

June 6, 1994

22

Mr. Samuel Chilk, Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

DOCKET NUMBER
PROPOSED RULE PR 1708-171
(59 FR 24065)

DOCKETED
USNRC



POWER
RESOURCES

'94 JUN 10 P4:13

ATTN: Docketing and Service Branch

RE: Proposed Revisions of Fee Schedules

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Dear Mr. Chilk,

Power Resources, Inc. (PRI) submits these comments in response to the Nuclear Regulatory Commission's (NRC) proposed rule to amend licensing, inspection and annual fees charged to licensees for fiscal year (FY) 1994. PRI operates the Highland Uranium Project which recovers uranium utilizing the in situ mining technique and possesses an NRC Source Material License authorizing operation of the facility.

NRC proposes to increase the annual fees charged to Class II facilities from \$25,400 to \$41,200 which represents approximately 16% of the FY 1994 uranium recovery budget allocation and a 60% increase over the FY 1993 annual fee. PRI believes that this increase represents a disproportionate allocation since the FY 1994 budget allocation for uranium recovery decreased approximately 25% from FY 1993. Based upon the figures provided in the proposed rule, PRI sees no technical justification for increasing the fees for the uranium recovery group of licensees at all.

NRC proposes to increase the hourly charge for regulatory services from \$132 per hour to \$133 per hour. PRI is appreciative that NRC does not intend to make the types of increases they have in the past. However, as we have stated in the past, the hourly rate being charged is excessive and greatly exceeds the generally accepted rates for similar types of services in private industry. PRI believes that these hourly rates are unwarranted.

PRI supports NRC's proposal to assess DOE fees to cover NRC's costs in the UMTRCA program. PRI suggests that the DOE should also pay, through user fees, for NRC's costs related to DOE's high level waste activities at Yucca Mountain.

PRI appreciates the opportunity to comment on this proposed rule.

Sincerely,

P.R. Hildenbrand
Manager of Environmental
and Regulatory Affairs

Highland Uranium Project
Post Office Box 1210
Glenrock, Wyoming 82637

Fax: 307-358-4533
Casper: 307-235-1628
Douglas: 307-358-6541

PRH/ksj

cc: P.G. Cooper
S.P. Morzenti

L.C. McGonagle
W.F. Kearney

9406150008 940606
PDR PR
170 59FR24065 PDR

1510