



Wisconsin Electric POWER COMPANY

231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

VPNPD-86-049

NRC-86-011

January 31, 1986

CERTIFIED MAIL

Mr. William O. Miller, Chief
License Fee Management Branch
Office of Administration
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. Miller:

DOCKET NOS. 50-266 AND 50-301
INVOICES FOR INSPECTION FEES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

We have received invoices numbered 0712W and 0713W for inspection fees for the Point Beach Nuclear Plant during the period from March 21, 1985 to June 22, 1985. In comparing the inspection man-hours listed in the printout provided with these invoices against the respective inspection reports, we have noted several discrepancies involving the number of man-hours charged to specific inspections. Details of these discrepancies are discussed below.

The attachment to Invoice 0712W for Point Beach Unit 1 shows an inspection fee of \$5,300 for Inspection Report No. 50-266/84-09. We have reviewed this inspection report which was provided with Mr. Keppler's letter dated December 12, 1984. Please note that this report is not, in fact, an inspection report but the SALP Board Report for Point Beach covering the period from April 1, 1983 through September 30, 1984. There are no inspector man-hours

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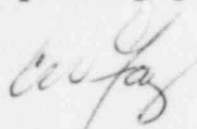
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attributed to this report. The report is also outside the period covered by this invoice period. In addition, the majority of that SALP period was prior to the June 20, 1984 effective date of the current fee schedule. For the above reasons, we believe the charge of \$5,300 for the report is in error and should be rescinded.

We have also compared the number of man-hours invoiced against the inspector man-hours listed in the respective reports. A comparison of these man-hours is provided in Attachment 1. These figures demonstrate that the invoices for this inspection period have overcharged the inspection manpower by 66 man-hours. This equates to \$3,498 at the 10 CFR 170 man-hour rate proscribed for the Office of Inspection and Enforcement. Please note that we have not contested the man-hours listed either for inspection preparation or documentation in disputing these invoiced fees. We do question, however, what appears to be an excessive charge for documentation of Inspection Report Nos. 50-266/85-08 and 50-301/85-08 in that the documentation man-hours are over twice the man-hours spent on the inspection.

We have enclosed herewith a check in the amount of \$80,083 for payment of invoices 0712W and 0713W. This represents the total of the two invoiced amounts minus the fees contested in this letter. Pursuant to 10 CFR 15.31 and 10 CFR 170.51, we request your review of these contested fees.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Enclosures (Check No. 889772)

Copy to NRC Resident Inspector

Attachment 1

<u>Inspection Report Nos.</u> <u>Unit 1/Unit 2</u>	<u>Inspection Report</u> <u>Transmittal Date</u>	<u>Inspector Man-Hours</u> <u>From Report</u>	<u>Man-Hours Listed in Invoices</u> <u>0712W + 0713W = Total</u>
85-03/85-03	April 5, 1985	274	162 + 145 = 307
85-04/85-04	June 11, 1985	436	327 + 153 = 480
85-05/85-05	May 22, 1985	134	33.5 + 33.5 = 67
85-06/85-06	April 24, 1985	10	10 + 10 = 20
85-07/85-07	May 8, 1985	78	45 + 83 = 128
85-08/85-08	June 18, 1985	30	13 + 13 = 26
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	TOTALS	962	1,028