Document # 12

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February 19, 1999

SECY-99-053

FOR: The Commissioners

FROM: Jesse L. Funches
Chief Financial Officer

SUBJECT: FY 1999 FEE RULE

PURPOSE: To seek a Commission decision on whether to rebaseline the FY 1999 annual fees, to inform the Commission of the FY 1999 hourly rates, and to provide the Commission with the schedule necessary to meet the 100 percent fee recovery requirement.

DISCUSSION: In SECY-98-260, "FY 1999 Fee Rulemaking," I presented several policy issues to the Commission for its consideration. In a Staff Requirements Memorandum dated February 2, 1999, the Commission provided the necessary policy guidance. It also directed my office to calculate, based on that guidance, preliminary annual fee amounts which would assist the Commission in determining whether to rebaseline the FY 1999 annual fees or establish the annual fees by the percent change method. This paper provides the Commission with the preliminary FY 1999 annual fees and discusses the merits of the options available to the Commission and the associated litigative risks.

The Office of the Chief Financial Officer needs prompt guidance from the Commission on the method to use to establish the FY 1999 annual fees in order for the agency to meet its statutory obligation to collect approximately 100 percent of its budget authority by September 30, 1999. A proposed schedule that would permit the agency to meet that deadline is set forth as Attachment 1 to this paper.

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I indicated in SECY-98-260 that we planned to hold a public meeting after publication of the proposed FY 1999 fee rule to discuss the proposed changes. However, as the schedule in Attachment 1 indicates, the limited time remaining to promulgate the FY 1999 fee rule and to collect the required amounts does not allow the scheduling of the public meeting. As in the past, we plan to send a notice of the proposed rule to all licensees. In addition, because they are not currently subject to annual fees, we will assure that nonoperating reactors are individually notified of the proposal to assess them an annual fee for spent fuel storage and reactor decommissioning.

In evaluating the methods for developing the FY 1999 annual fees, there are several external factors that must be considered. The preliminary annual fee amounts that are being presented for your consideration are premised on an assumption that the State of Ohio will not become an Agreement State before March 31, 1999. Staff's current projection is that the NRC will not grant Ohio the necessary approval until June at the earliest. Should Ohio become an Agreement State before March 31, 1999, NRC licensees in that State would be subject to only one-half of the annual fee for FY 1999, which would require fees for other licensees to be increased.

Projected annual fees under the various methods discussed in this paper are set forth in Attachment 2. In evaluating these options for handling proposed increases, the Commission should be cognizant that with respect to the uranium recovery category (whose three uranium mills and seven solution mining licensees would see their fees increase by approximately 127 percent and 238 percent, respectively, if the fee schedule is rebaselined), the Senate Committee on Appropriations has expressed concerns about NRC regulation of in situ mines. In the committee's report on NRC's FY 1999 appropriations (Rpt. 105-206, June 5, 1998), it suggested that NRC's regulation of these mines unnecessarily duplicated adequate regulation by other Federal and State authorities.

The Nuclear Energy Institute (NEI) filed a petition for reconsideration of the FY 1997 fee rule, indicating that the NRC should undertake a full revision of the FY 1997 fees because the agency must have shifted resources away from reactor licensees and therefore [in using the percent change method] did not meet its statutory obligation to ensure that annual fees have a reasonable relationship to the costs of providing services. NEI provided similar comments on the proposed FY 1998 fee rule. In a August 10, 1998, letter to Chairman Jackson, NEI reiterated its point that the NRC must ensure that licensees are charged only for costs that bear a reasonable relationship to the regulatory services provided to them.

I. Options For Establishing Annual Fees

Three methods for establishing the FY 1999 annual fees are presented: the rebaselining method, the "percent change" method, and a modified rebaselining method that would impose a 50 percent cap on the fee increase to each fee category with the remaining budgeted costs being covered by surcharges imposed on all other licensees that pay annual fees.

A. Rebaselining

For FYs 1991 through FY 1995, the first five years the agency promulgated fee schedules under the authority of the Omnibus Budget Reconciliation Act of 1990 ("OBRA-90"), which requires the agency to collect approximately 100 percent of its budget authority in fees, the agency established its annual fees by "rebaselining." Under rebaselining, the agency annually determined the approximate budgeted regulatory costs attributable to each class of licensee. These budgeted costs, less the estimated amounts to be recovered through Part 170 fees, formed the basis for the annual fees to be assessed to each class of licensee. This method resulted in large swings in annual fees. Licensees objected to the wide fluctuations in fees, primarily caused by decreases in the number of licensees paying annual fees and changes in the resources allocated to the various programs. As a result, in an effort to stabilize and simplify fees, the NRC announced in the FY 1995 statement of considerations supporting the FY 1995 final fee rule that it would not rebaseline fees again until the year 2000 and that it would use the "percent change" method of determining fees for FY 1995 through FY 1999. Fees would be rebaselined earlier than the five-year mark only if there was a substantial change in the NRC budget or in the magnitude of a specific budget allocation to a class of licensees. For FYs 1996 through 1998 the NRC determined that the criteria for rebaselining had not been met.

Based on the program changes that have taken place since the baseline fees were established in FY 1995, including those resulting from the agency's strategic planning efforts, downsizing, reorganization of agency resources, and the addition of a new fee class for FY 1999 (spent fuel storage and reactor decommissioning), it can be argued that the agency should rebaseline its fees now. In addition, there have been substantial changes in the numbers of licensees within the various classes and several fee policy changes since FY 1995. The fee policy changes include the elimination of renewal fees in FY 1996 for most materials licensees, the proposed elimination of amendment fees for these licensees in FY 1999, and inclusion of these costs in the materials licensees' annual fees.

For the past couple of years the power reactor licensees have asserted that their annual fees are too high and that a rebaselining would result in lower annual fees for them. Rebaselining in FY 1999 would result in lower annual fees for power reactor licensees. In FY 1995 approximately 89 percent of the agency's budgeted costs were allocated to power reactors; for FY 1999 after rebaselining that percentage is closer to 80 percent. Rebaselining for FY 1999 would result in an estimated 6.8 percent reduction in annual fees from FY 1998 for each operating power reactor, which includes the new spent fuel storage and reactor decommissioning annual fee of approximately $202,000, and reductions of approximately 7 to 49 percent for certain materials licensees. However, annual fees would increase dramatically for certain other licensees. For example, rebaselining would result in an increase of approximately 238 percent for solution mining licensees, 127 percent for the uranium mills, 26 percent for high enriched fuel facilities, 120 percent for transportation cask users, and between approximately 5 percent and 56 percent for certain materials licensees. The preliminary FY 1999 rebaselined annual fees for all fee categories are listed in Attachment 3.

Although changes in budgeted costs and the increased hourly rates affect the annual fees, there are other factors that contribute to the annual fee increases. The annual fee increases for the uranium recovery licenses are primarily the result of increased budgeted costs for this group of licensees. Factors contributing to annual fee increases for other materials licensees include decreases in the number of licensees and the results of the biennial review required by the CFO Act. The biennial review reflects increases for certain fee categories in the average time, and thus costs, to conduct inspections and review new applications. Under rebaselining, the annual fees for the various materials license categories are calculated using the inspection and new license application review costs as a method to allocate the materials budget because they reflect the complexity of the license. In addition, rebaselining reflects the renewal and amendment costs to be included in the materials annual fees which were not included in FY 1995.

One major advantage of rebaselining in FY 1999 is that annual fees would be closely aligned with allocated agency budgeted costs for each class of licensee, reflecting the program changes that have occurred since FY 1995 and the establishment of a new fee class for FY 1999. All categories of licensees would be paying for their share of the agency costs. Adoption of this approach also would present virtually no litigative risk as it would clearly satisfy all statutory requirements. Rebaselining in FY 1999 instead of FY 2000 is consistent with the stated policy in the FY 1995 fee rulemaking, and would reflect the agency's commitment to rebaseline when warranted. Under this approach, the percent change method would be used for FY 2000 through FY 2003 unless the criteria for rebaselining are met sooner. This would stabilize fees over the period, including minimizing the impact of the loss of NRC materials licenses to the States of Ohio and Oklahoma, who are currently projected to become Agreement States prior to FY 2000.

While such an approach would be supported by the power reactor licensees and a large number of licensees with fee decreases, licensees with substantial fee increases would undoubtedly oppose adoption of this approach. The licensees with substantial annual fee increases could be expected to argue that they were not warned of the increases in sufficient time for their FY 1999 budget planning. They also will presumably argue that they are not receiving benefits commensurate with the increased fees. The fee increases would also likely prompt Congressional interest. However, postponing rebaselining until FY 2000 could have the same, or similar, results as rebaselining in FY 1999.

B. Percent Change Method

The second option would be to continue the percent change method for determining annual fees for FY 1999 and rebaseline fees in FY 2000. The percent change method would result in an annual fee decrease of approximately 5.4 percent for all classes of licensees for FY 1999. All licensees would benefit from the uniform decrease, thus continuing the policy of stabilizing fees. Under this approach, the Commission could, in its notice of proposed or final rulemaking, make an announcement of its intent to rebaseline next year and indicate that some fee categories may receive substantial fee increases.

Drawbacks to the percent change method do exist. Delaying rebaselining postpones addressing budget and programmatic changes and the resulting changes in annual fees. As discussed above, if rebaselining does not take place until FY 2000, fees will also be affected by the large number of licensees lost to the State of Ohio when it becomes an Agreement State later in FY 1999. Staff also projects that Oklahoma will become an Agreement State by mid FY 2000. As a result, the number of materials licensees would decrease by approximately 13 percent for FY 2000. The small materials licensees' annual fees would be substantially impacted by this decrease if rebaselining is postponed until FY 2000, because under rebaselining the budgeted costs for the class are borne by the existing licensees in the class. However, rebaselining annual fees in FY 1999, prior to this loss of licensees, would minimize the impact of the decrease in the number of materials licensees on that class in FY 2000 because under the percent change approach the decrease would impact the percentage change to all licensees' annual fees uniformly.

Adoption of the percent change method for FY 1999 also poses some litigative risk should power reactor licensees challenge the decision not to rebaseline. Those licensees could make reasonable arguments that fairness and equity dictate that rebaselining should not be postponed until FY 2000 because the agency's stated rebaselining conditions–when there was a substantial change in the agency budget or in the magnitude of a specific budget allocation to a class of licensees–have already been met. The power reactor licensees could be expected to argue that the Commission's fee schedule does not satisfy the requirement found in OBRA-90 that "to the maximum extent practicable, the charges shall have a reasonable relationship to the cost of providing regulatory services." This argument is especially likely since for FY 1999, in response to Congressional action, the Commission instituted a major regulatory reform effort for the reactor program.

C. Rebaselining With A 50 Percent Cap On Fees

The third option evaluated by staff would be to rebaseline fees for FY 1999 with a cap to avoid the larger percentage increases in fees for nine categories of licensees. Fee increases would be capped so that no licensee's annual fee increased more than 50 percent. If this approach is adopted, approximately $800,000 would be added to the annual fee surcharge and assessed to all licensees. Because approximately 80 percent of the surcharge is paid by power reactor licensees, the net result of this method would be a slightly lower decrease in annual fees for power reactors compared to full rebaselining (from a 6.8 percent reduction under full rebaselining to 6.6 percent under rebaselining with a cap, including the new spent fuel storage and reactor decommissioning annual fee of $202,000). Other licensees would also pay slightly more under this method than they would under rebaselining. Under this method, rebaselining would not take place again until FY 2004, unless there is a substantial change in the agency budget or in the magnitude of a specific budget allocation to a class of licensees.

While this method will partially mitigate the concerns from some licensees than would straight rebaselining, it still would not eliminate them since an annual fee increase of up to 50 percent will occur for many licensees that may not have anticipated such increases in their budgets for

FY 1999. Although materials licensees do not generally comment on proposed fee rules, the agency is likely to receive numerous complaints about the annual fee increases when the materials licensees are billed for the increased amounts, particularly since the substantial fee increases could be deferred for a year under the percent change option.

Power reactor licensees are likely to complain that rebaselining with the 50 percent cap is a partial fix, or perhaps not a true rebaselining, and does not provide the anticipated relief of a complete rebaselining. Moreover, by making the data public that materials licensees would not be asked to pay their allocated share of the agency budget in fees, the Commission would in effect be providing information supporting power reactor licensees' argument that the agency's fee schedules are not in compliance with the requirements of OBRA-90 discussed above. Accordingly, OGC believes that adoption of this option would pose litigative risk if the power reactor licensees chose to sue the NRC for overcharges, although the likelihood of a lawsuit may be diminished by the relatively small amount (less than $1M for FY 1999) involved. It must be recognized, however, that licensees, primarily power reactors, would continue to absorb the additional costs due to the cap beyond FY 1999, and potentially the costs could increase.

Adoption of rebaselining with a cap would set a precedent in terms of the agency determining how large an increase is appropriate and may be challenged as being subjective. Licensees paying the additional costs could also argue that they are being required to pay for even more costs that do not benefit them than would be the case under straight rebaselining.

In summary, this method would only minimize, not eliminate, large annual fee increases, and would result in other licensees paying additional costs for activities that do not benefit them.

II. FY 1999 Hourly Labor Rate

The Commission currently uses two hourly rates to charge applicants and licensees fees for billable (Part 170) services: one for the reactor program and one for the nuclear material and nuclear waste program. These same two hourly rates are also used in the calculation of the remaining agency costs which are recovered through (Part 171) annual fees. The reactor rate has historically been slightly higher than the materials rate, based on the salaries and benefits associated with the pertinent direct FTE, and the resulting allocation of program overhead and management and support expenses. FY 1998 fees were set at $124 per hour for reactor related work and $121 per hour for materials related work. These hourly rates, which some licensees argued were too high, nonetheless represented a decrease from the FY 1997 hourly rates of $131 per hour and $125 per hour, respectively.

In calculating the FY 1999 hourly rates, the staff discovered that an error in budget coding occurred for FY 1998, contributing to the hourly rate decrease for that year. Specifically, 134 FTE for regional management and support and approximately $10M in contract support were coded as direct resources for FY 1998 rather than as overhead. The correction of that error in FY 1999 results in substantial increases in the hourly rates compared to FY 1998, from $124 to $141 for the reactor program and from $121 to $140 per hour for the materials program. This is the result of increased overhead costs to be allocated to the two programs, with fewer direct FTE to divide the costs among. In addition, the proportion of direct resources has shifted, resulting in the materials program having a larger share and therefore absorbing more of the overhead and management and support costs.

Because of the error in FY 1998, the FY 1999 hourly rates are more appropriately compared to the FY 1997 hourly rates of $131 and $125 for the reactors and materials programs, respectively. Applying only the salary and benefit increase of 4.4 percent from FY 1997 to FY 1998, and 3.68 percent from FY 1998 to FY 1999, would result in FY 1999 hourly rates of $142 for the reactor program and $135 for the materials program. This does not consider that the proportion of direct resources has shifted, resulting in the materials program having a larger share and therefore absorbing more of the overhead and management and support costs.

While the rather dramatic increase in the hourly rates of approximately $18-22 per hour compared to FY 1998 will undoubtedly provoke protests from licensees, the error was in the reduced FY 1998 hourly rates, not in the increased FY 1999 hourly rates. We plan to explain the error in the FY 1999 proposed fee rule.

RECOMMENDATION:

I recommend that the Commission approve rebaselining annual fees for FY 1999, based on the various programmatic and fee policy changes that have occurred since FY 1995, including reforming the reactor regulatory program and the establishment of a new fee class for FY 1999. I plan to issue the proposed FY 1999 fee rule based on the Commission decision.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the General Counsel believes that rebaselining for FY 1999 poses the least litigative risk. The Office of the Executive Director for Operations has reviewed and concurred in this paper. The Office of the Chief Information Officer has been provided a copy for information purposes.

SCHEDULING:

I request a Commission decision on this paper by March 4, 1999, in order to provide sufficient time to incorporate the decision in the FY 1999 proposed fee rule, obtain and evaluate public comments, and publish the final rule to accomplish the 100 percent fee recovery requirement for FY 1999. I further request that this paper not be made available to the public because it is pre-decisional and contains attorney-client information.

Jesse L. Funches
Chief Financial Officer

Attachments:
1. Proposed Schedule
2. Comparison of Annual Fees
3. Preliminary FY 1999 Rebaselined Annual Fees

cc: SECY
OGC
OCA
OPA
OIP
CIO
CFO
EDO
CFO
OIG

SECY NOTE: Commissioners' completed vote sheets/comments should be provided directly to the Office of the Secretary by c.o.b. Monday, March 1, 1999.

Commission staff office comments, if any, should be submitted to the Commissioners NLT February 24, 1999, with an information copy to SECY. If the paper is of such a nature that it requires additional review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

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ATTACHMENT 1

PROPOSED SCHEDULE FOR FY 1999 FEE RULE

• Annual Fee Commission Paper	Feb 17-18
• Commission Decision	Mar 4
• CFO Signs Proposed Fee Rule	Mar 23
• Proposed Fee Rule Published	Apr 1
• CFO Signs Final Fee Rule	Jun 1
• Final Fee Rule Published	June 10
• Final Fee Rule Effective	Aug 10

ATTACHMENT 1

ATTACHMENT 2

COMPARISON OF ANNUAL FEES PER LICENSE FOR REPRESENTATIVE FEE CATEGORIES

			REBASELINE		REBASELINE W/ CAP		PERCENT CHANGE
No.[1]		FY 98 $(000)	FY 99 $ (000)	%	FY 99 $(000)	%	FY 99 (-5.4%)
104/0	Power Reactors	2,976	2,571*	-13.6%	2,577	-13.4%	2,616
	W/ Spent Fuel Decomm.		*2,773*	*-6.8%*	*2,779*	*-6.6%*	*2,819*
123/0	Spent fuel / Decomm.	N/A	202		202		202
4/0	Nonpower Reactors	57.3	63.4	10.6%	63	10.6%	54
2/0	HEU Facility	2,604	3,281	26.0%	3,288	26.3%	2,464
2/0	USEC	2,604	2,043	-21.5%	2,048	-21.4%	2,464
4/0	LEU Fuel Facility	1,278	1,100	-13.9%	1,103	-13.7%	1,209
1/0	UF6 Conversion	648	471	-27.3%	473	-27.1%	613
1/0	UMTRCA-DOE	1,964	855	-56.5%	857	-56.4%	1,858
3/0	Uranium Mill	61.7	140	126.9%	92	49.3%	58
7/0	Solution Mining	34.9	118	238.1%	52	49.3%	33
1/0	Disposal 11e(2)	45.3	87	92.1%	68	49.3%	43
2/0	Disposal 11e(2)-POL sites	8	14	75.0%	12	49.3%	8
3/0	Rare Earth	22	30	36.3%	30	36.6	21

1) Number of Licensees/Number of Small Entities

ATTACHMENT 2

COMPARISON OF ANNUAL FEES PER LICENSE(cont.)
FOR REPRESENTATIVE FEE CATEGORIES

			REBASELINE		REBASELINE W/ CAP		PERCENT CHANGE
No.[1]		FY 98 $(000)	FY 99 $ (000)	%	FY 99 $(000)	%	FY 99 (-5.4%)
73/1	Transportation Cask User	1	2.2	120%	1.5	49.3%	1
87/1	Broad Scope Medical	23.5	27.8	18.3%	27.8	18.5%	22
80/1	Broad Scope R&D	12.3	11.2	-8.9%	11.2	-8.9%	11.6
10/2	Broad Scope Manufact.	16.6	25.9	56.0%	24.8	49.3%	15.7
6/0	Irradiators <10,000 ci.	3.8	5.7	50.0%	5.7	49.3%	3.6
58/4	Teletherapy	10.3	15.3	48.5%	15.4	49.0%	9.7
153/87	Radiographer	14	14.7	5.0%	14.7	5.4%	13.3
51/32	Well Logger	8.2	10.0	22.0%	10.0	22.0%	7.7
1747/302	Other Medical	4.7	5.8	23.4%	5.8	23.4%	4.4
2279/391	Gauge User	1.7	2.6	52.9%	2.5	49.3%	1.6

lumber of Licensees/Number of Small Entities

ATTACHMENT 3

PRELIMINARY FY 1999 REBASELINED ANNUAL FEES

	No. of Licenses	No. of Small Entities	FY 1998 Annual Fee	FY 1999 Annual Fee	Change
REACTORS					
Power - Operating	104	0	$2,976,000	$2,571,000	-13 6%
Spent Fuel Storage/Reactor Decommissioning	123	0	N/A	202,000	
Nonpower	4	0	57,300	63,400	10 6%
FUEL FACILITIES AND SNM					
Fuel Fabrication-High Enriched Uranium	2	0	2,604,000	3,281,000	26 0%
Fuel Fabrication-Low Enriched Uranium in Dispersable Form	4	0	1,278,000	1,100,000	-13 9%
Limited Operations Fuel Facilities	1	0	508,000	432,000	-15 0%
All Other Fuel Facilities	1	0	345,000	314,000	-9.0%
Independent Spent Fuel Storage	8	0	283,000	N/A	N/A
Industrial Gauges	19	0	1,300	1,200	-7.7%
All Other Special Nuclear Material	80	8	3,100	3,400	9.7%
Uranium Enrichment	2	0	2,604,000	2,043,000	-21.5%
URANIUM RECOVERY AND SOURCE MATERIAL					
UF6 Conversion	1	0	648,000	471,000	-27.3%
Conventional Mills	3	0	61,700	140,000	126 9%
Solution Mining	7	0	34.900	118,000	238.1%
Other (Rare Earth, Metal Extraction)	3	0	22,300	30,400	36 3%
Disposal of 11e(2) Materials	1	0	45,300	87,000	92.1%
Disposal of 11e(2) Materials - POL sites	2	0	8,000	14,000	75 0%
Source Material for Shielding	31	4	490	600	22 4%
Other Source Materials	99	11	8.700	11,700	34.5%

ATTACHMENT 3

	No. of Licenses	No. of Small Entities	FY 1998 Annual Fee	FY 1999 Annual Fee	Change
BYPRODUCT MATERIAL					
Manufacturing - Broad Scope	10	2	16,600	25,900	56 0%
Manufacturing - Other	67	32	5,600	6,300	12.5%
Radiopharmaceuticals-Manufacture/Process	49	18	11,200	15,200	35 7%
Radiopharmaceuticals-No Manufacture/Process	8	3	4,400	3,800	-13 6%
Irradiators - Self Shielded	159	9	3,200	3,400	6.3%
Irradiators - <10,000 Curies	6	0	3,800	5,700	50.0%
Irradiators - >10,000 Curies	13	0	19,700	14,800	-24.9%
Exempt Distribution - Device Review	35	16	5,000	3,200	-36.0%
Exempt Distribution - No Device Review	85	24	8,900	4,600	-48 3%
Distribution to General Licensees-Device Review	27	13	3,800	2,100	-44.7%
Distribution to General Licensees-No Device Review	5	0	3,200	1,700	-46.9%
Research and Development - Broad Scope	80	1	12,300	11,200	-8.9%
Research and Development - Other	235	92	5,500	5,000	-9.1%
Service License	75	30	6,100	5,200	-14.8%
Radiography	153	87	14,000	14,700	5 0%
All Other Byproduct Materials	2279	391	1,700	2,600	52.9%
WASTE DISPOSAL AND PROCESSING					
Waste Disposal	0	0	N/A	N/A	N/A
Waste Receipt and Packaging	13	2	14,500	11,400	-21.4%
Waste Receipt - Prepackaged	4	1	7,700	8,400	9.1%
WELL LOGGING					
Well Logging	51	32	8,200	10,000	22 0%
Field Flooding Tracer Studies	0	0	N/A	N/A	N/A
NUCLEAR LAUNDRY	3	0	14,700	18,900	28 6%

	No. of Licenses	No. of Small Entities	FY 1998 Annual Fee	FY 1999 Annual Fee	Change
HUMAN USE OF BYPRODUCT, SOURCE, OR SNM					
Teletherapy	58	4	10,300	15,300	48 5%
Medical - Broad Scope	89	1	23,500	27,800	18.3%
Medical - Other	1747	302	4,700	5,800	23 4%
CIVIL DEFENSE	10	0	1,800	1,200	-33 3%
DEVICE, PRODUCT, OR SEALED SOURCE SAFETY EVALUATION					
Device/Product Safety Evaluation - Commercial	95	47	7,200	6,000	-16.7%
Device/Product Safety Evaluation - Custom	23	2	3,700	4,300	16 2%
Sealed Source Safety Evaluation - Commercial	27	9	1,600	1,800	12.5%
Sealed Source Safety Evaluation - Custom	21	0	780	600	-23.1%
TRANSPORTATION					
Certificate of Compliance	N/A	N/A	N/A	N/A	N/A
Quality Assurance Approvals (Users and Fabricators)	37	13	78,800	66,700	-15 4%
Quality Assurance Approvals (Users Only)	78	1	1,000	2,200	120.0%
OTHER LICENSES					
Standardized Spent Fuel Facilities	N/A	N/A	N/A	N/A	N/A
Special Projects	N/A	N/A	N/A	N/A	N/A
Spent Fuel Storage Certificate of Compliance	N/A	N/A	N/A	N/A	N/A
Spent Fuel General License	5	0	283,000	N/A	N/A
Decommissioning/Possession-Only (Non-reactor)	N/A	N/A	N/A	N/A	N/A
Export/Import	N/A	N/A	N/A	N/A	N/A
Reciprocity	N/A	N/A	N/A	N/A	N/A
Master Material License	2	0	421,000	190,000	-54.9%
DOE Transportation Activities	1	0	1,168,000	871,000	-25.4%
DOE UMTRCA Activities	1	0	1,964,000	855,000	-56.5%