



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

PDR-016

AUG 16 1984

Nicholas S. Reynolds, Esquire  
Bishop, Liberman, Cook, Purcell & Reynolds  
1200 Seventeenth Street, NW  
Washington, DC 20036

IN RESPONSE REFER  
TO FOIA-84-564

Dear Mr. Reynolds:

This is in further response to your letter of July 6, 1984, in which you requested, pursuant to the Freedom of Information Act and 10 CFR 9.3 of the Commission's regulations, five categories of documents regarding license and inspection fees.

Enclosed are the 43 documents listed on appendix A (for a total of 130 pages with this response).

The search for and review of additional documents subject to your request have not been completed. As soon as the search and review have been completed, we will contact you.

Sincerely,

A handwritten signature in black ink, appearing to read "J. M. Felton", written over a horizontal line.

J. M. Felton, Director  
Division of Rules and Records  
Office of Administration

Enclosures: As stated

8502130098 840816  
PDR FOIA  
REYNOLDB4-564 PDR

## APPENDIX A

1. Undated Draft Memo for the Commissioners from William J. Dircks, re: License Fees - Proposed Schedule with attached note to Ralph Wilde from Al Cabell (4 pages)
2. 7/17/81 Memo for Daniel J. Donoghue from Victor Stello, re: Proposed License Fee Schedule Revision with attached tables - Range of Inspection Manpower (7 pages)
3. 8/7/81 Memo for W. O. Miller from Lloyd J. Donnelly, re: Proposed License Fee Schedule Revision with attached range of expected inspection manhours (2 pages)
4. 9/24/81 WITS tracking sheet with attached 9/25/81 Routing and Transmittal sheet for Claudia Seelig from Kathy Jordan and attached memo for D. R. Chapell from George W. McCorkle (9/25/81) (3 pages)
5. 11/20/81 Memo for Daniel J. Donoghue from Richard C. DeYoung, re: Revised response regarding Commission question of IE recoverable resources contained in the license fee proposal with attached tables (5 pages)
6. 1/6/82 Memo for Robert Brown from William O. Miller, re: Proposed License Fee Revision with attached Professional Processing Time tables (11 pages)
7. 2/5/82 Memo for William O. Miller from Lloyd J. Donnelly, re: Proposed License Fee Revision with attached staffhour tables (3 pages)
8. 4/22/82 Note to Pat Norry from William O. Miller, re: "Reworked" Commissioner Ahearne package without attachment
9. 4/23/82 Memo for Bernard Singer from William O. Miller; re: Revisions to the Proposed License Fee Schedule (2 pages)
10. 5/18/82 Memo for William O. Miller from Bernard Singer, re: License Fee Categories with attached program code tables (9 pages)
11. 10/22/82 Memo for R. S. Brown from William O. Miller, re: Proposed Revision to License Fee Schedule (2 pages)
12. 1/28/83 Memo for William O. Miller from A. L. Newsom, re: License Fee Data Computations
13. 2/1/83 Handwritten note to John Davis from Tom Rehm with attached draft response letter to Rep. Dick Cheney from William J. Dircks and letter from Rep. Cheney with enclosures (11 pages)
14. 2/28/83 Memo for Patricia Norry from John T. Collins, re: Comments on issues raised by public in re notice of proposed rulemaking (4 pages)

15. 3/1/83 Memo for William O. Miller from Bernard Singer, re: License Fees (5 pages)
16. 3/3/83 Memo for William O. Miller from Herbert N. Berkow, re: NRR Costs associated with the Floating Nuclear Plants
17. 3/11/83 Memo for Patricia Norry from John T. Collins, re: Comments on issues raised by public in re notice of proposed rulemaking (2 pages)
18. 4/20/83 Memo for Patricia G. Norry from James P. O'Reilly, re: 10 CFR Part 170 proposed revision of License Fee Schedule
19. 4/26/83 Memo for Jim Blaha from Elliott Greher, re: Operating Reactor Histograms with attached histograms (7 pages)
20. 5/9/83 Note to Patricia Norry from Guy Cunningham, re: License Fees (4 pages)
21. 5/24/83 Memo for Larry P. Cooper from George M. Mathews, re: Comments on procedures for license fee recovery of contract costs
22. 6/8/83 Memo for Patricia G. Norry from James P. O'Reilly, re: Revision of License Fee Schedule
23. 6/20/83 Memo for Bernard Singer from 4 named individuals, re: Proposed Revision to Part 170 (License Fees) (3 pages)
24. 7/5/83 Note to Mike Springer from James P. O'Reilly, re: Licensee Fee Management Function (3 pages)
25. 7/20/83 Memo for William O. Miller from William H. Foster, re: License Fees - Final Date
26. 7/21/83 Memo to Patricia Norry from James P. O'Reilly, re: Comments on Proposed Changes to 10 CFR 170
27. 7/27/83 Memo for Patricia Norry from James G. Keppler, re: Comments on Proposed Changes to 10 CFR 170
28. 7/27/83 Memo for Patricia Norry from Thomas E. Murley, re: Final Rule Changes for 10 CFR 170 (2 pages)
29. 9/14/83 Note for Reba Diggs from Valeria Wilson, re: Printouts for Six PDA Reviews (2 pages)
30. 10/6/83 Memo for William O. Miller from A. L. Newsome, re: Request for Professional Staff Effort - GESSAR II
31. 10/13/83 Routing/Transmittal slip to Jim Holloway from Claudia Seelig with attached table for Fee Category (10 CFR 170.31) (2 pages)

32. 11/14/83 Memo for William O. Miller from Robert L. Fonner, re: Final Rule amending 10 CFR Part 170
33. 1/11/84 Memo for William O. Miller from R. S. Brown, re: License Fee Final Rule (SECY-83-495) with attached fees tables (6 pages)
34. 2/17/84 Memo for 6 named individuals from William J. Dircks, re: License Fees - Reporting Requirements
35. 2/20/84 Memo for William O. Miller from Alois J. Burda, re: RWATS/RITS Compatibility with new license fee rule
36. 2/27/84 Memo for Patricia Norry from John Collins, re: License fees - Reporting Requirements (NOTE: Copy reproduced poorly)
37. 2/27/84 Memo for Patricia Norry from James Keppler, re: License fees - Reporting Requirements
38. 3/8/84 Memo for William O. Miller from John McOscar, re: License fees - Reporting Requirements (NOTE: Copy reproduced poorly)
39. 3/19/84 Memo for Patricia Norry from John Martin, re: License fees - Reporting Requirements
40. 3/26/84 Memo for Patricia Norry from James O'Reilly, re: License fee staff liaison
41. 4/9/83 Transmittal to Chuck Beckwith from Jim Holloway with attached request from Commission Asselstine and response to Sen. Simpson letter (9 pages)
42. 5/11/84 Memo for Mike Kaltman from William O. Miller, re: FIN No. A-4050
43. 5/14/84 Letter to The Honorable Edward Markey from Patricia G. Norry, re: Amendment of 10 CFR Part 170 (2 pages)
- Note: Duplicate letters also sent to Rep. Morris K. Udall, Sen. Alan Simpson, and Rep. Richard O. Ottinger
44. 3/1/82 Memo for W.O. Miller from Lloyd Donnelly Subject: Proposed License Fee Revision - Response to W.O. Miller's Memorandum of February 12, 1982 (3 pages)

U.S. GOVERNMENT PRINTING OFFICE: 1965 O 281166  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20545

JUL 27 1981

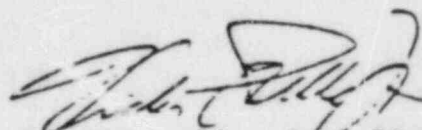
MEMORANDUM FOR: Daniel J. Donoghue, Director  
Office of Administration

FROM: Victor Stello, Jr., Director  
Office of Inspection and Enforcement

SUBJECT: PROPOSED LICENSE FEE SCHEDULE REVISION

I have reviewed your proposal to use actual inspection manhours for license fee purposes, rather than a flat rate, as a way to recover more of the costs of performing inspections. More specifically, you propose to use manpower expended for all routine and reactive work plus all associated preparation and documentation effort, but not direct travel time. There are certain aspects of this proposal that I would like to have changed. First, I see numerous problems associated with trying to bill licensees for certain reactive work such as investigations, enforcement actions, and incident response effort. However, reactive inspections are more analogous to routine inspection activity and could logically be combined with the routine effort. Second, I believe it would make sense to include direct travel time since it is time that must be expended to conduct on-site inspections and is certainly as much a part of the overall inspection activity as writing the inspection report itself. You also proposed to include IE contractual support dollars. I understand that the program support costs of other offices that are now included in license fee billings are those that can be specifically identified with a given docket. None of our contracts are docket specific. Unless we establish an elaborate accounting mechanism to track contract costs on a per docket basis, I see no way of including any of IE's program support costs.

You asked me to provide a range of manhours expended at reactors and fuel facilities. I have done so for reactors, but I need more time to compute good statistics for the classes of fuel facilities you have specified. I will provide this information to you in the near future.



Victor Stello, Jr., Director  
Office of Inspection and Enforcement

~~81-024457 NA~~



ROUTINE SAFETY & SAFEGUARDS INSPECTION  
FOR FYR1

TOTAL REGULAR  
HOURS

DOCKET NO FACILITY NAME

VEIND TOTAL	05000313	ARKANSAS 1	2,768.2
VEIND TOTAL	05000368	ARKANSAS 2	2,163.0
VEIND TOTAL	05000334	BEAVER VALLEY 1	2,968.5
VEIND TOTAL	05000155	BIG ROCK POINT 1	2,167.5
VEIND TOTAL	05000259	BROWNS FERRY 1	2,717.2
VEIND TOTAL	05000260	BROWNS FERRY 2	1,621.7
VEIND TOTAL	05000296	BROWNS FERRY 3	1,617.7
VEIND TOTAL	05000375	BURNSWICK 1	2,416.0
VEIND TOTAL	05000376	BURNSWICK 2	2,359.6
VEIND TOTAL	05000317	CALVERT CLIFFS 1	1,866.0
VEIND TOTAL	05000318	CALVERT CLIFFS 2	1,352.0
VEIND TOTAL	05000319	COOK 1	2,686.0
VEIND TOTAL	05000316	COOK 2	2,656.5
VEIND TOTAL	05000298	COOPER STATION	2,729.0
VEIND TOTAL	05000302	CRYSTAL RIVER 1	4,585.3
VEIND TOTAL	05000366	DAVIS BESSF 1	4,093.0
VEIND TOTAL	05000010	DEFSOEN 1	300.0
VEIND TOTAL	05000237	DEFSOEN 2	1,941.5
VEIND TOTAL	05000249	DEFSOEN 3	1,278.5
VEIND TOTAL	05000331	DUANE ARNOLD	3,167.5
VEIND TOTAL	05000368	FARLEY 1	2,139.5
VEIND TOTAL	05000366	FARLEY 2	2,090.0
VEIND TOTAL	05000333	FITZPATRICK	2,788.0
VEIND TOTAL	05000285	FORT CALHOUN 1	2,935.5

ROUTING SAFETY & S GUARDS INSPECTION  
FOR FYR1

TOTAL PFC/ILAP  
HOUP.

FACILITY  
NAME

NOCKET  
NO

VEIND TOTAL	05000267	FORT ST VPAIN	3,360.5
VEIND TOTAL	05000264	GINNA	2,325.5
VEIND TOTAL	05000213	HADDAM NECK	1,782.0
VEIND TOTAL	05000321	HATCH 1	1,300.0
VEIND TOTAL	05000366	HATCH 2	1,118.0
VEIND TOTAL	05000003	INDIAN POINT 1	116.0
VEIND TOTAL	05000247	INDIAN POINT 2	3,023.5
VEIND TOTAL	05000286	INDIAN POINT 3	2,842.5
VEIND TOTAL	05000305	KFWAINGE	3,351.5
VEIND TOTAL	05000400	LA CROSSE	2,985.0
VEIND TOTAL	05000309	MAINE YANKFF	3,234.0
VEIND TOTAL	05000369	MCCUIPE 1	3,740.5
VEIND TOTAL	05000245	MILLSTONE 1	1,984.7
VEIND TOTAL	05000336	MILLSTONE 2	894.8
VEIND TOTAL	05000263	MONTICELLO	2,692.0
VEIND TOTAL	05000220	NINE MILE POINT 1	3,775.0
VEIND TOTAL	05000338	NORTH ANNA 1	1,945.3
VEIND TOTAL	05000339	NORTH ANNA 2	1,626.2
VEIND TOTAL	05000269	OCONEE 1	2,083.2
VEIND TOTAL	05000270	OCONEE 2	1,485.0
VEIND TOTAL	05000287	OCONEE 3	1,578.0
VEIND TOTAL	05000219	OYSTER CREEK 1	2,877.5
VEIND TOTAL	05000255	PALISADES	3,571.5



ROUTINE SAFETY & SECURITY GUARDS INSPECTION FOR FYK1

PROJECT NO	FACILITY NAME	TOTAL PER HOUR
05000277	PEACH BOTTOM 2	1,378.0
05000278	PEACH BOTTOM 3	1,640.0
05000293	PILEGRIM 1	2,408.5
05000266	POINT BEACH 1	1,838.5
05000301	POINT BEACH 2	1,980.5
05000282	PRAIRIE ISLAND 1	1,633.0
05000306	PRAIRIE ISLAND 2	1,865.5
05000254	QUAD CITIES 1	2,516.0
05000265	QUAD CITIES 2	2,660.5
05000312	RANCHO SECO 1	4,823.5
05000261	ROBINSON 2	3,466.0
05000272	SALEM 1	2,602.0
05000311	SALEM 2	2,173.0
05000206	SAN ANGELO 1	4,714.2
05000327	SEQUOYAH 1	2,777.0
05000328	SEQUOYAH 2	4,396.0
05000335	ST LUCIE 1	4,726.5
05000280	SURRY 1	1,693.6
05000281	SURRY 2	1,653.6
05000289	THREE MILE ISLAND 1	5,678.5
05000320	THREE MILE ISLAND 2	3,250.5
05000344	TRONJAN	5,872.5
05000250	TURKEY POINT 3	1,971.5
05000251	TURKEY POINT 4	1,783.0

07/84

ROUTINE SAFETY & GUARDS INSPECTION  
FOR (A)

	DOCKET NO	FACILITY NAME	TOTAL REGULAR HOURS
YEING TOTAL	05000271	VERMONT YANKEE 1	3,160.0
YEING TOTAL	05000029	YANKEE-ROWE 1	1,967.5
YEING TOTAL	05000295	ZION 1	2,717.5
YEING TOTAL	05000364	ZION 2	2,054.5

ROUTINE SAFETY & GUARDS INSPECTION  
FOR FYR 1

POCKET NO	FACILITY NAME	TOTAL REGULAR HOURS
		189,950.3

TOTAL

Refer To  
LFMB

DRAFT

1. Subsequent to meet the helpline  
2. ~~Program~~ for scheduling of  
of John and Coste. I indicated  
indicated in my actual cost bill  
CPR any actual cost bill  
be assessed.  
3. Our cost per hour for  
for mass - is higher  
in city - all other  
4. When actual fees  
are assessed for  
the actual cost  
of the material  
made for material.

The Commissioners

William J. Dircks, Executive Director for Operations

LICENSE FEES - PROPOSED SCHEDULE

To comply with a Commission request for a proposed revision to the NRC fee schedule which would more completely recover costs of licensing and inspection.

This paper covers major policy issues requiring Commission approval.

On March 23, 1978, the NRC implemented a revised schedule of license fees updating the August 10, 1973 fee schedule. The revised schedule established fees for review of requests filed by vendors and architect-engineers for standardized reference designs; amendments; renewals; routine inspections; special projects; approval of spent fuel casks, and shipping containers; and sealed sources and devices containing byproduct, source or special nuclear material. The revised schedule also updated fees for review of applications for facility construction permits and operating licenses and applications for byproduct, source and special nuclear materials licenses. The revised schedule was based on FY 1977 costs.

The Commission's guidelines used in developing the March 23, 1978 fee schedule were based on two decisions of the Supreme Court issued on March 4, 1974, and four opinions of the Court of Appeals for the District of Columbia Circuit issued on December 16, 1976. The two cases decided by the Supreme Court were challenges of the validity of annual license fees charged by the Federal Communications Commission and the Federal Power Commission under authority of the Independent Office Appropriation Act of 1952. National Cable Television Association, Inc. v. United States, 415 U.S. 336 (1974) and Federal Power Commission v. New England Power Company, 415 U.S. 345 (1974). The Court of Appeals cases were challenges of a revised fee schedule published by the Federal Communications Commission. National Cable Television Association v. Federal Communications Commission, Nos. 75-1053 et. al.;

Services for which the NRC may recover costs are those having a clearly identifiable recipient of the service. These services include the review of applications and requests for permits, licenses, amendments, renewals, approvals, operator qualifications, and inspections.

Excluded from recovery by the fee guidelines are all research activities, standards and code development, generic licensing and non-routine inspection activities, and international programs. In addition, the Commission has, by rule, specifically exempted from fees licenses issued to Federal, State and local governments and to educational institutions where the material is used for teaching, training or medical purposes.

#### PROPOSED REVISION TO FEE POLICY

It is proposed that: (1) fees for the review and processing of all Part 50 applications for construction permits, operating licenses, amendments, standard design reviews, topical reports, technical specifications, and special projects be based on actual costs and full cost recovery; (2) fees be assessed for all inspection activities associated with Part 50 operating licenses and Parts 40 and 70 fuel cycle licenses identified in revised fee Categories Part 170.32.1.A., 1.B., 1.C., 2.A. and 4.A. and such charges will be based on actual costs; (3) fees for Part 30 waste disposal burial licenses, Parts 40 and 70 and 71 fuel cycle licenses, and approvals be based on actual costs; (4) the present Part 170 exemption from fees for applications and requests resulting from Commission Orders be eliminated; and (5) fees for Part 55 applications for qualification and requalification of reactor operators be based on actual costs and assessed to the utility employing the operator or operators.

Licensing costs have more than doubled for CP's and OL's since 1977 when the present fee schedule was developed. Inspections costs have increased substantially.

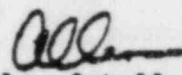
Radioisotopes Licenses. Fees for radioisotopes licenses (small programs covered by Parts 30, 40 and 70) and for inspection of these programs have not been revised. The current fees are the FY 1977 average cost for the particular type or category of license, e.g., industrial radiography. It is not possible to recover actual costs for these approximately 8,000 licenses because NMSS and IE do not record manpower to the docket assigned to the application. Instead manpower is assigned to a broad category of licenses, e.g., medical institutions.

*may get challenged by Commission or member of public. Why can't NMSS + IE record manpower to the docket assigned to applications + licenses.*

→ PPB 2.6.1  
John ~~RA~~ 1/19/2000 R  
FYI  
R 10<sup>55</sup>/<sub>19</sub>

NOTE TO: Ralph Wilde, Fuel Cycle, 396-55

Attached is a preliminary copy of our proposal to modify fee Categories 1I, 2A, 2B and 2E of the proposed fee schedule. We would appreciate your comments with respect to the revisions.

  
Allen Cabell  
License Fee Management Branch  
x27225

R

- 1.I. Applications for termination of licenses and other approvals in fee Categories 1A through 1H, including requests for amendments covering decommissioning, decontamination, site reclamation or restoration activities.
  
- 2.A. Licenses for possession and use of source material or byproduct waste material in milling operations, except in in-situ leaching and heap-leaching operations, ore-buying stations, ion exchange facilities, and the processing of ores containing source material for extraction of metals.<sup>3</sup>
  
- 2.B. Licenses for processing and recovery of source material in in-situ leaching operations or heap-leaching operations, possession of byproduct waste material, or restoration of in-situ leaching operations.
  
- 2.E. Applications for termination of licenses and other approvals in fee Categories 2A through 2D, including requests for amendments covering decommissioning, decontamination, reclamation or site restoration activities.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

RM  
Possession Only License  
See Next Page

MEMORANDUM FOR: W. O. Miller, Chief  
License Fee Management Branch

FROM: Lloyd J. Donnelly, Chief  
Resource Management Branch

AUG 7 1981

SUBJECT: PROPOSED LICENSE FEE SCHEDULE REVISION

The attached chart of inspection manhour ranges is provided to complete our response to your request of July 17, 1981. You should be aware of the following:

- o The minimum/maximum ranges have been established using a combination of history, planned inspection, and judgement. Extremely high cases of reactive effort from our historical data base were not used in our range determinations.
- o The NFS Erwin facility is unique in that it has a safeguards resident on-site, and therefore was excluded from the safeguards range calculations for category 1A. The NFS Erwin site can be expected to receive the following ranges of safeguards inspection manhours:

Routine Manhours		Reactive Manhours	
From	To	From	To
749	2688	546	1175

- o Licensees in categories 1A, 1B, and possibly others, may have single or multiple operations. Those with multiple operations have more inspection effort than those with a single operation. While our inspection effort is concentrated at the higher category license process, it also includes manhours to inspect the other processes. Therefore the range for each of the categories is somewhat biased in this regard.

If further details are required please contact my office

*Lloyd J. Donnelly*  
for Lloyd J. Donnelly, Chief  
Resource Management Branch  
Office of Inspection & Enforcement

Enclosure:  
As stated

cc: D. Donoghue, ADM  
V. Stello, IE  
L. I. Cobb, IE

RECEIVED BY LFMB	
Date	8-10-81
Log	P.M.
By	A.L.B.
Orig. To	.....
Action Compl.	.....

~~830218-110~~



Range of Expected Inspection Hours for  
Typical Licensees For Inspections  
Conducted During FY81

Category (170.23 & 170.24)	Routine Inspections				Reactive Inspections			
	Safety		Safeguards		Safety		Safeguards	
	From	To	From	To	From	To	From	To
Production or Utilization Facility Licensed For Possession But Not Operation	8	24	1	2	0	8	0	8
<hr/>								
(70.32)								
1A	42	392	508 <sup>1/</sup>	1872 <sup>1/</sup>	0	180	0 <sup>1/</sup>	787 <sup>1/</sup>
1B	42	294	52	372	0	171	0	676
1C	81	319	106	1012	0	171	0	520
1D	0	24	292	375	0	122	0	177
1E <sup>4/</sup>								
1F <sup>4/</sup>								
1G	34	68	502	823	16	32	127	207
1H	34	68	167	243	16	32	0	61
2A	34	44	NA <sup>3/</sup>		16	19	NA <sup>3/</sup>	
2B <sup>2/</sup>	0	19	NA <sup>3/</sup>		0	19	NA <sup>3/</sup>	
2C <sup>5/</sup>	34	44	NA <sup>3/</sup>		16	19	NA <sup>3/</sup>	
4A	5	7	NA <sup>3/</sup>	NA	1	4	NA <sup>3/</sup>	

New Categories (categories not presently covered by Part 170)

Ore Buying Station <sup>2/</sup>	12	24	NA <sup>3/</sup>		0	12	NA <sup>3/</sup>	
Ion Exchange (solvent extraction) Facilities <sup>2/</sup>	12	24	NA <sup>3/</sup>		0	12	NA <sup>3/</sup>	

<sup>1/</sup> Excludes NFS Erwin.

<sup>2/</sup> This category inspected once every 2 years.

<sup>3/</sup> Not inspected by Safeguards.

<sup>5/</sup> Agreement State Licensees data shown.  
Non-Agreement State Licensees data is twice that shown.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

September 25, 1981

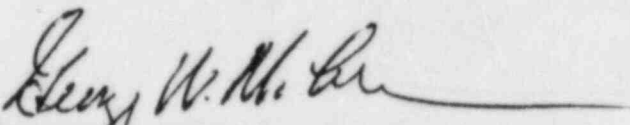
MEMORANDUM FOR: D. R. Chapell, Deputy Director  
Division of Safeguards

FROM: George W. McCorkle, Chief  
Physical Security Licensing Branch  
Division of Safeguards

SUBJECT: DRAFT NOTICE OF PROPOSED RULE MAKING

Upon review of the draft Notice of Proposed Rule Making which would amend the Commission's license fee schedule, we disagree with two of the proposed changes as indicated below.

- 1) We agree that licensees should be assessed for actual costs, however, there should be an upper limit. There are too many unpredictable factors which could affect a licensing action that are beyond the control of NRC and the licensees. These factors could result in unnecessary pressure on the NRC staff as well as unreasonable costs to the licensees.
- 2) The present Part 170 exemption from fees for applications and requests resulting from Commission Orders should not be eliminated.

  
George W. McCorkle, Chief  
Physical Security Licensing Branch  
Division of Safeguards

~~9203100466~~

DATE OF DOCUMENT 09 22 81	DATE RECEIVED 09 23 81	DUE DATE 09 25 81	REVISED DUE DATE	COMPLETION DATE	CONTROL NUMBER 810965
OFFICE ASSIGNED PSN/FC/SG/WM		NAME OF ORIGINATOR AND OFFICE Donoghue DJ ADM			
REFERRED TO Seelig C		DESCRIPTION Draft Notice of Proposed Rule Making- License Fee Proposed Schedule			
TRANSITION TYPE (Code Option)		<p><i>Since no sufficient time is being permitted for review we have not reviewed.</i></p> <p>FC/SG/WM to Provide input to PSB BY 09/25/81 PSB Due Date 09/28/81</p> <p><i>No comment</i></p> <p><i>[Signature]</i> 9/24</p>			
<ul style="list-style-type: none"> <li>_____ 1. Add new items</li> <li>_____ 2. Delete items</li> <li>_____ 3. Change item date</li> <li>_____ 4. Update item status (close out)</li> <li>_____ 5. Revised due date</li> <li>_____ 6. Correct item status</li> </ul>					
DISTRIBUTION					

NRC FORM 300 (1-79)

U.S. NUCLEAR REGULATORY COMMISSION

WORK ITEM TRACKING SYSTEM (WITS, NMSS)

**ROUTING AND TRANSMITTAL SLIP**

Date **9/25/81**

Off (Name, office symbol, room number, building, Agency/Post)	Initials	Date
Claudia Seelig		

Review	File	Note and Return
Approval	For Clearance	For Conversation
As Requested	For Correction	Prepare Reply
Objection	For Your Information	See Me
Amendment	Investigate	Signature
Disposition	Justify	

Attached are Division of Safeguards comments regarding the Draft Notice of Proposed Rule Making - License Fee Proposed Schedule (DSS 810965)

This slip may be used as a RECORD of approvals, concurrences, disposals, objections, and similar actions.

Officer (Name, office symbol, Agency/Post)	Room No.—Bldg.
<i>[Signature]</i>	
	Phone No.
	74030



IE

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

2/20/81 R

*Base kg and  
only with  
NOT An  
attached*

RECEIVED BY LFMB	
Date	11/20/81
Log	5:30 P.M.
By	V.M.S.
Orig. To	
Action Compl.	

**MEMORANDUM FOR:** Daniel J. Donoghue, Director  
Office of Administration

**FROM:** Richard C. DeYoung, Director  
Office of Inspection and Enforcement

**SUBJECT:** REVISED RESPONSE REGARDING COMMISSION QUESTION OF  
IE RECOVERABLE RESOURCES CONTAINED IN THE LICENSE  
FEE PROPOSAL

I have revised the tables of enclosures 1 and 2 to my November 10, 1981 memorandum on the same subject. Revised tables are contained as enclosure 1 and 2 to this memorandum. The changes I have incorporated were based on the new information we received from your staff at our November 18, 1981 meeting on this subject.

In addition to the attached, you requested I provide a single paragraph that responds to the Commission question contained in the Office of the Secretary's memorandum to the EDO dated November 4, 1981. The following paragraph is provided as requested.

The FY 1982 Budget contains 63% (620) professional/technical staff and 37% (365) management direction and indirect staff. Of the 620 professional/technical staff, 297 staffyears (30%) are budgeted to perform direct docket fee recoverable inspection/investigation/enforcement activities. The remaining 323 staffyears are not recoverable because they are not docket specific. The activities performed by this part of the IE staff are inspection program development, audit and oversight, training (both conduct and receipt), Vendor/Contractor inspection, State Liaison Officer functions, NRC Operations Center management, travel, bulletin coordination, event evaluation, mobile lab management, technical support to HQ/other NRC offices, reviewing generic safety matters, interface with licensing offices, special study groups/task force participation. Also not recoverable are inspectors' administrative duties to complete personnel forms, manpower system/ T&A forms, travel voucher forms, obtain physical examinations, and do other routine office work to include correspondence review, filing, etc.

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The IE professional rate is designed to recover a portion of the 365 management direction and indirect staff. The portion proposed for recovery in this category amounts to 14% of the IE FY 1982 budget. This figure (14%) coupled with the 297 direct docket staffyears (23%) and IE's proportionate share of PDA/PTS costs (6%) total to 43% of the IE FY 1982 Budget.

Richard C. DeYoung, Director  
Office of Inspection and Enforcement

Enclosures:  
As stated

cc: W.O. Miller  
L.I. Cobb

FY 82 Budget For IE Staffing  
And Dollar Analysis Relative to  
License Fee Recovery

	<u>Staffyears</u>	<u>% of IE Budget (65,000,000)</u>	<u>% of Budget That is Fee Recoverable*</u>
<u>Non-Personnel Related Costs</u>			
<u>Section I</u>			
Program Support and Technical Equipment Dollars	N/A	22% ✓	0%
<u>Personnel Related Costs</u>			
Section II - Technical Staff Direct Docket Work 1/	297	23% ✓	23%
Section III - Technical Staff Non-Docket and other 2/			
Leave/Holidays (33)			
Travel (49)			
Program Development/ Oversight (57) 3/			
Training (50)			
Vendor & Contractor 4/ (21)			
State Liaison Officer (5)			
Operations Center (9)			
Non-Docket Inspector 5/ Effort (99)			
	323	26% ✓	0%
<u>Section IV - Management Direction</u>			
In-Direct Staffyears			
HQ Management Direction/ Supervision 6/ (20)			
Regional Management Direction/Supervision 6/ (124)			
Regional Clerical/Admin (165)			
HQ Clerical/Admin (56)	365	29%	14%
SUBTOTAL	985	100%	
SECTION V - PDA/PTS Costs Recoverable	N/A	13%	6%
TOTAL		RECOVERABLE	43%

1/ Includes preparation, documentation, routine and reactive inspection, investigations and enforcement effort, plus associated leave hours.

Excludes staff in Emergency Preparedness performing license reviews (included in Direct Docket Work above - Section II).

Excludes Performance Appraisal Branch inspectors (included in Section II).

Not included in Section II since inspections are conducted of non-fee eligible activities.

Non-docket inspector effort includes bulletin coordination, event, evaluation, mobile lab management, support to HQ /other NRC Offices, program development assistance, generic safety matters, interface with licensing offices, special study groups, taskforce participation, etc. Also included inspector administrative efforts such as any filing, reading of mail/professions (materials, completion administrative forms such as travel vouchers, leave/T&A records, MPS forms, or personnel forms).

Management (Section Chiefs and above).



IE FY 82 Budget  
 Distribution of Direct Inspection/Investigation <sup>1/</sup> Staffyears  
 By Licensee Category (Routine & Reactive)

	<u>PLANNED ROUTINE</u>	<u>PLANNED REACTIVE</u>
Reactors with O/Ls	110.70	60.57
Reactors with C/P (O/L Review)	55.04	30.32
Reactors Pre C/P (C/P Review)	1.18	—
Non Power	1.97	—
Fuel Facilities	12.50	7.48
Material Licensees	<u>11.90</u>	<u>5.34</u>
	193.29	103.71

TOTAL = 297 Staffyears

<sup>1/</sup> Includes preparation, documentation, routine and reactive inspection, investigation, and enforcement time, and associated leave and holidays as reflected in FY 82 Budget.



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JAN 8 1982

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MEMORANDUM FOR: Robert Brown, Chief, Program Support Branch, NMSS

FROM: William O. Miller, Chief, License Fee Management Branch, ADM

SUBJECT: PROPOSED LICENSE FEE REVISION

As Mr. Donoghue indicated in the third paragraph of his memorandum dated January 4, 1982 to Mr. Davis, a fee program based on actual costs would require the Material Licensing Branch and the Material Certification and Procedures Branch to keep track of the actual professional staff hours and associated contractual services costs expended for each application for a new license, amendment and renewal.

When we developed the proposed schedule of revised fees for the fuel cycle licenses (contained in SECY 81-615), we were advised by the legal staff to show the expected range of application, amendment and renewal fees based on the actual professional staff hours expended for several cases in a fee category. To assist us in developing a proposed revision to the fee schedule, we request that your office provide us with a range of professional staff hours expended (Enclosure 1) for applications for new licenses, amendments and renewals of the small materials programs. The range for each category of license (\$170.31) would show the minimum costs (professional staff hours and contractual) and maximum costs to process a single application in the category. In addition, please indicate whether the midpoint of the range, which you establish for each category, would be a representative average that could be used in the event the Commission decides to continue the average cost method of determining license fees for small licensed programs. If the midpoint of the range is not a representative average, then please provide the average for each fee category.

We will be pleased to meet with you or members of your staff to discuss this request. If you have questions, please contact me (27225).

*William O. Miller*  
William O. Miller, Chief  
License Fee Management Branch  
Office of Administration

Enclosure:  
Tables

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OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

9. DEVICE, PRODUCT, OR SEALED SOURCE SAFETY EVALUATION

<u>SAFETY &amp; ENVIR.</u>		<u>Contr.</u>	
<u>SH</u>	<u>Asst.</u>	<u>SH</u>	<u>Asst.</u>
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>SAFEGUARDS</u>		<u>Contr.</u>	
<u>SH</u>	<u>Asst.</u>	<u>SH</u>	<u>Asst.</u>
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>SAFETY &amp; ENVIR.</u>		
<u>Cases</u>	<u>SH</u>	<u>Asst.</u>

<u>SAFEGUARDS</u>		
<u>Cases</u>	<u>SH</u>	<u>Asst.</u>

- |  |   |
|--|---|
| <p>A. Safety evaluation of devices or products containing byproduct material, source material, or special nuclear material, except reactor fuel devices and devices or products distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.</p> | <p>Application</p> <p>Evaluation</p> <p>Amendment</p> |
| <p>B. Safety evaluation of sealed sources containing byproduct material, source material, or special nuclear material except reactor fuel and sealed sources distributed to general licensees or persons exempt from the requirements for a license pursuant to Parts 30, 40, and 70 of this chapter.</p>                    | <p>Application</p> <p>Evaluation</p> <p>Amendment</p> |

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

7. HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL

<u>SAFETY &amp; ENVIR.</u>			
		<u>Contr.</u>	
<u>SH</u>		<u>Asst.</u>	
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>SAFEGUARDS</u>			
		<u>Contr.</u>	
<u>SH</u>		<u>Asst.</u>	
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>SAFETY &amp; ENVIR.</u>		
<u>CONTR.</u>		
<u>Cases</u>	<u>SH</u>	<u>Asst.</u>

<u>SAFEGUARDS</u>		
<u>CONTR.</u>		
<u>Cases</u>	<u>SH</u>	<u>Asst.</u>

- B. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to medical institutions, or two or more physicians on a single license, for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.
  - New License
  - Renewal
  - Amendment

- C. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter to an individual physician for human use of byproduct material, source material, or special nuclear material, except licenses in Category 7A.
  - New License
  - Renewal
  - Amendment

8. CIVIL DEFENSE

- A. Licenses for possession and use of byproduct material, source material, or special nuclear material for civil defense activities.
  - New License
  - Renewal
  - Amendment

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES	<u>SAFETY &amp; ENVIR.</u>				<u>SAFEGUARDS</u>				<u>SAFETY &amp; ENVIR.</u>			<u>SAFEGUARDS</u>		
	<u>Contr.</u>		<u>Asst.</u>		<u>Contr.</u>		<u>Asst.</u>		<u>Cases</u>	<u>Contr.</u>		<u>Cases</u>	<u>Contr.</u>	
	<u>SH</u>	<u>To</u>	<u>From</u>	<u>To</u>	<u>SH</u>	<u>To</u>	<u>From</u>	<u>To</u>		<u>SH</u>	<u>Asst.</u>		<u>SH</u>	<u>Asst.</u>
5. WELL LOGGING AND WELL SURVEYS AND TRACER STUDIES														
A. Licenses for possession and use of specific nuclear material and/or byproduct material for well logging, well surveys, and tracer studies.														
New License														
Renewal														
Amendment														
studies.														
6. NUCLEAR LAUNDRIES														
A. Licenses for commercial collection and laundry of items contaminated with byproduct material, source material, or special nuclear material.														
New License														
Renewal														
Amendment														
nuclear material.														
HUMAN USE OF BYPRODUCT MATERIAL, SOURCE MATERIAL, OR SPECIAL NUCLEAR MATERIAL														
A. Licenses issued pursuant to Parts 30, 40, and 70 of this chapter for human use of byproduct material, source material, or special nuclear material in sealed sources contained in teletherapy devices.														
New License														
Renewal														
Amendment														
nuclear material in sealed sources contained in teletherapy devices.														

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CON'T

- L. All other specific byproduct material licenses, except those in Categories 4A through 10B.
  - New License
  - Renewal
  - Amendment

4. WASTE DISPOSAL

- B. Waste disposal licenses specifically authorizing the receipt of waste byproduct material, source material, or special nuclear material from other persons for the purpose of packaging the material. The licensee will dispose of the material by transfer to another person authorized to receive or dispose of the material.
  - New License
  - Renewal
  - Amendment
- C. Waste disposal licenses specifically authorizing the receipt of prepackaged waste byproduct material, source material, or special nuclear material from other persons. The licensee will dispose of the material by transfer to another person authorized to receive or
  - New License
  - Renewal
  - Amendment

<u>SAFETY &amp; ENVIR.</u>			
<u>Contr.</u>			
<u>SH</u>		<u>Asst.</u>	
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>SAFEGUARDS</u>			
<u>Contr.</u>			
<u>SH</u>		<u>Asst.</u>	
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

	<u>SAFETY &amp; ENVIR.</u>		
	<u>Contr.</u>		
	<u>SH</u>	<u>Asst.</u>	
<u>Cases</u>			

	<u>SAFEGUARDS</u>		
	<u>Contr.</u>		
	<u>SH</u>	<u>Asst.</u>	
<u>Cases</u>			

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CON'T

<u>SAFETY &amp; ENVIR. CONTR.</u>				<u>SAFEGUARDS</u>				<u>SAFETY &amp; ENVIR. CONTR.</u>			<u>SAFEGUARDS</u>		
<u>SH</u>		<u>Asst.</u>		<u>SH</u>		<u>Asst.</u>		<u>Cases</u>	<u>SH</u>	<u>Asst.</u>	<u>Cases</u>	<u>SH</u>	<u>Asst.</u>
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>						

- |  |  |
|--|--|
| <p>I. Licenses issued pursuant to § 32.18 of this chapter to distribute quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter.</p>                                     | <p>New License<br/>Renewal<br/>Amendment</p> |
| <p>J. Licenses issued pursuant to § 32.14 of this chapter to distribute timepieces, hands and dials, containing hydrogen 3 or promethium 147 to persons exempt from the licensing requirements of Part 30 of this chapter.</p> | <p>New License<br/>Renewal<br/>Amendment</p> |
| <p>K. Licenses for possession and use of byproduct material for research and development, except those licenses covered by Categories 3A or 3B, and licenses covered by Categories 7B or 7C authorizing medical research.</p>  | <p>New License<br/>Renewal<br/>Amendment</p> |



OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CON'T

- G. for distribution to persons generally licensed under Parts 31 or 35 of this chapter.
- H. Licenses issued pursuant to Subpart A of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons exempt from the licensing requirements of Part 30 of this chapter, except (1) §§ 32.11 and 32.18 of this chapter, (2) specific licenses authorizing redistribution of items and quantities which have been manufactured or imported under a specific license and licensed by the Commission for distribution to persons exempt from the licensing requirements of Part 30 of this chapter, and (3) specific licenses which authorize distribution of timepieces, hands and dials.

New License  
Renewal  
Amendment

<u>SAFETY &amp; ENVIR.</u>			
<u>SH</u>		<u>Contr. Asst.</u>	
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>SAFEGUARDS</u>			
<u>SH</u>		<u>Contr. Asst.</u>	
<u>From</u>	<u>To</u>	<u>From</u>	<u>To</u>

<u>Cases</u>	<u>SAFETY &amp; ENVIR.</u>	
	<u>SH</u>	<u>Contr. Asst.</u>

<u>Cases</u>	<u>SAFEGUARDS</u>	
	<u>SH</u>	<u>Contr. Asst.</u>

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL PROCESSING TIME

PROJECTED FY 82 RESOURCE COMMITMENT

PRESENT FEE CATEGORIES

3. BYPRODUCT MATERIAL - CON'T

SAFETY & ENVIR.			
SH		Contr.	
From	To	From	To

SAFEGUARDS			
SH		Contr.	
From	To	From	To

Cases	SAFETY & ENVIR.	
	SH	Contr.
	Asst.	Asst.

Cases	SAFEGUARDS	
	SH	Contr.
	Asst.	Asst.

- |   |                                     |
|---|-------------------------------------|
| E. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is not removed from its shield (self-shielded units).  | New License<br>Renewal<br>Amendment |
| F. Licenses for possession and use of byproduct material in sealed sources for irradiation of materials where the source is exposed for irradiation purposes.   | New License<br>Renewal<br>Amendment |
| Licenses issued pursuant to Subpart B of Part 32 of this chapter to distribute items containing byproduct material or quantities of byproduct material to persons generally licensed under Parts 31 and 35 of this chapter, except specific licenses authorizing redistribution of items which have been manufactured or imported under a specific license and licensed by the Commission | New License<br>Renewal<br>Amendment |

OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

INFORMATION FOR LICENSE FEES

PROFESSIONAL FEES

PRESENT FILE CATEGORIES	<u>SAFETY &amp; TARIFF</u>		<u>PROFESSIONAL FEES</u>		<u>APPLY, RE-NEW, &amp; AMEND</u>	<u>Case</u>	<u>SH</u>	<u>Asst.</u>
	<u>SA</u>	<u>Asst.</u>	<u>SA</u>	<u>Asst.</u>				
	<u>From To</u>	<u>From To</u>	<u>From To</u>	<u>From To</u>				
<b>3. BYPRODUCT MATERIAL</b>								
<b>A. Licenses for possession and use of byproduct material issued pursuant to Parts 30 and 33 of this chapter for processing or manufacturing of items containing byproduct material for commercial distribution.</b>								
					<b>New License</b>			
					<b>Renewal</b>			
					<b>Amendment</b>			
<b>B. Licenses issued pursuant to §§ 32.72, 32.73 and 32.74 of this chapter authorizing the processing or manufacturing and distribution of radiopharmaceuticals, generators or reagents kits, and sources and devices, containing byproduct material.</b>					<b>New License</b>			
					<b>Renewal</b>			
					<b>Amendment</b>			
<b>C. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at one location.</b>					<b>New License</b>			
					<b>Renewal</b>			
					<b>Amendment</b>			
<b>D. Licenses for byproduct material issued pursuant to Part 34 of this chapter for industrial radiography operations at more than one location.</b>					<b>New License</b>			
					<b>Renewal</b>			
					<b>Amendment</b>			

OFFICE OF INDUSTRIAL MATERIALS SERVICES

INDUSTRIAL MATERIALS

PROFESSIONAL PERSONNEL

PRESENT FEE CATEGORIES

S. No	TY & GRADE	CLASS	Fees	
			Basic	Special
From 1st	1st	2nd	1st	2nd

S. No	Name	Grade	Class	S. No	Comp. Amt.

1. SPECIAL NUCLEAR MATERIALS
    - I. Licenses for production and use of special nuclear material in sealed sources contained in devices used in industrial radiography systems. New License Annual
    - J. All other special nuclear material in sealed sources licensed nationally by special license authorities in quantities that would constitute a critical quantity as defined in § 150.11 of Part 150 which shall pay the same rate as Category II and special nuclear material for use in production which shall pay the fee in Category III. New License Annual
  2. SOURCE MATERIALS
    - D. All other source material licenses (Does not include milling, in-situ leaching heap leach uranium to U<sub>3</sub>O<sub>8</sub> ore and ion exchange facilities.) New License Annual
- 1/ Professional Staff Hours



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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FEB 5 1982

MEMORANDUM FOR: William O. Miller  
License Fee Management Branch  
Office of Administration

FROM: Lloyd J. Donnelly, Director  
Regional Coordination Staff

SUBJECT: PROPOSED LICENSE FEE REVISION

The enclosure is provided in response to Mr. Donoghue's January 8, 1982, memorandum to Mr. DeYoung. Because IE manhour reporting systems are not structured to allow automated retrieval of the data you requested, we have averaged the estimates obtained from Regions I, II, and III to form our response.

The enclosure contains only one column of manhour estimates which are equally applicable to FY 1981 and FY 1982 inspection effort. Only one column of information is provided because:

- . There is no contractor assistance used to complete the inspection program.
- . There is no safeguards inspection at these licensees.
- . There is no difference between FY 1981 and FY 1982 inspection effort.

Regional offices had difficulty correlating IE groupings of licenses with the license fee categories on the enclosed. While the license fee categorization is based on the type of license, the IE categorization is based on levels of risk. Because of this, the number of inspections identified for FY 1982 are only approximations.

If you staff needs further assistance, please have them contact George Mathews III of my staff on x24384.

*Lloyd J. Donnelly*

Lloyd J. Donnelly, Director  
Regional Coordination Staff  
Office of Administration

~~8203030578~~ XA

Enclosure:  
As stated

cc: J. Blaha ✓  
P. Norry  
D. Donoghue

ENCLOSURE I

LICENSE FEE CATEGORY		ROUTINE NON-ROUTINE	SAFETY & ENVIRONMENTAL STAFFHOURS			NO. OF ANNUAL INSPECTIONS <sup>1/</sup>
			MIN	MAX	AVG	
1	I	R -	3	7	4	.18
		NR -	4	22	12	.33
1	J	R -	3	9	6	.33
		NR -	4	9	7	.07
2	D	R -	3	11	7	.33
		NR -	4	22	13	.13
3	A	R -	9	20	14	1.10
		NR -	5	27	17	.40
3	B	R -	7	13	9	.33
		NR -	5	16	13	.24
3	C	R -	6	16	10	1.00
		NR -	6	28	20	.17
3	D	R -	7	21	14	1.00
		NR -	7	30	21	.12
3	E	R -	3	7	4	.33
		NR -	4	9	6	.10
3	F	R -	6	13	9	.33
		NR -	7	24	20	.16
3	G	R -	4	8	6	.33
		NR -	3	8	6	.06
3	H	R -	3	7	5	.33
		NR -	3	7	5	.07
3	I	R -	3	8	5	.33
		NR -	4	14	8	.09
3	J	R -	4	8	6	.22
		NR -	3	9	6	.07
3	K	R -	4	8	7	.33
		NR -	5	10	7	.07
3	L	R -	4	8	7	.33
		NR -	4	11	7	.06

<sup>1/</sup> Represents the number of inspections that a typical licensee in each fee category can expect to receive within a one-year period.

LICENSE FEE CATEGORY			SAFETY & ENVIRONMENTAL STAFFHOURS			NO. OF ANNUAL INSPECTIONS
			MIN	MAX	AVG	
4	B <sup>2/</sup>	R -	0	0	0	0
		NR -	0	0	0	0
4	C	R -	10	20	14	.33
		NR -	10	24	18	.18
5	A	R -	5	11	7	.33
		NR -	5	9	7	.11
6	A	R -	8	14	10	.33
		NR -	12	24	16	.33
7	A	R -	4	9	6	.30
		NR -	5	17	12	.10
7	B	R -	5	9	7	.33
		NR -	5	19	15	.03
7	C	R -	4	8	6	.25
		NR -	5	7	6	.08
8	A	R -	5	8	6	.10
		NR -	4	9	6	.10
9A & 9B <sup>2/</sup>		R -	0	0	0	0
		NR -	0	0	0	0
10	A	R -	4	16	10	.33
		NR -	4	16	10	.10

<sup>2/</sup> No Licensees were identified by the Regional Offices.