

DOCKET NUMBER
PROPOSED RULE **PR 71, 170 + 171**
(56FR14870)

DONNELL & ASSOCIATES, INC.

CONSULTING ENGINEERS

CIVIL ENGINEERS
LAND SURVEYORS

243

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117 NORTH TENTH

P.O. BOX 638

WORLAND, WYOMING 82401

307-347-0276

May 13, 1991

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

Re: Proposed changes to License
Fee Regulations in 10 CFR
Parts 170 and 171.

Dear Sir:

We are writing you to protest your proposed license fee changes in the strongest possible terms. We feel that the proposed increase is completely out of reason, especially for a firm the size of ours. We are a small civil engineering firm which obtained a Troxler moisture density gauge to monitor construction projects we design. This gauge is used approximately 10 to 15 days per year and then only part time, however, it allows us to better control the project and insure a better product for the client. Your proposed changes would increase our license fee from the current \$400.00 every five years to \$1,400.00 per year, an increase of 1,650%. In these struggling economic times this is completely out of line and unreasonable. To further point out the idiocy of such an increase, in 1985 it only cost \$230.00 per five years for licensure. Your present proposal is approximately 3,000% greater than just 6 years ago. Does this sound reasonable? The \$230.00 to \$400 increase was hard to bear; the presently proposed increase is completely out of line.

If we increased our rates to cover these expenses we would be be charging \$600.00 per hour for the use of this equipment. There is absolutely no way that we could collect that kind of fee. If we were a large geotechnical firm with 50 or so gauges in constant use, then a \$1,400.00 per year fee might not seem so bad. However, under present conditions, there is no way we could survive such an increase, nor could any other small engineering firm. If you go through with this increase as proposed you will effectively destroy any possibility of the small engineering firm utilizing the tools they have been using for the past decade.

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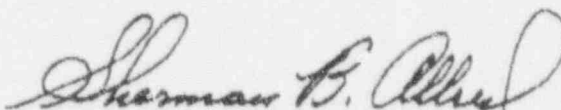
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Nuclear Regulatory Commission
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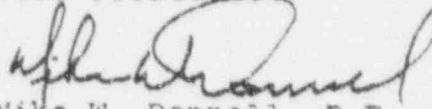
In addition to the license fees, we are obligated to reimburse the NRC whenever they inspect our facility. These inspections are not on any kind of schedule and pose a significant additional burden for the small firm.

The proposed changes join most of the other recent changes in government regulations in effectively strangling the small business. We need simplification of the bureaucratic red tape and regulation, not exorbitant fee increases and additional red tape and bureaucratic rules.

Sincerely,



Sherman B. Allred, P.E. & L.S.
Vice-President



Mike W. Donnell, P.E.
Vice-President

cc Senator Alan Simpson

Senator Malcolm Wallop

Representative Craig Thomas