

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

MAR 1 1982

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MEMORANDUM TO: W. O. Miller, Chief
License Fee Management Branch

FROM: Lloyd J. Donnelly, Director
Regional Coordination Staff
Office of Administration

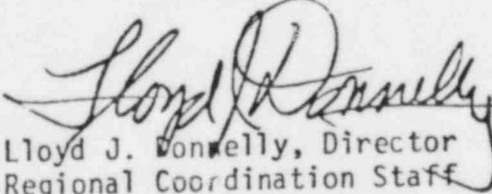
SUBJECT: PROPOSED LICENSE FEE REVISION - RESPONSE TO W. O. MILLER'S
MEMORANDUM OF FEBRUARY 12, 1982

Attached is the information requested in paragraph 2 and 3 of your memorandum.

During research of the matter raised in your paragraph 1, we found that in five fee categories our estimates of inspection staffhours needed to be increased. However, these increases do not explain a major portion of the differences you cited between the FY 1977 data and our FY 1982 staffhour estimates. There are several reasons why the FY 1977 staffhour estimates are higher. First, the FY 1977 staffyear estimates were prepared using a planning base of 1800 annual inspections when approximately 2700 inspections were actually conducted in the calendar year 1977. With a fixed number of materials inspectors, the time per inspection for 2700 licensees would be considerably less than the time needed for 1800 licensees. For FY 1982 we are expecting to perform 2800 inspections. Second, it appears that your staff used a factor of 1300 staffhours/staffyear to convert FY 1977 routine inspection staffyears to routine inspection staffhours. Using an 1800 factor only excludes leave time and holidays. Hence, it includes all time spent on such activities as travel, training, reactive effort and non-docket related work, all of which have been excluded from the routine inspection staffhour figures we sent to you. To convert our staffhour estimates to staffyears of direct routine inspection including preparation and documentation, divide the estimate at the attached by a factor of 707.2 inspection staffhours/staffyear. If this is done, then a one for one comparison can be made.

Please contact me to discuss this matter further should you have additional questions.

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PDR FOIA
KNOWLES82-607 PDR


Lloyd J. Donnelly, Director
Regional Coordination Staff
Office of Administration

cc: D. Donoghue
P. Norry
J. Blaha

Attachment:
As stated

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ENCLOSURE I

LICENSE FEE CATEGORY		ROUTINE NON-ROUTINE	SAFETY & ENVIRONMENTAL STAFFHOURS			# OF FY82 INSPECTIONS ^{1/}
			MIN	MAX	AVG	
1	I	R -	3	7	4	9
		NR -	4	22	12	16
1	J	R -	3	9	6	17
		NR -	4	9	7	3
2	D	R -	3	11	7	44
		NR -	4	22	13	17
3	A (Small)	R -	5	13	9	170
		NR -	6	27	17	42
3	A (Lg)	R -	10	25	18	3
		NR -	6	32	19	1
3	B	R -	7	13	9	15
		NR -	5	16	13	11
3	C	R -	6	16	10	109
		NR -	6	28	20	18
3	D	R -	7	26	19	194
		NR -	7	35	26	23
3	E	R -	3	7	4	19
		NR -	4	9	6	5
3	F	R -	6	13	9	3
		NR -	7	24	20	1
3	G	R -	4	8	6	22
		NR -	3	8	6	4
3	H	R -	3	7	5	35
		NR -	3	7	5	7
3	I	R -	3	8	5	16
		NR -	4	14	8	4
3	J	R -	4	8	6	9
		NR -	3	9	6	2
3	K	R -	4	12	11	117
		NR -	5	14	11	24
3	L	R -	4	11	10	896
		NR -	4	14	10	163

^{1/} Represents the total number of licensees that are to be inspected in each fee category within a one year period.

LICENSE FEE CATEGORY	ROUTINE NON-ROUTINE	SAFETY & ENVIRONMENTAL STAFFHOURS			# OF FY82 INSPECTIONS
		MIN	MAX	AVG	
4 B <u>1/</u>	R -	8	30	19	0
	NR -	8	19	14	0
4 C	R -	10	20	14	4
	NR -	10	24	18	2
5 A	R -	5	11	7	45
	NR -	5	9	7	15
6 A	R -	8	14	10	1
	NR -	12	24	16	1
7 A	R -	4	13	10	96
	NR -	5	21	16	32
7 B	R -	5	13	11	483
	NR -	5	23	19	43
7 C	R -	4	8	6	48
	NR -	5	7	6	15
8 A	R -	5	8	6	.10
	NR -	4	9	6	.10
9A & 9B <u>2/</u>	R -	0	0	0	0
	NR -	0	0	0	0
10 A	R -	4	16	10	.33
	NR -	4	16	10	.10

1/ Represents the total number of licensees that are to be inspected in each fee category within a one year period.

2/ No licensees were identified by the Regional Offices.