

# PUBLIC SUBMISSION

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**Docket:** NRC-2022-0046

Revision of Fee Schedules: Fee Recovery for Fiscal Year 2024

**Comment On:** NRC-2022-0046-0001

Fee Schedules; Fee Recovery for Fiscal Year 2024

**Document:** NRC-2022-0046-DRAFT-0002

Comment on FR Doc # 2024-03231

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## Submitter Information

**Email:** mike\_callahan@govstrat.com

**Organization:** Decommissioning Plant Coalition

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## General Comment

See attached file(s) from the Decommissioning Plant Coalition

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## Attachments

Fee Rule 3-13-24



11803 Wayland Street  
Oakton, VA, 22124  
January 15, 2024

Secretary, U.S. Nuclear Regulatory Commission,  
Washington, DC 20555-0001,  
ATTN: Rulemakings and Adjudications Staff  
RE: Docket ID NRC-2022-0046

The Decommissioning Plant Coalition is providing comments requested by 89 FR 12759 regarding NRC's proposal to amend the licensing, inspection, special project, and annual fees charged to its applicants and licensees.

The DPC believes the increase in annual and professional charges proposed for Spent Fuel Storage/Reactor Decommissioning of 26.4%, and an increase of 117% since 2019, is systemically unsustainable.

The proposed professional charge of \$321/hour also indicate a systemic flaw that will be increasingly problematic for both the regulated community and the NRC.

We do not fault the mechanics of the staff's development of this year's fee schedule. The fee schedule reflects some serious fundamental flaws in the way the Commission, the Administration, and the Congress are budgeting and funding the Agency.

All our sites no longer produce electricity and the assumption that we will recover costs from the DOE via litigation or settlement(s) is one that ignores the costs that are not allowed for recovery. That cost is the erosion of the recovery due to the time value of money. Others do not receive full recovery of costs. Costs associated with the recovery process are not included.

Since the utilities are precluded from charging the Federal Government the appropriate interest for costs incurred several years in advance of recovery we are impacted by real escalation and inflation.

This will be exacerbated in the future as NRC fees continue to escalate.

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Oakton, VA 22124  
703.716.4846

We ask that the NRC undertake serious discussions internally, and then with the Congress and the Office of Management and Budget, to seek long-term solutions to the dramatic and unsustainable increases in our members' fees.

Sincerely,

A handwritten signature in black ink, appearing to read 'Wayne Norton', with a long horizontal flourish extending to the right.

Wayne Norton,  
President, Maine Yankee  
President and CEO, Yankee Rowe and Connecticut Yankee  
On Behalf of the Decommissioning Plant Coalition