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IOWA STATE UNIVERSITY
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May 3, 1991

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Documentation and Service Branch

Dear Mr. Secretary:

This letter is written in response to the proposed revision to 10CFR 170 and 171 regarding the assessment of yearly fees for costs associated with the administration of licenses regulated by the Nuclear Regulatory Commission for Test, Research, and Training Reactors.

We operate the Iowa State University UTR-10 Reactor under license R-59. This is a small reactor (10 kW maximum power level) that is used for teaching, research, and public outreach. The proposed fee of \$50,000/year would almost double our present operating budget and would make it very difficult for the University to justify its continued operation.

The UTR-10 reactor is very important to our educational programs. It is used for laboratory experiments in our undergraduate and graduate courses, for graduate student research, and for demonstrating the characteristics of nuclear reactors in our public outreach programs. The major portion of our present budget, approximately \$60,000/year, is derived from state funding. The addition of the proposed charges would make the operating costs of the reactor very prohibitive with the result that we would not be able to continue the important uses of the reactor described above.

We urge the Nuclear Regulatory Commission to continue to exempt non-profit educational licensees from this large cost.

Sincerely,

Richard Danofsky
Richard Danofsky
Nuclear Engineering
Program Coordinator

cc: Dr. Ted Okiishi, Chair
Mechanical Engineering

Dr. David Kao, Dean
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