



M.M.P. Quality Inspections, Inc.

TICKET NUMBER  
PROPOSED RULE PR 71,170,170  
(56FR14870)

654

'91 JUN 21 A9:46

June 19, 1991

Mr. Samuel J. Chilk  
Secretary - US Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Docketing and Service Branch  
Ref. Federal Register Notice Vol. 56, No. 71 - FR Doc. 91-8161

Dear Mr. Chilk:

This protest to the proposed NRC fee schedules noted above is presented after sincere investigation. The negative impact on users of radioactive materials is three-fold.

The fees assessed on users will increase, again, the increase costs to manufacturers will also be paid by users. The reduction in the number of manufacturers of radioactive products and the range of products offered will indeed increase cost again simply as a result of supply and demand.

The NRC should take the following actions:

1. Extend the comment period for at least 180 days. The 30 day comment period is entirely insufficient. More time is required to ensure that reasonable and equitable fee schedules result.
2. In view of the enormous negative cost impact this will have on US industry, the assumption that 100% cost recovery is appropriate is questionable.
3. Fees for amendment and renewal of Certificates of Compliance and Device Registrations already cover actual costs. The concept of annual fees is inappropriate and should be eliminated from the schedule.

Respectfully,

M.M.P. QUALITY INSPECTIONS, INC.

Maurice M. Pickard,  
President

9106250021 910610  
PDR PR  
170 56FR14870 PDR

DS10