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LPDR. Wm-10 (2)
Wm-11 (2)
Wm-16 (2)

NUCLEAR WASTE CONSULTANTS INC.

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WM Project 10, 11, 16
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April 8, 1987

009/PM/NWC.008
RS-NMS-85-009
Communication No. 146

U.S. Nuclear Regulatory Commission
Division of Contracts
Office of Administration
Washington, DC 20555

Attention: Ms. Elois Wiggins, Contracting Officer
Technical Assistance in Hydrogeology - Project B (RS-NMS-85-009)

Re: Payment on Invoices 13-16, FY 87

Dear Ms. Wiggins:

I call to your attention the following data on payment of Nuclear Waste Consultants' invoices 13 - 16 (October, 1986 - January, 1987):

TABLE 1

| INVOICE NUMBER | MONTH | DATE OF INVOICE | DATE OF CHECK | DAYS |
|----------------|--------|-----------------|---------------|------|
| 13 | OCT 86 | 11/13/86 | 01/07/87 | 56 |
| 14 | NOV 86 | 12/10/86 | 02/02/87 | 53 |
| 15 | DEC 86 | 01/12/87 | 02/26/87 | 45 |
| 16 | JAN 87 | 02/10/87 | 04/07/87 | 57 |

You will note that of these four invoices, none has been paid in 30 days (per the terms of the current contract) and only one has been paid within the 45 days that I am told by the NRC Staff that the Federal procurement regulations allow. Even if one were to allow five days for mail delivery to Washington from Denver, three of the last four paid invoices were more than 15 days overdue; from the point of view of our corporate officers (of whom I am one) and my subcontractors and consultants, the invoices are very close to 30 days overdue. Nuclear Waste Consultants has not been paid any interest on these invoices, but, frankly, I am substantially more interested in being paid within 30 days than I am in receiving interest on overdue bills.

I have discussed this matter with Ms. Carolyn Barry of the NRC's Cashier's Office. I appreciate the difficulties that arise when new personnel require training and an office is understaffed, and I believe that Ms. Barry and her staff are doing their best. However, this does not relieve the Government of its contractual obligations, and it does not address my project management difficulties over receivables. Nuclear Waste Consultants has worked very hard to develop and implement a comprehensive and responsive invoicing system for

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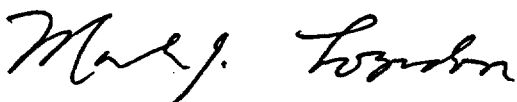
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this contract; a measure of the success of our system is that we have had no disallowances since the second month of the contract (and that disallowance over an airfare was subsequently reinstated on submission of further documentation). Thus, to the best of my knowledge, delays in processing our invoices have not been caused by inadequate documentation. Indeed, throughout FY 86, our invoices were routinely processed in 30 days. I will be very happy to work with you, your staff, or any of your NRC colleagues in identifying procedures that we can adopt to expedite the review of our materials.

Thank you for your attention in this matter. I look forward to your response, including an NRC plan for returning review of our invoices to the contractually agreed schedule. If you have any questions about this letter, please contact me immediately.

Respectfully submitted,
NUCLEAR WASTE CONSULTANTS, INC.



Mark J. Logsdon, Vice President

cc: US NRC - Director, NMSS (ATTN PSB)
DWM (ATTN Division Director)
Mary Little, Contract Administrator
WMTG (ATTN Branch Chief)
Jeff Pohle, WMTG

cc: M. Galloway, TTI
L. Davis, WWL
J. Minier, DBS

Nuclear Waste Consultants, Inc.