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**EDP Consultants, Inc.**

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May 18, 1993

Mr. C. James Holloway  
Office of the Controller  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

RE: Public Comment on the Fee Structure

Dear Mr. Holloway:

EDP CONSULTANTS, INC.  
(COMPANY NAME)

fully supports the letter dated May 18, 1993, signed by William F. Troxler, Jr. of Troxler Electronic Laboratories, Inc. regarding the unreasonable fee structures imposed by the NRC.

Sincerely yours,

John E. Dingelbein  
Representative of

EDP CONSULTANTS, INC.  
(Company Name)

Geotechnical • Geoenvironmental • Construction Materials Consultants

34025 Chardon Road, Willoughby Hills, Ohio 44094 • Phone (216) 585-1320 • Fax (216) 585-2325

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# TROXLER

May 19, 1993

Mr. C. James Holloway  
Office of the Controller  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

RE: Response to NRC Fee Policy: Request for Public Comment

Dear Mr. Holloway:

In 1991, Trolox Electronic Laboratories, Inc., strongly opposed the increase in NRC fees to our industry. This represented a 393% fee increase for an average customer who experienced routine inspections.

Data from 1992 indicates that the number of licensees in the 3P category dropped from 9100 to 6800 representing a 25% decrease in the number of companies paying fees. This number is significant because it represents many small business owners who can no longer do the testing required to build highways and roads in the United States for the federal or state governments.

We do not feel that our industry can continue to meet the demands and requirements of quality control testing to meet government specifications if fees stay in the same range as they are now and as proposed for 1993. The average proposed fee for a 5-year license with one inspection and two amendments brings the cost to approximately \$2700 per year. This is more than 50% of the total cost of a typical nuclear gauge. The fees are therefore an unfair burden to NRC licensees.

We urge you to reconsider the fee structure and to find other ways to fund the very important work of control and regulation conducted by the Nuclear Regulatory Commission.

Sincerely yours,

TROXLER ELECTRONIC LABORATORIES, INC.

William F. Trolox, Jr.  
Executive Vice President

WFT:jtr/ek

Troxler Electronic Laboratories, Inc. • Trolox International, Ltd.

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