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City of Moscow

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May 8, 1991

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Docketing & Service Branch

Re: Proposed Revisions to 10 CFR 170 and 171 on License, Inspection
and Annual Fees

Dear Sirs,

In response to the recent decision by the state of Idaho to turn
administration of radioactive materials licenses over to the NRC, I
would like to submit the following comments.

After reviewing some of the changes to be faced by users of
moisture - density gauges (known as nuclear densometers), I feel the
proposed fee schedules are completely out-of-line. The NRC needs to
keep in perspective the type of gauge that is being used and the
type of user that is operating it.

We are one of many in Idaho that maintain these gauges year-round
to use them only 6 or 8 times a year. Our main purpose for having
the gauge is to keep contractors in compliance when compacting
trenches and roadway subgrades. Hopefully taxpayer dollars can be
saved in the future by doing this. Smaller cities and consulting
firms are not involved with the amount of construction that can
warrant carrying the licenses and fees at the rates proposed.

I can understand fees for covering license renewal costs and
inspection fees, but even if this type of gauge was used every day
it wouldn't require any additional administration costs on your
part. What I see happening with your proposed fee schedule is small
cities and engineering firms will sell their gauges (if they can
now) and foregoing this type of testing procedure on construction
projects. Some may hire larger firms to do their compaction
inspection if there is one in the area. This will also be
expensive.

Your inspection fee appears to be very high for what we would get
in return. An inspector should be able to check all the gauges in
Idaho for the cost you have established for one gauge. Licensees
will still be doing annual leak tests on their own and keeping
records on their gauges.

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Thank you for the opportunity to comment on this matter and I hope that serious consideration will be given to lowering the proposed fees for moisture-density gauges.

Sincerely,

David C. Klatt

David C. Klatt
Engineering Technician
City of Moscow, Idaho