

OCT 21 1982

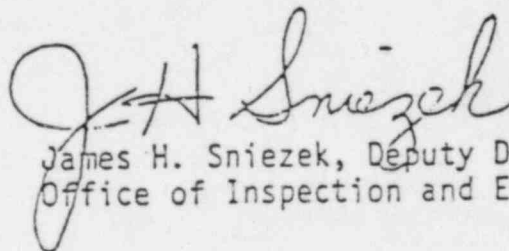
MEMORANDUM FOR: Patricia Norry, Director
Office of Administration

FROM: James H. Sniezek, Deputy Director
Office of Inspection and Enforcement

SUBJECT: FEDERAL REGISTER NOTICE ON LICENSE FEES

The following are IE's comments on the proposed Federal Register Notice:

1. Page 11, para 1: Fees should only be charged for investigations when the allegation is substantiated. It would be unjust to charge licensees for investigations based on allegations that prove to be unfounded.
2. Page 11, par 1: After "incident/accident response" add "excluding cost for operation of the Headquarters and Regional Incident Response Centers." Fee charges should be charged only for on-site or near-site assistance or inspections.
3. Page 11, par 1: There is no such thing as an "enforcement" inspection.
4. Page 11, par 1: Change "emergency preparedness safety reviews," to "special emergency preparedness inspections."
5. Page 11, para 1: The Systematic Appraisal of Licensee Performance (SALP) Program, unlike other activities in the list, is not an inspection effort. SALP involves primarily a paperwork review of how well licensees have performed in the past. The results are used to direct future inspection effort. As such we suggest it be dropped from the list of fee chargeable activities.
6. Page 24: FY 1981 Actual Costs for IE included the Regions. Because of the difference in grade structures between the headquarters and the regions, the accounting procedures should be adjusted to reflect separate Regional and IC cost for FY 1982 and thereafter. Separate charges could then be levied depending on whether the inspection or licensing action was accomplished in the Region or Headquarters. This proposal should also apply to NRR and NNSS.



James H. Sniezek, Deputy Director
Office of Inspection and Enforcement