



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

SEP 30 1988

MEMORANDUM FOR: C. James Holloway, Jr., Chief
License Fee Management Branch
Division of Accounting and Finance
Office of Administration and
Resources Management

FROM: Vandy L. Miller, Chief
Medical, Academic, and Commercial
Use Safety Branch, NMSS

SUBJECT: COMMENTS ON 10 CFR 170

This is in reference to your September 16, 1988 memorandum, requesting information on several issues. Our response follows in order your requested information.

A. Lixi, Inc.

1. In general, the staff effort required to review application for use of a Lixi device is the same for both human and industrial use.
2. In general, the staff effort required to inspect a licensed program for use of a Lixi device is the same for both human and industrial use.
3. In general, the staff effort required to review an application for human use of a Lixi device is about the same as other devices used for human use.
4. To our knowledge, Policy and Guidance Directive FC 85-1 did not result in a decrease in the staff effort required to review application for use of the Lixi devices. It was intended to ensure that all five Regions reviewed such request in a similar manner.
5. To our knowledge, Policy and Guidance Directive FC 85-1 did not result in a decreased effort required to inspect licensees.

B. Health Physics Association, Inc.

1. We basically agree with Health Physics Associates comments that the service category is too broad. Some types of service company, e.g., calibration company require far less review and inspection time, than other licensee such as manufacturing company's. The following are our answers for 1a. through 1d. of paragraph B.

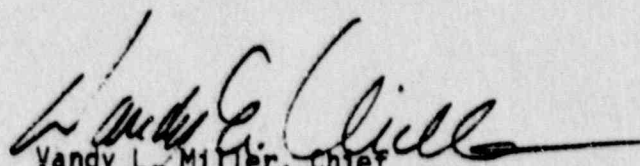
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- a. Approximately 1/3 of the effort
- b. About the same
- c. Approximately 1/3 of the effort
- d. About 1/4 of the effort

We hope this information will be helpful. If you require additional assistance, please contact Michael A. Lamastra of my staff on Ext. 23416.



Vandy L. Miller, Chief
Medical, Academic, and Commercial
Use Safety Branch, NMSS