INTER-MOUNTAIN LABORATORIES
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YOUR ENVIRONMENTAL MONITORING PARTNER

24 February 2015

Ms. Maureen E. Wylie
Chief Financial Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Small business entity exemption request

Dear Ms. Wylie:

Inter-Mountain Laboratories (IML) operates under two NAICS codes which share the same $15 million size standard (541380 and 541620) according to the Small Business Administration Standards. The SBA size standards were updated through an interim rule on June 12, 2014, which increased the size standard from $14 million to $15 million. Previously, the same two NAICS codes were increased from $7 million to $14 million in 2012.

It appears that the Nuclear Regulatory Commission's Small Business size standards do not accurately reflect the current SBA threshold amounts for small business. According to the current 2014 Fee Rule published by the agency, Licensees conducting business operations under NAICS codes 541380 and 541620 are subject to full cost after exceeding the $7 million dollar threshold established prior to 2012.

Under Code 10 CFR 171.11(c), Inter-Mountain Laboratory requests the Nuclear Regulatory Commission provide an exemption/ waiver for full cost fees and apply the small business standard to the current license fees.

10 CFR 171.11 (c) The Commission may, upon application by an interested person or on its own initiative, grant an exemption from the requirements of this part that it determines is authorized by law or otherwise in the public interest.

Should this exemption be granted, IML requests that it be applied to our current license (November 2014 renewal) and an adjustment be made to the fee. IML paid $26,600 for its license renewal rather than $5,600 that would apply as a small entity.

Please feel free to call with any questions or concerns.

Best regards,

Kevin Chartier
President

cc: Ms. Barbara Gusack, NRC