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PROPOSED RULE

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LAW ENGINEERING, INC.

GEOTECHNICAL, ENVIRONMENTAL
& CONSTRUCTION MATERIALS
CONSULTANTS

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

ATTENTION: Docketing and Service Branch

REFERENCE: Federal Register Notice Vol. 56, No. 71 - FR Doc. 91-8161

Dear Mr. Chilk:

I am writing to protest the proposed NRC fee schedules referenced above. These will have a negative impact on users of radioactive materials both by increasing the fees assessed on users and by increasing costs to manufacturers, which will be passed on to users. In addition to the cost impact, a secondary effect will be a reduction in the number of manufacturers of radioactive products and the range of products they offer.

I propose that 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 fee schedules are reasonable and equitable.
- 2) Reconsider the assumption that 100% cost recovery is appropriate, in view of the enormous negative cost impact this will have on US industry.
- 3) The concept of annual fees for Certificates of Compliance and Device Registrations is inappropriate. Fees for amendment and renewal already cover actual costs. Annual fees should be eliminated from the schedule.

Sincerely,

LAW ENGINEERING, INC.



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