



DANIELLE SHEEN, EXECUTIVE DIRECTOR

February 27, 2019

Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

**RE: Amendment to Materials License No. 21-00215-04 / Docket 03001988
Type A License of Broad Scope
University of Michigan**

Materials Licensing:

The University of Michigan (U-M) is requesting an amendment to U-M Materials License No. 21-00215-04 (Docket 030-01988). The U-M would like to amend Condition 10 with respect to locations of use; specifically, as it relates to medical use vs non-medical use in accordance with NRC annual fee category 10 CFR 171 / Fee Category 7B(1) [licenses of broad scope issued to medical institutions for the number of locations of use: 6-20).

The U-M Broad Scope License currently lists seven locations of use; however, only three of those locations include current or potential medical use along with other authorized uses:

- U-M Campuses Ann Arbor, MI
- U-M Brighton Center for Specialty Care, Brighton, MI
- U-M Research Facility located at Domino's Farms Corporation

The other four locations (noted below) are for non-medical purposes including radioactive waste storage as described and authorized in our Broad Scope License application. It is our understanding that these categories should be exempt from NRC annual fees because the U-M is a state-supported educational institution:


- U-M Dearborn, MI Campus
- U-M Flint, MI Campus
- U-M Biological Station, Pellston, MI
- U-M Beck Road Facilities, Belleville, MI

Until recently, there was no specific need to make distinctions of use by locations within the Broad Scope License and we maintained the format followed for decades. However, the 2018 change to the 10 CFR 171 medical use fee category now scales costs according to the number of licensed locations of 10 CFR 35 uses subject to those fees. This inflates our fees out of proportion to actual number of locations needed for medical uses subject to fees. We now need to distinguish the medical use locations in Condition 10 from the other locations listed.

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Thank you for your time, effort, and consideration in this amendment request. Please do not hesitate to contact me at Radiation Safety Service / EHS [(734) 647-2251 / (734) 764-6200 / drisc@umich.edu] should you have any questions or comments regarding this correspondence.

Sincerely,



Mark L. Driscoll
Director / Radiation Safety Officer
Radiation Safety Service / EHS

MLD/mlid
NRCLicenseAmendmentAnnualFees022719

cc: Danielle Sheen, CIH, Executive Director, Environment, Health & Safety
Ruthann Nichols, Ph.D., Chair, Radiation Policy Committee
Broad Scope Materials License No. 21-00215-04 Files

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ANN ARBOR MI 48109

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US NUCLEAR REGULATORY COMMISSION
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2443 WARRENVILLE ROAD
LISLE IL 60532

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HEALTH & SAFETY
UNIVERSITY OF MICHIGAN

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