



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

September 28, 1981

RECEIVED BY LFMB
DATE 9/29/81
BY A.M.
V.M.S.

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

FROM: Learned W. Barry
Controller

SUBJECT: DRAFT NOTICE OF PROPOSED RULEMAKING RE LICENSE
FEE SCHEDULE

We have reviewed the subject draft and offer the following comments:

Page 4, Third Paragraph

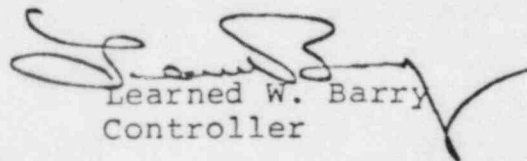
For clarity, delete the fourth and fifth lines and after the word "add" and insert the following, "the inflation factor (used in formulating the budgets for FY 1978-FY 1981) for all other allocated costs." ✓

Page 11, Last Paragraph

Delete the word "concur" and insert the words "have coordinated."

It is felt that the offices listed are not in a position to concur in the raising of license fees, but that only the Commission can do so.

These changes have been discussed with Bill Miller's staff.


Learned W. Barry
Controller

cc: ✓ W. O. Miller, ADM/LFMB

25

8302160141 830111
PDR FOIA
KNOWLES82-607 PDR

CHANGES DISCUSSED IN SECY-81-615 AND SUPPLEMENTS THERETO

- . REVISE LABOR RATES FOR PROGRAM OFFICES USING '81 ACTUAL COST DATA
- . REVISED RANGES AND REMOVED FEE CEILING FOR REACTOR AND MAJOR FUEL CYCLE LICENSES (CP, OL, TR, PDA, FDA, SP)
- . ASSESS FEES FOR PART 50 AMENDMENTS AND OTHER REQUIRED APPROVALS BASED ON ACTUAL COSTS RATHER THAN AVERAGE COST METHOD (CLASSES ELIMINATED)
- . CHARGE FOR ALL INSPECTIONS (ROUTINE AND NONROUTINE) RATHER THAN ROUTINE ONLY
- . FEES FOR PART 55 APPL. (REQUAL., REPLACEMENT, REEXAM.) (ACTUAL COSTS BILLED TO UTILITY)
- . FEES FOR ORDERS AND APPL. & REQUESTS RESULTING FROM ORDERS
- . REVISE LICENSE & INSPECTION FEES FOR RADIOISOTOPES LICENSES

CHANGES DISCUSSED IN SECY-81-615 AND SUPPLEMENTS THERETO (CONTD:)

- . REVISE BILLING PROCEDURE FOR ACTUAL COST CASES (BILL FOR WORK AS IT PROGRESSES)

- . PROVIDES FOR ANNUAL UPDATE OF FEE SCHEDULE

- . CHARGE FOR CONTESTED HEARINGS

COMPARISON OF REACTOR FEES

	<u>CURRENT RANGE</u> ^{1/}	<u>PROPOSED RANGE</u> ^{2/}
<u>POWER</u>		
CP REVIEW	\$846,000 - \$1,069,000	\$2,239,000 - \$3,260,000
OL REVIEW	829,000 - 1,025,000	2,735,000 - 3,182,000
AMENDMENT REVIEWS	400 - 45,900	150 - 164,600
ROUTINE SAFETY INSP./YR.	60,400 - 75,700	41,600 151,800
ROUTINE SAFEGUARDS INSP./YR.	9,500 - 11,800	2,100 14,300
NON ROUTINE SAFETY/YR.	NO CHARGE	4,200 73,100
<u>RESEARCH & TEST</u>		
AMEND. REVIEWS	\$ 600 - \$20,000	\$150 - 42,100
ROUTINE SAFETY INSP./YR.	4,200 - 9,000	800 - 2,400

1/CURRENT CAPS BASED ON AVERAGE COST METHOD FOR TYPE REACTOR.

2/FEEES BASED ON THE ACTUAL COST TO PROCESS AN APPLIC. FOR AN INSPECTION WITH NO CAP.

COMPARISON OF FUEL CYCLE LICENSE FEES
(ACTUAL COSTS)

	<u>LICENSE COSTS</u>			<u>AMENDMENT COSTS</u>	
	<u>CURRENT</u> (MAXIMUM)	<u>PROPOSED RANGE</u>		<u>CURRENT</u>	<u>PROPOSED RANGE</u>
1.A. SNM					
➤ 5Kg U-235 OR 2Kg U-233-FUEL FAB.	\$136,600	\$468,000-	\$825,000	\$150-\$34,600	\$250-\$170,000
➤ 2Kg Pu-FUEL FAB.	771,900	\$876,000-	1,444,000	150- 75,000	250-\$222,000
1.B. RECEIPT & STG. SPENT FUEL - NEW SITE	325,000	354,000-	609,000	150- 88,500	250-\$159,000
EXISTING SITE	234,300	204,000-	419,000	150- 88,500	250-\$159,000
2.A. SOURCE MATERIAL					
URANIUM MILLING	107,700	208,000-	343,000	150- 20,800	300- 54,000
IN-SITU LEACHING:					
PRODUCTION SCALE	66,500	191,000-	258,000	150- 4,200	300- 43,000
R & D SCALE	23,800	23,000-	91,000	150- 4,200	300- 22,000
4.A. WASTE BURIAL	323,100	52,000-	818,000	150-197,700	150-152,000
11.A. EVAL. SPENT FUEL CASK	83,100	46,000-	164,000	150- 6,900	500- 43,000

COMPARISON OF RADIOISOTOPE LICENSE FEES

(AVERAGE COSTS)

<u>CATEGORY</u>	<u>TYPE REV.</u>	<u>CURRENT (77)</u>	<u>REVISED (81)</u>
SNM-SEALED SOURCES IN DEVICES	NEW	\$110	\$230
	RENEW	110	120
	AMEND.	40	60 .
ALL OTHER SNM	NEW	\$460	350
	RENEW	460	350
	AMEND.	110	120
SMALL SOURCE MATL. PROG.	NEW	\$140	\$350
	RENEW	70	230
	AMEND.	40	120
BYPRODUCT MATL. BROAD LICEN. MFG.-COMMERCIAL	NEW	\$460	\$1,200
	RENEW	460	700
	AMEND.	110	120

COMPARISON OF RADIOISOTOPE (CONTD:)

<u>CATEGORY</u>	<u>TYPE REV.</u>	<u>CURRENT (77)</u>	<u>REVISED (81)</u>
R&D BROAD LICENSE	NEW	\$190	\$1,200
	RENEW	150	700
	AMEND.	40	120
INDUST. RADIOGRAPHY	NEW	\$190 - 460	\$700
	RENEW	150 - 460	700
	AMEND.	40 - 110	230
ALL OTHER BYPRODUCT MATL.	NEW	\$110	\$230
	RENEW	110	230
	AMEND.	40	60
BROAD MEDICAL	NEW	\$190	\$1,200
	RENEW	150	700
	AMEND.	40	120
NON-BROAD MEDICAL	NEW	\$190	\$580
	RENEW	150	580
	AMEND.	40	230

ESTIMATED COLLECTIONS
(\$ IN MILLIONS)

SCHEDULE		<u>FY 1982</u>	<u>FY 1983</u>	<u>FY 1984</u>
CURRENT	NRR	\$5.7	\$ 8.2	*\$11.4
	IE & REG.	9.3	10.8	11.6
	NMSS	<u>1.0</u>	<u>1.0</u>	<u>1.0</u>
		\$16.0	\$20.0	\$24.0
<u>PROPOSED*</u>	NRR	N/A	\$38.0	\$30.0
	IE & REG.	N/A	23.0	27.0
	NMSS	N/A	<u>3.0</u>	<u>3.0</u>
			\$64.0	\$60.0

*ASSUMES 1/1/83 EFFECTIVE DATE

RECOMMENDATIONS

APPROVED:

- REVISION OF LABOR RATES (BASED ON 1981 ACTUAL COSTS); ANNUAL UPDATE
- REMOVAL OF CEILING FOR FACILITIES AND FC REVIEWS
- CHARGES BASED ON ACTUAL COSTS FOR PART 50 AMENDMENTS
- COST RECOVERY FOR ALL INSPECTIONS (INCLUDING INVESTIGATIONS)
- COST RECOVERY FOR PART 55 APPL. (CHARGE TO UTILITIES)
- COST RECOVERY FOR ORDERS AND APPLICATIONS RESULTING FROM ORDERS
- CHARGES FOR RADIOISOTOPE (LICENSES AND INSPECTIONS) - ACTUAL COSTS
- REVISED BILLING PROCEDURE - PROGRESS PAYMENTS
- COST RECOVERY FOR CONTESTED HEARINGS

EXEMPTIONS

FEDERAL AGENCIES (970 LICENSES) (ELIMINATION WOULD REQUIRE STAT. AUTH.)	\$230,000
NONPROFIT EDUC. INST. (650 LICENSES)	\$280,000
STATE AGENCIES (750 LICENSES)	\$120,000