



OFFICE OF THE
CHIEF FINANCIAL
OFFICER

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 8, 2016

Mr. Michael Thompson
Chief Operating Officer
CSMI
60 Island Street
Lawrence, MA 01840-1835

Dear Mr. Thompson:

On behalf of the U.S. Nuclear Regulatory Commission (NRC), I am responding to your letter dated June 30, 2016, requesting a waiver/exemption to reduce your annual fees from the full cost fee to the small-entity fee.

The Small Business Act, 15.U.S.C. § 632, allows federal agencies to request approval of its size standards from the Small Business Administration (SBA). The NRC's current small business size standards were approved by the SBA, which uses the North American industry Classification System as a basis for its size standards. The criteria for NRC's small business size standards can be found under 10 CFR 2.810.

In April 2016, CSMI applied for the small entity status under section 1A - Small Business. The stipulations that apply to this section are that the business must be a for-profit concern not engaged in manufacturing with an average annual gross receipts of \$485,000 to \$7,000,000 calculated over the last three completed fiscal years. Gross annual receipts include all revenue received or accrued from any source, including receipts of the parent company, any subsidiaries and/or affiliates, and account for both foreign and domestic locations. Receipts include all revenues from sales of products and services, interest, rent, fees, and commissions from whatever sources derived (i.e., not solely receipts from NRC-licensed activities).

Your letter also states that CSMI's gross receipts for the last three fiscal years are as follows:

Fiscal Year	Gross Receipts
2013	\$15,240,563
2014	\$4,134,710
2015	\$1,926,731
3 Year Average	\$7,100,668

We agree with your determination that your three year average exceeds the maximum \$7,000,000 to qualify for the reduced \$2,800 annual fee. Specifically, your three year average is \$7,100,668 (so marginally above the \$7 million threshold). Under NRC's current small business size standards, therefore, CSMI does not meet the NRC's requirements for receiving a reduced annual fee.

Yet even so, under 10 CFR 171.11(c), I am able to grant your request for a one-time fee

adjustment to the small-business rate of \$2,800 given your steep decline in receipts from fiscal years 2013 - 2015 and your assertion that CSMI's fiscal year 2016's receipts are going to be comparable to FY 2015.

Please contact Mr. William Blaney of my staff, at 301-415-5092, for any fee-related questions.

Sincerely,

/RA/

Maureen E. Wylie
Chief Financial Officer

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Sincerely,

/RA/

Maureen E. Wylie
Chief Financial Officer

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