



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

MAR 27 1989

MEMORANDUM FOR: Jesse L. Funches, Director
Program Management, Policy Development
and Analysis Staff
Office of Nuclear Materials Safety and Safeguards

FROM: H. Lee Hiller, Deputy Controller
Office of the Controller

SUBJECT: MATERIALS LICENSING HOURS

We have reviewed the staff-hour data you provided on March 6, 1989, in support of our proposal to revise the materials license fees. As a result of our analysis of the data, we have identified several areas that appear to be inconsistent with our understanding of the materials licensing process and with the current fee schedule. The items in question are as follows:

1. More hours are reported for renewals than for new applications for fee categories 3B, 3E, 3M, 3P, 6A, and 7C. We note that the hours reported for 6A renewals are more than double the hours for new applications.
2. More hours are reported for amendments than for renewals for fee categories 1D and 2B.
3. The hours reported appear to be inconsistent for fee category 1C as compared to 1D and 3P, 3A as compared to 3B (amendments and renewals), 3E as compared to 3F (renewals), 3H as compared to 3I (all), 3J as compared to 3K (renewals), 3L as compared to 3M (amendments), and 7A as compared to 7B (new applications).
4. The data reflects a significant decrease in the staff hours for fee categories 1D (renewals), 3C (renewals), 3D (new applications and renewals), 3F (renewals), 3J (renewals), 3M (new applications), 3N (new applications and renewals), 4B (amendments), 4C (amendments), and 7C (new applications). We note that for some of these categories the hours for other action types increased.
5. The data reflects a significant increase in the staff hours for fee categories 1C (new applications and renewals), 2C (amendments and renewals), 3B (amendments and renewals), 3G (renewals), 3H (new applications and renewals), 3I (all types), 3K (all types), 3M (amendments), 3N (amendments), 3O (new applications), 3P (amendments and renewals), 5A (new applications and amendments), 6A (renewals and amendments), 7A (new applications), 7C (amendments), and 8A (amendments). For some of these categories, the hours for other action types decreased.

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6. The hours reported for fee categories 4B and 4C amendments seem to be inconsistent with the hours for new applications and renewals and with other fee categories.

Since we must be able to substantiate the basis for the revised fees, we are requesting your assistance in resolving the concerns listed above. In addition to any other information you are able to provide, please identify any licensing policies, changes in regulations, or other circumstances which had an impact on the staff hours in question. For example, are the hours reported for renewals greater than the hours for new applications (Item 1 above) due to the need to review historical inspection findings at the time of renewal? Have changes in the licensing process occurred which affected the correlation between the categories identified in Item 3 above? Did the implementation of new or revised regulations result in the increase or decrease in staff hours identified in Items 4 and 5 above?

In order to meet our schedule for preparing the Commission paper, please respond by April 11, 1989.

Lee Hiller

H. Lee Hiller, Deputy Controller
Office of the Controller