



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

APR 13 1989

MEMORANDUM FOR: H. Lee Hiller, Deputy Controller
Office of the Controller

FROM: Jesse L. Funches, Director
Program Management, Policy Development
and Analysis Staff, NMSS

SUBJECT: MATERIALS LICENSING HOURS

In response to your March 27, 1989 memo, NMSS is providing the following information.

1. Typically, our data show that renewals on average require more review time than applications for a new license. One reason for this is that renewal applicants have been using radioactive material for at least five years as NRC licensees. Therefore, when license reviewers process renewal requests, they review historical inspection findings and other operating data which do not exist for new licensees.
2. The processing time for amendments and renewals of the cited license fee categories is usually just a few hours. Since the review time is relatively small, the degree of precision in the time reported could vary by 30 or 40 minutes. Therefore, despite the large sample used to derive the new estimate of hours, it is possible that the rates are in error and should possibly be the same for both renewals and amendments.
3. The apparent inconsistency in review time necessary to process the various types of licensing actions cited in this question may be due to the following factors. First, a few of the categories do not contain similar licensees; therefore, the review time is calculated based on the mix of various licensee situations reviewed during the two year period analyzed. Second, even in categories where licensee activities are similar, the specific content of amendment requests and renewal requests may vary; some requests may be name changes, while others may involve a major change in licensed activities. Also, the difference in review time between some of the categories is relatively small and could be influenced by the degree of precision in the time reported discussed in item 2 above. Another factor may be the relative experience of the technical reviewer. Typically, senior staff are assigned to review the most complicated cases which may distort the average time per review.
4. The decrease in hours required to process licensing actions in the cited categories reflects the NRC's most recent experience (FY87/FY88). This experience is a reflection of the current standard review plans used to review the specific licensing requests and the varied mix of actions received during the period analyzed. One major rule change that has occurred since the early 1980's is the revision of Part 35 for medical

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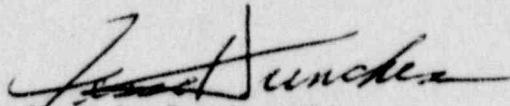
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licenses. Medical licenses are processed under fee categories 7A, 7B, and 7C. The proposed hours for these categories have both decreased and increased compared with the current fee schedule depending on the particular fee category and type of action (e.g., new application, amendment, renewal). The only other way NMSS could develop a more comprehensive answer regarding the decrease in hours would be to analyze the specific licensing cases completed during the time period used to develop the current fee schedule hours (early 1980's) and cases completed during FY87/FY89; the detailed data required to do this does not exist.

5. As stated in item 4 above, the hours required to process licensing actions in the cited categories reflect the NRC's most recent experience (FY87/FY88) using current standard review plans to process the varied mix of actions received. Another recent rule change which may have contributed to the increase in staff hours is the revision of Part 39. Also, review times for some sealed source and device distribution license requests have increased due to the revision to 10 CFR 30.32(g) which requires sealed source and device reviews and a management evaluation after the 3M incident regarding future reviews of these types of licenses.
6. As stated in items 4 and 5 above, the hours required to process licensing actions in the cited categories reflect the NRC's most recent experience (FY87/FY88) using current standard review plans to process the varied mix of actions received. We suspect that the mix of amendment requests completed during the period analyzed may have involved name changes or the addition of a RSO. However, as stated in item 4 above, the only way to develop a more comprehensive answer would be to analyze the specific licensing cases completed during the time period used to develop the current fee schedule hours (early 1980's) and cases completed during FY87/FY88; the detailed data required to do this does not exist.

If you have any questions, please call Claudia Seelig on ext. 20659.



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cc: J. Holloway, LFMB