



University
of
Delaware

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PROPOSED RULE **PR 71,170 & 171**
(56 FR 14870)

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

(302) 451-8475

April 29, 1991

John Skozzlas
Secretary
Docketing and Service Branch
United States Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: Proposed Revisions to 10CFR170 and 171 on License, Inspection and Annual Fees

Dear Mr. Skozzlas:

I am writing to express the view of the University of Delaware, a non-profit educational institution holding Type A Broad Scope Materials License for Research and Development. It is the opinion of the University that the United States Nuclear Commission should continue its practice of exempting non-profit educational institutions from all fees.

The University of Delaware has found the last two years to be quite a challenge financially. The economic climate has resulted in the need to cut the University budget two years in a row. The financial situation of the State of Delaware this fiscal year required the University to return three million dollars to the State to assist in balancing the State budget. The outlook for the coming years has not improved. The budgetary situation has resulted in a mid-year tuition increase for students, a hiring freeze and the lay-off of approximately 150 staff members in the coming year.

It is becoming increasingly more difficult to provide a quality education to Delaware students, as well as students from other states, at a reasonable and affordable tuition rate. The University recognizes that its students conducting research may go on to be the leading scientists and managers of the future and is committed to setting an example of safety and regulatory compliance. Increased regulation in the areas of safety and health in general have increased the operating costs of research activities substantially. A decrease in available research funding has also begun to stifle research. Adding another cost to educational research institutions who have no other mechanism for absorbing such expenses other than increasing grant overhead or tuition will certainly serve to decrease the quality of the experience we are allowed to offer our students.

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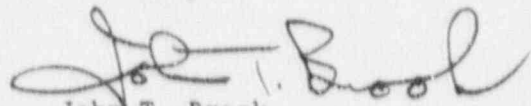
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The University understands however the need of the United States Nuclear Regulatory Commission to recover the cost of its activities. It suggests that the fees associated with non-profit educational institutions be absorbed by those licensees who benefit from the students who have gained materials experience while at the University. This group is probably very widespread and would most likely incorporate all other private non-fee exempt licensees.

If there is additional information which would be helpful in your analysis of the status of non-profit educational institutions, please do not hesitate to contact our Radiation Safety Officer, Robin Elliott, at 451-8476. Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script, appearing to read "John T. Brook". The signature is written in dark ink and is positioned above the printed name.

John T. Brook
Vice President for Government
and Public Relations

JTB:bc