

April 5, 2000
Our 124th Year!

DOCK **TORRANCE**
US/RC

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Secretary of the U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
ATTN: Docketing and Services Branch

OFFICE
FILE
ADMIN

SUBJECT: NRC'S PROPOSED FY2000 FEE RULE

DOCKET NUMBER
PROPOSED RULE 170-171
(65FR 16250)

Dear Sir or Madam Secretary:

Our company has a materials license which is in the annual fee category 3P of 10 CFR 171.16. In past years, rather than being charged a fee for this category, we have qualified as a small manufacturing firm which has resulted in a substantially lower fee. For example, in 1999 the fee category 3P equaled \$2,600. As a result of the fact that we are small manufacturer, we were charged only \$1,800.

I'm shocked at this year's proposed fee which shows an increase for the small manufacturers from \$1,800 to \$2,300 or 25%, whereas category 3P remains the same at \$2,600.

I fail to see the logic in this for two reasons:

First, small companies are OBVIOUSLY impacted much more greatly by these fees than large companies. Therefore, why punish them in this fashion?

Second, the reasoning the NRC has given for this large increase is the fact that the number of people holding licenses is decreasing, and therefore the annual receipts for the NRC are also decreasing. As a result, those left holding licenses are forced to pay more.

It must be nice to be able to run your agency in this fashion. In the real world, when businesses are faced with a reduction in sales, they are forced to cut back on their budget in order to hold their costs in line. They don't have the luxury of increasing their prices to their customers in order to maintain their budgetary requirements.

The obvious answer to this situation is simply a reduction in the budgetary requirements of the NRC. This requires cutbacks in personnel, supplies, materials and other overhead areas in order to accomplish this.

2—Letter to Secretary of the U.S. Nuclear Regulatory Commission, 4-5-00

If we take the NRC's logic and extend it out, you'll find that pretty soon there will be one company left in the country holding a materials license, and as a result they will be forced to pay an unbelievable fee in order to maintain the budget of the NRC. Ridiculous, isn't it?

I really don't expect anything to come from this letter as it is obvious that our small company has no recourse in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "William A. Torrance". The signature is fluid and cursive, with a long horizontal stroke at the end.

William A. Torrance
President

WAT:sk

cc: Senator Russ Feingold
Senator Herb Kohl
Representative Ron Kind