University of Wisconsin



NUCLEAR REACTOR LABORATORY NUCLEAR ENGINEERING DEPARTMENT PHONE 262-3392, AREA CODE COS

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B December 19, 1989 OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

Secretary U.S. Nuclear Regulatory Commission ATT: Docketing and Service Branch Washington, DC 20555

SUBJECT: Proposed Changes to 10CRF Part 170, RIN 3150-AD23

Dear Sir:

The proposed working of revised 170.11 (a)(4) is difficult to comprehend.

I believe part III (Section-by-Section Analysis) of the Federal Register publication contains much clearer wording.

A possible interpretation of the proposed change is that sponsored research at a university research reactor would result in a loss of exemption from licensing fees. Further, it also appears possible to interpret that any radiation treatment fees at a research reactor would result in loss of exemption.

Very truly yours,

ashwell

Reactor Director

RJC:cke

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