



Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420
USNRC

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OFFICE OF SECRETARY
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CASE NUMBER PR 1702171
(59FR 24065)

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Services Branch

SUBJECT: Revision of Fee Schedules; 100% Fee Recovery, FY 1994
59 Fed. Reg. 24065 - May 10, 1994
Request for Comments

On May 10, 1994, (59 FR 24065), the Nuclear Regulatory Commission (NRC) published for public comment a proposed rule titled "Revision of Fee Schedules; 100% Fee Recovery, FY 1994." Florida Power and Light Company (FPL), as the licensed operator of two nuclear power plant units in Dade County, Florida and two nuclear power plant units in St. Lucie County, Florida, submits the following comments regarding the subject Federal Register Notice.

The authority granted the NRC to pass on 100% of its operating costs to licensees and, ultimately rate payers and consumers, carries with it the responsibility to demonstrate to the public that the funds collected are appropriately spent. FPL believes the NRC should be held accountable for their expenditures and that the public has the right to comment on the variances between expenditures and budgeted costs at the program element level.

The NRC is proposing a request for payment for costs that are not clearly identified in the proposed rule. Power reactors will be assessed the majority of these unidentified costs. Additionally, the NRC is requesting payment for fees not collected from what the NRC classifies as a "small entity" or "lower tier small entity." Power reactors will be assessed the majority of this fee also. This proposed rule results in a surcharge of \$1.1 million for FPL.

The NRC should provide a detailed list of its expenditures if they expect power reactors to pick up the costs. Additionally, power reactors should not be required to subsidize fees from "small entity" or "lower tier small entity" industries.

an FPL Group company

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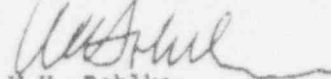
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As generation costs for nuclear power plants rise, more and more nuclear utilities are initiating efforts to improve cost effectiveness. We are aware that the NRC is also working to reduce its costs and expect that these efforts will result in effective budget reductions in the future.

FPL appreciates the opportunity to comment on this proposed rule.

Very truly yours,



W.H. Bohlke
Vice President
Nuclear Engineering and Licensing

WHB/spt