications under review, the bill would include professional staff hours and contractual services costs from the date the construction permit was issued through June 23, 1984. The date of June 23, 1984, was used for the end of the reporting period instead of June 20, 1984, the effective date of the rule, because professional staff hours are reported to the Regulatory Information Tracking System (RITS) on a weekly basis and can be pulled from the computer only in weekly increments.

In order to complete the initial billings required by 170.12(b), a detailed analysis and review was performed of professional staff hour computer data provided by IE-HQ and the Regional Offices relating to 55 cases (Enclosure 1) undergoing review. The data provided to LFMB was used in the initial fee billings. Specifically, the activity codes used by the professional staff in IE-HQ and the Regions to charge hours to the specific dockets were reviewed. In each of the cases, a determination was made as to whether the hours shown in the computer report should be included or excluded from license fee recovery for the period through June 23, 1984. Those activity codes which were included for license fee recovery are listed in Enclosure 2. Activity codes which were excluded from fee recovery are shown in Enclosure 3. The activity codes included for and excluded from license fee recovery will change for those inspections conducted on or after June 24, 1984. A separate

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memorandum to files was written for each individual case showing the professional staff hours and contractual services costs expended by IE-HQ and the Regional Offices for the various activity codes.

A review of the activity codes in Enclosure 2 shows that only the professional staff hours through June 23, 1984, relating to the routine inspection program have been included for fee recovery. When the March 23, 1978, fee schedule became effective, the NRC assessed fees for the first time for routine inspections only. For fee purposes, construction appraisal team (CAT) inspections, integrated design inspections (IDI), emergency preparedness (EP) inspections, allegations, performance appraisal team (PAT) inspections and systematic appraisal of licensee performance (SALP) were not considered routine inspections and thus were outside the scope of fee recovery. In fact, the Commission indicated on page 52461 (170.3 Definitions) of the Proposed Notice of Rulemaking, dated November 22, 1982 (effective June 20, 1984) that "Inspections include . . . non-routine inspections such as reactive inspections, investigations, incident/accident response, performance appraisal inspections, enforcement activities, special emergency preparedness inspections and systematic appraisal of licensee performance." It was the intent when the March 23, 1978, fee schedule was developed that CAT, PAT, IDI, and EP inspections, allegations, and SALP were clearly outside the scope of the routine inspection program and would not be recovered through inspection fees. This matter was discussed on September 18, 1984, with the Director and Deputy Director, ADM, and it was agreed that in determining the costs to be assessed for those reactors undergoing operating license review under the fee schedule effective June 20, 1984, any costs relating to the types of inspections mentioned above would not be included in the license fees assessed for the period through June 23, 1984. The costs for those kinds of inspections conducted on or after June 24, 1984, for CP or OL applications under review could be recovered since the revised fee schedule permits recovery of costs for both routine and non-routine inspections.

Signed, B. James Holloway, Jr.

C. James Holloway, Jr., Assistant Chief  
License Fee Management Branch  
Office of Administration

Enclosures:  
As stated

APPROVED:

Original Signed by  
Wm. O. Miller

William O. Miller, Chief  
License Fee Management Branch

DISTRIBUTION:

- Actual Manpower File (each case in Encl. 1)
- RMDiggs w/encls.
- CJHolloway w/encls.
- DWeiss w/encls.
- WOMiller w/encls.
- LFMB R/F

OFFICE ▶	LFMB:ADM	LFMB:ADM				
IRNAME ▶	CJHolloway:jp	WOMiller				
DATE ▶	4/11/85	4/11/85				

Inspection and Enforcement and Regional Office  
Construction Permit and Operating License Reviews

1. Beaver Valley 2
2. Bellefonte 1
3. Bellefonte 2
4. Braidwood 1
5. Braidwood 2
6. Byron 1
7. Byron 2
8. Callaway 1
9. Catawba 1
10. Catawba 2
11. Clinch River
12. Clinton 1
13. Comanche Peak 1
14. Comanche Peak 2
15. Diablo Canyon 1
16. Diablo Canyon 2
17. Fermi 2
18. Grand Gulf 1
19. Grand Gulf 2
20. Harris 1
21. Harris 2
22. Hope Creek 1
23. Limerick 1
24. Limerick 2
25. Marble Hill 1
26. Marble Hill 2
27. Midland 1
28. Midland 2
29. Millstone 3
30. Nine Mile Point 2
31. Palo Verde 1
32. Palo Verde 2
33. Palo Verde 3
34. Perry 1
35. Perry 2
36. River Bend 1
37. River Bend 2
38. Seabrook 1
39. Seabrook 2
40. Shoreham
41. Skagit/Hanford 1
42. Skagit/Hanford 2
43. South Texas 1
44. South Texas 2
45. Susquehanna 2
46. Vogtle 1
47. Vogtle 2
48. Waterford 3
49. Watts Bar 1
50. Watts Bar 2
51. WNP-1
52. WNP-2
53. WNP-3
54. Wolf Creek 1
55. Zimmer

INSPECTION AND ENFORCEMENT AND REGIONAL OFFICE  
CONSTRUCTION PERMIT AND OPERATING LICENSE REVIEWS

Activity Codes Included For License Fee Recovery Through 6/23/84

Routine Inspection Program - The routine inspection program consists of scheduled inspection activity.

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
1TA	Off-site routine safety inspection effort
1TO	All other routine safety inspection effort
1TV	Preparation for routine safety inspection
1TW	On-site routine safety inspection effort
1TX	In-office routine safety inspection effort
1TY	Preparation for routine safety inspection report writing
1TZ	Routine safety inspection report writing
2TA	Off-site routine environment inspection
2TO	All other routine environmental inspection effort
2TW	On-site routine environmental inspection effort
2TX	In-office routine environmental inspection effort
3TA	Off-site routine safeguards inspection effort <sup>1/</sup>
3TO	Routine safeguards inspection effort <sup>1/</sup>
3TW	On-site routine safeguards inspection effort <sup>1/</sup>
3TX	In-office routine safeguards inspection effort <sup>1/</sup>

<sup>1/</sup> Included for operating license fee recovery since professional staff effort was expended on or after 3/23/78, the date of the revised rule permitting the recovery of safeguards costs.

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
APD	Routine documentation
API	Routine on-site/off-site inspection
APP	Routine inspection preparation
DOC	Routine documentation
PAP	Routine preparation
PP1	Routine inspection
<u>Other Activities Included For Fee Recovery</u>	
BC	Emergency Preparedness licensing review
JH	Quality Assurance Reviews <sup>2/</sup>
J90	Review comment and assistance to licensing
LEP	Licensing-emergency preparedness
LOA	Licensing other activities
LRA	Licensing reactor activities
N5S	Part 50-security plans
OLA	Operator Licensing Activities
PFE	Power facility initial exam
PSA	Performing security activities
PSR	Licensing action - power reactor, plant specific
QAT	Quality Assurance reviews <sup>2/</sup>
110	Safety CP activities

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<sup>2/</sup> Included for operating license fee recovery if review was of Chapter 17 of the FSAR and not a topical report review.

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
131	Power facility initial exams
135	Training Program Review relating to initial operator exams
140	Safety review of partial power application
Operator Licensing	Initial hot and cold operator exams

INSPECTION AND ENFORCEMENT AND REGIONAL OFFICE  
CONSTRUCTION PERMIT AND OPERATING LICENSE REVIEWSActivity Codes Excluded From License Fee Recovery Through 6/23/84

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
A1K1	Program development and other support
AEP	Inspection program management and administration
AFE	Allegation follow-up effort
AFI	Freedom of information
ALR	ACRS operating license review (reported separately)
ANT	Non-technical training
AOA	Other administrative
APA	Monitor case review
APL	ACRS Monitor Case Progress (reported separately)
ARD	Reactive documentation
ARI	Reactive on-site/off-site inspection
ARP	Reactive inspection preparation
AS1	Inspector support to other offices
AST	Inspector support to other offices
AT	Travel - inspection related
ATV	Travel
BA1	Normal enforcement activities
BA2	Escalated enforcement activities
BB	Systematic assessment licensee performance (SALP)
BD1	Emergency response support activities
BD2	Response to events/incidents

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
BE	Technical support for investigations
BF	Laboratory technician activities
BG	Contract monitorship
BH	Quality Assurance Reviews <sup>1/</sup>
BJ	Allegation follow-up
B00	Training
BR1	Reactive preparation
BTA	Off-site inspection training effort
BTW	On-site inspection training effort
BZX	In-office regional training
C00	Travel
C01	Docket Travel
C0T	Code unknown
D00	Professional meetings
DPP	Program development, coordination and assessment
DR1	Reactive documentation
EPG	Emergency response support
EPI	Emergency preparedness inspection
EVA	Event analysis
EVC	Event correspondence

<sup>1/</sup> Excluded from fee recovery since reviews covered by a topical report.



<u>Activity Codes</u>	<u>Description of Activity Codes</u>
HLE	Escalated enforcement
HOO	Absence
JAC	Assist NRR - caseload forecasting
JAO	Commission Information Requests
JMO	Management supervision
JNK	Principal correspondence
JNO	Management assistance
JNP	Management - information systems
JNR	Planning/forecasting
JOL	Budget
JOM	Administrative support
JOO	Indirect and overhead
JQO	Clerical support
J-80	Overhead review, comment, assistance to operations
LKB	FOIA - document search
LKM	FOIA - other related activities
NMS	NHSS related activity
OMD	Office management direction
PAA	Administrative support
PB1	Providing public information
PC1	Providing Congressional information
PDA	Program development and appraisal
PE1	Enforcement

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
PIS	Performing information systems support activities
P1V	Investigation
PPII	Performing personnel management activities
PPS	Performing special studies
PPT	Providing & preparing for testimony
PR1	Reactive on-site/off-site inspection
PRM	Petitions for rulemaking
PRS	Administrative support to other NRC offices
PTG	Support to IE HQ & other regional offices
PTP	Program third party
QAT	Quality assurance topical report
RAH	Regional assessment HQ
R1I4	Respond to inquiries
RT1	Incident/accident response
RPE	Regional office professional effort
SLP	Systematic assessment of licensee performance (SALP)
SRO	Support to regional offices
SR1	Site public relations
SSS	Support of special studies
STA	Support for technical assistance
STF	Support for problem facility
1CA	Inspection construction appraisal
1D1	Integrated design inspection

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
1DV	Independent design verification
1MO	Technical report review - standards
1NF	INPO follow-up
1OR	Inspection - other
1OU	Safety - review of operating experiences
1PA	Inspection performance appraisal
1UA	Off-site safety investigation effort
1UO	Safety investigations
1UW	On-site safety investigation effort
1UX	In-office safety investigation effort
1VO	Safety inquiry activities
1WO	Safety enforcement
1YO	Safety specification technical studies
2VO	Environmental inquiry activities
3UX	In-office safeguards investigation effort
3UW	On-site safeguards investigation effort
4UZ	Part 21 request, review, and evaluation
4WO	Part 21 - enforcement action
7VO	Agreement state & non licensee inquiry activities
100	Safety activities not case related
115	Safety CP hearings
125	OL safety hearings
134	Certification exams

<u>Activity Codes</u>	<u>Description of Activity Codes</u>
1321	Power facility replacement exam
1322	Power facility requalification exam
200	Environmental activities not case related
215	Environmental CP hearings
3TA	Off-site routine safeguards inspection effort <sup>2/</sup>
3TO	Routine safeguards inspection effort <sup>2/</sup>
3TW	On-site routine safeguards inspection effort <sup>2/</sup>
3TX	In-office routine safeguards inspection effort <sup>2/</sup>
No name No act. code Unidentified time	Professional staff hours had either no name or no activity code listed in the computer printout so it was excluded from licensee fees.

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<sup>2/</sup> Excluded from fee recovery since professional staff effort was expended before 3/23/78.

# INVOICE FOR SERVICES AND MATERIALS

UNITED STATES NUCLEAR REGULATORY COMMISSION  
OFFICE OF CONTROLLER  
WASHINGTON, D. C. 20555

To: Pacific Gas & Electric Company  
ATTN: Mr. Malcolm H. Furbush  
Vice President - General Counsel  
P.O. Box 7442  
77 Beale Street - 31st Floor  
San Francisco, CA 94106

Date: August 20, 1981

F. O. B.:

Terms:

Net 30 Days

ACCESS PERMIT NO.

LICENSE NO.

PURCHASE ORDER

DPR-76

QUANTITY		DESCRIPTION OF SERVICES AND MATERIALS	UNIT PRICE	AMOUNT
ORDERED	SHIPPED			
		Operating License Fee - Diablo Canyon, Unit 1		\$1,024,500
		NOTE: The Commission amended 10 CFR 170 of its regulations effective March 23, 1978. The unit listed above is subject to the revised regulations as shown in Section 170.21(a)A.1. In accordance with Footnote 3 of 10 CFR 170.21, the Commission will determine the expenditures for professional manpower and appropriate contractual services expended for the review after the review has been completed. If the review cost is less than that shown on this invoice, a refund will be made by the Commission. If the cost of the review exceeds the amount of this invoice, no additional charges will be made since the regulations provide that in no event will the fee exceed that shown in the schedule of facility fees.		
			AMOUNT DUE	\$1,024,500

MAKE CHECK PAYABLE TO U. S. NUCLEAR REGULATORY COMMISSION AND MAIL TO ABOVE ADDRESS

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