



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

J. Holloway

JUN 2 1982

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

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

SUBJECT: ELD REQUIRED STATEMENT FOR COMMISSION PAPER
ON PROPOSED REVISION FOR LICENSE FEES

Below, please find the requested statement to support the estimates embodied in the computation of proposed inspection fees as contained in the Commission paper.

The number of FY 1982 inspections and the associated staffyears for each license fee category that were forwarded to your branch on May 14, 1982 are best estimates obtained from senior technical staff in the regions. In the aggregate, the estimated staffhour expenditures and number of planned inspections are consistent with generic budget planning factors as well as historical data.

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

cc: K. Kohler
J. Holloway

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MEMORANDUM FOR: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine

FROM: William J. Dircks, Executive Director for Operations

SUBJECT: PART 170 LICENSE AND INSPECTION FEES - RADIOISOTOPE LICENSES

This responds to the Commission's request for the staff to conduct a study to determine whether use of actual costs in establishing license and inspection fees for radioisotope licenses would have a significant economic impact on a substantial number of these small programs.

Currently there are 23 categories of small licensed programs that use byproduct material, source material, and small quantities of special nuclear material. Categories are determined largely by use of the material, e.g., industrial radiography, medical, oil well logging, etc. Fees for these licenses are based on the average cost to process a new license application, a renewal or amendment within a category of license or to conduct a routine inspection of a licensed program within a license category.

Economic impact of assessing fees based on actual cost.

The Staff examined the alternative of fees based on actual costs v. average costs for radioisotope applications and licenses and concluded that the use of actual costs in establishing fees would have little impact on these small programs. The major difference would be that under an actual cost system, an applicant filing a complete application would pay a smaller fee than an applicant whose application was incomplete because less review effort would be required. Likewise a licensee who operates in accord with the regulations and terms and conditions of his license should pay less in inspection fees. This would provide for greater equity and fairness in fee assessment. Many licensees (in commenting on previous fee schedules) have suggested that fees should be based on actual costs.

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Procedure for recording staff time.

Currently all license applications received by the Commission are assigned a docket number and are entered into the computer where their progress is tracked by milestones. However, the individual license reviewers in NMSS, in reporting the amount of time expended in the review of a license application, charge their time to two different systems. For the large fuel cycle applications (e.g., fuel fabrication, uranium mills, etc.) the actual time expended is charged to the specific docket and fees are assessed based on the actual professional staff hours expended. For the small materials program the professional staff in the Material Licensing Branch charges licensing review time to program codes and activity codes rather than to specific docketed cases. A program code identifies a specific category of license (e.g., industrial radiography), and the activity code further qualifies the effort as associated with a new license, amendment or renewal. Similarly an inspector charges inspection time to a category of license rather than to a specific docket number. For the small materials program, this system supports fees based on average costs rather than actual costs. To assess fees based on the actual professional staff hours expended would require both the licensing and inspection staffs to charge their review and inspection time to dockets on a case-by-case basis.

Administratively, greater effort would be required to charge professional staff review or inspection time to the individual docket. NMSS recommends against the use of actual costs in establishing a revised fee schedule based on their conclusion that actual costs would not increase collections, but would significantly increase the administrative burden on the NMSS technical staff because it would need to keep track of time expenditures on a case-by-case basis for more than 5,000 cases per year, each of which averages less than five (5) hours of review time. Another factor which would add to the administrative burden is that the review of an application may be completed over several weeks or months while the reviewer waits for additional information requested from the applicant. To a lesser degree, fees based on actual costs would also increase the administrative burden for inspection.

Revised fee schedules.

Enclosed are revised licensing and inspection fee schedules which are based on average costs. Enclosure 1 compares current fees (FY 1978 Schedule) with fees necessary to recover current licensing costs. The table shows that licensing costs have increased for most categories of use. Significant increases are found in charges for broad licenses issued to manufacturers and distributors of radioisotopes and products or devices containing radioisotopes, e.g., radiopharmaceuticals, gauging devices, light sources, tagged compounds, etc. Similarly fees for broad licenses authorizing industrial R & D and medical treatment and research have increased significantly. Overall licensing costs for these more complex radioisotope programs have increased 3 to 6 times.

The license fees shown in Enclosure 1 were determined by multiplying the average professional staff time required to process the three types of material license applications by the professional staff-hour rate. The average time was derived from computerized data input for calendar years 1981 and 1982, along with estimates provided by the senior technical reviewers who process these license applications. The average times, used in fee computation, are based on current radiation protection requirements, which have changed since the current fee schedule was developed in 1977.

Additional license fee categories have been added to the schedule to more clearly define the types of licenses for fee purposes. For example, broad licenses now take considerably more time to review than previously because of additional requirements. For those fee categories where an insufficient number of applications have been reviewed to establish an average professional staff time for review, it would be necessary to base the fee on actual costs. As indicated above, once the average professional staff review time has been determined it is then multiplied by the professional hourly rate for NMS.

Enclosure 2 compares FY 1978 inspection fees for radioisotope licenses with current costs. Currently fees are assessed for routine inspections only and the frequency for imposing charges is limited. Under the revised schedule all inspections (routine and non-routine) would be subject to fees and would be based on average costs. As in licensing, there is a wide range of inspection effort within the same category of license.

In developing the inspection fees for materials licenses as shown in Enclosure 2, the senior technical staff determined the average professional staff time required to conduct routine and non-routine inspections of licensed programs. The average time was determined from computer data for FY 1981, and the first six months of FY 1982. The inspection fee categories track those for licensing. The average professional staff time requirement for each category was multiplied by the hourly professional rate for IE.

(Signed) T. A. Rehm

for William J. Dircks
Executive Director for Operations

Enclosures:

1. Revised Table of License Fees
2. Revised Table of Inspection Fees

DISTRIBUTION:

- WJDircks, EDO
- PNorry, ADM
- WOMiller, LFMB
- CJHolloway, LFMB ✓
- ASCabell, LFMB
- LFMB License Fee File
- LFMB R/F (2)
- EDO R/F

OFFICE	LFMB:ADM	ADM	EDO	ELD		
NAME	WOMiller:bs	PNorry	WJDircks	RFonner		
DATE	6/24/82	6/ /82	6/ /82	6/ /82		

<u>FFC CATEGORIES</u>	<u>TYPE OF REVIEW</u>	<u>Current Fees (3/78)</u>	<u>Proposed Fees</u>
<u>SPECIAL NUCLEAR MATERIAL</u>			
C. Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems.	New License	\$110	\$230
	Renewal	110	120
	Amendment	40	60
D. 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 fees in accordance with Category 1A.	New License	\$460	\$350
	Renewal	460	350
	Amendment	110	120

<u>SOURCE MATERIAL</u>			
Use of source material for shielding.	New License	\$140	\$60
	Renewal	70	60
	Amendment	40	60
C. All other source material licenses.	New License	\$140	\$350
	Renewal	70	230
	Amendment	40	120

<u>BYPRODUCT MATERIAL</u>			
A. Licenses of broad scope for possession and use of by-product material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution to specific licensees.	New License	\$460	\$1,200
	Renewal	460	700
	Amendment	110	120

CATEGORIES	TYPE OF REVIEW	Current Fees (3/78)	Proposed Fees
<u>BYPRODUCT MATERIAL (con't.)</u>			
B. Other licenses for possession and use of byproduct material issued pursuant to Part 30 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution to specific licensees.	New License	\$460	\$460
	Renewal	460	460
	Amendment	110	120
C. Licenses issued pursuant to §32.72, 32.73 and/or 32.74 of Part 32 of this chapter authorizing the processing or manufacture and distribution of radio-pharmaceuticals, generators, reagent kits and/or sources and devices containing byproduct material.	New License	\$190	\$1,400
	Renewal	150	1,400
	Amendment	40	230
Licenses issued pursuant to §32.72, 32.73 and/or 32.74 of Part 32 of this chapter authorizing distribution of radiopharmaceuticals, generators, reagent kits and/or sources or devices not involving processing of byproduct material.	New License	\$190	\$700
	Renewal	150	700
	Amendment	40	120
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).	New License	\$190	\$230
	Renewal	150	170
	Amendment	40	120
F. Licenses for possession and use of less than 10,000 curies of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.	New License	\$460	\$580
	Renewal	460	350
	Amendment	110	230
Licenses for possession and use of 10,000 curies or more of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.	New License	\$460	\$2,300
	Renewal	460	930
	Amendment	110	230

CATEGORIES	TYPE OF REVIEW	Current Fees (3/78)	Proposed Fees
<u>BYPRODUCT MATERIAL (con't.)</u>			
H. Licenses issued pursuant to subpart A of Part 32 of this chapter to distribute items containing byproduct material which require device review to persons exempt from the licensing requirements of Part 30 of this chapter.	New License	\$950	\$580 ^{1/}
	Renewal	570	230 ^{1/}
	Amendment	230	120 ^{1/}
I. Licenses issued pursuant to subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material which do not require device evaluation to persons exempt from the licensing requirements of Part 30 of this chapter.	New License	\$190	\$290
	Renewal	150	230
	Amendment	40	60
J. Licenses issued pursuant to subpart B of Part 32 of this chapter to distribute items containing byproduct material which require sealed source and/or device review to persons generally licensed under Parts 31 or 35 of this chapter, except specific licenses authorizing redistribution of items which have been authorized for distribution to persons generally licensed under Parts 31 or 35 of this chapter.	New License	\$950	\$1,200 ^{2/}
	Renewal	570	700 ^{2/}
	Amendment	230	230 ^{2/}
K. Licenses issued pursuant to subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct which do not require sealed source and/or device review to persons generally licensed under Parts 31 or 35 of this chapter.	New License	\$110	\$290
	Renewal	110	230
	Amendment	40	60

^{1/}In addition to fee shown, applicant will be assessed an additional \$460 for each device review.

^{2/}In addition to the fee shown, an additional \$1,600 will be assessed for each device/product review and \$350 for each sealed source review.

CATEGORIES	TYPE OF REVIEW	Current Fees (3/78)	Proposed Fees
<u>BYPRODUCT MATERIAL (con't.)</u>			
L. Licenses of broad scope for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for research and development which do not authorize commercial distribution.	New License	\$190	\$1,200
	Renewal	150	700
	Amendment	40	120
M. Other licenses for possession and use of byproduct material issued pursuant to Part 30 of this chapter for research and development which do not authorize commercial distribution.	New License	\$190	\$700
	Renewal	150	460
	Amendment	40	120
N. Licenses which authorize services for other licenses, except for leak testing and waste disposal pickup services.	New License	\$110	\$930
	Renewal	110	930
	Amendment	40	120
O. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations.	New License	\$190, \$460 ^{3/}	\$700
	Renewal	150, 460 ^{3/}	700
	Amendment	40, 110 ^{3/}	230
P. All other specific byproduct material licenses, except those in the categories 4A through 9B.	New License	\$110	\$230
	Renewal	110	230
	Amendment	40	60

WASTE DISPOSAL

B. Licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging or repackaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	New License	\$1,100	\$1,400
	Renewal	570	930
	Amendment	570	350

^{3/} Currently, there are two fee categories covering radiography operations.

FEE CATEGORIES	TYPE OF REVIEW	Current Fees (3/78)	Proposed Fees
<u>WASTE DISPOSAL (con't.)</u>			
C. Licenses specifically authorizing the receipt of prepackaged 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.	New License	\$190	\$930
	Renewal	150	460
	Amendment	40	120
D. Licenses specifically authorizing the receipt of waste byproduct material, source material, and/or special nuclear material from other persons for treatment or disposal by incineration; packaging of residues resulting from incineration; and transfer of packages containing residues to another person authorized to receive or dispose of waste material.	New License	\$1,100	4/
	Renewal	570	4/
	Amendment	570	4/
<u>WELL LOGGING</u>			
A. Licenses specifically authorizing use of byproduct material and/or special nuclear material for well logging, well surveys, and tracer studies other than field flooding tracer studies.	New License	\$460	\$700
	Renewal	460	700
	Amendment	110	170
B. Licenses specifically authorizing use of byproduct material for field flooding tracer studies.	New License	\$460	4/
	Renewal	460	4/
	Amendment	110	4/

4/ Fees to be based on actual cost to process the application.

FEE CATEGORIES	TYPE OF REVIEW	Current Fees (3/78)	Proposed Fees
<u>NUCLEAR LAUNDRIES</u>			
A. Licenses for commercial collection and laundry of items contaminated with byproduct material, source material, or special nuclear material.	New License	\$460	\$700
	Renewal	460	700
	Amendment	110	170
<u>HUMAN USE OF BYPRODUCT, SOURCE OR SPECIAL NUCLEAR MATERIAL</u>			
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.	New License	\$300	\$580
	Renewal	270	350
	Amendment	40	230
Licenses of broad scope issued to medical institutions or two or more physicians pursuant to Parts 30, 33, 35, 40 and 70 of this chapter authorizing research and development including human use of byproduct material, except licenses for byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.	New License	\$190	\$1,200
	Renewal	150	700
	Amendment	40	120
C. Other licenses issued pursuant to Parts 30, 35, 40 and 70 of this chapter for human use of byproduct material, source material, and/or special nuclear material, except licenses for byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.	New License	\$190	\$580
	Renewal	150	580
	Amendment	40	230

FEE CATEGORIES	TYPE OF REVIEW	Current Fees (3/78)	Proposed Fees
<u>CIVIL DEFENSE:</u>			
A. Licenses for possession and use of byproduct material, source material, or special nuclear material for civil defense activities.	New License	\$190	\$290
	Renewal	150	230
	Amendment	40	60
<u>DEVICE, PRODUCT OR SEALED SOURCE SAFETY EVALUATION</u>			
A. Safety evaluation of devices or products containing byproduct material, source material, or special nuclear material, except reactor fuel devices and devices or products distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.	New License	\$570	\$1,600
	Amendment	-	580
B. Safety evaluation of sealed sources containing byproduct material, source material, or special nuclear material except: (1) reactor fuel, (2) sealed source(s) distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.	New License	\$110	\$350
	Amendment	-	\$120

COMPARISON OF PRESENT VS.
PROPOSED MATERIALS LICENSE INSPECTION FEES

<u>CATEGORIES</u>	<u>TYPE OF INSPECTION</u>	<u>Current Fees (3/78)</u>	<u>Proposed Fees</u>
<u>SPECIAL NUCLEAR MATERIAL</u>			
C. Licenses for possession and use of special nuclear material in sealed sources contained in devices used in industrial measuring systems.	Routine	\$330	\$210
	Non-Routine	N/A ^{1/}	640
D. 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 fees in accordance with Category 1A.	Routine	\$780	\$320
	Non-Routine	N/A ^{1/}	370
<u>SOURCE MATERIAL</u>			
B. Use of source material for shielding.	Routine	\$460	\$130
	Non-Routine	N/A ^{1/}	160
C. All other source material licenses.	Routine	\$460	\$370
	Non-Routine	N/A ^{1/}	690
<u>BYPRODUCT MATERIAL</u>			
A. Licenses of broad scope for possession and use of by-product material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution to specific licensees.	Routine	\$1,600	\$ 950
	Non-Routine	N/A ^{1/}	1,000

^{1/}N/A - Not applicable, currently there are no fees for non-routine inspections.

<u>CATEGORIES</u>	<u>TYPE OF INSPECTION</u>	<u>Current Fees (3/78)</u>	<u>Proposed Fees</u>
<u>BYPRODUCT MATERIAL (con't.)</u>			
B. Other licenses for possession and use of byproduct material issued pursuant to Part 30 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution to specific licensees.	Routine	\$780	\$480
	Non-Routine	N/A ^{1/}	900
C. Licenses issued pursuant to §32.72, 32.73 and/or 32.74 of Part 32 of this chapter authorizing the processing or manufacture and distribution of radiopharmaceuticals, generators, reagent kits and/or sources and devices containing byproduct material.	Routine	\$650	\$640
	Non-Routine	N/A ^{1/}	850
Licenses issued pursuant to §32.72, 32.73 and/or 32.74 of Part 32 of this chapter authorizing distribution of radiopharmaceuticals, generators, reagent kits and/or sources or devices not involving processing of byproduct material.	Routine	\$650	\$370
	Non-Routine	N/A ^{1/}	530
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).	Routine	\$390	\$210
	Non-Routine	N/A ^{1/}	320
F. Licenses for possession and use of less than 10,000 curies of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.	Routine	\$390	\$270
	Non-Routine	N/A ^{1/}	580
Licenses for possession and use of 10,000 curies or more of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.	Routine	\$390	\$480
	Non-Routine	N/A ^{1/}	640

<u>CATEGORIES</u>	<u>TYPE OF INSPECTION</u>	<u>Current Fees (3/78)</u>	<u>Proposed Fees</u>
<u>BYPRODUCT MATERIAL (con't.)</u>			
H. Licenses issued pursuant to subpart A of Part 32 of this chapter to distribute items containing byproduct material which require device review to persons exempt from the licensing requirements of Part 30 of this chapter.	Routine	\$390	\$320
	Non-Routine	N/A ^{1/}	320
I. Licenses issued pursuant to subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material which do not require device evaluation to persons exempt from the licensing requirements of Part 30 of this chapter.	Routine	\$390	\$210
	Non-Routine	N/A ^{1/}	320
Licenses issued pursuant to subpart B of Part 32 of this chapter to distribute items containing byproduct material which require sealed source and/or device review to persons generally licensed under Parts 31 or 35 of this chapter, except specific licenses authorizing redistribution of items which have been authorized for distribution to persons generally licensed under Parts 31 or 35 of this chapter.	Routine	\$390	\$320
	Non-Routine	N/A ^{1/}	320
Licenses issued pursuant to subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct which do not require sealed source and/or device review to persons generally licensed under Parts 31 or 35 of this chapter.	Routine	\$390	\$320
	Non-Routine	N/A	320

CATEGORIES	Type Of Inspection	Current Fees (3/78)	Proposed Fees
<u>BYPRODUCT MATERIAL (con't.)</u>			
L. Licenses of broad scope for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for research and development which do not authorize commercial distribution.	Routine	\$390	\$420
	Non-Routine	N/A	530
M. Other licenses for possession and use of byproduct material issued pursuant to Part 30 of this chapter for research and development which do not authorize commercial distribution.	Routine	\$390	\$370
	Non-Routine	N/A ^{1/}	420
N. Licenses which authorize services for other licenses, except for leak testing and waste disposal pickup services.	Routine	\$390	\$320
	Non-Routine	N/A ^{1/}	320
O. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations.	Routine	\$720, 980 ^{2/}	\$ 530
	Non-Routine	N/A	1,200
P. All other specific byproduct material licenses, except those in the categories 4A through 9B.	Routine	\$390	\$530
	Non-Routine	N/A	530
<u>WASTE DISPOSAL</u>			
B. Licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging or repackaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.	Routine	\$650	\$1,000
	Non-Routine	N/A	740
<p>^{2/}Currently, there are two fee categories covering radiography operations.</p>			

CATEGORIES	TYPE OF INSPECTION	Current Fees (3/78)	Proposed Fees
<u>WASTE DISPOSAL (con't.)</u>			
C. Licenses specifically authorizing the receipt of prepackaged 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.	Routine	\$650	\$740
	Non-Routine	N/A ^{1/}	950
D. Licenses specifically authorizing the receipt of waste byproduct material, source material, and/or special nuclear material from other persons for treatment or disposal by incineration; packaging of residues resulting from incineration; and transfer of packages containing residues to another person authorized to receive or dispose of waste material.	Routine	\$650	\$740
	Non-Routine	N/A ^{1/}	900

WELL LOGGING

A. Licenses specifically authorizing use of byproduct material and/or special nuclear material for well logging, well surveys, and tracer studies other than field flooding tracer studies.	Routine	\$520	\$370
	Non-Routine	N/A ^{1/}	370
B. Licenses specifically authorizing use of byproduct material for field flooding tracer studies.	Routine	\$520	\$320
	Non-Routine	N/A ^{1/}	480

FEE CATEGORIES	TYPE OF INSPECTION	Current Fees (3/78)	Proposed Fees
<u>NUCLEAR LAUNDRIES</u>			
A. Licenses for commercial collection and laundry of items contaminated with byproduct material, source material, or special nuclear material.	Routine	\$590	\$530
	Non-Routine	N/A ^{1/}	850
<u>HUMAN USE OF BYPRODUCT, SOURCE OR SPECIAL NUCLEAR MATERIAL</u>			
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.	Routine	\$460	\$530
	Non-Routine	N/A ^{1/}	850
Licenses of broad scope issued to medical institutions or two or more physicians pursuant to Parts 30, 33, 35, 40 and 70 of this chapter authorizing research and development including human use of byproduct material, except licenses for byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.	Routine	\$460	\$740
	Non-Routine	N/A ^{1/}	800
C. Other licenses issued pursuant to Parts 30, 35, 40 and 70 of this chapter for human use of byproduct material, source material, and/or special nuclear material, except licenses for byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.	Routine	\$320, 460 ^{3/}	\$480
	Non-Routine	N/A ^{1/}	690

^{3/}Private practice physicians combined with "other medical" non-broad institutional licenses.

FEE CATEGORIES	TYPE OF INSPECTION	Current Fees (3/78)	Proposed Fees
<u>CIVIL DEFENSE:</u>			
A. Licenses for possession and use of byproduct material, source material, or special nuclear material for civil defense activities	Routine	\$200	\$320
	Non-Routine	N/A ^{1/}	320
<u>DEVICE, PRODUCT OR SEALED SOURCE SAFETY EVALUATION</u>			
A. Safety evaluation of devices or products containing by-product material, source material, or special nuclear material, except reactor fuel devices and devices or products distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.	Routine	No Fees	
	Non-Routine	No Fees	
B. Safety evaluation of sealed sources containing byproduct material, source material, or special nuclear material except: (1) reactor fuel, (2) sealed source(s) distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.	Routine	No Fees	
	Non-Routine	No Fees	