

NON DESTRUCTIVE TESTING MANAGEMENT ASSOCIATION—

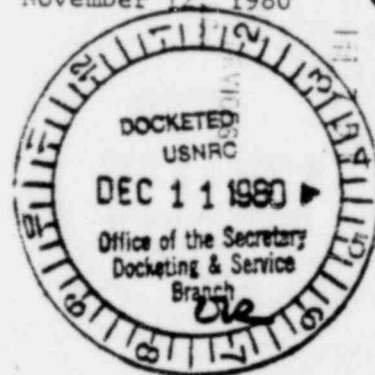
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~~DOCKET NUMBER~~ **PR. Misc Notice**
~~RECORDED FILE~~ **(US FR 65726)**

November 12, 1980

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Washington, DC 20555

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Dear Mr. Chilk:

Recently the United States Nuclear Regulatory Commission has published in the Federal Register an intent to charge a fee for evaluation of Quality Assurance Programs presented by licensees in agreement States. These entanglements exist because of Appendix E to part 71 of Title 10 of the Code of Federal Regulations. Further, the requirement of a fee and forcing agreement State licensees to file for U.S. NRC approvals constitutes a dual licensing program.

Fees charged by the Commission constitute a tax burden that fortunately or unfortunately has been upheld by the Fifth U. S. Circuit Court. The purpose of the fees are considered a cost recovery. Firms operating under U. S. NRC and agreement States programs where fees are charged are forced to pay multiple cost recoveries and hire large quantities of personnel to keep up with variations in State programs and NRC programs.

The above is considered for the basis of this petition.

On behalf of the NDTMA I hereby petition the U. S. NRC to standardize it's program with the agreement States and if a fee is to be paid to an agreement State or to the U.S. NRC for any licensee that no duplicate fees be inacted by another licensing agency. The basis of the suit brought against the U.S. NRC was cost recovery. We contend that costs cannot be clarified because of the intermingling of Reactor programs and medical and industrial licenses. A previous petition filed by Mr. Walter P. Peeples, Jr. of Gulf Nuclear Inc. to split the reactor areas from the medical and industrial licenses we wish to request that U.S. NRC costs be made public in the Federal Register and that these costs be combined and published with States program costs.

Very truly yours,

Allen Cash
Allen Cash, President

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