

POCKET NUMBER  
PROPOSED RULE

2  
PR-170

(47 FR 52454)



December 9, 1982

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Docketing and Service Branch

Gentlemen:

Re: Proposed Revision to Part 171

This refers only to the proposed changes in paragraph 170.31, paragraphs 3F and 3G.

As a company which currently operates seven units in the new 3G category, the proposed increase for application fee from \$460 to \$2,300 per unit--a five-fold increase-- appears to be overly ambitious. In the past several years, our requests for By-Product Material Licenses have become quite standard, since the safety features are standard and conform to ANSI Standard N433.4, now in the process of being finalized. The amount of correspondence from NRC to us regarding additional input, etc. is minimal. In short, we feel we would be subsidizing those companies whose applications are quite deficient. We would suggest that the fee for category 3G be on an actual cost basis so that those of us better versed in writing applications pay only our fair share.

Secondly, if an average staff employee is at a rate of \$60 per hour, the proposed \$2,300 charge would suggest that some 38 hours are required to review a category 3G license request. This would be an inordinate amount of time to spend on such an application, which can normally be prepared--correctly--in less than half that time.

In short, we object to the proposed fee and suggest that the charge be made on an actual cost basis.

Very truly yours,

ISOMEDIX, INC.

*George R. Dietz*  
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President

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ISOMEDIX INC.

Acknowledged by card *12/15/82 gmp*