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Secretary, US Nuclear Regulatory Commission
ATTN: Docket and Services Branch
Washington, DC 20555

REF: NRC RECIPROCAL SECRETARY
OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Subject: NRC Reciprocity Fees

We wish to comment on the proposed fees for reciprocity.

1. We oppose the proposed \$200.00 charge for "each revision" for the reason that (a) it is excessive and (b) does not consider the small business licenses holder. There are many instances which a licenses holder would be subject to the charge. Consider the following based on a 45 day presence:

The annual fee for reciprocity has been made prior to any activity. A first revision is made to indicate a start date incurring a charge. Subsequent charges can occur for reasons such as (1) start date change (2) the radiographer in charge falls ill necessitating a replacement (3) equipment malfunctions and is replaced (4) project duration increases (5) termination of activity.

Total expenditure = \$700.00 + (5 x \$200.00) = \$1,700.00

In addition to the possible charges, the licenses holder is exposed to charges of a NRC Audit during the period of occupancy.

Our proposal would be to reduce the charge somewhere between \$25.00 - \$50.00 per revision.

Trutom appreciates the opportunity to have these comments considered.

Sincerely,

H. Paul Thomas
President & Radiological Controls Manager

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