



PROPOSED RULE PR 170 & 171
(59FR 24065)

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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Rhode Island Atomic Energy Commission
NUCLEAR SCIENCE CENTER
South Ferry Road
Narragansett, R.I. 02882-1197
May 26, 1994

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Secretary
Attn.: Docketing and Service Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments Supporting Exemption of State-Owned
Research Reactors from Annual Fees (10CFR171.11)

Dear Sir:

This letter supports the proposed exemption from annual fees for state-owned research reactors as proposed in the Federal Register dated May 10, 1994. This exemption is requested on the basis of the many "significant externalized benefits" provided by these organizations to: educational institutions, nuclear power plants, individuals and state and local governments. Additionally, these organizations contribute significantly to the national research effort and the nation's technological competitiveness.

Historically, this state-owned university research reactor has been devoted almost exclusively to serving the state's educational institutions. The Rhode Island Nuclear Science Center (RINSC) operates under an agreement with the Board of Higher Education which severely limits the amount of commercial work that can be performed. The Rhode Island Atomic Energy Commission was established as a state agency over thirty years ago to ensure that all educational institutions in Rhode Island had access to its facilities. RINSC's strong support for a wide spectrum of educational and research efforts that range from high school science programs such as the popular JASON Project to post-doctoral research in neutron scattering truly exemplifies the externalized benefits to the society of university research reactors that warrant continued exemption from federal fees.

A small facility such as RINSC offers unique opportunities for students to gain hands-on experience with nuclear technology on a daily basis. Such opportunities are much more limited at larger federal facilities. This significant educational

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benefit to the research community and America's technological competitiveness is possible because of the strong support of the federal government in providing research funding and equipment grants. The federal government has long realized that the low operating cost of RINSC and other university reactors make them a particularly cost effective means of providing high quality scientific training and research experience. Continued exemption of state-owned research reactors from federal fees would be consistent with this historical federal commitment to educational and research excellence in the scientific fields.

The chance to view an operating pool reactor and the fact that the facility has been responsible for many important environmental monitoring discoveries make the Science Center a popular place to visit. Over a thousand students received briefings by the RINSC staff this year. The reactor has been featured on PBS for its part in discovering who was polluting the Arctic and has been featured on local television stations for its unique role in environmental monitoring. This positive image of nuclear technology and its linkage to improving the environment benefit the entire nuclear industry and help to dispel the negative images of past problems.

In closing, continued exemption from license fees is justified based on the significant external benefits to society that are provided by state-owned research reactors.

Sincerely,



Terry Tehan
Director

cc: Senator Claiborne D. Pell
Senator John H. Chafee
Representative Jack Reed
Representative Ronald K. Machtley