



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

SEP 28 1981

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

FROM: Victor Stello, Jr., Director  
Office of Inspection & Enforcement

SUBJECT: DRAFT NOTICE OF PROPOSED RULE MAKING - REVISED  
LICENSE FEE SCHEDULES

I have reviewed the proposed rule making notice. I am not commenting on the policy of what should be included or excluded from the license fee schedule. However, I have identified three items you might want to consider before finalizing the proposal.

First, your staff has not included the time expended by inspectors while traveling to conduct inspections/investigations. It is a direct staff expenditure that would contribute to the objective of more completely recovering costs.

Second, page 7 of Enclosure "A" states that the applicability of charges for Part 19.16 investigations (employee allegations) would be decided on an individual basis. Since licensees derive the same benefit from these investigations as they do any other, I see no need to single these out for special consideration.

Finally, I would like to have it made clear in the proposal that IE will not be able to separately identify the manhours for each inspection report issued. However, if a billing is questioned by a licensee, we will be prepared to identify the total inspection activity that occurred during the billing period, thereby giving the licensee a clear picture of the inspection work completed.

*Victor Stello, Jr.*  
Victor Stello, Jr.  
Director  
Office of Inspection  
and Enforcement

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