



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

SEP 28 1981

MEMORANDUM FOR: Daniel J. Donoghue, Director
Office of Administration

FROM: R. S. Brown, Jr.
Assistant to the Director
and Chief,
Program Support Branch, NMSS

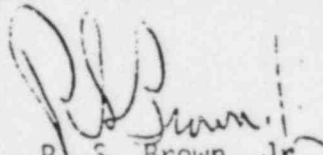
SUBJECT: DRAFT NOTICE OF PROPOSED RULE MAKING

We have reviewed the September 22, 1981 draft Notice of Proposed Rule Making which would amend the Commission's license fee schedule. It is our understanding that the following information was inadvertently left out of the draft. The summary of materials fees and costs chart which starts on page 11 of Enclosure A does not include the present range of costs for renewals. The maximum amount in the range of costs for Category 1A through 1H amendments on page 11 should be based on a combination of safety and safeguards costs. The new fee category 4D for Part 30 licenses specifically authorizing contingency storage of low level waste at power reactor sites should be added to the charts on pages 12 and 28 of Enclosure A. Page 4 of the Commission Paper should state that NMSS review of topical reports filed by licensees or vendors is included, and an appropriate entry should be included in Enclosure A.

We feel that the new procedure for fee collection is not appropriate for certain Materials Licenses. A minimum threshold of staff time expended should be established before the six month billing starts; otherwise, the administrative burden of collecting the information and billing the applicant would exceed the amount of time expended on the review. We suggest a threshold of ten staff hours.

The fee category numbers in Enclosure A on pages 11 and 12 are inconsistent with the fee category numbers on pages 25 through 30.

NMSS will concur on the draft after the above changes are made. If you have any questions on the above comments, please call Claudia Seelig on Ext. 74072.


R. S. Brown, Jr.
Assistant to the Director
and Chief,
Program Support Branch, NMSS

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