



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

LFMB: 83-103

Reba Diggs

March 18, 1983

Mr. William O. Miller, Chief
License Fee Management Branch
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Zion Station Units 1 and 2
Fees for Amendment Nos. 65
and 62 to License Nos. DPR-39
and DPR-48
NRC Docket Nos. 50-295 and 50-304

- References (a): April 10, 1980, letter from D. G. Eisenhut to All Power Reactor Licensees.
- (b): May 23, 1980, letter from D. L. Peoples to H. R. Denton.
- (c): June 11, 1980, letter from D. G. Eisenhut to All Operating PWR's.
- (d): November 7, 1980, letter from T. R. Tramm to H. R. Denton.
- (e): June 22, 1981, letter from S. A. Varga to J. S. Abel.
- (f): December 29, 1982, letter from R. M. Diggs to L. O. DelGeorge.
- (g): March 4, 1983, letter from W. O. Miller to L. O. DelGeorge.

Dear Mr. Miller:

Your letters of references (f) and (g) informed Commonwealth Edison that an additional sum of \$2,800 was due for processing of the subject Amendment. The following discussion is provided in response to your request for the additional remittance.

In issuing the subject Amendment (see reference (e)), the NRC consolidated two previous applications by Commonwealth Edison (references (b) and (d)). A fee remittance of \$1,600 was submitted with each of those applications. The two applications were submitted in response to NRC requests of references (a) and (c), which provided model technical

M008

8303280062 830318
PDR ADOCK 05000295
P PDR

specifications. In the letter of issuance of reference (e), the NRC stated that the technical specifications submitted by Commonwealth Edison were consistent with the model technical specifications, and were, therefore, acceptable.

We have reviewed the technical specifications submitted by Commonwealth Edison in references (b) and (d) against the model technical specifications contained in references (a) and (c). Our submittals provided virtually the same words as the model technical specifications, plus some additional wording necessary to maintain provisions of the existing Zion technical specifications not included in the NRC's Standard Technical Specifications. The following are examples of minor changes and additions that were made to the model technical specifications:

Decay Heat Removal

1. Added requirements for startup of an unisolated coolant loop, to maintain a provision of the existing Zion technical specifications.
2. Replaced footnote from model technical specifications on overpressure protection with a reference to existing Zion technical specifications containing corresponding provisions.

Operable

1. As a result of a conference call with members of the NRC staff on May 22, 1980 (prior to our submittal), words were added to the model technical specification definition of "operable" to clarify the NRC's intent regarding instrument buses.
2. Zion's definitions of Operational Modes were changed to more closely correspond to those of the Standard Technical Specifications.

In view of the fact that we provided technical specifications essentially unchanged from the NRC's model technical specifications, we find it difficult to understand the Division of Licensing's determination that the review was more than administrative or pro forma in nature, or that the staff's actual costs exceeded the \$3,200 provided.

We note with interest that the Commission's Proposed Revision of License Fee Schedules published November 22, 1982, calls for the assessment of a fee of \$150 or actual costs, whichever is greater, for such an Amendment. (We would expect that under the proposed fee schedule most administrative or pro forma changes would be assessed a fee of \$150, rather than the \$1,600 presently assessed for a two-unit plant.) The Proposed Revision also calls for providing the licensee with an itemized bill of actual costs. We regard this as a significant improvement in the fee assessment process.

March 18, 1983

Therefore, regarding the subject Amendment, Commonwealth Edison respectfully requests an itemized bill of actual costs, so that we might better understand the nature and extent of the NRC's review. Upon receipt of such information, we would be happy to discuss this matter further, and to provide any additional remittance deemed necessary following that discussion.

Please address further questions regarding this matter to this office.

Very truly yours,

F. G. Lentine

F. G. Lentine
Nuclear Licensing Administrator

lm

6225N

FROM: Commonwealth Edison Co. P.O. Box 767 Chicago, Ill 60690 (F.G. Lentini)		DATE OF DOCUMENT 3/18/83	DATE RECEIVED 3/24/83	NO. LFMB:83-103
TO: William O. Miller, LFMB		LTR X	MEMO	REPORT:
CLASSIF.: U		POST OFFICE	REG. NO.	
DESCRIPTION: (Must Be Unclassified)		ACTION NECESSARY <input checked="" type="checkbox"/> NO ACTION NECESSARY <input type="checkbox"/>		
ENCLOSURES		CONCURRENCE <input type="checkbox"/> COMMENT <input type="checkbox"/> DATE ANSWERED: BY:		
Ltr. providing reasons for not paying additional fees requested pursuant to 10 CFR 170 for 11/7/80 application re Zion which was requested by LFMB in letter 12/29/82.		FILE CODE: 5-295		
		Docket Nos. 50-295 and -304		
		REFERRED TO	DATE	RECEIVED BY
		Jeff Bartlett	3/24	
		w/original for processing thru mail sys. w/M008 type of distribution.		
		Reba Diggs	3/24	
		w/cy for action		
REMARKS: Cy to LFMB Reactor File f/record				