



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

FEB 19 1981



General Atomic Company  
ATTN: Mr. William R. Mowry  
Licensing Administrator  
P.O. Box 81608  
San Diego, California 92138

Gentlemen:

This refers to your November 14, 1980 letter (SHP-2027) to Douglas Weiss, which requested that we reexamine our position concerning the assessment of the \$5,500 major amendment fee for your October 9, 1980 amendment request to Certificate of Compliance No. 6346.

The additional fee requested in our October 24, 1980 letter was based on the Licensing staff's initial review of your amendment request for fee purposes where it was determined that the scope of review required to process your request should be classified as a major amendment. Because the License Fee Management Branch has to rely on the technical reviewer's decision as to the review scope of an application, we have forwarded a copy of your November 14, 1980 letter to the Transportation Branch, Division of Fuel Cycle and Material Safety, concerning the points raised in your letter. Please be informed, however, that the decision as to whether an amendment is major or minor is not influenced by NRC policy deliberations, but rather the decision is based solely on the type of review effort required by Licensing.

In the case of your October 9, 1980 amendment request, it is still the Licensing staff's position that the application would require a major amendment review, notwithstanding your classification of the request as a minor amendment. As we indicated in our October 24, 1980 letter to you, Licensing's justification for a major amendment review was that your application presented a "new concept in shipping high level liquid wastes" within separate containers and inserts. In order to qualify as a major amendment review, the application must require evaluation of many aspects of licensed activities where the proposed action could present a potential risk to the public's health and safety. Accordingly, we have again confirmed with the Licensing staff that your October 9 application meets the requirements of an application which qualifies for a major amendment review.

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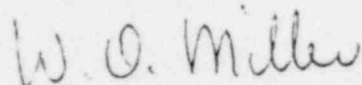
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Mr. William R. Mowry

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As you are aware, the Licensing staff time required to review the application will be carefully monitored, and the final fee assessed will be based on the professional manpower expended, in accordance with 10 CFR 170.31, Footnote 4. If the final review cost is less than the \$5,500 fee submitted for your application, a refund will be made.

Sincerely,



William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

Enclosure:  
10 CFR 170

FEB 13 1981



General Atomic Company  
ATTN: Mr. William R. Mowry  
Licensing Administrator  
P.O. Box 31608  
San Diego, California 92138

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Mr. William R. Mowry

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FEB 13 1981

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Sincerely,

Original Signed by  
Wm. O. Miller

William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

Enclosure:  
10 CFR 170

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ASCabell, LFMB

PDR

Mats. License Fee File

Mats. Manpower File

LFMB R/F (2) (SS & Beth)

LFMB

OFFICE	LFMB:ADM	LM LFMB:ADM	LFMB:ADM			
SURNAME	<i>asc</i> Weiss <i>asc</i> ASCabell:vt	<i>CJH</i> Alloway	WOMiller <i>WOM</i>			
DATE	2/15/81	2/15/81	2/13/81			