

FEB 12 1982

MEMORANDUM FOR: Lloyd Donnelly, Director, Regional Coordination Staff, ADM
FROM: William O. Miller, Chief, License Fee Management Branch, ADM
SUBJECT: PROPOSED LICENSE FEE REVISION-ROUTINE INSPECTION EFFORT

We have reviewed your February 5, 1982 memorandum and its enclosures. We note that for every category, except 8A, the average professional time required to conduct a routine inspection has decreased since FY 1977. In about one-half of the categories the professional time required to conduct a routine inspection is 50% below that required in FY 1977. Before we prepare a staff paper and fee schedule for the Commission using these numbers, we want to verify that the numbers you provided are being interpreted as you intended. We have enclosed, for comparative purposes, a table showing the professional staff hours required to perform a routine inspection of small materials license programs in FY 1977 and FY 1981.

Category 3A of 10 CFR 170 is currently divided into two categories i.e., large programs and small programs. 1/ We would appreciate receiving inspection data concerning the two types of programs. With respect to Category 4B, please provide a best estimate of the inspection time required if there were licensees in this category. It is our understanding that Adco Services Company has filed an application with the Commission requesting authorization to conduct activities which must be covered by a Category 4B license.

In our January 8 request we asked for the estimated total number of routine and non-routine inspections to be conducted in each fee category. This information is needed to estimate fee collections from routine and non-routine inspections.

We appreciate your assistance in this matter.

Original Signed by
Wm. O. Miller

William O. Miller, Chief
License Fee Management Branch
Office of Administration

cc: DJDonoghue, ADM
PNorry, ADM
JBlaha, IE

DISTRIBUTION:
License Fee File
CJHolloway, LFMB ✓
LFMB R/F (2)

(61)

1/ Large Programs - Those licensees handling or processing loose or unsealed material for the manufacture of tagged compounds or products such as sealed sources and distribution of same to others.

Small Programs - Those licensees who are processors of "finished products" such as previously tagged compounds and sealed sources for introduction into products or repackaging for sale to others.

OFFICE	LFMB:ADM	LFMB:ADM				
USERNAME	CJHolloway:vm	WOMiller				
DATE	2/16	8302180304 830111				
	PDR FOIA					
	KNOWLES82-607	PDR				

AVERAGE PROFESSIONAL STAFF HOURS
TO CONDUCT A ROUTINE INSPECTION
FY 1977 VS. FY 1982

Routine Inspections

SENT FEE CATEGORIES

Average Professional
Staff Hours FY '77^{1/}

Estimated
Average Professional
Staff Hours FY '82²

SPECIAL NUCLEAR MATERIAL

I. Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems.

9

4

J. All other special nuclear material licenses, except licenses authorizing special nuclear material in unsealed form in combination that would constitute a critical quantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category 1A and special nuclear material for use in power generation which shall pay the fee in Category 10.

21.6

6

SOURCE MATERIAL

D. All other source material licenses (Does not include milling, in-situ leaching heap leaching, refining uranium mill concentrates to UF₆ ore buying stations and ion exchange facilities.)

12.6

7

BYPRODUCT MATERIAL

A. Licenses for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution.

Large
Program

43.2

14

Small
Program

21.6

professional staff hours used in the fee schedule effective 3/78

Proposed estimates to be used in revising the fee schedule provided by
2/5/82, Memo Donnelly to Miller.

AVERAGE PROFESSIONAL STAFF HOURS
 TO CONDUCT A ROUTINE INSPECTION
 FY 1977 VS. FY 1982

PRESENT FEE CATEGORIES	<u>Routine Inspections</u>	
	<u>Average Professional Staff Hours FY '77^{1/}</u>	<u>Estimated Average Profession Staff Hours FY '82</u>
BYPRODUCT MATERIAL - CON'T		
B. Licenses issued pursuant to §§ 32.72, 32.73 and 32.74 of this chapter authorizing the processing or manufacturing and distribution of radiopharmaceuticals, generators or reagents kits, and sources and devices, containing byproduct material.	18	9
C. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at one location.	19.8	10
D. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at more than one location.	27	14
E. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (self-shielded units).	10.8	4
F. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.	10.8	9

1/ Professional staff hours used in the fee schedule effective 3/78
 2/ Proposed estimates to be used in revising the fee schedule provided by
 2/ 5/22 Memo Donnelly to Miller.

AVERAGE PROFESSIONAL STAFF HOURS
TO CONDUCT A ROUTINE INSPECTION
FY 1977 VS. FY 1982

Routine Inspections

PRESENT FEE CATEGORIES

BYPRODUCT MATERIAL - CON'T

Average Professional
Staff Hours FY '77^{1/}

Estimated
Average Professional
Staff Hours FY '82^{2/}

G. Licenses issued pursuant to Subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons generally licensed under Parts 31 or 35 of this chapter.

10.8

6

H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials.

10.8

5

^{1/}Professional staff hours used in the fee schedule effective 3/78.

^{2/}Proposed estimates to be used in revising the fee schedule provided by 2/5/82, Memo Donnelly to Miller.

AVERAGE PROFESSIONAL STAFF HOURS
TO CONDUCT A ROUTINE INSPECTION
FY 1977 VS. FY 1982

ESSENT FEE CATEGORIES	Routine Inspections	
	Average Professional Staff Hours FY '77 ^{1/}	Estimated Average Professional Staff Hours FY '82 ^{1/}
BYPRODUCT MATERIAL - CON'T		
I. Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter.	10.8	5
J. Licenses issued pursuant to § 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium 147 to persons exempt from the licensing requirements of Part 30 of this chapter.	10.8	6
K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research.	10.8	7
L. All other specific byproduct material licenses, except those in Categories 4A through 10B.	10.8	7

Professional staff hours used in the fee schedule effective 3/78
Proposed estimates to be used in revising the fee schedule provided by

AVERAGE PROFESSIONAL STAFF HOURS
 TO CONDUCT A ROUTINE INSPECTION
 FY 1977 VS. FY 1982

PRESENT FEE CATEGORIES	Routine Inspections	
	Average Professional Staff Hours FY '77 ^{1/}	Estimated Average Professional Staff Hours FY '82
WASTE DISPOSAL		
B. Waste disposal licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	18	-
C. Waste disposal licenses specifically authorizing the receipt of <u>prepackaged</u> waste byproduct material, source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	18	14
WELL LOGGING AND WELL SURVEYS AND TRACER STUDIES		
A. Licenses for possession and use of specific nuclear material and/or byproduct material for well logging, well surveys, and tracer studies.	14.4	7

Professional staff hours used in the fee schedule effective 3/78
 Proposed estimates to be used in revising the fee schedule provided by
 2/ 5/82, Memo Donnelly to Miller.

AVERAGE PROFESSIONAL STAFF HOURS
 TO CONDUCT A ROUTINE INSPECTION
 FY 1977 VS. FY 1982

Routine Inspections

SENT FEE CATEGORIES

Average Professional
Staff Hours FY '77^{1/}

Estimated
Average Professional
Staff Hours FY '82^{2/}

NUCLEAR LAUNDRIES

A. Licenses for commercial collection and laundry of items contaminated with byproduct material, source material, or special nuclear material.	16.2	10
--	------	----

HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL

A. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter for human use of byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.	12.6	6
---	------	---

B. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to medical institutions, or two or more physicians on a single license, for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.	12.6	7
--	------	---

C. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to an individual physician for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.	9	6
---	---	---

/ Professional staff hours used in the fee schedule effective 3/78

/ Proposed estimates to be used in revising the fee schedule provided by

THE AVERAGE PROFESSIONAL STAFF
 TO CONDUCT A ROUTINE INSPECTION
 FY 1977 VS. FY 1982

Routine Inspections

PRESENT FEE CATEGORIES

Average Professional
Staff Hours FY '77^{1/}

Estimated
 Average Professional
Staff Hours FY '82

B. CIVIL DEFENSE

A. Licenses for possession
 and use of byproduct
 material, source material,
 or special nuclear
 material for civil defense
 activities.

5.4

6

D. POWER SOURCE

A. Licenses for the manufac-
 ture and distribution of
 encapsulated byproduct
 material or special
 nuclear material for use
 in power generation,
 except reactor fuel.

21.6

10

^{1/} Professional staff hours used in the fee schedule effective 3/78

^{2/} Proposed estimates to be used in revising the fee schedule provided by
 2/ 5/82, Memo Donnelly to Miller.