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State Health Officer

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PROPOSED RULE

(26)

State of Alabama
Department of Public Health

(54 FR 49763)

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USNRC



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OFFICE OF SECRETARY
DOCKETING & SERVICE BRANCH
MAILING ADDRESS
Monroe Street
Montgomery, Alabama 36130-1701

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

Re: 10CFR170

Gentlemen:

On December 1, 1989 you published proposed changes to 10CFR170.31
We support these changes with the following suggested
improvements:

1. Add to the inspection fees footnote the following:

"A charge will be assessed for inspections of persons conducting operations pursuant to the authority granted in 10CFR31.5, 10CFR40.25, or 10CFR150.20 if such persons are not subject to another inspection fee for the location being inspected."

This should be adopted because at the present time any effort expended in inspecting general licensees is not recovered. Adding this to the footnote would not require an inspection of this class, but, when something like the static eliminator problem arises both the NRC and the Agreement States can recover part of the costs for the taxpayer.

2. Reduce the time available for reciprocity. This would place the licensees in the NRC jurisdiction in a more competitive economic position with Agreement States Licensees. At the present time an Agreement State licensee who may not be paying a fee for his license can operate six (6) months in competition with the NRC licensee who have to pay both a license fee and an inspection fee.

Thank you for this opportunity to comment on this proposal.

Sincerely,

Aubrey V. Godwin
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