

2170-111
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IOWA STATE UNIVERSITY
OF SCIENCE AND TECHNOLOGY

28 June 1993

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

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DOCKETED
JUN 23 1993
DOCKETING &
SERVICE BRANCH
SECY-NRC

Subject: FY 1993 Exemption of Non-Profit Educational Institutions from License Fees

Dear Sir:

During a recent meeting of the Nuclear Engineering Departments Heads Organization (NEDHO), I learned that the license fee exemption for non-profit educational institution for FY 1993 may be eliminated. As Director of the UTR-10 Nuclear Reactor Facility at Iowa State University, I must report that the removal of this exemption will severely impact the operation of my facility. The projected license fee of \$65,000 per reactor will have a devastating effect on the ability of my institution to complete our primary mission, which is to teach. Our entire reactor operating budget for FY 1993 is \$68,505. The imposition of the projected license fee would severely limit our ability to continue operation and may result in the closure of our facility.

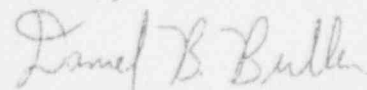
I understand that my comments on this issue are somewhat late. I thought that comments on the imposition of licensing fees were not due until 19 July 1993. However, I was informed that there were two separate requests for comments on this issue in the Federal Register. I apparently missed the request for comments in the 23 April 1993 Federal Register.

In closing, I would like to note that our reactor, which has a power rating of 10 kW, is used almost exclusively for teaching and university research. The proposed license fees could result in the closure of our reactor facility. A reactor is the "heart" of any nuclear engineering curriculum. Without a reactor, it would be extremely difficult to train the next generation of engineers and scientists, who will be responsible for the design and operation of nuclear power plants in the next century. This generation will also be challenged with the development of technologies necessary to safely address the issue of radioactive waste management. These issues must be addressed by competent nuclear engineers and scientists who have been trained to understand the operating principles of a nuclear reactor. Such training is necessary to preserve the health and safety of the State of Iowa and the entire nation. This reason alone should provide sufficient justification to exempt non-profit educational institutions from license fees.

If you have any questions or require any further information regarding this issue, please contact me at your convenience. My telephone number is (515) 294-9380.

Thank you for your timely attention to this issue.

Sincerely,



Daniel B. Bullen, Ph.D., P.E.
Associate Professor of Nuclear Engineering &
Director, UTR-10 Nuclear Reactor Facility

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