

October 11, 1985

Docket Nos. 50-329/330

Mr. Walter Bird
Midland Project
Consumers Power Company
1945 West Parnall
Jackson, Michigan 49201

Dear Mr. Bird:

Consistent with our telephone conversation of today, enclosed is a copy of the April 9, 1984 memorandum from C. James Holloway which discusses the Regional and Inspection and Enforcement activity codes included and excluded from operating license reviews. We hope this satisfies your needs.

Sincerely,

Original Signed by:
Reba M. Diggs

Reba M. Diggs
Facilities Program Coordinator
License Fee Management Staff
Office of Administration

Enclosure:
Memo dtd 4/9/84

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Walker Bird
Advisory Project

APR 09 1984

MEMORANDUM FOR: Files
THRU: William O. Miller, Chief, License Fee Management Branch, ADM
FROM: C. James Holloway, Jr., Assistant Chief, License Fee Management Branch, ADM
SUBJECT: PROFESSIONAL STAFF HOUR DATA

I recently completed a detailed analysis and review of IE computer data provided by the regions and IE headquarters relating to the issuance of four operating licenses (McGuire 2, San Onofre 3, St. Lucie 2 and Summer 1). In three of the four cases the data to be reviewed covered a ten-year period. Specifically, the activity codes used by the professional staff in the regions and headquarters to charge hours to the four specific dockets were reviewed. In each of the cases, a determination was made as to whether the hours shown in the computer reports should be included in the operating license fee assessed or excluded from fee recovery under the March 23, 1978 license fee schedule. The activity codes for the four cases are listed below and are identified as included for license fee recovery or excluded from license fees.

Operating License Reviews

Activity Codes Included For License Fees - Docket/Case Specific Activities

Routine Program - The routine program consists of scheduled inspection activity.

- 1TA Off-site safety inspection effort
- 1TO All other safety inspection effort
- 1TV Preparation for safety inspection
- 1TW On-site safety inspection effort
- 1TX In-office safety inspection effort
- 1TZ Safety inspection report writing
- 2TO All other environmental inspection effort
- 2TW On-site environmental inspection effort
- 2TX In-office environmental inspection effort

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3TO	Safeguards ^{1/} inspection effort
3UX	In-office safeguards ^{1/} inspection effort
PAP	Routine preparation
PP1	Routine inspection
DOC	Routine documentation

Other

J-90	Review, comment and assistance to licensing
113	Safety review of CP application

Activity Codes Excluded From License Fees

Reactive Program - The reactive program consists of work generated because of an unforeseen event or allegation. This effort includes inspections, investigations, response to incidents/accidents and enforcement activities (Docket-case specific).

1UA	Off-site safety investigation
1UO	Safety investigation
1UW	On-site safety investigation
1UX	In-office safety investigation
BR1	Reactive preparation
PR1	Performing Reactive inspection
P1V	Performing investigation
RT1	Incident/Accident response
PE1	Enforcement
DR1	Reactive Documentation

1/

Eligible for fee recovery if professional staff effort expended on or after 3/23/78.

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Exclusions (cont'd)

Other Docket Related Activities

- 115 Construction Permit Public Hearing 2/
- 125 Operating License Public Hearing 2/
- SR1 Site Public Relations - Does not include any routine or reactive inspection/investigation work.
- CO1 Travel time charged to a specific docket.

Other Activities

- 1V0 Safety inquiry activities
- 100 Safety - not case related
- 170 Assist Regulatory Standards
- 4UZ Part 21 report review and evaluation - effort expended on the review and evaluation of Part 21 reports.
- 4WP Follow-up actions on Part 21 reports.
- AEP Inspection Program Management and Administration - Effort directed toward planning, monitoring and organizing inspection activity at a licensee's facility. Includes scheduling, planning, and structuring of an inspection plan and information exchange necessary to support the inspection program implementation.
- AST Support to organizations outside IE - Time spent by inspectors to assist other organizations in the resolution of problems or the conduct of special studies/activities.
- B00 Training - All time spent training (conducting and receiving) both technical and non-technical. Includes on-the-job training only if effort spent does not result in a direct contribution to completion of the program of inspection at the licensee facility.

2/ Not eligible for fee recovery since hearing was contested.

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Exclusions (cont'd)

- BTA Off-site training effort
- BTW On-site training effort
- COO Travel not related to a specific docket.
- DOO Professional meetings
- DPP Program Development, Coordination and Assessment - Effort directed to develop, modify and evaluate the inspection program; conducting inspection program evaluations, assessments and appraisals.
- JMO Management Direction - Time spent by Directors, Deputies, Assistant Directors in HQ, Division Directors, Executive Officers and Branch Chiefs in the general conduct of office management.
- JOO Indirect and Overhead
- JQO Clerical Support
- PAA Administrative - All time necessary to support office operations and work flow, e.g., xeroxing, MPS forms, reading mail, attending general meetings, etc.
- PB1 Providing Public Information - Effort expended on all types of activities involving dissemination of information to the public other than in response to FOIA requests.
- PC1 Providing Congressional Information - Effort expended on all types of activities involving the Congress such as preparation of testimony and responding to Congressional requests and inquiries.
- PPS Performing Special Studies - Effort expended on non-routine studies and analyses requested by Congress or by top management.
- PPT Providing/Preparing For Testimony - All activities centering on the preparation and provision of official testimony excluding Congressional (under PC1).
- PRS Providing NRC regionalization support - effort expended on all type of support for personnel of other NRC offices under the NRC regionalization program.

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Exclusions (cont'd)

PTG

Support to IE Office or Other Regional Office - Time spent by inspectors assisting IE or another regional office in inspection program development or in special projects.

RIN

Responding to inquiries - effort expended on all activities pertaining to inquiries.

The above codes are only the ones used for the four operating license cases which I reviewed. They do not represent all of the IE codes in the professional manpower system.

Signed, B. James Holloway, Jr.

C. James Holloway, Jr., Assistant Chief
License Fee Management Branch
Office of Administration

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License Fee File

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