



July 20, 2016

Scott Moore, Acting Office Director
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT: Docket 07109157 Invoice LFB 16-0586; and,
Docket 07109185 Invoice LFB-16-0587

Dear Mr. Moore:

This is a copy of our letter that was sent to Ms. Maureen Wylie, Chief financial Officer. Industrial Nuclear Company appreciates the recent approvals of our revised SARs for our IR100 Type B shipping container and industrial radiography camera (Docket 07109157) and OP100 Type B shipping container (Docket 07109185).

With all due respect, INC requests a review of the charges reflected in the invoices referenced above. INC believes that the SAR reviews should have been limited to a simple radiation shielding calculation, as the only changes to the SARs (except for an update in formatting) were the addition of a new radioactive source as a payload. INC added Selenium 75 at radioactivity levels that we believe are enveloped by the existing shielding of our Iridium 192 payload. INC had our design consultant perform a shielding calculation to assure that this was the case prior to revising and submitting the SAR for approval. This calculation was included in both SAR revisions.

In strictly commercial terms, INC, as a small company, would have a difficult time recovering this large an investment with this simple product addition. It is unlikely that we would have requested these changes had we known in advance that the charges would be this great.

INC requests a review of the hours billed to review these SARs, and hopefully a reduction in the amount invoiced. Your help with this issue is greatly appreciated. Please note that this request was also sent to Michele Sampson, Acting Deputy Director, Division of Spent Fuel Management.

Sincerely,

A handwritten signature in cursive script that reads 'Sameer Jetly'.

Sameer Jetly
President, Industrial Nuclear Company

Attachments: Docket 07109157 Invoice LFB 16-0586
Docket 07109185 Invoice LFB-16-0587